



Office of Inspector General | United States Postal Service

Audit Report

Highway Contract Route Contracting Practices and Conflicts of Interest

Report Number NL-AR-18-001 | October 10, 2017



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Highlights

Objective

Our objective was to determine if the U.S. Postal Service's Highway Contract Route (HCR) contracting practices, including avoidance of conflicts of interest, are in compliance with Postal Service policies and procedures and in line with industry practices.

What the OIG Found

We found that the Postal Service's HCR contracting practices were not always in compliance with its policies and procedures regarding conflicts of interest or in line with industry practices.

Under certain circumstances and with specific disclosures, the Postal Service's *Supplying Principles and Practices* (SP&P) allow the consideration of contract offers from or the awarding of HCR contracts to Postal Service employees, their relatives, or individuals residing in the same household. HCR suppliers

***“ The Postal Service’s
HCR contracting
practices were not
always in compliance
with its policies and
procedures regarding
conflicts of interest. ”***

are required to disclose this information during the contract award and renewal processes. The contracting officers (CO) must then consult with the Postal Service's Ethics Office (Ethics Office) to determine if conflicts of interest exist.

We reviewed all 13,945 HCR contracts in place as of September 1, 2016, and found 337 (over 2 percent) where the supplier and a Postal Service employee had matching addresses. Of the 337 contracts, we identified only 51 (about 15 percent)

contracts where requests were forwarded to the Ethics Office for a conflict of interest review as required. Ethics Office reviews determined there were no issues in those contracts.

We found no documentation in the contract files to support that COs forwarded the remaining 286 contracts to the Ethics Office for review. Specifically:

- Forty-one contracts had the proper disclosures, but the CO did not consult the Ethics Office.
- Ninety-one contracts had disclosure forms, but the forms did not include a disclosure about the HCR supplier's relationship with a Postal Service employee.
- Sixty contracts did not have the required disclosure forms.
- For 94 contracts, it appears that the potential conflict occurred subsequent to contract award and the contracts did not include the required disclosure forms or the suppliers did not disclose their relationship with a Postal Service employee.

This occurred because Postal Service's Supply Management group did not have a review process to ensure compliance with the SP&P requirements.

As a result, the Postal Service is at risk of conflicts of interest that can result in fraud, waste, and abuse, which could negatively impact its brand. We made a referral to our Office of Investigations concerning this matter. We estimated the Postal Service incurred unsupported questioned costs of about \$17.3 million annually for HCR contract awards and renewals that were not in compliance.

Regarding other contracting practices, we found that the Statement of Work for HCR contracts allows a supplier six months to resolve an unsatisfactory Department of Transportation rating for vehicles whose gross vehicle weight rating is 10,001 pounds or greater. An unsatisfactory rating, as determined by the Federal Motor Carrier Safety Administration, occurs when a motor carrier does not have adequate safety management controls in place to ensure compliance with safety fitness standards. This six-month timeframe is much longer than the 60-day requirement of Title 49 of the U.S. Code of Federal Regulations. Additionally, the industry practice for a motor carrier rated unsatisfactory is generally prohibition from operating a commercial motor vehicle and immediate termination.

Finally, we found that the current HCR vehicle insurance minimum requirement of \$750,000 is lower than the industry standard of \$1 million.

What the OIG Recommended

We recommended management:

- Correct and resolve all OIG-identified potential conflicts of interest in accordance with the requirements of SP&P Section 7.12.
- Establish, at a minimum, an annual review process to ensure the contracting requirements of SP&P Section 7.12 are carried out.
- Revise the time period for resolving Department of Transportation unsatisfactory ratings to be, at a minimum, in compliance with Title 49 of the Code of Regulations.
- Increase HCR insurance minimum requirements to match industry standards.


Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

October 10, 2017

MEMORANDUM FOR: SUSAN M. BROWNELL
VICE PRESIDENT, SUPPLY MANAGEMENT

E-Signed by Michael Thompson
VERIFY authenticity with eSign Desktop


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

SUBJECT: Audit Report – Highway Contract Route Contracting Practices
and Conflicts of Interest (Report Number NL-AR-18-001)

This report presents the results of our audit of the U.S. Postal Service's Highway Contract Route Contracting Practices and Conflicts of Interest (Project Number 17XG020NL000).

