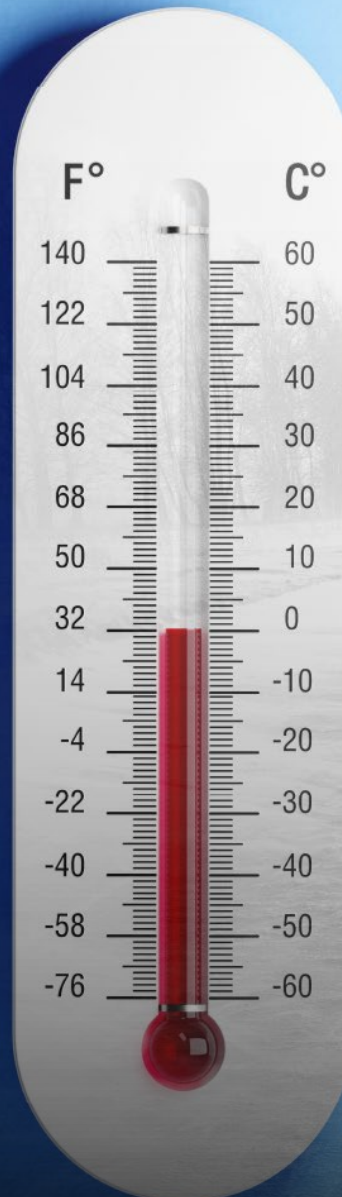
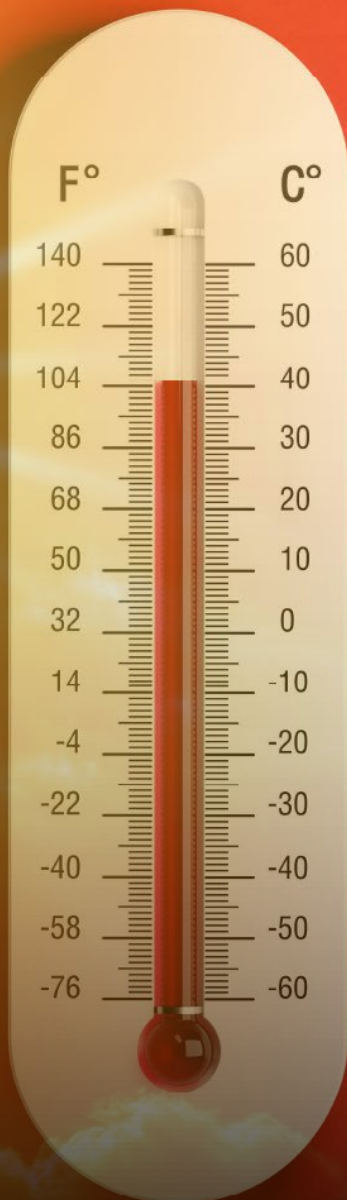


# Postal Service's Adverse Weather Condition Procedures

## AUDIT REPORT

Report Number 24-064-R24 | August 14, 2024



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# Highlights

## Background

Every year, U.S. Postal Service employees risk illness and injury while working in extreme hot or cold temperatures. Mail carriers, especially, experience daily weather challenges and when exposed to extreme heat may be at risk of heat stress. Heat stress can result in heat stroke, heat exhaustion, heat cramps, or heat rashes. Employees can also face cold stress while performing their daily duties in cold environments, which can potentially lead to frostbite or hypothermia. Employers must take steps to prevent illnesses, injuries, or fatalities by controlling these hazards in workplaces impacted by extreme temperatures.

## What We Did

Our objective was to assess the Postal Service's safety programs, policies, and procedures for extreme hot and cold temperatures, and applicable controls for training records. We conducted site visits at 12 judgmentally selected facilities and interviewed district human resources personnel, facility managers, and carriers to understand the Postal Service's safety programs, policies, and procedures for extreme hot and cold temperature conditions. In addition, we compared the supplies the Postal Service provided to its carriers to several other agencies and mailing companies.

## What We Found

The Postal Service established cold weather awareness training and a Heat Illness Prevention Program (Heat Program) to educate and help protect carriers from adverse weather related injuries and illnesses. To protect the carriers during extreme hot and cold temperatures, we determined the Postal Service provided more supplies to its carriers compared to the other agencies and mailing companies. However, while we did not find any issues with the cold weather training, we found opportunities exist for the Postal Service to improve the Heat Program. Specifically, we found Heat Program training was not always certified or presented correctly in group settings. In addition, we found weekly safety talks were not always documented to show carriers were provided heat safety-related information. Also, Heat Program safety material was not always posted or available to carriers to promote safety awareness.

## Recommendations and Management's Comments

We made five recommendations to address the opportunities to improve the Heat Program identified in the report. Postal Service management agreed with four recommendations and disagreed with one. Management's comments and our evaluation are at the end of each finding and recommendation. The U.S. Postal Service Office of Inspector General considers management's comments responsive to all recommendations and the corrective actions should resolve the issues identified in the report. See [Appendix C](#) for management's comments in their entirety.

# Transmittal Letter



OFFICE OF INSPECTOR GENERAL  
UNITED STATES POSTAL SERVICE

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August 14, 2024

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

A handwritten signature in black ink, reading "Alan MacMullin", is positioned below the memorandum header.

**FROM:** Alan MacMullin  
Deputy Assistant Inspector General  
for Finance, Pricing & Human Capital

**SUBJECT:** Audit Report – Postal Service's Adverse Weather Condition Procedures  
(Report Number 24-064-R24)

This report presents the results of our audit of Postal Service's Adverse Weather Condition Procedures.

All recommendations require U.S. Postal Service Office of Inspector General (OIG) concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. Recommendations 1, 3, 4, and 5 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. We consider recommendation 2 closed with issuance of this report.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Lazerick Poland, Director, Human Capital Management, or me at 703-248-2100.

Attachment

cc: Postmaster General  
Corporate Audit Response Management  
Secretary of the Board of Governors



# Results

## Introduction/Objective

This report presents the results of our self-initiated audit of the U.S. Postal Service's Adverse Weather Condition Procedures (Project Number 24-064). Our objective was to assess the Postal Service's safety programs, policies, and procedures for extreme hot and cold temperatures, and applicable controls for training records. See [Appendix A](#) for additional information about this audit.

## Background

Every year, Postal Service employees risk illness and injury while working in extreme hot or cold temperatures. Mail carriers, especially, experience daily weather challenges and when exposed to extreme heat may be at risk of heat stress. Heat stress can result in heat stroke, heat exhaustion, heat cramps, or heat rashes. Employees can also face cold stress while performing their daily duties in cold environments, which can potentially lead to frostbite or hypothermia. See [Appendix B](#) for full details on cold stress.

The Occupational Safety and Health Act requires the Postal Service to provide a safe and healthy workplace free of recognized hazards and to follow Occupational Safety and Health Administration (OSHA) standards. Employers must take steps to prevent illnesses, injuries, or fatalities by mitigating hazards in workplaces impacted by extreme temperatures. The Postal Service's responsibilities include providing safety training and proper record keeping.

