



OFFICE OF INSPECTOR GENERAL

UNITED STATES POSTAL SERVICE

Security Clearances for Postal Service Contract Drivers

Audit Report

Report Number
HR-AR-15-001

November 20, 2014





OFFICE OF INSPECTOR GENERAL

UNITED STATES POSTAL SERVICE

Highlights

Based on our nationwide projection, 4,502 (31 percent) of at least 14,524 contract drivers did not have a valid security clearance. Of the 4,502 contract drivers, security clearances for 2,566 (57 percent) had expired.

Background

The U.S. Postal Service is obligated to maintain the security of the mail and preserve the public's trust. It must also uphold public confidence in the reliability and integrity of all Postal Service personnel, including contract drivers who handle and transport mail. The security clearance process is designed to prevent ineligible or unsuitable applicants from having access to the mail, Postal Service assets, and facilities.

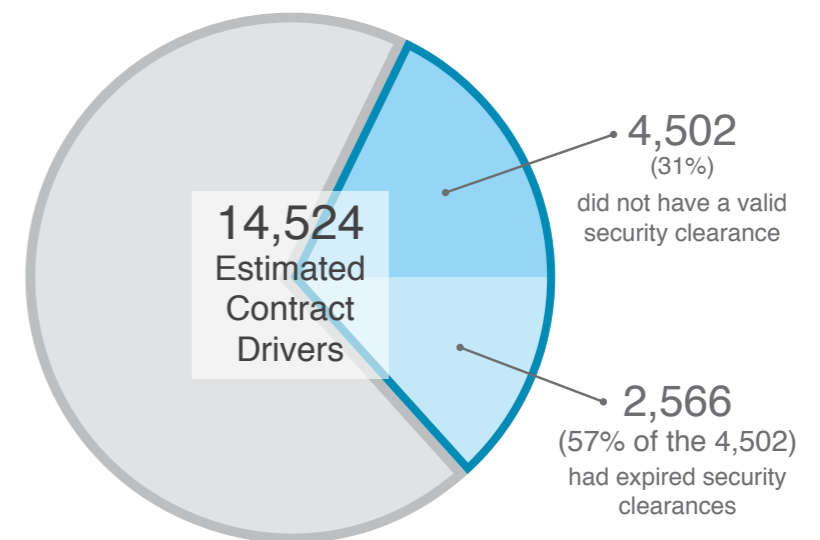
Postal Service policy requires contract drivers to obtain non-sensitive security clearances, which the Postal Inspection Service Security Investigations Service Center must renew every 4 years. In fiscal year 2013, this group received 17,892 security clearance applications for contract drivers. Contracting officers designate administrative officials to obtain clearance documents from contract drivers, submit them to the Postal Inspection Service, and ensure that drivers have the appropriate clearance.

Our objectives were to determine whether Postal Service officials issued security clearances to contract drivers in accordance with policy, and assess controls over the contract driver security clearance process.

What The OIG Found

Postal Service personnel, including contract drivers, did not always comply with security clearance requirements, and controls over the process were not adequate. Based on our nationwide projection, 4,502 (31 percent) of at least 14,524 contract drivers did not have a valid security clearance. Of the 4,502 contract drivers, security clearances for 2,566 (57 percent) had expired.

Estimated Number of Contract Drivers Without a Valid Security Clearance



This occurred because management did not have sufficient controls in place to track and monitor clearances for contract drivers. In addition, management did not sufficiently oversee or otherwise ensure responsible personnel, including contract drivers, complied with clearance requirements. Further, management did not properly train personnel to obtain screening information from contract drivers. As a result, there are increased safety and security risks to the public, mail, and assets, which could negatively impact the Postal Service's brand.

What The OIG Recommended

We recommended management establish formal procedures to track and monitor security clearances and notify appropriate personnel when clearances are not renewed. We also recommended management establish mandatory training requirements and a formal oversight process for contracting officers to validate contract drivers have security clearances when renewing contracts.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE


November 20, 2014

MEMORANDUM FOR: GUY J. COTTRELL
CHIEF POSTAL INSPECTOR

SUSAN M. BROWNELL
VICE PRESIDENT, SUPPLY MANAGEMENT

DAVID E. WILLIAMS, JR.
VICE PRESIDENT, NETWORK OPERATIONS

EDWARD F. PHELAN, JR.
VICE PRESIDENT, DELIVERY OPERATIONS

E-Signed by Janet Sorensen
VERIFY authenticity with eSign Desktop


FROM: Janet M. Sorensen
Deputy Assistant Inspector General
for Revenue and Resources

SUBJECT: Audit Report – Security Clearances for Postal Service
Contract Drivers (Report Number HR-AR-15-001)

This report presents the results of our audit of Security Clearances for U.S. Postal Service Contract Drivers (Project Number 14YG008HR000).

