



Office of Inspector General | United States Postal Service

## Audit Report

# Accident Reporting

Report Number 21-015-R21 | August 27, 2021



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# Highlights

## Objective

Our objective was to review and assess the effectiveness of management's controls over reporting accidents.

U.S. Postal Service management is responsible and accountable for the prevention of accidents and responsible for controlling losses, such as ensuring quality of performance and operating within cost and budget guidelines. Management's role is to share responsibility for the safety and health of employees.

The Employee Health and Safety (EHS) application is used to enter and manage accident, injury, and claim information related to vehicle and industrial incidents. The application included information for 455,099 accidents from fiscal years (FY) 2016 to 2020, of which 144,607 (32 percent) were motor vehicle accidents and 310,492 (68 percent) were industrial accidents.

The Injury Compensation Performance Analysis System (ICPAS) identifies workers compensation costs associated with employee injuries. The Department of Labor's (DOL) Employees' Compensation Operations and Management Portal (ECOMP) allows federal workers and their employers to electronically file workers compensation forms.

The Solution for Enterprise Asset Management (SEAM) application is used to manage vehicle maintenance, repair, and work orders. Over the same five-year time period, accident-related repair work totaled 147,192 orders and cost about \$129.9 million.

The National Performance Assessment (NPA) application collects performance-related metrics from source systems across the organization. These metrics are translated into web-based balanced scorecards that can be used to monitor performance. One of these metrics is the "Total Accidents" indicator, which measures the total count of all accidents in order to achieve established targets to reduce accidents. Of all the NPA indicators, "Total Accidents" is one of the more heavily weighted in the NPA scorecard in determining facility and supervisor overall performance score.

## Findings

We found that the Postal Service did not always effectively manage controls over reporting motor vehicle and industrial accidents. Supervisors did not always report or timely report motor vehicle and industrial accidents in EHS during FYs 2016 through 2020. We found accident-related motor vehicle work orders did not always have corresponding accident reports in EHS, and accidents were not reported in EHS within 24 hours of notification of the accident/injury. Further, management did not always perform or have an efficient process in place to reconcile and track accident-related activity to identify unreported personal injuries. Specifically,

- Of the 147,192 nationwide accident repair-related work orders completed in SEAM, 108,126 (73 percent) did not have corresponding accident reports in EHS. Also, there were 23,301 (14 percent) accidents not reported in EHS within 24 hours of notification of the accident/injury. These accidents were reported from 2 to 1,185 days late. There were 1,329 instances where the accident was reported between 31 and 365 days after the event, and 75 instances where over 365 days had elapsed.
- When we compared accidents in EHS to determine whether they were recorded in SEAM, we found 178,389 different motor vehicle and industrial accidents recorded in EHS involving 105,139 vehicles that were not reflected in SEAM repair work orders. This could indicate that damaged vehicles were not repaired or there may be miscoding issues.
- The Postal Service's reported personal injury industrial accidents decreased each fiscal year from 57,892 in FY 2016 to 46,589 in FY 2020. However, it was difficult to determine whether it was due to implemented safety procedures or unreported accidents because EHS and ICPAS did not interface with one another and we were unable to identify a unique identifier shared by both systems that would assist in reconciling the data.
- In discussions with eight districts, safety management did not conduct reconciliations between accident information in EHS and accident-related vehicle repairs in SEAM to identify unreported accidents or efficiently reconcile

industrial personal injury accidents with injury claims to identify unreported personal injuries.

These conditions occurred due to a variety of reasons, such as unclear or contradictory guidance; and limitations within systems used to track accident, injury, claim, maintenance, and repair information.

Not reporting accidents or injuries in EHS may lead to inaccurate NPA “Total Accidents” indicator scores for facilities, which undermines management’s ability to accurately recognize performance. Additionally, unreported damage to vehicles could lead to unrepaired vehicles, drivers operating vehicles with undetected safety hazards, and a poor reflection on the Postal Service’s brand and image to the public. Furthermore, by not reconciling and tracking accident-related activity, it was impossible for management to accurately manage motor vehicle repair costs stemming from accidents. As a result of accident-related work orders in SEAM not having a corresponding accident report in EHS, we estimated the Postal Service incurred over \$5.6 million annually in unsupported questioned costs.

The Postal Service’s *Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence* (Ten-Year Plan), released March 23, 2021, emphasizes its goal to enhance safety programs that includes empowering employees to identify, record, and report safety concerns in real time with a goal of reducing all accidents (motor vehicle and industrial). These issues, if addressed, will help accomplish that goal.

## Recommendations

We recommended management:

- Reiterate to all employees to promptly notify their supervisor if involved in a work-related accident, regardless of severity; and to all supervisors to report all accidents in EHS within 24 hours of the accident/injury or notification.
- Review, update, and communicate policies and procedures related to accident reporting to ensure they accurately and clearly reflect the accident reporting processes.
- Identify solutions to interface EHS and SEAM; or implement an automated reconciliation process between EHS and SEAM, and EHS and ECOMP to ensure all motor vehicle and personal injury industrial accidents, respectively, are reported and recorded.
- Reiterate and provide training to vehicle maintenance facility personnel on the process to modify individual line items on work orders in SEAM to differentiate between scheduled maintenance and accident-related repairs.
- Identify ways to actively manage corrective actions to verify and ensure completion when employees are involved in an accident.

# Transmittal Letter



OFFICE OF INSPECTOR GENERAL  
UNITED STATES POSTAL SERVICE

August 27, 2021

**MEMORANDUM FOR:** SIMON STOREY  
VICE PRESIDENT, HUMAN RESOURCES

JOSHUA COLIN  
CHIEF RETAIL & DELIVERY OFFICER

ROBERT CINTRON  
VICE PRESIDENT, LOGISTICS

A handwritten signature in black ink, which appears to read "Jason M. Yovich", is positioned above the "FROM:" field.

**FROM:** Jason M. Yovich  
Deputy Assistant Inspector General  
for Supply Management and Human Resources

**SUBJECT:** Audit Report – Accident Reporting  
(Project Number 21-015-R21)

This report presents the results of our audit of the Accident Reporting.

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

Attachment

cc: Corporate Audit Response Management  
Postmaster General  
Vice President, Labor Relations  
Vice President, Technology Applications

# Results

## Introduction/Objective

This report presents the results of our self-initiated audit to assess U.S. Postal Service management's controls over accident reporting (Project Number 21-015). Our objective was to review and assess the effectiveness of management's controls over reporting accidents. See [Appendix A](#) for additional information about this audit.

## Background

The Employee Health and Safety (EHS) application is used to enter and manage accident, injury, and claim information related to Postal Service vehicle and industrial incidents. The application included information for 455,099 accidents from fiscal years (FY) 2016 through 2020, of which 144,607 (32 percent) were motor vehicle accidents and 310,492 (68 percent) were industrial accidents. Motor vehicle accidents generally consisted of accidents involving striking objects or other vehicles while using a Postal Service vehicle<sup>1</sup> in official operations. Industrial accidents involved personal injuries as well as property damage that can include motor vehicle damage under certain conditions, such as while legally parked and struck by an object from the road. Vehicles not considered motor vehicles include ones operated on fixed rails, bicycles, snowmobiles, airplanes, and similar human transporters; and powered industrial trucks such as fork trucks, tractors, and platform lift trucks.<sup>2</sup> Additionally, the Injury Compensation Performance Analysis System (ICPAS) identifies workers compensation costs associated with employee injuries. Further, the Department of Labor's (DOL) Employees' Compensation Operations and Management Portal (ECOMP) allows federal workers and their employers to electronically file workers compensation forms.