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

Attachment

cc: Postmaster General
Corporate and Audit Response Management

Results

Introduction/Objective

This report presents the results of our self-initiated audit of the U.S. Postal Service's Highway Contract Route (HCR) Contracting Practices and Conflict of Interest (Project Number 17XG020NL000). Our objective was to determine if the Postal Service's HCR contracting practices, including avoidance of conflicts of interest, are in compliance with Postal Service policies and procedures and in line with industry practices. See [Appendix A](#) for additional information about this audit.

Background

The Postal Service uses supplier-operated HCRs to transport mail and equipment between plants, post offices, or other designated points that receive or dispatch mail. HCRs include transportation and Contract Delivery Service (CDS) routes. As of September 1, 2016, the Postal Service had about 14,000 HCR contracts with an annual cost of about \$3.5 billion.

The Postal Service develops HCR contracts using its Transportation and CDS Terms and Conditions (T&C). The T&C consist of a Statement of Work (SOW), provisions, and clauses and implements the Mail Transportation Purchasing section of the Postal Service's Supplying Principles and Practices (SP&P). The SP&P is the internal guidance for conducting supply chain management functions. The T&C also implements laws and requirements such as Title 49 of the U.S. Code of Federal Regulations (CFR), the Contract Disputes Act of 1978, and Title 39 of the United States Code.

Under certain circumstances and with specific disclosures, the Postal Service's SP&P allows the consideration of offers from or the awarding of HCR contracts to Postal Service employees, their relatives, or individuals residing in the same household. HCR suppliers are required to disclose this information during the contract award and renewal processes. Contracting officers (CO) must then

consult with the Postal Service's Ethics Office (Ethics Office) to determine if conflicts of interest exist.

Finding #1: Potential Conflicts of Interest

We found that the Postal Service's Supply Management group did not ensure HCR contract awards and renewals were in compliance with SP&P restrictions. These restrictions include contracting with Postal Service employees, their spouses, other family members of a Postal Service employee, individuals residing in the same household as a Postal Service employee, and business organizations substantially owned or controlled by any of the above. HCR suppliers are required to disclose this information

during the contract award and renewal processes. Finally, COs are required to consult with the Ethics Office to determine if conflicts of interest exist.¹

We reviewed 13,945 HCR contracts (8,759 HCR suppliers) in place nationwide as of September 1, 2016,² and identified 337 contracts (over 2 percent), which required a review and action by the Ethics Office. These contracts represent 253 HCR suppliers with addresses that matched the addresses of current Postal Service employees at the time of award or renewal.

COs forwarded only 51 (about 15 percent) contracts for a conflict of interest review by the Ethics Office. These reviews found no issues; however, 286 of the 337 contracts (about 85 percent) did not have documentation in the contract files to support disclosures were forwarded to the Ethics Office for review (see [Table 1](#)).

“ Of the 337 contracts where the suppliers and Postal Service employees had matching addresses, COs did not forward 286 contracts to the Ethics Office for review as required. ”

¹ SP&P Section 7-12, Restrictions on Contracting with Former Postal Service Officers, Executives, Employees, and Other Sources, September 2016.

² We initially identified 738 contracts (over 5 percent) or 563 suppliers had the same addresses as 574 Postal Service employees. Using the contract terms and the Postal Service employees' hire and termination dates, we determined that 401 of those contracts were not impacted because the identified employees were no longer with the Postal Service at the contract start date.

Table 1. Review of Contract by Route Type

HCR Contract Type	HCR Contracts Required Ethics Office Review Support	HCR Contracts With Ethics Office Review	HCR Contracts With No Ethics Office Review	Percentage of HCR Contracts With No Ethics Office Review
Transportation	109	13	96	88%
CDS	228	38	190	83%
Total	337	51	286	85%

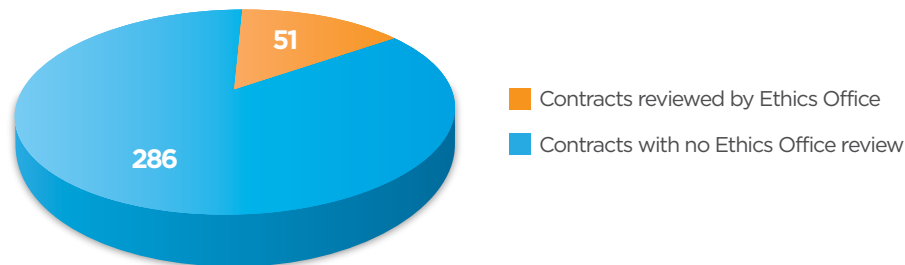
Source: U.S. Postal Service Office of Inspector General (OIG) review of Postal Service contract files.