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

Attachment

cc: Corporate Audit and Response Management

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Findings

Introduction

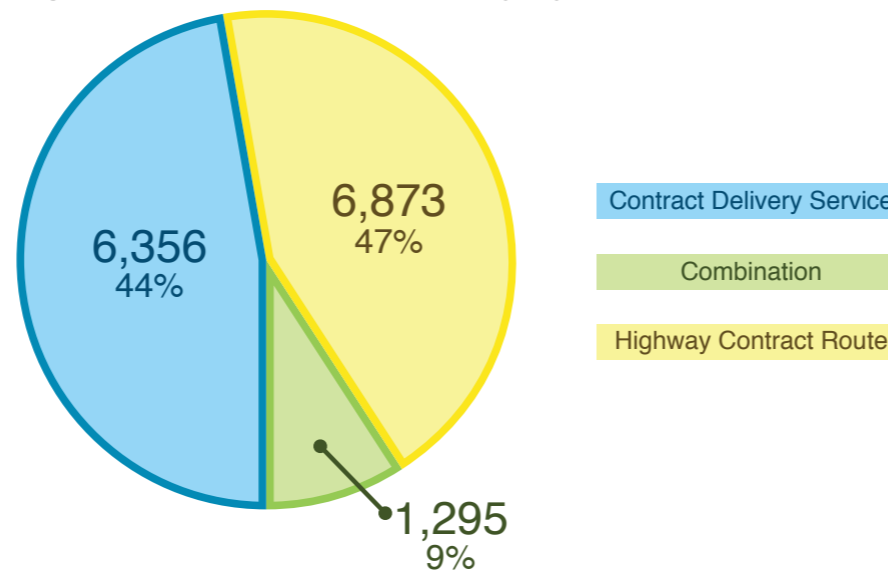
This report presents the results of our self-initiated audit of Security Clearances for U.S. Postal Service Contract Drivers (Project Number 14YG008HR000). Our objectives were to determine whether Postal Service officials issued security clearances to contract drivers in accordance with policy and assess controls over the contract driver security clearance process. See [Appendix A](#) for additional information about this audit.

The Postal Service is obligated to maintain the security of the mail and preserve the public's trust. It must also ensure the public is confident in the reliability and integrity of Postal Service personnel, including contractors. The Postal Service must carefully screen its potential employees to make sure their conduct will reflect favorably on the organization.

The chief postal inspector or a designee is responsible for the adjudication of security clearances. If an individual needs a security clearance, the type granted will depend on the sensitivity of the individual's Postal Service position. The Postal Inspection Service's Security Investigations Service Center (SISC) oversees the security clearance process for regular and contract Postal Service personnel. See [Appendix B](#) for additional information on the security clearance process for contract drivers.

As of March 3, 2014, there were 14,524 contract delivery service¹ (CDS), combination route,² and highway contract route³ (HCR) contracts (see Figure 1). Each contract could have one or more drivers. All drivers must obtain a non-sensitive clearance because they handle mail and have access to Postal Service facilities. The SISC in Memphis, TN, issues non-sensitive clearances, which must be renewed every 4 years. About 4,200 administrative officials (AO) were designated by five contracting officers (CO),⁴ who report to Supply Management, to supervise and administer mail transportation contracts and related services by suppliers. The AOs are responsible for obtaining clearance documents from contract drivers and submitting them to the SISC, as well as ensuring drivers have the appropriate clearance.

Figure 1: Contract Routes by Type



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

- 1 A route that delivers house-to-house and reports to a facility, similar to a rural carrier.
- 2 A route that provides both HCR and CDS service.
- 3 A route that provides for the transportation of mail between postal facilities.
- 4 A Postal Service official who solicits, awards, manages, and terminates contracts.

Postal Service personnel, including contract drivers, did not always comply with security clearance requirements, and controls over the process were not adequate.