## Management Responsibilities

Postal Service facility management must be aware of the safety rules and regulations and the rights and responsibilities of their employees. During extreme hot temperatures, Postal Service leadership should implement procedures to ensure facility management provides safe water sources in all facilities and include examinations of water sources in their regular safety inspections. Additionally, Postal Service Headquarters requires facility

“Every year, Postal Service employees risk illness and injury while working in extreme hot or cold temperatures.”

management to provide employees with postcards, stickers in carrier vehicles, and laminated badges promoting heat stress awareness. See Figure 1 for the laminated badge provided to employees.

Figure 1. Signs and Symptoms of Heat-Related Illness



Source: Postal Service 2023 Heat Program.

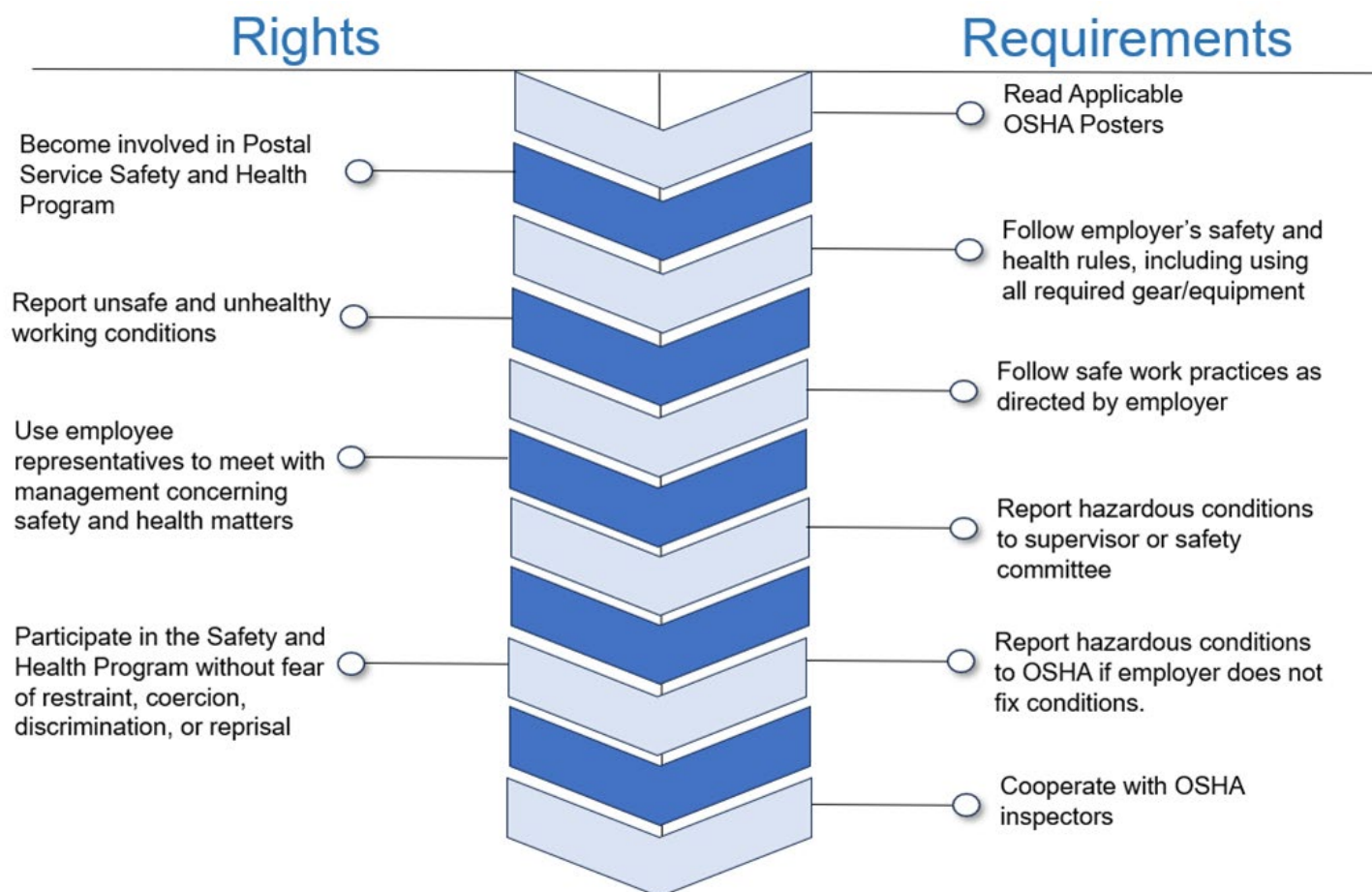
Facility management is also required to inspect Postal Service vehicle fans during all preventive maintenance inspections and perform any necessary repairs. During the annual heat season,<sup>1</sup> facility management should also include Heat Program related conversations with employees, paying additional attention to newly hired employees or those returning from extended absences of seven or more consecutive days, while performing street observations.

### Employee Responsibilities

Employees have certain rights as well as certain requirements regarding the Safety and Health

Program. Employees must follow safe work practices for their jobs and have the right to report unsafe and unhealthy working conditions. Employees should wear proper attire for the weather conditions, gradually build up tolerance to the environment, hydrate frequently, take short breaks in shaded/cool areas on warm days, and monitor physical condition.<sup>2</sup> Additionally, employees working away from a Postal Service facility should immediately call 911 and then their supervisor, if able, when they experience signs or symptoms of heat or cold stress. See Figure 2 for additional information.

**Figure 2. Employee Safety Rights and Requirements**



Source: Handbook EL-801, *Supervisor's Safety Handbook*.

<sup>1</sup> April 1 through October 31.

<sup>2</sup> Monitoring physical condition also includes understanding potential impacts of any prescribed medications.

