

Office of Inspector General | United States Postal Service

Audit Report

Assumptions and Metrics Underlying the Delivering for America 10-Year Plan

Report Number 21-224-R22 | July 6, 2022



First-year Progress Report



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Highlights

Background

The U.S. Postal Service and the Board of Governors released their 10-year strategic plan, called Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence (the Plan), on March 23, 2021. The Plan outlines steps to achieve a positive net income within three years and break-even operating performance over the next 10 years. To achieve these objectives, the Postal Service identified 13 strategic focus areas, which are supported by 175 initiatives designed to eliminate a 10-year projected loss through additional revenue and cost savings opportunities, totaling \$160 billion.

What We Did

Our objective was to evaluate the Plan to determine if the underlying assumptions and projections were supported and whether metrics were established and reasonable. We reviewed 58 key initiatives, their risks and interdependencies, as well as methods of communication for internal and external stakeholders.

What We Found

The Postal Service's assumptions and projections underlying the 58 initiatives we reviewed were supported, and its systems for recording, measuring, and monitoring initiative risks, milestones, and metrics were in place. The Postal Service also implemented a process to validate projected revenue growth and cost savings resulting from the Plan.

We did note, however, that when the Postal Service developed its initiatives related to service performance, it did not conduct studies to determine whether specific demographic groups could be disproportionately affected. Management noted that such studies were not required or necessary, and the Postal Service does not have specific guidance or situations in which they complete a distributive impact study. Lastly, while the Postal Service provided public-facing plan updates in its most recent Integrated Financial Plan and progress report in April 2022, it has opportunities to further enhance communication regarding its progress and savings. This would better inform its customers and stakeholders about the Plan's progress and success.

Recommendations

We recommended management: 1) Create guidance that details the requirements for when a distributive impact study should be performed, and 2) Enhance the *Delivering for America* Plan's website, to provide comprehensive communications regarding plan progress, status of ongoing initiatives, future plans, and outcomes. Link to review the entire report

Transmittal Letter



July 6, 2022

MEMORANDUM FOR: LUKE T. GROSSMANN

SENIOR VICE PRESIDENT FINANCE AND STRATEGY

JEFFERY A. ADAMS

VICE PRESIDENT, CORPORATE COMMUNICATIONS

FROM: Amanda H. Stafford

Deputy Assistant Inspector General for Retail, Delivery, and Marketing

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SUBJECT: Audit Report – Assumptions and Metrics Underlying the

Delivering for America 10-Year Plan (Report Number 21-224-R22)

This report presents the results of our audit of the Postal Service's *Delivering for America* 10-Year plan.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Janet M. Sorensen, Director, Sales, Marketing, and International, or me at 703-248-2100.

Attachment

cc: Corporate Audit Response Management

Postmaster General

Results

Introduction/Objective

This report presents the results of our self-initiated audit of the assumptions and metrics underlying the U.S. Postal Service's Delivering for America 10-year strategic plan, (Project Number 21-224). Our objective was to evaluate the Postal Service's plan to determine if the underlying assumptions and projections were supported, and whether metrics were established and reasonable. See Appendix A for additional information about this audit.

Background

Figure 1. 13 Strategic Focus Areas in the Delivering for America Plan

The Postal Service and the Board of Governors announced their 10-year strategic plan, called *Delivering for America: Our Vision and Ten-Year* Plan to Achieve Financial Sustainability and Service Excellence (the Plan), on March 23, 2021. The Plan outlined steps to achieve a positive net income within three years and break-even operating performance over the next 10 years. To achieve these objectives, the Postal Service identified 13 strategic focus areas, which are supported by 175 Getting it Right initiatives designed to eliminate a 10-year projected loss through additional revenue and cost savings opportunities totaling \$160 billion (see Figure 1).