The Solution for Enterprise Asset Management (SEAM) application is used to manage vehicle maintenance, repair, and work orders.<sup>3</sup> Fleet management<sup>4</sup> tracks vehicle accident-related repairs using two account codes<sup>5</sup> in SEAM: 25-Accident (postal-at fault)<sup>6</sup> and 42-Chargeable to Others (third party-at fault).<sup>7</sup> For FYs 2016 through 2020, SEAM accident-related repair work totaled 147,191 orders and cost about \$129.9 million.

The National Performance Assessment (NPA) application collects scorecard metrics, such as retail revenue and accidents. These metrics are translated into web-based balanced scorecards that can be used to monitor performance of the entire enterprise and individual units across the nation. Of the NPA indicators, the "Total Accidents" indicator is one of the more heavily weighted in the NPA scorecard in determining facility and supervisor overall performance score. The indicator is comprised of (1) the total number of all accidents<sup>8</sup> per exposure hour,<sup>9</sup> and (2) the rate of improvement.<sup>10</sup>

Postal Service management is responsible and accountable for the prevention of accidents and responsible for controlling losses, such as ensuring quality of performance and operating within cost and budget guidelines. Management's role is to share responsibility for the safety and health

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***“Postal Service management is responsible and accountable for the prevention of accidents and responsible for controlling losses, such as ensuring quality of performance and operating within cost and budget guidelines.”***

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1 Any mechanically or electrically powered device upon which a person or property may be transported or drawn upon a land highway.

2 Handbook EL-804, *Safe Driver Program*, Section 121, pages 2-3, June 2013.

3 This includes repairs made to vehicle damage categorized as both motor vehicle accidents and industrial accidents.

4 A Postal Service organizational group, under Delivery Operations, that provides fleet services and is responsible for vehicle acquisitions and the maintenance and repair of Postal Service vehicles.

5 SEAM account codes are used to charge labor and material costs for the maintenance and repair of vehicles.

6 Account code 25 is used for all costs generated by an accident, including paint, body and fender work, towing, shuttle, and vehicle examination.

7 Account code 42 includes costs for maintenance repairs performed by a vehicle maintenance facility for accidents whose fault resides with a third-party.

8 Includes both recordable and non-recordable accidents involving both industrial and motor vehicles.

9 Exposure hours are an Occupational, Safety, and Health Administration term defined as the total hours worked by all employees during a month, quarter, or fiscal year.

10 The year-to-date total accidents figure compared to the same period last year.

of employees, including the preparation and submission of accurate accident reports, which is critical to the accident prevention process.

## Findings Summary

Postal Service management did not always effectively manage controls over reporting motor vehicle and industrial accidents. In addition, management did not always perform or have an efficient process in place to reconcile and track accident-related activity. These conditions occurred for a variety of reasons, such as unclear or contradictory guidance, and limitations within systems used to track accident, injury, claim, maintenance, and repair information. As a result, 73 percent of accident-related work orders from FYs 2016 through 2020 did not have corresponding accident reports, resulting in over \$5.6 million in unsupported questioned costs annually.

### Finding #1: Unreported Accidents

Supervisors did not always report or timely report motor vehicle and industrial accidents in EHS during FYs 2016 through 2020. Specifically, the downward trend in Postal Service motor vehicle accidents between FYs 2018 and 2020

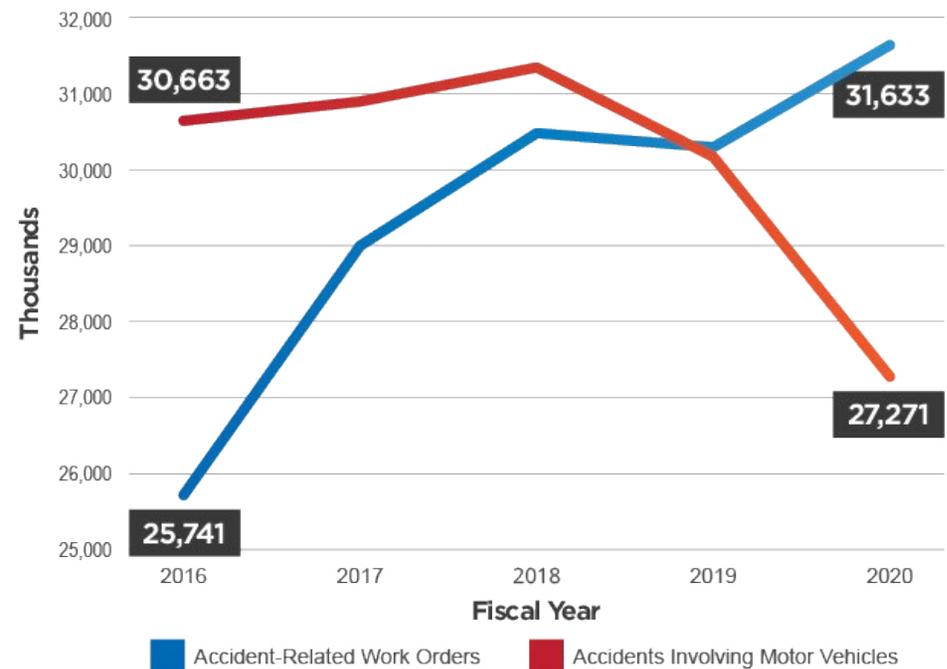
*“This downward trend in motor vehicle accidents is contradictory to the upward trend in accident-related repairs, which suggests that not all accidents involving damage to Postal Service motor vehicles were reported.”*

compared to the upward trend in accident-related vehicle repairs indicates that not all motor vehicle accidents were reported. Accident-related motor vehicle work orders did not have corresponding accident reports in EHS, and accidents were not reported in EHS within 24 hours of notification of the accident/injury. Also, the Postal Service’s personal injury industrial accidents decreased each fiscal year from FY 2016 to FY 2020; however, it was unclear whether it was due to implemented safety procedures or unreported accidents, since unreported industrial accidents are not easily identified.

## Accident Activity

EHS motor vehicle data showed motor vehicle accidents consistently trending downward between FYs 2018 and 2020, to a low point of 27,271 in FY 2020, a 13 percent decrease. As shown in Figure 1, this downward trend in motor vehicle accidents is contradictory to the upward trend in accident-related repairs, which suggests that not all accidents involving damage to Postal Service motor vehicles were reported.

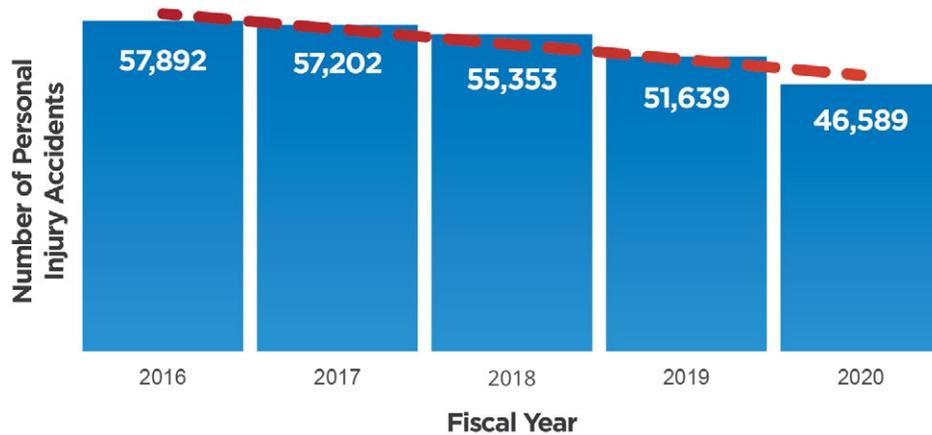
**Figure 1. Annual Number of Accident-Related Work Orders and Accidents Involving Motor Vehicles – Nationwide Between FYs 2016 - 2020**



Source: Postal Service’s SEAM and Safety Dashboard.