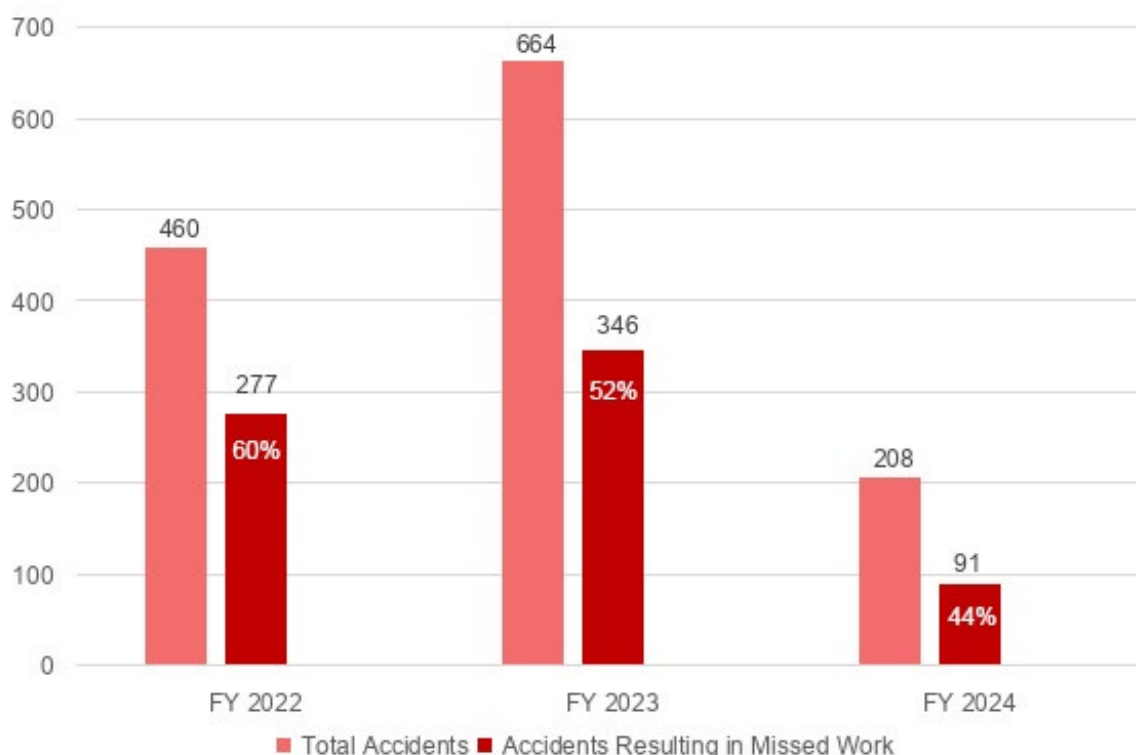
## Heat Stress

The OSHA states employers should create a plan to protect workers from heat-related hazards. The Postal Service implemented a nationwide Heat Illness Prevention Program (Heat Program) in 2018, which runs annually during the heat season. The Heat Program can also be activated at any other time when weather reports issued by the National Weather Service for a particular work location indicate the outdoor heat index temperatures are expected to exceed 80 degrees Fahrenheit during the course of a workday or work shift. The Occupational Safety and Health Review Commission (OSHRC) reviewed the Postal Service's Heat Program and found it to be

adequate. Additionally, OSHRC did not identify any specific improvements to the program.

Facility managers are responsible for the execution of the Heat Program for their employees. During fiscal years (FYs) 2022 through 2024,<sup>3</sup> the Postal Service had 1,332 heat-related accidents. Of the 1,332 total heat-related accidents, 618 (46 percent) accidents did not result in injuries (such as heat cramps or dizziness), while 714 (54 percent) accidents resulted in missed work time and potentially injuries (such as heat exhaustion or heat stroke). See Figure 3 for the Postal Service's heat-related accidents in FYs 2022 through June 2024.

**Figure 3. Heat-Related Accidents in FYs 2022 Through June 2024**



Source: OIG analysis of Postal Service accident data.

<sup>3</sup> As of June 30, 2024.

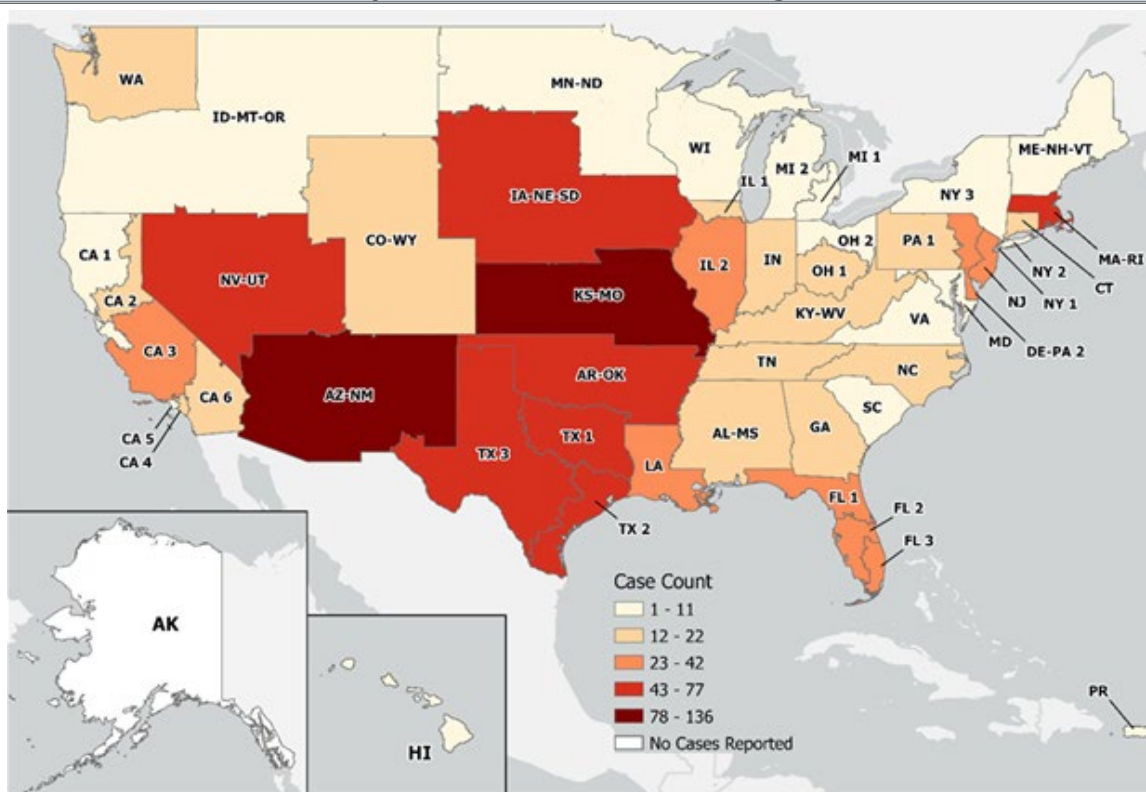
The Kansas – Missouri (KS-MO) District had the most heat-related accidents with 136, an average of one accident per 78 carriers. In addition, the Arizona – New Mexico (AZ-NM) District had the second highest with 118 accidents, one accident per 60 carriers. See Figure 4 for an analysis of the heat-related accidents by district in FYs 2022 through June 2024.

During the heat season, Postal Service management can message carriers concerning issues related to heat exposure and the prevention of heat-related illnesses on their Mobile Delivery Device.<sup>4</sup> The messages generally focus on matters such as proper attire, sufficient hydration, effects of personal medical conditions or medications, how to recognize signs and symptoms of heat-related illnesses, other temperature related concerns, and guidance on how to respond in an emergency.