Of the 286 HCR contracts without an Ethics Office review (see Figure 1), we determined that:

- Forty-one contracts had the proper disclosures, but the CO did not consult the Ethics Office.
- Ninety-one contracts had disclosure forms, but the forms did not disclose the HCR supplier's relationship with a Postal Service employee.
- Sixty contracts did not have the required disclosure forms.
- In 94 contracts, the relationship causing the potential conflict appears to have occurred subsequent to contract award. In these cases, the contracts did not have the required disclosure forms or suppliers did not disclose their relationship with a Postal Service employee.

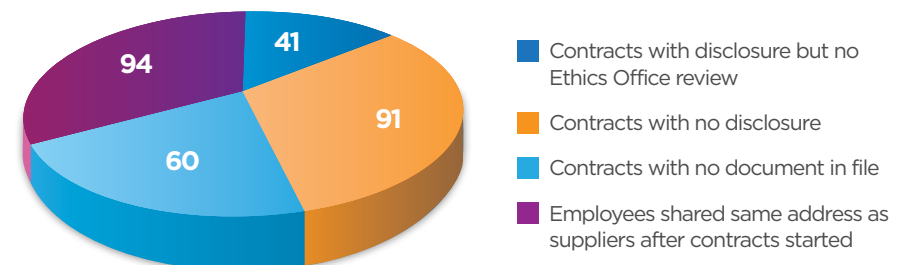
Figure 1. Contract Review Summary

1a: 337 Transportation and CDS Contracts Required Ethics Office Review



Source: OIG review of Postal Service contract files.

1b: 286 Transportation and CDS Contract Awards Without Ethics Office Review



This occurred because Supply Management did not have a process to ensure the HCR supplier and the CO complied with SP&P requirements. Additionally, the Postal Service does not have policies and procedures in place for periodic review of these contracts for potential subsequent conflicts that may arise after the contract award.

“ We recommend management correct and resolve all potential conflicts of interest in accordance with the requirements of Postal Service policies and procedures. ”

As a result, the Postal Service is at risk of conflicts of interest, which may result in fraud, waste, and abuse, which could negatively impact its brand. We made a referral to our Office of Investigations concerning this matter. We estimated the Postal Service incurred unsupported questioned costs³ of about \$17.3 million annually and about \$34.7 million over a two-year period because disclosure forms were not reviewed and the Ethics Office was not consulted prior to contract award or renewal to avoid potential conflicts of interest.

Recommendation #1:

Vice President, Supply Management, correct and resolve all Office of Inspector General-identified potential conflicts of interest in accordance with the requirements of Supplying Principles and Practices Section 7.12.

Recommendation #2:

Vice President, Supply Management, establish, at a minimum, an annual review process to ensure the contracting requirements of Supplying Principles and Practices Section 7.12 are carried out.

³ A weaker claim and a subset of questioned costs. Claimed because of failure to follow policy or required procedures, but does not necessarily connote any real damage to the Postal Service.

Finding #2: Highway Contract Route Contracting

We reviewed contract language in the T&C used for each HCR contract and found it to be in compliance with Postal Service policies. However, we found that the SOW for HCR contracts allows suppliers six months to resolve an unsatisfactory Department of Transportation rating for vehicles whose gross vehicle weight rating is 10,001 pounds or greater, which does not follow the 60-day requirement of 49 CFR.⁴ An unsatisfactory rating occurs when a motor carrier does not have adequate safety management controls in place to ensure compliance with the safety fitness standards. The Federal Motor Carrier Safety Administration compliance review of motor carrier operations determines safety ratings. Generally, a motor carrier rated unsatisfactory is prohibited from operating a commercial motor vehicle. The industry practice is generally immediate termination.