For industrial accidents involving only personal injuries, the Postal Service reported 268,675 injuries between FYs 2016 and 2020, decreasing 20 percent over that period, as shown in Figure 2.

**Figure 2. Annual Number of Industrial Personal Injury Accidents – Nationwide Between FYs 2016 - 2020**



Source: EHS.

In February 2017, the former Vice President, Delivery Operations, issued a memorandum<sup>11</sup> to all area vice presidents that reiterated accident investigation and reporting policies and procedures. Further, according to *The U.S. Postal Service Future Ready Five-Year Strategic Plan 2020 – 2024*, one of the Postal Service’s goals is to Equip, Empower, and Engage Employees. To accomplish this, the Postal Service plans to enhance safety programs that include empowering employees to identify, record, and report safety concerns in real time with a goal of reducing all accidents (motor vehicle and industrial).

This goal was further solidified in the Postal Service’s *Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence* (Ten-Year Plan), released March 23, 2021. While the memorandum, strategic plan, and Ten-Year Plan all serve as a reminder from management about the importance of accident investigation and reporting, there may be an unintended effect that correlates these goals with the downward trend in *reported*

<sup>11</sup> Investigation and Reporting of Accidents and Occupational Injuries and Illnesses, Vice President, Delivery Operations, dated February 10, 2017.

<sup>12</sup> *Employee Labor Manual* (ELM) 50, Section 821.12, pages 713-714, March 2021, and EHS for Safety Professionals, PDF PowerPoint, undated, requires submission of an accident report in EHS within 24 hours of the accident/injury or notification of the accident/injury. To allow for reporting delays of less than 24 hours that appear on the following calendar day, “delayed reports” in this analysis are those where two or more days span the time from the accident to the report.

<sup>13</sup> Accident-related work order entries where account codes for scheduled maintenance or unscheduled repairs were used instead of those designated for accident repair. These account code entries were contained in the work order descriptions and identified by isolating one or both keywords “accident” or “damage.”

motor vehicle accidents that began in FY 2018 so that it appears, based on Figure 1, that goals are being accomplished.

### Motor Vehicle Accidents

Of the 147,192 nationwide accident repair-related work orders reported in SEAM, 108,126 (73 percent) did not have corresponding accident reports in Employee Health and Safety (EHS) during FYs 2016 through 2020. Also, there were 23,301 (14 percent) accidents not reported in EHS within 24 hours<sup>12</sup> of notification of the accident/injury. These accidents were reported from 2 to 1,185 days late. As shown in Table 1, 18,776 (81 percent) of the 23,301 accidents not reported in EHS within 24 hours were reported late within one week of the accident or of a supervisor being notified of the accident. There were 1,329 instances where the accident was not reported between 31 and 365 days after the event, and 75 instances where over 365 days had elapsed.

**Table 1. Date Ranges Between Accident and Reporting Dates**

Number of Days Before Reporting Accident	Number of Accidents
365+	75
31-365	1,329
8-30	3,121
2-7	18,776

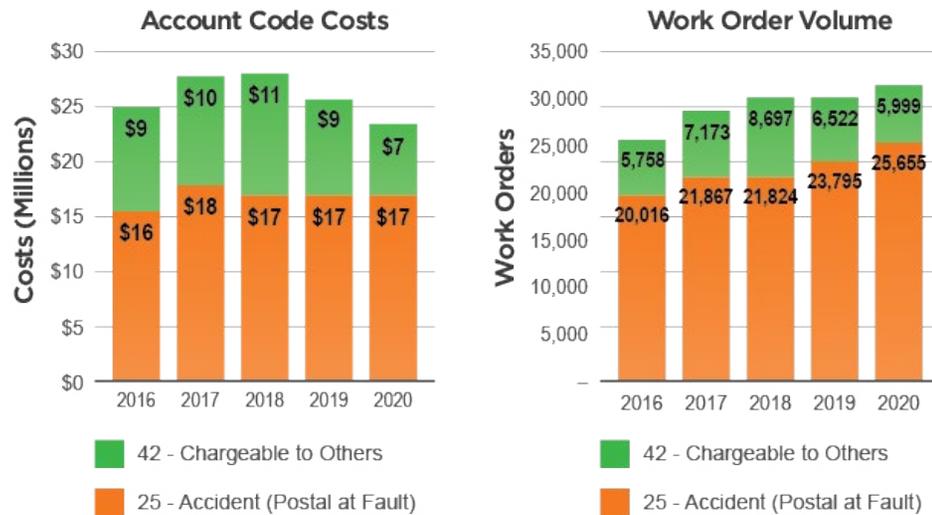
Source: EHS.

Conversely, there were 178,389 different motor vehicle and industrial accidents recorded in EHS involving 105,139 vehicles not reflected in SEAM repair work orders, indicating these were damaged vehicles not repaired or miscoded.<sup>13</sup> Of

these vehicles, there were 158 having six or more accidents and one vehicle with 45 accidents. These 45 accidents involved a long-life vehicle being used by 44 different employees at 34 different facilities in the San Diego District.

For FYs 2016 through 2020, nationwide costs for accident-related workorders totaled about \$129.9 million. As shown in Figure 3, since FY 2016, costs trended upward and reached a peak in FYs 2017 and 2018 of about \$28 million. Over the following two years, costs trended downward and reached its lowest point in FY 2020. Although costs trended downward over the five-year span, accident-related repair activity consistently trended upward each year, increasing 23 percent.

**Figure 3. Nationwide Accident-Related Account Code Costs and Work Order Volume FYs 2016 – 2020**



Source: SEAM.

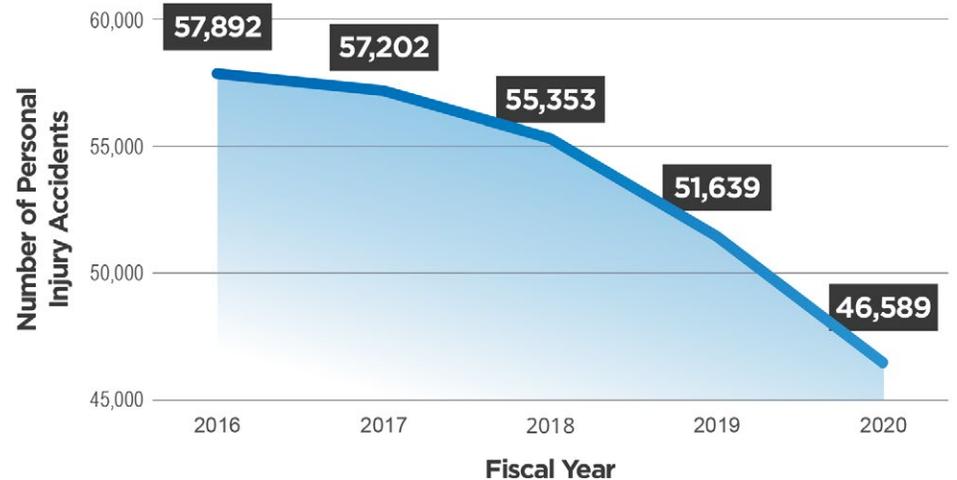
The Bay-Valley and Seattle districts had the greatest number of SEAM work orders with no corresponding EHS accident reports, suggesting these districts did not always report their vehicle accidents. On the other hand, for the accident reports in EHS not reflected in SEAM repair work orders, the Atlanta and Greater Boston districts had the highest number of reported vehicle accidents with no

corresponding repair activity, which indicated that management may not always have properly reported vehicle damage.