## Training

Each year, all employees must participate in Heat Program training, which includes watching a video (*Heat Stress Recognition and Prevention*) and answering interactive test questions throughout the video. In addition, employees must attend a mandatory safety talk<sup>5</sup> on heat stress. Facility management and employees can access the Heat Program training in HERO.<sup>6</sup> The purpose of safety talks is to promote safety awareness. The Heat Program training instructs employees on how to recognize the signs and symptoms of heat-related illnesses, the effects of heat on the body, outline the risk factors for heat-related illnesses, and describe the associated treatments for each. The training also explains several techniques and safe work practices that employees can use to prevent heat-related illnesses.

**Figure 4. Heat-Related Accidents by District in FYs 2022 Through June 2024**





Facility management must ensure all employees participate in the Heat Program training annually prior to April 1. Although most employees have individual access to the training in HERO, it is common practice for facility management to conduct the training as a group. When facility management conducts group Heat Program training, they must certify in HERO which employees were present and received the training. When certifying, facility management can select individual employees in HERO or bulk certify their entire facility. Employees who are absent during the group training must complete the Heat Program training prior to returning to street duties during the heat season.

Additionally, before certifying the Heat Program training is complete in HERO, facility management must post the Heat Program policy and Heat Illness poster in their facility, provide Heat Illness Prevention badge cards to all employees, and ensure Heat Illness Prevention stickers are placed in all Postal Service vehicles. In addition to the Heat Program training in HERO, the Postal Service's Occupational Safety and Health team issued guidance that requires facility management to give weekly safety talks during the heat season addressing issues related to heat exposure and prevention of heat-related illnesses. According to the guidance,<sup>7</sup> facility management must electronically certify in HERO they presented the weekly safety talks to their employees.

## Findings Summary

The Postal Service established cold weather awareness training and a Heat Program to educate carriers on how to stay safe during adverse weather and protect them from injuries and illnesses. We determined the Postal Service provided more supplies to its carriers to combat the hot and cold temperature conditions compared to other agencies and mailing companies. However, while we did not find any issues with the cold weather training, we found opportunities exist for the Postal Service to improve the Heat Program. Specifically, we found Heat Program training was not always certified or presented correctly in group settings. In addition, we found weekly safety talks were not always documented to show carriers were provided heat safety-related information. Also, Heat Program safety material was not always posted or available to carriers to promote safety awareness.

“However, while we did not find any issues with the cold weather training, we found opportunities exist for the Postal Service to improve the Heat Program.”

<sup>7</sup> Heat Illness Prevention Program, FY 2023.

## Finding #1: Proactive Measures for Adverse Weather

The Postal Service established a Heat Program to protect employees from heat-related illnesses, and established training for cold weather exposure, both of which are intended to educate employees on how to stay safe during adverse weather. The Postal Service also provides its carriers with supplies to ensure they have the resources available to remain safe during extreme hot and cold temperatures. During extreme hot temperatures, facility management provides the carriers with water, ice pops, cooling towels, additional breaks, and electrolyte packets to add to their water bottles. During extreme cold temperatures, facility management provides the carriers with hand warmers and headwear, and carriers are also provided heat from their Postal Service vehicles.

We gained an independent perspective about the Postal Service's management of extreme hot and cold temperature conditions policies and procedures by benchmarking against several other agencies and mailing companies. We found the Postal Service's management of extreme hot and cold temperature conditions was similar to other agencies and mailing companies. Like the Postal Service, we found the other agencies and companies provide employees with annual training on extreme temperature conditions. The Postal Service uses in-person

training, online training, and daily briefings similar to the agencies and companies we benchmarked. Finally, we determined the Postal Service provided more supplies to its carriers to combat the hot and cold temperature conditions compared to the other agencies and mailing companies.

In addition, the OSHA guidance related to cold stress is based entirely on awareness training. OSHA does not require employers to outline training in a formalized program. The Postal Service's Occupational Safety and Health team provides awareness training for cold weather and winter related exposures in HERO. Additionally, the Postal Service mails postcards to all employees to provide information on cold stresses. Therefore, we did not identify any issues related to cold weather awareness and will not offer any recommendations in relation to this finding.

### Postal Service Response

Management agreed with this finding.

### OIG Evaluation

Although this finding did not contain any recommendations, the OIG acknowledges management's agreement to the finding.

# Finding #2: Group Training Certification Process

Facility management did not always accurately certify or present the Heat Program training when given in group settings. Specifically, facility management incorrectly certified Heat Program training completion in HERO for absent employees and presented alternative versions of the heat safety video.

“Facility management did not always accurately certify or present the Heat Program training when given in group settings.”

During FY 2023, facility management nationwide certified 98 percent of carriers received the Heat Program training; however, during site visits, we found instances where facility management certified carriers received the training using the bulk certification option without verifying employees were present. For example, during FY 2023, one facility manager in the Louisiana District certified completion of the Heat Program training for 39 carriers; however, a Time and Attendance Collection System<sup>8</sup> report<sup>9</sup> identified 17 of 39 (44 percent) carriers as not working on the date of certification.

Further, one facility manager in the KS-MO District certified completion for 137 carriers, but the same report identified 51 of 137 (37 percent) carriers as not working on the date of certification. Additionally, 16 of 48 (33 percent) carriers interviewed stated they did not watch the *Heat Stress Recognition and Prevention* training video in the past year. However, FY 2023 HERO training records indicated that facility management certified 10 of the 16 (63 percent) carriers participated in the training.

Additionally, two of four (50 percent) districts did not follow Heat Program policy<sup>10</sup> when presenting the training video. We found instances where facility management played a pre-recorded video where the answers to the questions were pre-selected, and some facilities played a condensed version of the video without the interactive questions and answers. See Table 1 for additional details by district.

Table 1. Training Video Discrepancies by District

District	Facilities Visited	Played Heat Stress Recognition and Prevention <sup>11</sup> Video	Played Pre-Recorded Video	Played Condensed Video
AZ-NM	3	0	0	3
Massachusetts-Rhode Island (MA-RI)	3	0	3	0
Louisiana	3	3	0	0
KS-MO	3	3	0	0
Total	12	6	3	3

Source: OIG results identified during site visits.

8 A system used for calculating employee clock rings, manually entering weekly time and reporting time and attendance data.  
9 *Employees On The Clock* - lists all employees currently working at the specified time.  
10 *Heat Illness Prevention Program*, FY 2023.  
11 Postal Service Headquarters designed Heat Program training video in HERO.

The purpose of the Heat Program training is to discuss the different types of heat-related illnesses and explain the symptoms of each, as well as how to avoid them. The video includes check-point questions throughout, followed by a final course test at the end of the video. The interactive questions are intended to help carriers be able to recognize the signs and symptoms of heat stress, first-aid treatments of heat-related illnesses, and preventative measures for minimizing heat stress. When presented in a group setting, facility management can certify the Heat Program training as an “Express Class” in HERO<sup>12</sup> and must record any absent employees as “unavailable.”<sup>13</sup> The Postal Service’s Occupational Safety and Health team monitors the completion of the Heat Program training in HERO by sending out weekly reports. The Occupational Safety and Health team also monitors employees listed as unavailable in HERO throughout the year and conducts a comparison to Time and Attendance Collection System clock rings.