STRATEGIC FOCUS AREAS

- 01 | Grow Package Business and Launch USPS Connect
- **02** | Strengthen the Value of Mail
- 03 | Implement Service Standard Changes
- Implement Best-in-Class Mail and Package Processing
- Fully Optimize Surface and Air Transportation Network
- **06** Implement Best-in-Class Delivery Operations
- **07** Invest in New Delivery Vehicles
- **08** | Modernize the Post Office Network
- **09** Design and Implement an Organization Structured for Success
- 10 | Develop a Stable and Empowered Workforce
- 11 | Pricing Strategies Aligned with Organizational and Market place Needs
- 12 Legislative and Administrative Framework Aligned to Organizational Need
- 13 Other Critical Enterprise Objectives

FINANCIAL PROJECTIONS



Source: U.S. Postal Service Office of Inspector General (OIG) created.

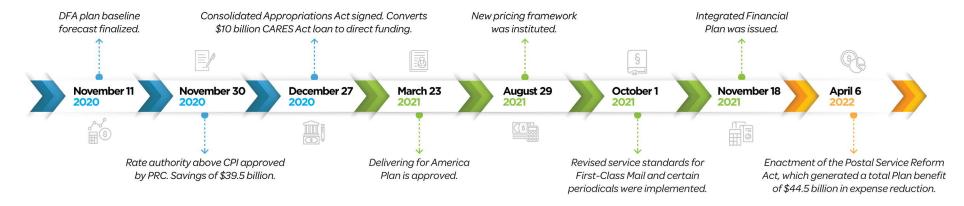
As of September 2021, the Postal Service assigned 58 initiatives as a Level 1 or 2 priority and 117 initiatives a Level 3 priority. Levels were assigned as follows:

- Level 1: These include Postmaster General priority initiatives directly linked to the Plan, which often require regular Board of Governor status briefings and/or Postal Regulatory Commission (PRC) engagement due to political sensitivity, magnitude of initiative impact, or legal or regulatory requirements. These initiatives may or may not have a financial benefit.¹
- Level 2: These initiatives return a validated net financial benefit aligned to the Plan's financial targets.

Level 3: These initiatives include other corporate and business unit initiatives, which may include initiatives that directly or indirectly support the accomplishment of Level 1 and Level 2 initiatives.

To date, the Postal Service has implemented several significant initiatives, including revised service standards as well as a new pricing framework. Significant financial changes will also result from the passage of the Postal Service Reform Act² of 2022, which included eliminating the retiree health benefit prefunding requirement, integrating the retiree health benefit program with Medicare, and formalizing six-days-per-week delivery for mail and packages (see Figure 2). Looking forward, the scope and magnitude of the Plan's initiatives will continue to involve significant coordination throughout all levels and organizations within the Postal Service.

Figure 2. Delivering for America Timeline



Source: OIG created.

Finding #1: Plan Initiatives

We reviewed 58 key initiatives³ from the Postal Service's plan that underpin the broader 13 strategic focus areas, including the supporting data and the Postal Service's internal monitoring dashboard. The Postal Service's assumptions

and projections underlying the 58 initiatives in the Plan were supported, and its systems for recording, measuring, and monitoring initiative risks, milestones, and metrics were in place and reasonable. The Postal Service also implemented a process to validate projected revenue growth and cost savings resulting from the

¹ Level 1 initiatives may have a significant impact on operations but may not be directly tied to a financial benefit.

² Postal Service Reform Act of 2022.

³ The 58 key initiatives reviewed were all Level 1 or 2 initiatives as of September 21, 2021.

"The OIG will continue to evaluate associated risks and the Plan's progress."

Plan. We determined the Postal Service followed best practices for strategic planning including:

Dedicated Team: The Postal Service's Strategic Management office provided dedicated support to the Postmaster General and senior management in the identification, development, and reporting the status of strategic initiatives. This group ensures that strategic initiatives, which are supported by rigorously tested data, align with business priorities. Strategic Management officials facilitate a regular review of strategic initiatives by the Executive Leadership Team to evaluate progress and resolve issues.

Business Case Analysis: We found plan assumptions and projections were supported, and systems were in place for recording, measuring, and monitoring initiative risks, milestones, and metrics. We reviewed 58 initiative details for reasonableness and support. In addition, we reviewed the revenue and cost calculations for reasonableness. We also noted that the Postmaster General, Executive Leadership Team, and Vice Presidents have controls in place to meet weekly and review progress against the Plan's initiatives. Having a cross functional team provides insight into initiative interdependencies and enables change to be made across initiatives.