Further, federal regulation requires a motor carrier operating freight vehicles with 10,001 or more pounds in gross vehicle weight and transporting a non-hazardous commodity to have minimum liability insurance of \$750,000.⁵ The Postal Service maintains the required insurance limit; however, we found that industry practice is for commercial shippers to generally require motor carriers to have at least \$1 million in liability insurance. We concluded this would provide additional protection to the Postal Service and ensure HCR contracts are awarded using industry practices.

Recommendation #3:

Vice President, Supply Management, *revise the time period for resolving Department of Transportation unsatisfactory ratings to be, at a minimum, in compliance with the Title 49, U.S. Code of Federal Regulations.*

Recommendation #4:

Vice President, Supply Management, *increase the highway contract route insurance minimum requirement to match industry standards.*

⁴ 49 CFR §385.11, Notification of safety fitness determination.

⁵ 49 CFR §387.303, Security for the protection of the public: minimum limits.

Management's Comments

Management agreed with recommendations 1 and 3 and the report findings except as noted, but disagreed with recommendations 2 and 4 and the monetary impact.

Management noted the following exceptions to the findings:

- Management found seven ethics reviews for suppliers identified as part of the 41 contracts identified as having proper disclosures, but no ethic reviews. Management also found 16 ethics reviews for suppliers identified as part of 60 contracts identified as not having the proper disclosure forms.
- Management asserted there is no violation of policy or failure to follow procedure on the part of the Postal Service for the 91 contracts where the supplier did not disclose their relationships or the 94 contracts where the potential conflict of interest occurred after contract award. Management stated that policy requires supplier disclosure and the CO relies on that disclosure. Additionally for the potential conflicts of interest identified after contract award, there is no indication that the contracting officer did not properly evaluate properly evaluate required disclosures prior to contract award.

For monetary impact, management stated that a supplier's failure to disclose a restricted relationship or an emergent potential conflict of interest subsequent to contract award are not policy violations and therefore any funds among the 286 contracts are not at risk.

Regarding recommendation 1, management will request suppliers to complete and submit a new Provision 4-3 - Representations and Certifications (November 2012) where records of Ethics Office reviews cannot be located. Contracting officers will identify any supplier disclosures that require the Ethics Office review

and seek Ethics counsel recommendation. The target implementation date is June 2018.

Regarding recommendation 2, management stated that given the very small percentage of contracts with the potential for conflict of interest, they believe the current due diligence process described in SP&P, Section 7-12.1.3 - Provision 4-3, Representations and Certifications, that is based on the offeror's disclosures is sufficient to protect the Postal Service. Further, management stated the proposed annual review is a labor-intensive process that would not result in a complete review of potential conflicts of interests or have any actual financial impact on the Postal Service. Management's opinion is that the cost to implement such a process would outweigh its benefits.

Regarding recommendation 3, management identified that this change has already been implemented in the standard terms and conditions for HCR contracts. Management said they would delete any conflicting language found in the Transportation Contracting Support System (TCSS). The target implementation date is March 2018.

Management disagreed with recommendation 4 because the Postal Service is in compliance with federal regulations regarding the minimum insurance requirement. Further, management stated the OIG has not offered a detailed explanation as to how it developed its understanding of a \$1 million minimum insurance requirement being standard industry practice nor how requiring this increased level of insurance coverage is in the best interests of the Postal Service.

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

Evaluation of Management's Comments

The OIG considers management's comments responsive to recommendations 1 and 3 and the corrective actions should resolve the issues identified in the report.

Regarding recommendation 2, the OIG believes the Postal Service still needs to establish a review process to ensure it is meeting the intent of SP&P Section 7.12. It requires that the Postal Service not consider offers of or award contracts to Postal Service employees, their spouses, other family members of a Postal Service employee, individuals residing in the same household as a Postal Service employee, and business organizations substantially owned or controlled by any of the above. The current process does not ensure the Postal Service is in compliance with SP&P Section 7.12 or provide for an understanding of the negative financial impact of conflicts of interest.

Regarding recommendation 4, the OIG identified the \$1 million insurance minimum as an industry standard based on a transportation specialist's research of insurance coverage. The OIG discussed the benefit of the \$1 million minimum insurance coverage standard with the Postal Service's legal department and they concurred. We agree the Postal Service is in compliance with federal regulations, therefore, the OIG will consider recommendation 4 closed, but not implemented with issuance of this report.