These training issues occurred because no controls are in place to ensure facility management accurately certifies the Heat Program training in HERO when given in a group setting. Providing the training in a group setting may be the only option for some facilities since not all employees have access to the online training in HERO and some facilities do not have computer access for carriers to take the training on their own. In addition, the Postal Service does not require carriers to provide their signatures for any training received due to a nationally agreed upon settlement.<sup>14</sup> Lastly, some facility managers were not aware of the proper Express Class certification process and used the bulk certify option without unselecting employees who were not present because it was quicker.

“When controls or processes over safety training are inadequate, the integrity and accuracy of facility management certifications are at risk.”

For example, a facility manager in the Louisiana District explained he certifies the Heat Program training in HERO by using bulk certify for the entire facility even if employees are absent. The manager was aware he had the ability to certify the training by individual employee but placed more emphasis on retaining physical records since he believed this was more accurate. Another facility manager in the KS-MO District stated in prior years, she used

the bulk certify option in HERO to certify the training for employees. She was unaware of the option to individually certify employees until FY 2023. However, now she individually selects the employees that were present when certifying training in HERO.

Additionally, facility management presented pre-recorded or condensed videos of the Heat Program training to employees due to the pressure of completing the training by the April 1 deadline and to ensure carriers could

start their delivery routes on time. For example, the MA-RI District training department sends facility management a pre-recorded video via email to play on the workroom floor. The pre-recorded video was a district initiative and was not something derived from the Occupational Safety and Health team. In the AZ-NM District, the Western Pacific Area Employee Development team provides a link to the Heat Program video. It is a condensed version of the video found in HERO that does not include the interactive questions.

When controls or processes over safety training are inadequate, the integrity and accuracy of facility management certifications are at risk. Providing the proper heat safety-related training to carriers, as well as verifying that all carriers receive the required training, will help reduce the risk of heat-related injuries or illnesses. Heat-related injuries or illnesses

<sup>12</sup> HERO How To: Give Credit via Express Class.

<sup>13</sup> These are employees who are out on extended leave, such as for military obligations or medical reasons.

<sup>14</sup> Postal Service labor union class action lawsuit.



cause a strain on the human body and could worsen health risks from chronic conditions, such as cardiovascular, mental, respiratory and diabetes related conditions.

#### Recommendation #1

We recommend the **Vice President, Human Resources**, develop and implement a process to verify only employees who are present during the Heat Illness Prevention Program training are certified using the bulk certification option.

#### Recommendation #2

We recommend the **Vice President, Human Resources**, assess the feasibility of leveraging technology, such as the Mobile Delivery Device, to allow carriers to individually certify completion of the required Heat Illness Prevention Program training.

#### Recommendation #3

We recommend the **Vice President, Human Resources**, communicate expectations to facility management for conducting the required Heat Illness Prevention Program training video in group settings to promote participation.

#### Postal Service Response

Management agreed with this finding and recommendations 1 and 3 but disagreed with recommendation 2.

Regarding recommendation 1, management stated standard work instructions, to include reports and other data visualizations, will be developed to identify training conducted for employees who are not in attendance when bulk training is entered. The target implementation date is March 31, 2025.

Regarding recommendation 2, management stated the Postal Service has explored opportunities to leverage Mobile Delivery Device technology as well as other technology solutions. They stated due to the varying ages and capabilities and costs, it is not currently feasible to push the training to these devices.

Finally, management stated the current training is too large and would require shortening the training provided and removing the interactive portion of the knowledge test. In subsequent communications, the Postal Service affirmed they explored technology, such as the Mobile Delivery Device, to enhance the heat safety training and certification, but determined it was not feasible. They further stated the new heat standard proposed by OSHA could result in potential changes to the heat safety training in FY 2025 which may not require the annual training and certification in HERO.

Regarding recommendation 3, management stated standard work instructions for using media (other than the online HERO course) for presenting heat stress recognition training will be developed and communicated. The target implementation date is December 31, 2024.

#### OIG Evaluation

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

Regarding recommendation 2, although the Postal Service disagreed with the recommendation, we consider their actions aligned with the intent of the recommendation. We consider the actions taken as responsive and will close the recommendation with issuance of the report.

## Finding #3: Weekly Safety Talk Records Retention

Facility management did not always document weekly heat-related safety talks or certify the safety talks were conducted in HERO. During site visits, we found only seven of 12 (58 percent) facilities retained copies of the weekly heat-related safety talks. All three facilities visited in the KS-MO District retained copies. Two of three facilities in the AZ-NM District retained copies, while only one facility in both the Louisiana and MA-RI Districts retained copies. Further, none of the 12 facilities certified any of the weekly heat-related safety talks in HERO to document they conducted the safety talks.

The Heat Program policy requires weekly heat-related safety talks between April 1 and October 31 each year addressing issues related to heat exposure and prevention of heat-related illnesses. The policy states facility management should document these safety talks in HERO and certify completion for all employees.<sup>15</sup> Facility management is also required keep a record of all safety talks on file at the facility for three years.<sup>16</sup>

This issue occurred because facility management did not dedicate time to follow prescribed procedures for retaining weekly heat-related safety talks, as the priority was to get the mail delivered. Additionally, facility management did not certify weekly heat-related safety talks in HERO because of the confusion caused by the conflicting wording in the policy. Further, the policy did not align with Postal Service Occupational Safety and Health management expectations of the Heat Program. During the audit, Postal Service Occupational Safety and Health management clarified that facility management should conduct weekly safety talks, but they are not required to certify the weekly safety talks in HERO. District management confirmed the weekly safety talk documentation should be retained locally at the facility. While district management provides the facilities with instructions and guidance related to providing and maintaining safety talk records, they

do not ensure compliance. Facility management is responsible for implementing established policies and ensuring compliance for their specific facility.

Documenting the weekly safety talks helps demonstrate facility management's commitment to keeping carriers safe during the heat season. Providing this vital safety information to carriers helps them to identify common signs of heat-related illnesses and appropriate steps to stay safe while delivering the mail.

### Recommendation #4

We recommend the **Vice President, Human Resources**, review the Heat Illness Prevention Program policy statement for uploading weekly heat-related safety talks in HERO and revise, as appropriate, to align with expectations.

### Postal Service Response

Management agreed with this finding and recommendation 4, stating when the FY 2025 Heat Illness Prevention Program is communicated to the field, references to documenting weekly safety talks will be removed. The target implementation date is December 31, 2024.

### OIG Evaluation

The OIG considers management's comments responsive to recommendation 4 and corrective actions should resolve the issues identified in the report.

<sup>15</sup> Heat Illness Prevention Program, FY 2023.

<sup>16</sup> Handbook EL-801, *Supervisor's Safety Handbook*, Section 1-7, dated July 2020.