### Industrial Personal Accidents

The Postal Service’s personal injury industrial accidents decreased each fiscal year from FY 2016 to FY 2020, as shown in Figure 4. However, it was unclear whether it was due to implemented safety procedures or unreported accidents since unreported industrial accidents are not easily identified. For example, we attempted to reconcile EHS accident data with ICPAS injury claims data to be able to potentially identify unreported personal injury industrial accidents. However, both systems do not interface with each other and we were unable to identify a unique identifier shared by both systems that would assist in reconciling the data. An automated reconciliation of injury-related accident data in EHS and injury claims data would be beneficial to determine if the decrease in injury-related industrial accidents was due to implemented safety procedures or employees failing to report accidents.

**Figure 4. Industrial Accident – Personal Injuries Trend Analysis**



Source: EHS.

Common types of personal injuries include strains, sprains, contusion bruises (with skin intact), and bites (animals and/or insects). Strains were the highest injury type, accounting for 21 percent of all personal injuries. Most of the injury types hit their highest points in FY 2017 and continued to decrease through FY 2020.

Accident reporting in EHS is required by Postal Service policy<sup>14</sup> if an accident occurs, and by the Occupational Safety and Health Act (OSHA)<sup>15</sup> if an occupational injury or illness that is recordable by OSHA definition occurs, regardless of tort claim action or the requirements of the Federal Employees' Compensation Act.<sup>16</sup> When an employee is involved in any accident, they must promptly notify their supervisor. They must use Postal Service (PS) Form 4565, *Vehicle Repair Tag*, to report all mechanical defects, failures, and vehicle damage to the supervisor.<sup>17</sup> Supervisors are then required to submit an accident report in EHS within 24 hours of the accident/injury or notification of the accident/injury when any of the following occurs:<sup>18</sup>

- Injury or illness of a Postal Service employee.
- Death of an employee on the premises or on the job.
- Injury or fatality to a non-Postal Service person on the premises.
- Motor vehicle accidents that result in death, injury, or property damage, regardless of cost; who was injured (if anyone); or what property was damaged.

- Damage to Postal Service property or to property of customers or the general public, regardless of whether an injury was involved.
- Fire damage to Postal Service property.

Additionally, carriers are required to perform daily vehicle inspections before driving a Postal Service vehicle.<sup>19</sup> Managers and supervisors are required to perform periodic inspections of vehicles, and to identify unreported vehicle damage and initiate and document investigation of any unreported vehicle damage found.<sup>20</sup> Furthermore, drivers are responsible for the proper care and handling of vehicles, so they are safe, securely protect the mail, and present an appropriate appearance.<sup>21</sup>

An employee may choose not to file a claim or seek medical attention; however, supervisors are still required to enter the accident and injury information into EHS. An employee has up to three years from the date of injury to file an injury compensation claim; therefore, it is a requirement to have the information in EHS for future use.<sup>22</sup>

Several factors contributed to supervisors not reporting vehicle and industrial accidents at all or in a timely manner. For motor vehicle accidents, supervisors stated drivers did not always report what they (drivers) believed was minor vehicle damage, and some managers and supervisors believed minor accidents are a cost of doing business. Supervisors also stated applicable policies, directives, and guidance were unclear or contradictory, which caused employee confusion and misinterpretation with regards to reporting accidents. Additionally, for industrial accidents, supervisors allowed employees to choose not to be medically treated for injuries and, in those instances, the accident was not entered into EHS, as

<sup>14</sup> *ELM 50*, Section 821.121, page 713.

<sup>15</sup> The Occupational Safety and Health Act of 1970 was passed to ensure safe and healthful working conditions for workers by setting and enforcing standards and by providing training, outreach, education and assistance.

<sup>16</sup> The Federal Employees' Compensation Act provides coverage to federal civilian employees who have sustained work-related injuries or disease by providing appropriate monetary and medical benefits and help in returning to work.

<sup>17</sup> Handbook EL-814, *Postal Employee's Guide to Safety*, Section X: Motor Vehicles, Item C. Reporting Accidents and Item D. Vehicle Regulations, page 52, July 2020; Handbook PO-701, *Fleet Management*, Section 245.12, page 53, March 1991, updated with Postal Bulletin revisions through October 23, 2008.

<sup>18</sup> *ELM 50*, Section 821.12, pages 713-714, and EHS for Safety Professionals, Adobe Acrobat Pro DC PowerPoint.

<sup>19</sup> Handbook EL-804, Section 142, pages 6-7; Notice 76, *Expanded Safety Vehicle Check*; EL-814, Section X, Item D, page 52.

<sup>20</sup> EL-804, Section 142, pages 6-7.

<sup>21</sup> PO-701, *Fleet Management*, Sections 244-245, pages 49, 53-57.

<sup>22</sup> Postal Service Blue, *Safety Accidents Reporting*, date last verified March 25, 2021.

required. In other instances, personnel reported accidents late because they did not have all the information necessary to complete the report or they were still working with their district safety office on the details to enter into EHS.

- **Minor Vehicle Damage** - At six Postal Service facilities visited in the Bay-Valley District, we identified 233 vehicles with varying levels and amounts of damage, including bumper and body damage; broken lights, mirrors, and hood latches; peeling paint and Postal Service logos; and graffiti. Of the 233 vehicles, 190 (82 percent) did not have associated EHS vehicle accident entries between October 1, 2015, and February 25, 2021, which indicated that accidents were not being reported to supervisors or supervisors failed to report accidents in EHS. See Figure 5 for examples of minor vehicle damage observed during our site visits.

**Figure 5. Minor Vehicle Damage Observed During Site Visits**



Source: U.S. Postal Service Office of Inspector General (OIG) photos taken in the Bay-Valley District the week of February 22, 2021.

One of the 19 (5 percent) management personnel interviewed mentioned that minor vehicle damage, such as the damage shown above, are not reported as accidents because they are a normal occurrence over a vehicle's lifetime

and are the cost of doing business. During the exit conference, headquarters' management stated this position does not represent the entire Postal Service.