Defined metrics: We reviewed the metrics for 58 initiatives and found they were defined and reasonable. Generally, metric measurements included a reduction in hours or expenses related to the initiative. Further, the Executive Leadership Team and Vice Presidents track weekly performance for all initiatives through an enterprise dashboard that displays:

- Risks and issues,
- Key milestone dates and adjustments, and
- Financial and other outcome results, as well as variance to targets.

Defined Process: The Postal Service's Strategic Initiative Governance Controls process guide contains governance controls, roles and responsibilities, as well as information about each phase of the strategic process. The guide provides the steps needed to create, define, manage, close initiatives and flexibly allows for exceptions, revisions, and deviations to those initiatives.

Validation of Results: The Postal Service's process to validate cost savings and revenue growth resulting from the Plan is sufficient to ensure that reported results are reviewed and verified. The process includes the Postal Service's Finance team validating all financial targets and actual values monthly. In addition, the Chief Financial Officer and the Senior Vice President of Finance and Strategy review financial progress with the Postmaster General each month.

As the Postal Service implements and revises the Plan, it will be important to continue to assess its initiatives, monitor progress toward implementation, ensure organizational coordination, and evaluate results. The OIG will continue to evaluate associated risks and the Plan's progress. We will conduct audits on specific topics as deemed appropriate throughout implementation.

Finding #2: Distributive Impact Studies

The Postal Service did not conduct studies to determine how changes related to mail service standards could impact specific demographic groups. The Postal Service does not have specific guidance or situations in which they complete this type of analysis, known as distributive impact studies.

The Postal Service performed modeling⁴ projections to examine potential impacts to First-Class Mail and package volume as part of its PRC requests for service standard changes. However, that analysis did not assess trends among demographic populations.

The benefits of distributive impact studies have been recognized as a key component in planning for large, regulatory change. Executive Order 12866⁵ states that agencies should consider distributive impacts when designing

⁴ Blue Yonder Transportation Modeler is logistics industry optimization software that specializes in optimizing both large and small transportation networks by providing users with a vast array of customizable variables and inputs.

⁵ Executive Order 12866, Regulatory Planning and Review, September 30, 1993.

regulations. Another executive order⁶ emphasized the need for a data-driven approach to foster diversity, equity, inclusion, and accessibility in the federal workforce. Additionally, Office of Management and Budget (OMB) Circular A-4 suggests analysts should be alert for regulatory alternatives that would result in significant changes or outcomes for different population groups.⁷ It also states a regulatory analysis should provide a separate description of distributional effects, or how benefits and costs are distributed among sub-populations of particular concern.

While the Postal Service is not bound by these executive orders or OMB Circular A-4, management should consider conducting distributive impact studies ahead of implementing initiatives, if necessary and appropriate, and develop guidance to consistently complete studies and share results. This could further promote the Postal Service's mission to provide the nation with reliable, affordable, universal mail service. Sharing the results of such studies could allow the Postal Service to be more transparent in its relationship with stakeholders. Additionally, such studies could provide the Postal Service with valuable information when making major changes with the potential to have unintentional disparate impacts on individual population groups.

Recommendation #1:

We recommend the **Senior Vice President, Finance and Strategy**, create guidance that details the requirements for when a distributive impact study should be performed.

Finding #3: Communication

The Postal Service provided periodic updates of the initiatives contained in the Plan through reporting channels such as press releases, social media content, annual progress report,⁸ and annual financial and operational reports, such as their Annual Report to Congress. To find updates on the Plan's progress,

stakeholders must navigate to the Postal Service's newsroom or read through technical documents, such as the Integrated Financial Plan. Having the information centrally located would be beneficial for stakeholders looking to obtain quick and comprehensive information.