# Finding #4: Heat Program Safety Awareness

Facility management did not complete all required Heat Program tasks to promote safety awareness. Specifically, facility management did not post the Heat Program policy or the Heat Illness poster in their facility or provide carriers with Heat Illness Prevention badges.

During our 12 site visits, we found 10 of 12 (83 percent) facilities did not display the Heat Program policy, while four of 12 (33 percent) facilities did not display the Heat Illness poster to promote safety awareness. Additionally, we found 280 of 427 (66 percent) carriers observed did not have a Heat Illness Prevention badge in their possession. The KS-MO District had the fewest carriers without a badge, with 42 of 118 (36 percent), while the Louisiana District had the most carriers without a badge, with 61 of 70 (87 percent). Possession of a Heat Illness Prevention badge is important for carriers to quickly identify symptoms of heat-related illnesses.

We randomly interviewed 48 carriers, and 16 (33 percent) stated facility management never provided them with a Heat Illness Prevention badge. The AZ-NM District had the most carriers who stated they did not receive a badge, with six of 12 (50 percent), while the MA-RI District had the fewest carriers who stated they did not receive a badge, with two of 12 (17 percent).

See Table 2 for additional details by district. Facility management should be providing Heat Illness Prevention badges to all carriers prior to the heat season.

The Postal Service’s Heat Program requires facility management to post the Heat Program policy and the Heat Illness poster in their facility. The Heat Program policy provides the carriers with comprehensive details of the Heat Program and with information they can use to remain safe during hot weather. The Heat Illness poster provides visual aids illustrating the various symptoms of, and proper first aid responses to, heat-related illnesses. Facility management must provide carriers Heat Illness Prevention badges each year prior to April 1.<sup>17</sup> The Heat Illness Prevention badges assist carriers in recognizing the signs and symptoms of heat-related illnesses. Mail carriers, who primarily work outside in various weather elements, may be more at risk of heat-related illnesses. The badge provides visual aids illustrating the various symptoms of, and proper first aid responses to, heat-related illnesses. Mail carriers can use these visual aids to assist in identifying common signs of heat-related illnesses and take appropriate actions to help guide decisions to seek medical attention.

Table 2. Heat Illness Prevention Badges Provided by District

District	Total Carriers Interviewed	Total Carriers Not Provided with Badge	Percentage Without Badge	Heat Program Period Active During Site Visit
AZ-NM	12	6	50%	No
Louisiana	12	4	33%	No
KS-MO	12	4	33%	Yes
MA-RI	12	2	17%	No
Total	48	16	33%	

Source: OIG results identified during site visits.

<sup>17</sup> Heat Illness Prevention Program, FY 2023.

Facility management did not post the Heat Program policy or Heat Illness poster due to competing priorities and not being fully aware of the Heat Program requirements. Additionally, they did not provide Heat Illness Prevention badges to all carriers due to prioritization of daily management responsibilities.

Providing proper Heat Program awareness in facilities gives carriers relevant information on heat safety to help prevent heat-related injuries or illnesses. As a result of not completing all tasks included in the Heat Program, there is an increased risk of heat-related illnesses and injuries.

#### Recommendation #5

We recommend the **Vice President, Human Resources**, reiterate guidance on the required tasks to complete before certifying the Heat Illness Prevention Program as complete in HERO.

#### Postal Service Response

Management agreed with this finding and recommendation 5, stating each year as the Heat Illness Prevention Program is deployed, notice is sent to all field leadership that outlines the requirements of the program and their responsibilities. The target implementation date is December 31, 2024.

#### OIG Evaluation

The OIG considers management's comments responsive to recommendation 5 and corrective actions should resolve the issues identified in the report.

#### Looking Forward

The Postal Service is committed to fostering safety as a core value throughout the organization. As part of the Postal Service's 10-year strategic plan, *Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence*,<sup>18</sup> and to enhance employee safety and well-being, the Postal Service continues to enhance its safety

programs to foster an environment in which safety is prioritized in all aspects. The Postal Service's safety philosophy<sup>19</sup> is that:

- Any injury can be prevented.
- Management is responsible and accountable for the prevention of accidents and control of resultant losses.
- It is possible to safeguard all operating exposures that can result in accidents and injuries, but it is better to eliminate the sources of danger.
- They must train all employees in proper work procedures and must be educated to work safely and to understand that they are responsible for doing so.
- Preventing personal injuries on and off the job is good business practice. Injuries cost money, reduce efficiency, and cause human suffering.

Over the past two years, the Postal Service has worked with the unions and management associations to address shared goals of workplace safety. Currently, OSHA plans on proposing a standard that may require employers to protect an estimated 50 million people exposed to high temperatures while they work. Potentially setting clearer standards for employers, and currently as proposed, would include two heat index thresholds, one at 80 degrees Fahrenheit and the other at 90 degrees Fahrenheit, for worker protections in both outdoor and indoor settings. However, there is no proposed implementation date because OSHA is still reviewing.

<sup>18</sup> Dated March 23, 2021.

<sup>19</sup> Handbook EL-801, *Supervisor's Safety Handbook*, dated July 2020.



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# Appendix A: Additional Information

## Scope and Methodology

The scope of our audit was the Postal Service’s safety programs, policies, and procedures for extreme hot and cold temperature conditions and related injuries and illnesses for city and rural carriers during FYs 2022 through June 2024. We assessed the effectiveness of these programs, policies, and procedures, including determining employees’ compliance with annual training requirements and reviewing the number of reported injuries or illnesses related to heat and cold stress. We also determined if adequate system controls were in place to prevent erroneous entries of information to ensure accurate record keeping.

- We conducted site visits at the Atlantic, Central, Southern, and Western-Pacific Areas using the following methodology:
- We judgmentally performed visits at the district office to talk with human resource personnel responsible for carrier safety.
  - We also visited retail and delivery facilities in selected districts to talk with facility management and carriers regarding extreme hot and cold temperature conditions. In total, we visited 12 facilities. See Table 3 for facilities visited during the audit.

Table 3. Fieldwork Site Visits

Area <sup>20</sup>	District	Facility
Atlantic	Massachusetts – Rhode Island	Malden Branch
		Medford Branch
		Roxbury Station
Central	Kansas – Missouri	Maryland Heights Branch
		Saint Charles South Post Office
		Florissant Post Office
Southern	Louisiana	Woodlawn Station
		Commerce Park Station
		Scotlandville Station
Western-Pacific	Arizona – New Mexico	Daisy Mountain Station
		Maryvale Station
		South Mountain Station

Source: Site visits based on OIG’s analysis of Postal Service data.