- **Policies, Directives, and Guidance** - The Postal Service has different criteria that support safety protocols, such as safe driver programs, maintenance, and fleet management. Some of these policies and procedures are inconsistent, which contributed to employees not always reporting accidents. For example:
  - *Employee Labor Manual* 50 outlines the specific criteria for when an accident report must be entered into EHS by the supervisor when any of the [events mentioned previously](#) occur.
  - Handbooks EL-801, *Supervisor's Safety Handbook*;<sup>23</sup> EL-803, *Maintenance Employee's Guide to Safety*;<sup>24</sup> EL-814, *Postal Employee's Guide to Safety*; and PO-701, *Fleet Management*, all outline accident reporting procedures. However, they did not include a reference to entering accidents into EHS, as specified in the ELM. The handbooks do require that installation heads and VMF personnel use PS Form 4564, *Postal Vehicle Accident Register*, to record accidents. VMF personnel should also review PS Forms 4564 at least once a month to ensure vehicles are inspected and repaired promptly, and to document repair and vehicle replacement costs to support potential claims for damage caused by private parties to Postal Service vehicles. Despite this requirement, some facilities' and VMFs' management were unfamiliar with the form, did not use them, or believed they were obsolete.
  - Handbook EL-804 defines a motor vehicle accident as any accident involving a motor vehicle operated for official Postal Service business (no matter who owns the vehicle); or results in death, injury, or property damage of one dollar or more (unless the vehicle is properly and legally parked). However, the ELM does not require any dollar amounts for any damages before reporting the accidents.

<sup>23</sup> Dated July 2020.

<sup>24</sup> Dated July 2020.

- *Postal Operations Manual* Sections 712.5 and 743.2 (both sections are titled Vehicle Appearance): Under 712.5, “vehicles must be constantly scrutinized by managers at all levels for paint deterioration; missing, torn, or faded markings; and corrosion or damage to the body.” Managers are directed to schedule immediate repairs, as needed. In contrast, under 743.2, “vehicles should be constantly scrutinized for paint deterioration and body damage.” This section further requires that paint touch-up should be done as needed to prevent exterior body deterioration. Additionally, “repairs of minor body damage should be accomplished on the scheduled maintenance service.” Based on the two *Postal Operations Manual* sections, it is unclear if managers must schedule repairs for paint deterioration and body damage immediately upon being notified or made aware of paint deterioration and body damage, or if managers are to wait and schedule the repairs on the vehicle’s regular maintenance schedule.
- Accident-related memorandums<sup>25</sup> obtained from three districts showed significant deviations from the ELM. These districts defined accidents as any that “results in death, injury, or property damage, regardless of cost, who was injured (if anyone), or what property was damaged.” Also, “damage of \$500 or more to Postal Service property or to property of visitors or the general public, regardless of whether an injury was involved” and \$100 in fire damage to Postal Service property were included in these districts’ prerequisites for accident reporting. However, the ELM does not require any dollar amounts for any damages before reporting the accidents.

There is no clear distinction among the different guidance, which has often made it difficult to interpret the official accident reporting requirements. When the ELM is coupled with other similar but inconsistent or conflicting criteria, those instances of when to report accidents in EHS are unclear and lend themselves to interpretation.

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***“There is no clear distinction among the different guidance, which has often made it difficult to interpret the official accident reporting requirements.”***

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Although the majority of managers and supervisors interviewed were aware of the accident criteria, two management personnel in two different districts had differing views of what should be considered an accident. One postmaster believed the accident guidance is open to interpretation and there should be additional clarification on what could be considered a reportable accident. For example, a rural carrier driving their normal route on gravel roads may sustain chips or scratches as part of their normal daily operations. Based on the various definitions, each scratch could be treated as a reportable accident because they are causing damage to a Postal Service vehicle. As the Postal Service moves forward, clearly written policies and procedures will “allow local operations team to focus on their key initiatives,” which is an objective of the Postmaster General’s restructure plan.<sup>26</sup>

- **Unofficial Memorandum** - At one facility, injured employees can choose not to report their injuries sustained in an accident by signing and dating an unofficial memorandum that indicates their intent not to file a Form CA-1<sup>27</sup> or Form CA-2.<sup>28</sup> When employees chose to do this, management did not enter these accidents into EHS, as required. The memorandum template is addressed to the postmaster and included the following information:

<sup>25</sup> Accident Reporting Policy memo, Bay-Valley District Manager, August 2012; Accident Reporting Policy District Operating Instruction memo, San Francisco District, November 2014; Accident Reporting Policy S.O.P. S&H #08 memo, Santa Ana District Manager, October 5, 2015.

<sup>26</sup> USPS Administrative Restructuring, VP Facilities Town Hall, page 4, dated May 19, 2021.

<sup>27</sup> U.S. Department of Labor (DOL) Office of Workers’ Compensation Programs (OWCP) *Federal Employee’s Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation*, revised October 2018.

<sup>28</sup> DOL OWCP *Notice of Occupational Disease and Claim for Compensation*, revised October 2018.

- I understand that if in the future I need treatment I will obtain the proper documents (Form CA-1, Form CA-2, and Form CA-17<sup>29</sup>) and authorization prior to seeking treatment or being absent.
- I have been provided with a copy of the “Employee Rights and Responsibilities for a Traumatic Injury and/or Occupational Injury” and any questions have been answered.
- A location for a witness signature and the body part affected.

Not reporting accidents or injuries in EHS may lead to inaccurate NPA “Total Accidents” indicator scores for facilities, which undermines management’s ability to accurately recognize performance. Regarding NPA scores, the indicator’s accident rate calculation<sup>30</sup> showed, depending on the district, that it is possible to easily improve the “Total Accidents” indicator score by underreporting accidents. Table 2 shows FY 2020 nationwide accident rates along with their corresponding cell values. For instance, a district’s cell score of “7” corresponds to an accident rate of 14.25, which means the district would have to underreport 61 accidents to move up one cell score to “8.” As a result, moving up on the scale provides a greater opportunity for a higher score and payout.

**Table 2. FY 2020 NPA Total Accidents Indicator Cell Score and Accident Rate Analysis<sup>31</sup>**

Score	1	2	3	4	5	6	7	8	9	10
Accident Rate	16.55	16.27	15.98	15.67	15.34	15.00	14.25	13.4	12.43	11.37
Difference between next cell rate	0.28	0.29	0.31	0.33	0.34	0.75	0.85	0.97	1.06	1.18
# of accidents to reduce to move up one cell	20	21	22	24	24	54	61	70	76	85

Source: NPA data and OIG analysis.

Additionally, not reporting accidents or damage to vehicles could lead to unrepaired vehicles and drivers operating vehicles with undetected safety hazards, presenting a threat to Postal Service employees and the public. As noted earlier, this is an important aspect of the Postal Service’s Ten-Year Plan to empower employees to identify, record and report safety concerns in real time with the goal of reducing all accidents (motor and industrial). Furthermore, unrepaired vehicle damage may reflect poorly on the Postal Service brand and image to the public.<sup>32</sup>

**Recommendation #1**

We recommend the **Acting Chief Retail & Delivery Officer** and **Vice President, Delivery Operations**, and **Vice President, Logistics**, reiterate to all employees to promptly notify their supervisor if involved in a work-related accident, regardless of severity; and to all supervisors to report all accidents in the Employee Health and Safety system within 24 hours of the accident/injury or notification.

**Recommendation #2**

We recommend the **Vice President, Human Resources**, review, update, and communicate accident reporting policies and procedures to ensure that they accurately and clearly reflect the accident reporting processes.

<sup>29</sup> DOL OWCP *Duty Status Report*, revised August 2014.

<sup>30</sup> Total number of accidents x 200,000, divided by exposure hours.

<sup>31</sup> The official NPA scorecard has a 15-point scale; however, this table shows 10 points for illustration purposes only.

<sup>32</sup> Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence, page 2.