The OIG believes the findings and monetary impact are accurate. The OIG reviewed the documentation and determined that Ethics Office reviews for the seven contracts the Postal Service identified were not part of our audit review. Subsequently management identified an additional 16 contracts the Ethics Office reviewed. Management did not provide documentation to support the reviews with their management comments or in response to a subsequent request by the audit team. Consequently, the OIG was not able to confirm reviews for the 16 contracts. The OIG believes that contract ethics reviews should occur for each contract because circumstances, such as employee – supplier relationships, vary by contract. For monetary impact and policy issues, the OIG agrees the policy only requires supplier disclosure and not a review after contract award; however, the OIG does not believe that this is sufficient to meet the intent of SP&P Section 7.12, which is not to consider offers of or award contracts to suppliers in the five identified categories.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. Recommendations 1, 2, and 3 should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

Appendices

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Appendix A: Additional Information

Scope and Methodology

The scope of this audit was all HCR and CDS contracts active as of September 1, 2016. To accomplish our objective, we:

- Reviewed Postal Service policies and procedures relevant to HCR contracting.
- Compared the T&C with Postal Service SP&P Section 8-2, Mail Transportation Purchasing, to determine whether the T&C is in compliance with Postal Service policy.
- Reviewed 13,945 HCR contracts (8,759 HCR suppliers) nationwide as of September 1, 2016, from the TCSS and compared the addresses on them with Postal Service employee addresses from the employee master file to identify suppliers and Postal Service employees who shared the same address.
- Compared the HCR contract time period to Postal Service employees' employment dates to identify contracts requiring an Ethics Office review.
- Reviewed TCSS contract files for supporting documentation related to the Ethics Office review and recommendation.
- Interviewed Postal Service Supply Management managers and Commodity-Based Sourcing Office personnel regarding restrictions on contracting with Postal Service employees, spouses, family members, and others; and HCR contracting practices.

- Interviewed Postal Service Legal Department and Ethics Office attorneys regarding HCR contracting on conflict of interest issues, policies and procedures, and T&C, including the SOW.
- Analyzed reports created by a transportation specialist regarding transportation industry practices.

We conducted this performance audit from May through October 2017, in accordance with generally accepted government auditing standards and included such tests of internal controls, as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on September 11, 2017, and included their comments where appropriate.

We assessed the reliability of employee address data in employee master file used in the report by validating the data to Employee Personnel Action History database. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

The OIG did not identify any prior audits or reviews related to the objective of this audit.

Appendix B: Management's Comment

SUSAN M. BROWNELL
VICE PRESIDENT, SUPPLY MANAGEMENT



September 28, 2017

LORI LAU DILLARD

SUBJECT: Highway Contract Route (HCR) Contracting Practices and Conflicts of Interest (Report Number NL-AR-18-DRAFT)

Thank you for providing the United States Postal Service (USPS or Postal Service) with an opportunity to review and comment on the subject Office of the Inspector General (OIG) draft audit report, "Highway Contract Route Contracting Practices and Conflicts of Interest." Management agrees with the report's findings except where noted below. Management also agrees with two recommendations, but does not agree with Recommendations 2 and 4 and the monetary impact.

Management would like to highlight that, out of a total 13,945 contracts reviewed, the OIG identified only 286 contracts, or 2%, as exhibiting potential conflicts of interests. As detailed further below, management questions findings related to this 2%.

Management questions the finding that forty-one contracts had the proper disclosures, but the contracting officer did not consult the Ethics Office. Consultation with the Ethics Office regarding this report identified at least seven instances where the USPS employee cited by the OIG as having a potential conflict of interest was the subject of an Ethics Office review.

Management questions the finding that sixty contracts did not have the required disclosure forms. Consultation with the Ethics Office regarding this report identified at least sixteen instances where the USPS employee cited by the OIG as having a potential conflict of interest was the subject of an Ethics Office review.