While we acknowledge the Postal Service's communications to date,⁹ customers and stakeholders could benefit from linking and centralizing the Postal Service's communication channels. Such information could be provided and updated on the Postal Service's *Delivering for America* external website, where the Postal Service could link key press releases to its site and publish data visualizations with the net income achieved from its initiatives.¹⁰ Plan progress information, including operational and financial updates, could reach a larger audience and help enhance public understanding of ongoing changes to operations and the Postal Service's financial condition.

Operational Updates: Currently, the Postal Service provides periodic, operational updates through reporting channels such as press releases and social

media content. Having the information centrally located would be beneficial for stakeholders looking for complete, succinct information. Centralizing key communications on the *Delivering for America* site could help the public understand how the Plan is being implemented, its impact on the organization, and how the results compare to the Plan.

The National Institute of Mental Health provides an example of how progress tracking towards goals can be shared comprehensively. The Strategic Planning site¹¹ features the Institute's progress – through documents such as press releases – and is organized by each priority (see Figure 3).

"Customers and stakeholders could benefit from linking and centralizing the Postal Service's communication channels."

⁶ Executive Order 14035, Executive Order on Diversity, Equity, Inclusion and Accessibility in the Federal Workforce, June 25, 2021.

⁷ OMB Circular A-4, Regulatory Analysis, September 17, 2003.

⁸ Delivering for America, First-Year Progress Report.

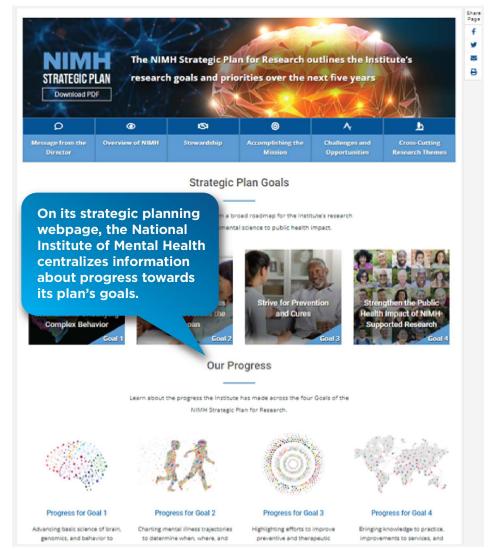
⁹ These communications include the annual fiscal year report to Congress, the Annual Compliance Report to the PRC, and Postal Reform Act reporting as required by law. Other communications include PRC filings for service and price changes and the Delivering for America annual progress report.

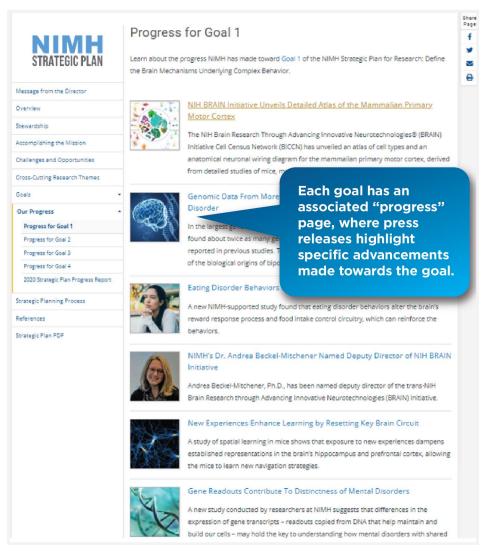
¹⁰ As of February 22, 2022, there was one limited update posted regarding the new USPS Connect products, including links to a press release and the USPS Connect website.

¹¹ https://www.nimh.nih.gov/about/strategic-planning-reports.

The Postal Service could use this approach to highlight individual initiatives, their progress, and information regarding possible delays. This could improve message clarity to the public about the Plan's progress.

Figure 3. National Institute of Mental Health Strategic Planning Website





Source: OIG analysis of National Institute of Mental Health strategic plan website. Screenshots taken and analysis conducted March 3, 2022.