Conclusion

Postal Service personnel, including contract drivers, did not always comply with security clearance requirements, and controls over the process were not adequate. Specifically, contract drivers did not always have a valid security clearance and were not always re-screened every 4 years, as required. Insufficient controls over contract driver security clearances increase the safety and security risks to Postal Service personnel, customers, mail, and assets, which could negatively impact the Postal Service's brand.

Security Clearances

Postal Service personnel, including contract drivers, did not always comply with security clearance requirements, and controls over the process were not adequate.⁵ Specifically, of at least 14,524 contract drivers, 4,502 (31 percent) did not have a valid security clearance. Of the 4,502 contract drivers, security clearances for 2,566 (57 percent) had expired (see Figure 2). In one instance, a contract driver had his clearance rescinded in September 2010 but he continued to work until September 2011.

Further, many contracts were renewed and some were renewed multiple times even though drivers were not in compliance with security clearance requirements or had never obtained the proper clearance. Finally, of 14,524 contract driver security clearance files, 5,664 (39 percent) were either not maintained at all or did not contain the required documentation.

See [Appendix C](#) for additional information regarding security clearance deficiencies and [Appendix D](#) for additional information regarding our nationwide projection.

Lastly, we judgmentally selected and reviewed 157⁶ contract driver badges and found 51 (33 percent) with expiration dates that did not match security clearance expiration dates. Badge expiration dates for contract drivers must coincide with security clearance expiration dates.

According to Postal Service policy⁷ and contract terms, contract drivers must obtain a non-sensitive clearance, which must be renewed every 4 years. The CO plays an essential role in ensuring the Postal Service and suppliers comply with contract terms and conditions. The AO is responsible directly to the CO in administering the contracts so the Postal Service receives the best possible service and contract performance. According to contracting officials, the AOs are supposed to ensure contract drivers have the appropriate security clearance. In addition, the AOs must maintain security clearance files, including Postal Service Form 2025, Contract Personnel Questionnaire and notification from the SISC stating that it granted the security clearance. The deficiencies we identified occurred for the following reasons:

- Management did not have sufficient controls, such as procedures for tracking and monitoring clearances and ensuring that contract drivers were obtaining security clearances. [REDACTED]
- There are about 4,200 AOs responsible for ensuring contract drivers have the appropriate security clearances; however, neither the Postal Service nor the Postal Inspection Service provided sufficient oversight or had controls in place to ensure the AOs and drivers complied with security clearance policies and procedures.

⁵ Based on our analysis, we projected nationwide security clearance deficiencies. These conservative estimates are based on the assumption that each of the 14,524 contracts has at least one contract driver who should obtain a security clearance.

⁶ We judgmentally reviewed badge information available in the security clearance files in the districts we visited and it is not a part of our nationwide projection.

⁷ *Management Instruction PO-530-2009-4*, dated September 2009.

[REDACTED]

We reviewed training records for 88 Postal Service personnel in six districts and found that 83 of them (94 percent) had no training regarding the security clearance process for contract drivers.

■ There were no mandatory training requirements and Postal Service personnel were not properly trained to obtain screening information from contract drivers and verify employment eligibility. We reviewed training records for 88 Postal Service personnel⁸ in six districts and found that 83 of them (94 percent) had no training regarding the security clearance process for contract drivers.

As a result, there are increased safety and security risks to the public, mail, and assets, which could negatively impact the Postal Service’s brand. For example, we identified recent news articles on theft by Postal Service contract drivers and found drivers did not always have the required security clearance at the time the offenses were committed. During a visit to a facility, the AO asked contract drivers to provide security clearance paperwork, including drug screening results for CDS drivers,⁹ which is required to obtain a clearance. After the AO’s request, one driver turned in his badge and quit rather than provide the requested drug screening results.

During our audit, postal officials took corrective actions to obtain security clearances for the contract drivers we identified who were not properly cleared.

⁸ Personnel include AOs, transportation managers, and network specialists.
⁹ The drug screening requirements only apply to CDS drivers.

Recommendations

We recommend management establish procedures to track and monitor contract driver security clearances; establish a formal centralized system that allows for the tracking and monitoring of contract driver security clearances; establish mandatory and refresher training requirements; and establish a formal oversight process for contracting officers.

We recommend the chief postal inspector, in coordination with the vice president, Supply Management, vice president, Network Operations, and vice president, Delivery Operations:

1. Establish formal procedures to track and monitor contract driver security clearances to ensure drivers have the appropriate clearance and are re-screened, as required. This should include a process to notify appropriate management officials when security clearances have not been renewed.
2. Establish a formal centralized system that allows for the tracking and monitoring of contract driver security clearances.
3. Establish mandatory and refresher training requirements for Postal Service officials responsible for security clearances to ensure they are aware of their roles and responsibilities regarding the security clearance process.