## Finding #2: Accident Data Reconciliation Processes

In discussions with eight districts, management did not always perform or have an efficient process in place to reconcile and track accident/injury-related activity or to ensure corrective actions prescribed in accident reports were addressed. Specifically, safety<sup>33</sup> management in the eight districts did not reconcile accident information in EHS with accident-related vehicle repairs in SEAM to identify unreported vehicle accidents or efficiently reconcile industrial personal injury accidents with injury claims to identify unreported personal injuries.

*“VMF personnel relied on inquiries with either their district safety office or the vehicle’s facility management to determine whether an accident had been reported. However, these inquiries sometimes went unanswered.”*

Additionally, VMF management could not reconcile accident activity to (1) match accident reporting with repairs, (2) classify whether the Postal Service or a third-party was at-fault, or (3) ensure the transactions in SEAM were accurately recorded. Reconciling accident reports with SEAM work orders is complicated by the frequent gaps between accident and report dates and by differing line items between accident and non-accident work order records. This made it difficult for the Postal Service and the OIG to determine which repairs were performed for damages resulting from reported or unreported vehicle accidents.

Instead, VMF personnel relied on inquiries with either their district safety office or the vehicle’s facility management to determine whether an accident had been reported. However, these inquiries sometimes went unanswered. Prior to the

Postal Service’s restructuring in FY 2021, there were only 67 district safety offices compared to 308 VMFs. With the restructuring, some safety offices have merged and may now be operating at a decreased capacity. Therefore, this manual reconciliation process is inefficient and can be costly.

Conversely, VMF technicians used incorrect SEAM account codes to document vehicle accident repairs. Specifically, 14,299 work orders related to accident repairs in SEAM, with a total cost of \$9.4 million, were incorrectly entered as account codes 22-Scheduled Maintenance<sup>34</sup> and 24-Unscheduled Repairs<sup>35</sup> instead of 25-Accident (Postal at Fault)<sup>36</sup> or 42-Chargeable to Others.<sup>37</sup> As shown in Table 3, FY 2019 had the most miscodes with 3,204, totaling \$2.1 million.

**Table 3. Miscoded Work Orders in Account Codes 22 and 24 (FYs 2016 – 2020)**

Fiscal Year	Work Order Volume	Total Account Code Cost
2016	2,486	\$1,743,553
2017	3,010	2,136,504
2018	2,622	1,643,350
2019	3,204	2,075,170
2020	2,977	1,816,211
<b>Grand Total</b>	<b>14,299</b>	<b>\$9,414,788</b>

Source: SEAM.

The process to reconcile or identify unreported personal injuries is a difficult and slow manual process. To reconcile EHS industrial personal injury accident data, management receives each employee’s Form CA-1 from ECOMP via email link. This involved retrieving over 198,000 Forms CA1 filed from FYs 2016 through

<sup>33</sup> Safety is an organizational group within Human Resources, dated 2021.

<sup>34</sup> Involves the cost of work generated by inspection and lubrication, ordinary wear and tear, and major component replacement only if the vehicle is due for scheduled maintenance service.

<sup>35</sup> Reflects the cost of work generated by PS Form 4565. Separate work orders are required for each individual vehicle repaired and includes repairs not specifically identified under another code.

<sup>36</sup> All costs generated by an accident, including paint, body and fender work, towing, shuttle, and examination time for which the Postal Service will bear the cost.

<sup>37</sup> Includes costs for maintenance and repairs performed by a VMF, chargeable to third-parties, and reflects the type of expenses such as maintenance, repairs, road calls, parts, and labor, all of which are reimbursable.

2020. Supervisors review each email to determine whether the injury claim had a corresponding accident record in EHS or whether the existing record should be updated with the claim information in the system. If no accident record exists, supervisors manually create an accident record in EHS. Reviewing each Form CA-1 to update employee claims and/or search for unreported personal injuries manually is time and labor intensive. We believe automating this reconciliation process would be more efficient and cost effective.

Although EHS and SEAM track accidents and vehicle repairs, respectively, they did not interface with one another. The only data field available in both the EHS accident data set and the SEAM repairs data set was the vehicle identification number. However, EHS had an additional unique identifier known as the accident identification number that, if included in SEAM, would allow VMF technicians to easily classify an at-fault accident, which aids in recovering reimbursements through the tort claims process.

Technicians interviewed at two of 11 VMFs were unaware that vehicle work orders could be modified by changing account codes of individual line items on vehicle work orders to correct information in SEAM. Those technicians were potentially miscoding accident-related work orders as regular maintenance. Also, as in [Finding 1](#), like EHS and SEAM, EHS and ICPAS did not interface with each other, and we were unable to identify a unique identifier or data field shared by both systems. Therefore, this made any reconciliation of industrial personal injury accidents between these two systems almost impossible.

Furthermore, management did not reconcile and ensure whether employees involved in motor vehicle and industrial accidents took the corrective actions management prescribed in their EHS accident reports. For instance, management generally recommended training and instruction as the corrective action for these types of accidents. However, for the three judgmentally selected districts (Chicago, Detroit, and Seattle) during FY 2018,<sup>38</sup> only 42 of 577 (7 percent) employees involved in a motor vehicle accident received and completed the recommended training. For employees involved in an industrial

accident at these districts during the same timeframe, only 43 of 509 (8 percent) employees received and completed the recommended training.

Postal Service policy requires managers and supervisors to analyze driver observations, route layout, and vehicle accident data to determine potential hazards, contributing factors, and the root causes of accidents. They must also develop and implement countermeasures designed to prevent motor vehicle accidents at their installations.<sup>39</sup> Installation heads and managers must use the results of accident analyses to address the causes of accidents, develop specific actions or countermeasures, and enter them into an accident reduction plan. The plan serves as management's primary tool for reducing OSHA injury and illness and motor vehicle accident rates.<sup>40</sup> These corrective actions are entered initially into the EHS accident report. However, the progress of ensuring these actions are completed is not required to be documented in EHS but can be through other means, such as tracking through the Learning, Development, and Diversity group or training completion certificates.

According to Headquarters personnel, districts' safety personnel bear the responsibility of performing safety data analysis and coordinating with its facilities to ensure they report accidents timely and accurately in EHS. VMF management stated they were not always notified of vehicle accidents. Also, they did not have EHS access that would allow them to search the database to determine whether an accident had been reported for vehicles needing repairs due to damage. However, Headquarters' personnel were concerned that allowing access to EHS data to other functional groups outside

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***“Postal Service policy requires managers and supervisors to analyze driver observations, route layout, and vehicle accident data to determine potential hazards, contributing factors, and the root causes of accidents.”***

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<sup>38</sup> We only included FY 2018 because it was the only year where we had both training records and NPA scores that overlap years.

<sup>39</sup> ELM 50, Section 821.31, page 715; EL-804, Chapter 14, page 6.

<sup>40</sup> ELM 50, Section 821.32, page 715.

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***“A total of 108,126 (73 percent) SEAM work orders involving accident-related repairs from FYs 2016 through 2020 did not have corresponding accident reports in EHS, resulting in \$28,237,887 of unsupported questioned costs”***

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vehicle repair costs stemming from accidents. Additionally, if VMF personnel are unable to obtain accident information, they may not be able to properly classify third-party at-fault accidents, which could potentially cause tort claim recovery losses for the Postal Service.

As a result, a total of 108,126 (73 percent) SEAM work orders involving accident-related repairs from FYs 2016 through 2020 did not have corresponding accident reports in EHS, resulting in \$28,237,887 of unsupported questioned costs.<sup>41</sup> Additionally, there were over 143,000 reported vehicle accidents in EHS (86 percent) that resulted in vehicle damage. However, there were no corresponding work orders identified in SEAM charged to account codes 25 or 42

the safety group raised privacy concerns since personally identifiable information (PII) could not be excluded from view.