In addition to the National Institute of Mental Health website, other entities also track major initiatives in a centralized location. UPS's "Our Strategy" site compiles

progress towards an overall organizational strategy in a central location. 12 Similarly, the Department of Transportation's webpage on the bipartisan infrastructure law provides a consolidated overview of press releases, news articles, social media, and component-specific progress updates. 13

Financial Updates: The Postal Service provided an update to its financial projections in the most recent Integrated Financial Plan. In it, the Postal Service compared the fiscal year (FY) 2022 Integrated Financial Plan projections to the original Delivering for America projections and explained the variances. The Postal Service also shared information on actual net income in FY 2021. This net income was greater than originally projected in the Plan, an indicator that the Postal Service's overall financial condition may be improving.

"The Postal Service has a unique opportunity to enhance the depth of information it provides to better inform its customers, stakeholders, and the media about the Plan's progress and success"

An opportunity exists to highlight this information in a graphic on the *Delivering for America* site, showing actual progress made towards closing the Plan's identified financial gaps. Displaying this information in an easy-to-understand way could be a useful accountability tool to help the public track and understand the Postal Service's progress toward the Plan's stated goals. Clear visuals allow any stakeholder, even those who may not be likely to review financial documents, to understand how the Plan contributes to the Postal Service's financial condition.

Federal policy requires agency websites to include regularly updated and accurate information on the performance of the agency in a readily useable form.

14 While not bound by this policy, the Postal Service has a unique opportunity to enhance the depth of information it provides to better inform its customers,

stakeholders, and the media about the Plan's progress and success. The Postal Service could provide enhanced information regarding the progress of ongoing initiatives, future plans, and the status of initiatives that have been delayed or revised. Including the information in one place would promote ease of access, making the Delivering for America page the go-to site for Plan information and promotion of the accomplishments of the Postal Service.

Recommendation #2

We recommend the **Vice President, Corporate Communications**, enhance the *Delivering for America* Plan's website, to provide comprehensive communications regarding plan progress, status of ongoing initiatives, future plans, and outcomes.

Management's Comments

Management agreed with the findings and recommendations.

Regarding recommendation 1, management stated that in conjunction with OIG Report Number RISC-WP-22-005,¹⁵ they will consider whether demographic factors should be considered in their decision-making process related to changes to service standards. To the extent they conclude those factors should be a part of the process, management will create guidance that details when distributive impact studies should be performed for service standard changes. In subsequent correspondence, management stated the target implementation date is June 24, 2023.

Regarding recommendation 2, management stated that they have a robust website in place that provides a significant amount of timely, relevant, and useful information concerning their plan and the success of their efforts to implement it. They agreed that improvement is always possible and will enhance the Delivering for America's web page by including links to the Postal Service Reform Act Dashboard, Semiannual Reports to Congress (publicly available information only), Annual Report to Congress, and relevant past releases. Management

¹² Our Strategy | About UPS, UPS, "Our Strategy."

¹³ https://www.transportation.gov/bipartisan-infrastructure-law, Department of Transportation, "Bipartisan Infrastructure Law."

¹⁴ Executive Order 13450 (November 13, 2007), "Improving Government Program Performance", Section 3(c).

¹⁵ RISC-WP-22-005, Demographic Trends in Mail Access Changes and Service, 2016-2020, April 28, 2022.

stated these combined reports outline progress, outcomes, and future plans as required by regulatory and legal requirements. In subsequent correspondence, management stated the target implementation date is June 24, 2023.

See Appendix B for management's comments in their entirety.

Evaluation of Management's Comments

The OIG considers management's comments responsive to the findings in the report.

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

Appendices

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Appendix A: Additional Information

Scope and Methodology

We reviewed 58 level 1 and 2 initiatives, including two that were placed on hold as of September 21, 2021. We judgmentally selected the level 1 and 2 initiatives because they are directly linked to the Plan or returned a validated net financial benefit to the Plan's financial targets. At the time of review there were a total of 175 initiatives.

To accomplish our review, we:

- Verified those individual initiatives align to the Plan.
- Validated assumptions and predicted cost savings underlying the initiatives.
- Determined if the Postal Service identified and reported any service impact issues, including whether the Postal Service identified how rural communities may be negatively impacted by service standard changes.
- Reviewed the Postal Service's support for the assumptions and projected revenues.
- Evaluated the mechanisms in place to monitor initiative metrics and milestones, as well as the Postal Service's contingency plans if it fails to meet the milestones. This included an examination of identifiable triggers for pivoting to alternative actions.
- Reviewed the marketing and communication plans and methods that communicate changes to external and internal stakeholders and customers.