We recommend the vice president, Supply Management, in coordination with the chief postal inspector, vice president, Network Operations, and vice president, Delivery Operations:

4. Establish a formal oversight process for contracting officers to validate contract drivers have security clearances when renewing contracts.

Management's Comments

Management agreed with the findings in the report and recommendations 1 through 3, and partially agreed with recommendation 4.

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

Management stated they would like to clarify that the SISC does not currently process Special Agency Checks with Inquiries (SACI) clearances. In addition, management stated they are committed to making improvements to the current contract driver security clearance process and will establish a team with representatives from various functional areas to explore opportunities for enhancement. Further, management stated while all the recommendations are logical, implementation will be a large effort that can only be accomplished through a long term, coordinated plan.

Regarding recommendation 1, management stated they will develop a plan to enhance current processes and procedures to ensure contract drivers have the appropriate clearance and are re-screened when required. In addition, appropriate officials will be notified of non-renewals of security clearances. The target implementation date is September 30, 2015.

Regarding recommendation 2, management stated the Postal Service will explore options for systems or a process that allows for the tracking and monitoring of contract driver security clearances. The target implementation date is September 30, 2015.

Regarding recommendation 3, management stated they are in the process of updating current training available through the Learning Management System. In addition, management will communicate the objectives and availability of the course to responsible officials that reinforce policy requirements regarding security clearances. The target implementation date is July 31, 2015.

Regarding recommendation 4, management stated they will consider and evaluate alternatives to establish an oversight process to validate contract drivers have security clearances when renewing contracts. In addition, management stated the roles and responsibilities will be determined within the formal oversight process. The target implementation date is September 30, 2015.

Evaluation of Management's Comments

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

We appreciate management's clarification that the SISC does not process SACI clearances. SACI investigations are generally applicable to non-career postal employees. However, our audit focused on security clearances for contract drivers.

The OIG considers all the recommendations significant, and therefore requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. These 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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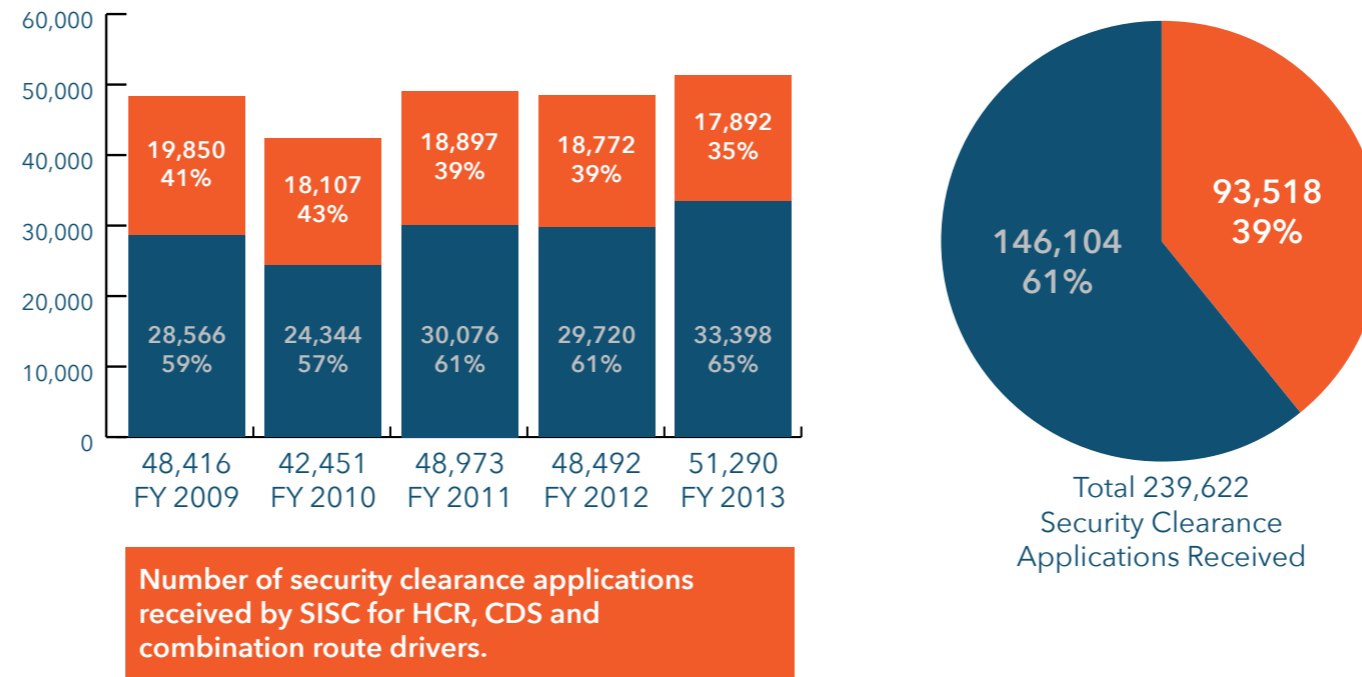
Appendix A: Additional Information