If the accident identification number was included in SEAM, access to EHS data by VMF technicians would be unnecessary and would alleviate any concern about other functional groups outside of safety personnel having access to EHS data and its PII. Facility managers, in conjunction with safety management, are responsible for determining corrective actions, based on the nature and significance of an accident. However, they were unable to provide evidence verifying completion of these corrective actions.

By not reconciling and tracking accident-related activity, it was impossible for management to accurately manage motor

to repair the damage, resulting in over \$37,532,212 that is considered at risk and may not accurately or fully support management’s business decisions.<sup>42</sup>

### **Recommendation #3**

We recommend the **Vice President, Human Resources**, in conjunction with the **Acting Chief Retail & Delivery Officer** and **Vice President, Delivery Operations**, and the **Vice President, Technology Applications**, identify a solution to interface or reconcile the Employee Health and Safety application’s accident identification numbers with the Solution for Enterprise Asset Management application to ensure all motor vehicle accidents are properly reported in both systems.

### **Recommendation #4**

We recommend the **Acting Chief Retail & Delivery Officer** and **Vice President, Delivery Operations**, reiterate and provide training to vehicle maintenance facility personnel on the process to modify individual line items on work orders in the Solution for Enterprise Asset Management application to differentiate between scheduled maintenance and accident-related repairs.

### **Recommendation #5**

We recommend the **Vice President, Human Resources**, in conjunction with the **Vice President, Technology Applications**, and the U.S. Department of Labor (DOL), implement an automated reconciliation process between data from DOL’s Employee Compensation Operations and Management Portal and the Postal Service’s Employee Health and Safety (EHS) system, to ensure all personal injury industrial accidents are properly recorded in EHS.

### **Recommendation #6**

We recommend the **Vice President, Human Resources**, identify ways to actively manage corrective actions to verify and ensure completion when employees are involved in an accident.

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<sup>41</sup> Unnecessary, unreasonable, unsupported, or an alleged violation of law, regulation, contract, etc. Usually a result of historical events.

<sup>42</sup> Data Integrity: Validation of the consistency, accuracy, and completeness of data used by the Postal Service. Data used to support management decisions that are not fully supported or completely accurate. This can be the result of flawed methodology; procedural errors; or missing or unsupported facts, assumptions, or conclusions.

## Management's Comments

Management generally agreed with recommendations 1, 2, 3, 4 and 6; however, they disagreed with recommendation 5. Additionally, management did not indicate in their written response whether they agreed or disagreed with the monetary impact. In subsequent correspondence, management agreed with the monetary impact.

Regarding recommendation 1, management will communicate to all employees of each functional group that they must notify the supervisors whenever they are involved in work-related accidents. They will also reiterate to all supervisors that all accidents must be reported in EHS within 24 hours of the accident or injury. The target implementation date is October 31, 2021.

Regarding recommendation 2, management reaffirmed that current policies and procedures will be needed as they work to replace EHS with a new tool. The Safety and Health Management Tool will provide greater insight into accidents and their impacts. The Safety and Health Management Tool is scheduled for deployment in October 2021. Prior to deployment, Occupational Safety & Health will provide training to front-line supervisors and employees. This training will reiterate accident reporting processes and protocols. The target implementation date is October 1, 2021.

Management partially agreed with recommendation 3 and will work with the developers of SEAM to determine the feasibility of an interface or reconciliation process for accident identification numbers from EHS or equivalent application. This will ensure SEAM reflects accident information identification numbers for motor vehicle accidents. If feasible, the Postal Service will work with the developer to incorporate. The target implementation date is July 31, 2022.

Regarding recommendation 4, management will develop and issue Standard Work Instructions to VMF personnel on modifying line items on work orders to differentiate between scheduled repairs and accident-related repairs. The target implementation date is September 30, 2021.

Regarding recommendation 5, management stated the DOL Office of Workers' Compensation Programs, requires benefit claims be initiated using ECOMP. For claims initiated by the Postal Service, there must be an EHS accident record. When an employee bypasses the agency and submits their claim directly through ECOMP, the Postal Service's injury compensation specialist and the employee's supervisor receive an automated message. The responsible specialist ensures the accident record is entered into EHS. Action on the claim cannot be completed without a corresponding accident report. In addition to this reconciliation process, the specialist and local safety personnel perform a monthly audit of all accident and injury claims. If an audit reveals a claim without a corresponding accident record, one is created.

Regarding recommendation 6, management stated the Safety and Health Management Tool requires specific action plans to be developed to address the primary cause and root cause of each accident. The tool assigns action plans and provides for reports to assist in monitoring completion. In addition to the tracking ability, there is a built-in escalation process when actions are not completed during the time frame outlined. The target implementation date is October 1, 2021.

Regarding monetary impact, management stated they could not fully replicate the OIG's numbers because they were not given the source data. However, management agreed with the monetary impact as the OIG's numbers were relatively close to what management could identify.

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

## Evaluation of Management's Comments

The OIG considers management's comments to recommendations 1, 2, 3, 4 and 6 responsive and planned corrective actions should satisfy the intent of the recommendations. However, we consider management's comments regarding recommendation 5 to be nonresponsive.

Regarding management's disagreement to recommendation 5, the OIG acknowledges the reconciliation process performed by the Injury Compensation specialists and supervisors, as well as the monthly audit by specialists and Safety personnel. However, as noted in the report, there were 198,000 CA-1 forms filed in a five-year period, which equates to about 39,600 annually. The intent of our recommendation was not to negatively affect the Postal Service's current reconciliation process. Instead, our recommendation addressed an improved and enhanced process, moving from a manual reconciliation process to an automated, more cost effective, and less prone-to-error approach. Therefore, to fully address this recommendation, we believe management could collaborate with DOL to determine if an automated reconciliation process is feasible, using DOL's claim data to update EHS.

All recommendations require OIG concurrence before closure. The OIG requests written confirmation when corrective actions are completed. Recommendations 1, 2, 3, 4, and 6 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. We view the disagreement on recommendation 5 as unresolved; therefore, the recommendation will remain open as we coordinate resolution with management.

# Appendices

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# Appendix A: Additional Information

## Scope and Methodology

We reviewed and analyzed nationwide accident reporting data from EHS and SEAM systems from FY 2016 through FY 2020, and NPA “Total Accident” data from FY 2018 through FY 2020.

To accomplish our objective, we:

- Obtained and reviewed Postal Service policies and procedures relating to accident activity and fleet management, including reporting, repairing, monitoring, and tracking.
- Identified and reviewed relevant OIG hotline submissions and allegations.
- Obtained and analyzed (1) VMF repair costs and counts from SEAM; (2) accident, injury, and claim data from EHS and ICPAS; and (3) NPA Total Accident scorecard data across all Postal Service domains.
- Analyzed accident, repair, and NPA data to identify trends, risk areas, and anomalies.
- Conducted interviews with facility, district, area, territory, region, and headquarters management to identify accident reporting and fleet management policies and procedures, systems and applications, training requirement, and NPA Total Accident scorecard activity and processes throughout the agency.
- Conducted site visits at four post offices, two VMFs, one detached delivery unit and one carrier annex in the Bay-Valley District.

While an impact of the audit is based on potential manipulation of NPA scores, we did not review other programs associated with NPA, such as Pay for Performance and Performance Evaluation System.