- Identified the Postal Service's plans for coordinating interdependent initiatives that are similar or that impact each other.
- Benchmarked other federal agency websites for communicating strategic plans.
- Reviewed the Postal Service's financial data used to create the Plan.

We conducted this performance audit from July 2021 through July 2022 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 June 3 2022, and included their comments where appropriate.

We assessed the reliability of initiative data by performing completeness, reasonableness, accuracy, validity, and existence tests on the data in the initiative listing and initiative tracking system, and through our review of the initiatives. 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 within the last five years.

Appendix B: Management's Comments



June 28, 2022

Amanda H. Stafford Deputy Assistant Inspector General For Retail, Delivery, and Marketing

SUBJECT: Management Responses: Assumptions and Metrics Underlying the Delivering for America 10-Year Plan (Project Number 21-224)

Thank you for providing the Postal Service an opportunity to review and comment on the findings and recommendations contained in the draft audit report, Assumptions and Metrics Underlying the Delivering for America 10-Year Plan (DFA PLAN) (Project Number 21-224). We very much appreciated our ongoing dialogue throughout the engagement, and the interactive nature of your process.

In addition, we value your acknowledgment that our assumptions and projections underlying the 58 initiatives that you reviewed in connection with our DFA Plan are supported; that our systems for recording, measuring, and monitoring initiative risks, milestones, and metrics are in place; and that we have implemented a process to validate projected revenue growth and cost savings resulting from our Plan. We are extremely proud of our DFA Plan and remain convinced that our successful implementation of it will result in long-term financial sustainability for the Postal Service, and service excellence for our customers.

With regard to your recommendations, below you will find the Postal Service's responses to the OIG recommendations received on June 8, 2022, to include target implementation dates and the identification of responsible officials for each.

OIG Recommendation 1:

We recommend the Senior Vice President, Finance and Strategy, create guidance that details the requirements for when a distributive impact study should be performed.

USPS Response/Action Plan:

The Postal Service interprets this recommendation in conjunction with the OIG's recommendation in USPS OIG Report Number RISC-WP-22-005, and agrees with it subject to the caveats set forth below. In management's response to the prior OIG recommendation, we agreed to consider whether demographic factors should be included in our decision-making processes related to access, and we are currently undertaking work to evaluate that

475 L'ENFANT PLAZA SW WASHINGTON DC 20260-8100 FAX: (202) 268-8104 WWW.USPS.COM question. In that same vein, Postal Service management will consider whether demographic factors should be considered in our decision-making processes related to changes to service standards, and, to the extent we conclude that demographic factors should be a part of such decision-making processes, then management will undertake to create guidance that details when distributive impact studies should be performed for service standard changes.

Target Implementation Date:

06/30/2023

Responsible Official:

Senior Vice President, Finance and Strategy

OIG Recommendation 2:

We recommend the Vice President, Corporate Communications, enhance the Delivering for America Plan's website, to provide comprehensive communications regarding plan progress, status of ongoing initiatives, future plans, and outcomes.

USPS Response/Action Plan:

While we have a robust Delivering for America website in place that provides a significant amount of timely, relevant, and useful information concerning our plan and the success of our efforts to implement it, Postal Service management agrees with the recommendation that improvement is always possible. Therefore, we will enhance the Delivering for America Plan's web page even further to better inform external stakeholders about the progress made by including links to the PSRA Dashboard, Semiannual Reports to Congress (publicly available information only), Annual Report to Congress, and links to relevant press releases. These combined reports outline DFA plan progress, outcomes, and future plans as required by regulatory and legal requirements.

A DRECTE DE THE CONGLAR MINES

Target Implementation Date:

06/30/2023

Responsible Official:

Vice President, Corporate Communications

Luke T. Grossmann

Senior Vice President, Finance and Strategy

Jeffery A. Adams

Vice President, Corporate Communications

cc: Manager, Corporate Audit Response Management

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