Regarding the finding that ninety-one contracts had disclosure forms, but the forms did not include a disclosure about the HCR supplier's relationship with a Postal Service employee, this is a failure on the part of the supplier, not the Postal Service. As discussed in Supplying Principles & Practices (SP&Ps) Section 7-12.1.3 – *Provision 4-3, Representations and Certifications*, an offeror must disclose whether he or she is a Postal Service employee, an employee's spouse, another family member of an employee, or an individual residing in the same household as an employee. This disclosure must also be made if the offeror is a business organization that is substantially owned or controlled by a person with such a relationship. Consistent with the SP&Ps, the contracting officer relies on this disclosure to initiate his or her coordination with Ethics counsel to obtain their review. There is no violation of policy or failure to follow procedure on the part of the Postal Service when a supplier does not disclose their potential conflict of interest.

Another finding was that ninety-four contracts have a potential conflict of interest that occurred subsequent to contract award. According to the OIG, these contracts either did not include the required disclosure forms or the suppliers did not disclose their relationship with a Postal Service employee. This is also not a failure on the part of the Postal Service. There is no indication that contracting officers failed to properly evaluate any required disclosures that may have been made by suppliers prior to award.

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Management does not agree with the monetary impact since the Postal Service does not agree that the majority of the 286 contracts identified by the OIG failed to follow policy or required procedures. A supplier's failure to disclose a restricted relationship or an emergent potential conflict of interest subsequent to contract award is not a policy violation on the part of the Postal Service. Accordingly, management does not agree that any funds among the 286 contracts are at risk.

Management's response to the recommendations included in the draft report may be found below.

We recommend the Vice President, Supply Management:

Recommendation 1: Correct and resolve all Office of Inspector General-identified potential conflicts of interest in accordance with the requirements of Supplying Principles and Practices Section 7.12.

Management Response to Recommendation 1: Management agrees with this recommendation. Where records of Ethics Office reviews associated with the 286 contracts cannot be located, suppliers will be requested to complete and submit a new Provision 4-3 - *Representations and Certifications* (November 2012). Contracting officers will identify any disclosures made by the supplier that require the review of the Ethics Office consistent with SP&Ps Section 7-12 - *Restrictions on Contracting with Former Postal Service Officers, Executives, Employees, and Other Sources* and seek the recommendation of Ethics counsel accordingly.

Target Implementation Date: June 2018

Responsible Official: Manager, Surface Transportation Category Management Center (CMC)

Recommendation 2: Establish, at a minimum, an annual review process to ensure the contracting requirements of Supplying Principles and Practices Section 7.12 are carried out.

Management Response to Recommendation 2: Management disagrees with this recommendation. Given the very small percentage of contracts with the potential for conflict of interest, management believes that our current due diligence process as described in SP&Ps Section 7-12.1.3 - *Provision 4-3, Representations and Certifications* that is based on the offeror's disclosures is sufficient to protect the Postal Service. If the Postal Service were to implement a process similar to the one the OIG described in its report where USPS employee addresses were compared to HCR supplier addresses, the process would not necessarily capture instances where the offeror is a business organization that is substantially owned or controlled by a postal employee, their spouse, or other family member or individual residing in the same household as a postal employee. Since the proposed annual review is a labor-intensive process, would not result in a complete review of potential conflicts of interests, and not have any actual financial impact to the Postal Service, management's opinion is that the costs to implement such a process would outweigh the benefits it would provide.

Recommendation 3: Revise the time period for resolving Department of Transportation unsatisfactory ratings to be, at a minimum, in compliance with the Title 49, U.S. Code of Federal Regulations.

Management Response to Recommendation 3: Management agrees with this recommendation. It is noted that this change has already been implemented in the standard terms and conditions for HCR contracts. Any conflicting language identified in the standard statement of work found in the Transportation Contracting Support System will be deleted.

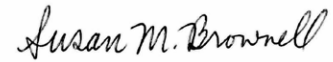
Target Implementation Date: March 2018

Responsible Official: Manager, Surface Transportation CMC

Recommendation 4: Increase the highway contract route insurance minimum requirement to match industry standards.

- 3 -

Management Response to Recommendation 4: Management disagrees with this recommendation. The OIG indicates that the Postal Services is in compliance with federal regulations regarding the minimum insurance requirement. Further, the OIG has not offered a detailed explanation as to how it developed its understanding of a \$1 million minimum insurance requirement being standard industry practice nor how requiring this increased level of insurance coverage is in the best interests of the Postal Service.

A handwritten signature in black ink that reads "Susan M. Brownell". The signature is written in a cursive, flowing style.

cc: Manager, Corporate Audit & Response Management



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