We conducted this performance audit from November 2020 through August 2021 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 objective. We discussed our observations and conclusions with management on July 22, 2021 and included their comments where appropriate.

We assessed the reliability of accident reporting data, vehicle maintenance work orders and NPA scorecard data by tracing them to source and supporting documentation and discussing and verifying the data with management officials knowledgeable about the data. While we did not find any issues in the work orders or scorecard data, we found limitations on the amount and level of accident reporting data that could be queried and returned through EDW for our scope period of FYs 2016 through 2020. We worked with facility, district, and information technology officials, and used other Postal Service applications such as the Workforce Planning, Insights, and Analytics dashboard to further validate the data’s completeness and trends in the accident data we mentioned in this report. 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>Postal Service Accident Safety Policies and Procedures - Great Lakes Area</i>	Determine whether the Postal Service adhered to safety policies and procedures related to accidents in the Great Lakes Area.	HR-AR-18-010	09/17/2018	None
<i>Workers' Compensation Program Cost Containment Activities</i>	Determine the current status of Postal Service cost containment activities related to workers' compensation costs and liabilities.	19-031-R20	08/06/2020	None

# Appendix B: Management's Comments



August 10, 2021

JOE WOLSKI  
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Draft Report – Accident Reporting  
(Project Number 21-015-Draft)

Thank you for providing the United States Postal Service with an opportunity to review and comment on the subject draft audit report, Accident Reporting. The Postal Service generally agrees with the findings and recommendations and has addressed each recommendation separately below.

#### **OIG RECOMMENDATIONS:**

##### **Recommendation 1:**

We recommend the Chief Retail & Delivery Officer and Vice President, Delivery Operations and Vice President, Logistics, reiterate to all employees to promptly notify their supervisor if involved in a work-related accident, regardless of severity; and to all supervisors to report all accidents in the Employee Health and Safety system within 24 hours of the accident/injury or notification.

##### **Management Response/Action Plan:**

Management agrees and will communicate to all employees of each functional group that they must notify the supervisors whenever they are involved in work related accidents, along with reiterating to all supervisors that all accidents must be reported in Employee Health and Safety system within 24 hours of the accident or injury.

##### **Target Implementation Date:**

October 31, 2021

##### **Responsible Official:**

Director, Retail & Delivery  
Director, Delivery Operations  
Sr Director, Surface Logistics

**Recommendation 2:**

We recommend the Vice President, Human Resources, review, update and communicate accident reporting policies and procedures to ensure they accurately and clearly reflect the accident reporting processes.

**Management Response/Action Plan:**

Management agrees with this recommendation. Reaffirming our current policies and procedures will be needed as we work to replace the Employee Health and Safety system with a new tool. The Safety and Health Management Tool (SHMT) will provide greater insight into accidents and their impacts.

The Safety and Health Management Tool is scheduled for deployment in October 2021. Prior to deployment, Occupational Safety & Health will be providing training to our front-line supervisors and employees. This training will reiterate accident reporting processes and protocols.

**Target Implementation Date:**

October 1, 2021

**Responsible Official:**

Sr. Director, Occupational Safety & Health

**Recommendation 3:**

We recommend the Vice President, Human Resources, in conjunction with the Chief Retail & Delivery Officer and Vice President, Delivery Operations and Vice President, Technology Applications, identify a solution to interface or reconcile the Employee Health and Safety application's accident identification numbers with the Solution for Enterprise Asset Management application to ensure all motor vehicle accidents are properly reported in both systems.

**Management Response/Action Plan:**

Management partially agrees with this recommendation. The U.S. Postal Service will work with the developers of the Solution for Enterprise Asset Management (SEAM) to determine the feasibility of an interface or reconciliation process for accident identification numbers from the Employee Health and Safety or equivalent application to ensure SEAM reflects accident information identification numbers for motor vehicle accidents. If feasible, The U.S. Postal Service will work with the SEAM developer to incorporate.

**Target Implementation Date:**

July 31, 2022

**Responsible Official:**

Director, Fleet Management

**Recommendation 4:**

We recommend the Chief Retail & Delivery Officer and Vice President, Delivery Operations, reiterate and provide training to vehicle maintenance facility personnel on the process to modify individual line items on work orders in the Solution for Enterprise Asset Management application to differentiate between scheduled maintenance and accident related repairs.

**Management Response/Action Plan:**

Management agrees with this recommendation. The U.S. Postal Service will develop and issue Standard Work Instructions to Vehicle Maintenance Facility (VMF) personnel on modifying line items on work orders to differentiate between scheduled repairs and accident related repairs.

**Target Implementation Date:**

September 30, 2021

**Responsible Official:**

Director, Fleet Management

**Recommendation 5:**

We recommend the Vice President, Human Resources, in conjunction with the Vice President, Technology Applications, and the US Department of Labor, implement an automated reconciliation process between data from DOL's Employee Compensation Operations and Management Portal and the Postal Service's Employee Health and Safety (EHS) system, to ensure all personal injury industrial accidents are properly recorded in EHS.

**Management Response/Action Plan:**

Management Disagrees with this recommendation. The US DOL, Office of Workers' Compensation Programs requires that all claims for benefits under the Federal Employees' Compensation Act be initiated electronically through the Employee Compensation Operations and Management Portal (eComp). Claims can be initiated by the employing agency or directly by the injured worker. For a claim to be initiated by the USPS, there must be an EHS accident record. When an employee bypasses the agency and submits their claim directly through eComp, the USPS Injury Compensation Specialist and employee's supervisor receive an automated message. That notification serves as notification and at that time the responsible Injury Compensation Specialist ensures that an accident record is entered into the system, if not already entered. Further action on the claim cannot be completed without a corresponding accident report.

In addition to this reconciliation process, the Injury Compensation Specialist and local Safety personnel perform a monthly audit of all accident and injury claims to ensure proper coding and recordability. If an audit reveals a claim that does not have a corresponding accident record, one is created.

**Target Implementation Date:**

N/A

**Responsible Official:**

N/A

**Recommendation 6:**

We recommend the Vice President, Human Resources, identify ways to actively manage corrective actions to verify and ensure completion when employees are involved in an accident.

**Management Response/Action Plan:**

Management Agrees with this recommendation. The Safety and Health Management Tool requires specific action plans to be developed to address the Primary Cause and Root Cause of each accident. The tool assigns action plans and provides for reports to assist in monitoring completion. In addition to the tracking ability, there is a built-in escalation process when actions are not completed during the time frame outlined.

**Target Implementation Date:**

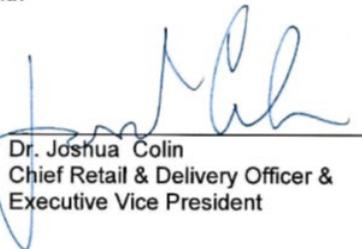
October 1, 2021

**Responsible Official:**

Sr. Director, Occupational Safety & Health

Robert Cintron  
Digitally signed by Robert  
Cintron  
Date: 2021.08.11 10:21:11  
-04'00'

Robert Cintron  
Vice President  
Logistics



Dr. Joshua Colin  
Chief Retail & Delivery Officer &  
Executive Vice President

Simon M. Storey  
Digitally signed by Simon M.  
Storey  
Date: 2021.08.12 20:00:55 -04'00'

Simon Storey  
Vice President, Human Resources

cc: Manager, Corporate Audit Response Management

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