20 Retail and Delivery is split into four areas (Atlantic, Central, Southern, and Western-Pacific) and has 50 districts.

To accomplish our objective, we:

- Identified, reviewed, and documented the Postal Service's policies regarding extreme hot and cold temperature conditions.
- Determined if there is any specific extreme temperature guidance when temperatures rise or fall to a specific level.
- Identified the responsibilities of the Occupational Safety and Health team.
- Obtained accident log data during FYs 2022 through 2024<sup>21</sup> for all accidents and injuries associated with extreme hot and cold temperature conditions.
- Obtained training data during 2023 for required trainings associated with extreme hot and cold temperature conditions.
- Determined the district's process for selecting stand-up talks for extreme hot and cold temperature conditions.
- Determined facility management's process for conducting and documenting safety talks.
- Interviewed carriers to obtain information about extreme hot and cold temperature conditions.
- Sent out a benchmarking survey and received responses from management in one federal agency and six mailing companies to benchmark extreme hot and cold temperature conditions policies and procedures.

We conducted this performance audit from January through August 2024 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 23, 2024, and included their comments where appropriate.

In planning and conducting the audit, we obtained an understanding of extreme hot and cold temperature conditions internal control structure to help determine the nature, timing, and extent of our audit procedures. We reviewed the management controls for overseeing the program and mitigating associated risks. Additionally, we assessed the internal control components and underlying principles, and we determined that the following five components were significant to our audit objective:

- Control environment
- Risk assessment
- Control activities
- Information and communication
- Monitoring

We developed audit work to ensure that we assessed these controls. Based on the work performed, we identified internal control deficiencies related to the control activities and risk assessment that were significant within the context of our objectives. Our recommendations, if implemented, should correct the weaknesses we identified.

We assessed the reliability of the accident data from FY 2022 through June 2024, and FY 2023 Heat Program training data by testing the accuracy and validity of the data. We compared the data provided by the Postal Service to source documents, assessed for validity, and in addition, we interviewed knowledgeable Postal Service officials about the data. We determined 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.

<sup>21</sup> As of June 30, 2024.

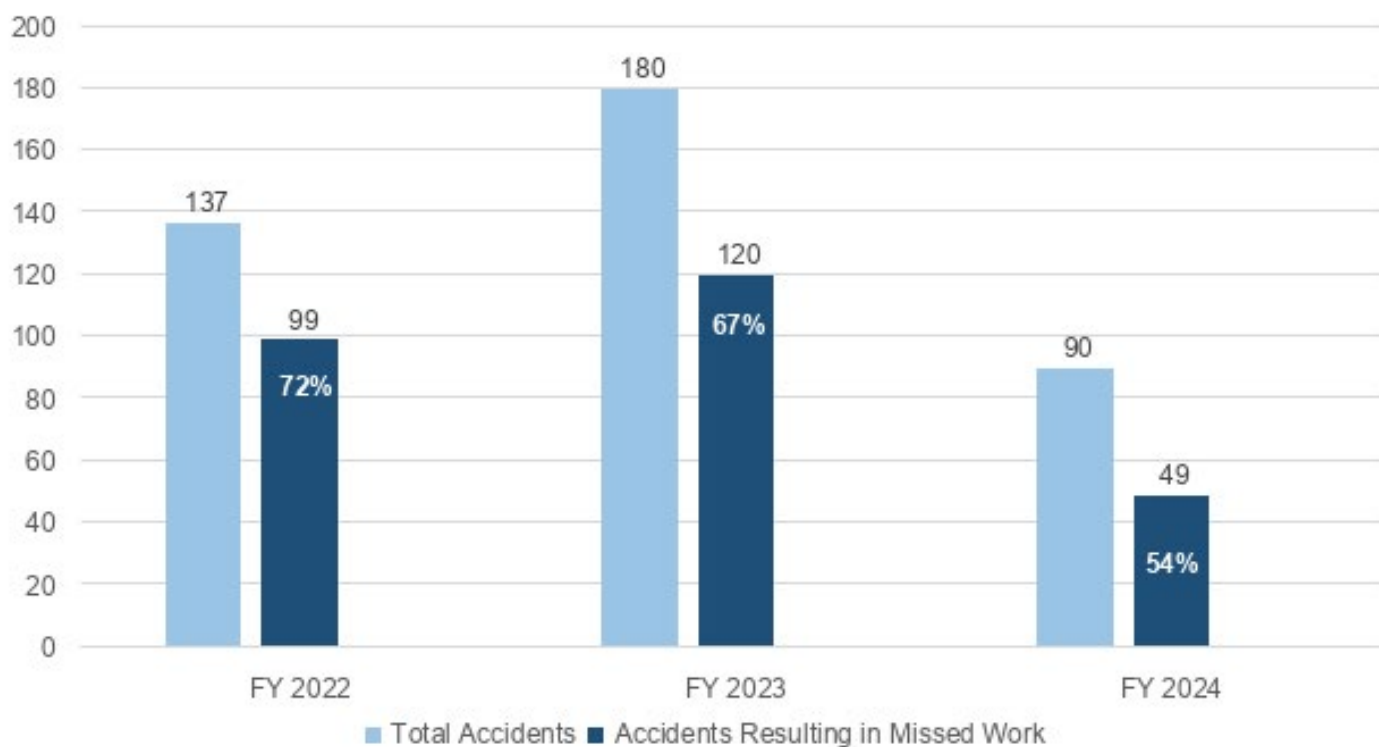
## Appendix B: Cold Stress

Postal Service employees can face cold stress while performing their daily duties. Cold stress occurs by decreasing skin temperature, and eventually, the internal body temperature. Cold stress can cause illness, injury, or become life threatening. The most common illnesses and injuries of cold stress are frostbite and hypothermia. It is important for Postal Service employees to understand common cold temperature illnesses and injuries and receive proper training prior to performing any work activities in the elements. The Postal Service provides annual guidance to their employees through policies and trainings that include identifying symptoms

of cold stress, understanding proper attire during cold weather conditions, and monitoring physical conditions.

From FYs 2022 through 2024,<sup>22</sup> the Postal Service had 407 cold-related accidents. Of the 407 total cold-related accidents, 139 (34 percent) accidents did not result in injuries (such as numbness in hands and feet), while 268 (66 percent) accidents resulted in missed work time and potentially injuries (such as frostbite and hypothermia.) See Figure 5 for the Postal Service's cold-related accidents in FYs 2022 through June 2024.

**Figure 5. Cold-Related Accidents in FYs 2022 Through June 2024**



Source: OIG analysis of Postal Service accident data.

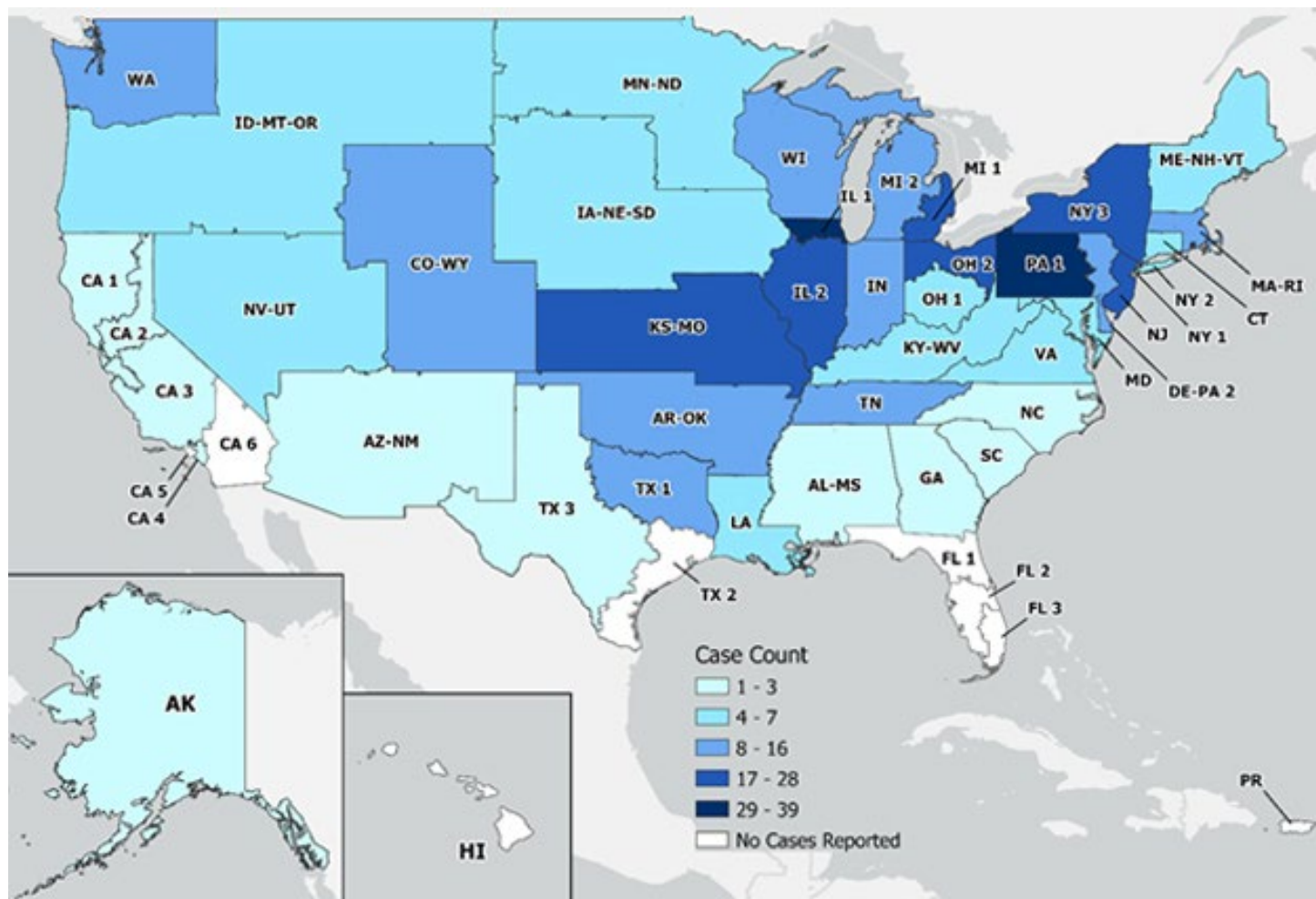
<sup>22</sup> As of June 30, 2024.



The Illinois 1 District had the most cold-related accidents with 39 (one accident per 203 carriers), followed by the Pennsylvania 1 District with 33 (one accident per 220 carriers) and the Michigan 1 District

with 28 (one accident per 253 carriers). See Figure 6 for an analysis of the cold-related accidents by district in FYs 2022 through June 2024.

**Figure 6. Cold-Related Accidents by District in FYs 2022 Through June 2024**



Source: OIG analysis of Postal Service accident data.

# Appendix C: Management's Comments



July 29, 2024

JOHN CIHOTA  
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Postal Service's Adverse Weather Condition Procedures (24-064-DRAFT)

Thank you for providing the Postal Service with an opportunity to review and comment on the findings and recommendations contained in the draft audit report, *Postal Service's Adverse Weather Condition Procedures*.

Management agrees with each OIG finding(s) and has not identified any factual inaccuracies in the report. However, it should be noted that the representation of heat related accident statistics presented on Page 4 and Figure 3 is not accurate. The data provided by the USPS and used in this section did not specify that incidents resulted in a diagnosed medical condition and disability from work. The data was presented as either OSHA recordable or not. An OSHA recordable incident is one where the employee required medical care, days away from work or restricted duty.

Following are our comments on each of the five recommendations.

Recommendation 1:

We recommend the Vice President, Human Resources, develop and implement a process to verify only employees who are present during the Heat Illness Prevention Program training are certified using the bulk certification option.

Management Response/Action Plan:

Management agrees with this recommendation. Standard work instructions, to include reports and other data visualizations will be developed to identify training conducted for employees who are not in attendance when bulk training is entered.

Target Implementation Date: March 31, 2025

Responsible Official: Sr. Director, Occupational Safety and Health

Recommendation 2:

We recommend the Vice President, Human Resources, assess the feasibility of leveraging technology, such as the Mobile Delivery Device, to allow carriers to individually certify completion of the required Heat Illness Prevention Program training.

Management Response/Action Plan:

Management disagrees with this recommendation.

The USPS has explored opportunities to leverage Mobile Delivery Device technology as well as other technology solutions. Due to the varying ages, capabilities and costs, it is not currently feasible to push the training to these devices or through some other means. The current training is too large for either version which would require shortening the training provided and remove the interactive portion of the knowledge test.

Target Implementation Date: N/A

Responsible Official: N/A

Recommendation 3:

We recommend the Vice President, Human Resources, communicate expectations to facility management for conducting the required Heat Illness Prevention training video in group settings to promote participation.

Management Response/Action Plan:

Management agrees with this recommendation. Standard work instructions for using media (other than the online HERO course) for presenting heat stress recognition training.

Target Implementation Date: December 31, 2024

Responsible Official: Sr. Director, Occupational Safety and Health

Recommendation 4:

We recommend the Vice President, Human Resources, review the Heat Illness Prevention Program policy statement for uploading weekly heat-related safety talks in HERO and revise, as appropriate, to align with expectations.

Management Response/Action Plan:

Management agrees with this recommendation.

When the FY25 Heat Illness Prevention Program is communicated to the field, references to documenting weekly stand-up talks will be removed.

Target Implementation Date: December 31, 2024

Responsible Official: Sr. Director, Occupational Safety and Health



Recommendation 5:

We recommend the Vice President, Human Resources, reiterate guidance on the required tasks to complete before certifying the Heat Illness Prevention Program as complete in HERO.

Management Response/Action Plan:

Management agrees with this recommendation. Each year as the Heat Illness Prevention Program is deployed, notice is sent to all field leadership that outlines the requirements of the Program and their responsibilities.

Target Implementation Date: December 31, 2024

Responsible Official: Sr. Director, Occupational Safety and Health



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Simon M. Storey  
Vice President, Human Resources

*cc: Corporate Audit & Response Management*



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UNITED STATES POSTAL SERVICE



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