Background

The Postal Service selects and retains only individuals with qualifications that are consistent with its security interests and the national security interests of the U.S. The protection of mail, postal funds, and property is the responsibility of every postal employee, including contractors. Contractors with access to Postal Service facilities, information, and resources, including computer systems, must obtain a security clearance from the SISC.

The SISC's security clearance process involves granting, denying, or revoking security clearances based on information gathered during background investigations of contractors. See [Appendix B](#) for additional information on the security clearance process for contract drivers. The SISC received 239,622 security clearance applications over the last 5 fiscal years (FY) and 39 percent of them were for HCR, CDS, and combination route drivers (see Figure 3). Proper execution of the security clearance process identifies applicants who meet suitability requirements and provides valuable information to officials who are considering applicants for employment.

Figure 3: Security Clearance Applications



Source: OIG analysis.

The Postal Inspection Service conducted personnel security reviews for contract drivers in FYs 2011 and 2012, and is currently conducting them for FY 2014. The purpose of the personnel security reviews is to ensure that all highway transportation contractors have a security clearance granted by the SISC. The reviews found that contract drivers did not always possess the required security clearances or drug screening results, and some lacked valid driver's licenses and badges. The Postal Inspection Service provided management with the review results so it could take corrective action to address any identified deficiencies. Postal Service policy requires all contract drivers be screened to determine their eligibility to be drivers and to have access to the mail and postal facilities.

Employees have the right to expect a safe work environment and the public has a right to expect the Postal Service to maintain the security of the mail. The security clearance process is designed to disqualify ineligible or unsuitable applicants and help ensure public confidence in the Postal Service. The CO is responsible for determining whether access to the mail and facilities should be denied to suppliers or their personnel, based on information supplied by personnel, the AO, or other Postal Service sources. Issuance of proper security clearances is a key element in protecting national security, ensuring the integrity of the mail, and protecting Postal Service personnel, customers, and assets.

Objectives, Scope, and Methodology

Our objectives were to determine whether Postal Service officials issued security clearances to contract drivers in accordance with policy and assess controls over the contractor security clearance process.

The scope of this review included fieldwork at Postal Service and Postal Inspection Service Headquarters; and in the [REDACTED]. In addition, we reviewed a statistical sample of contract drivers in each district we visited and projected the results nationwide. As part of our audit we:

- Interviewed Postal Service and Postal Inspection Service officials responsible for security clearances for Postal Service HCR, CDS, and combination route drivers.
- Interviewed contracting officials on each Postal Service Transportation Contract Management Team.
- Assessed current policies and procedures related to the security clearance process for HCR, CDS, and combination route drivers.
- Conducted testing and analysis related to compliance with security clearance policies and procedures for about 50 contract drivers in each district we visited.
- Assessed internal controls and identified control weaknesses within the security clearance process.

We conducted this performance audit from March through November 2014, 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We discussed our observations and conclusions with management on October 9, 2014, and included their comments where appropriate.

We assessed the reliability of Enterprise Data Warehouse,¹⁰ Security Clearance Tracking System (SCTS),¹¹ Transportation Contract Support System,¹² and Learning Management System¹³ data by reviewing existing information about the data, discussing the data with knowledgeable personnel, and conducting limited testing of the data. We determined that the data were sufficiently reliable for the purposes of this report.

¹⁰ A single repository for managing the Postal Service's corporate data assets and providing a common source of corporate data across organizations to a wide variety of users.

¹¹ An automated system used to process security clearance applications.

¹² A web-based application used to manage transportation contracts and related activities.

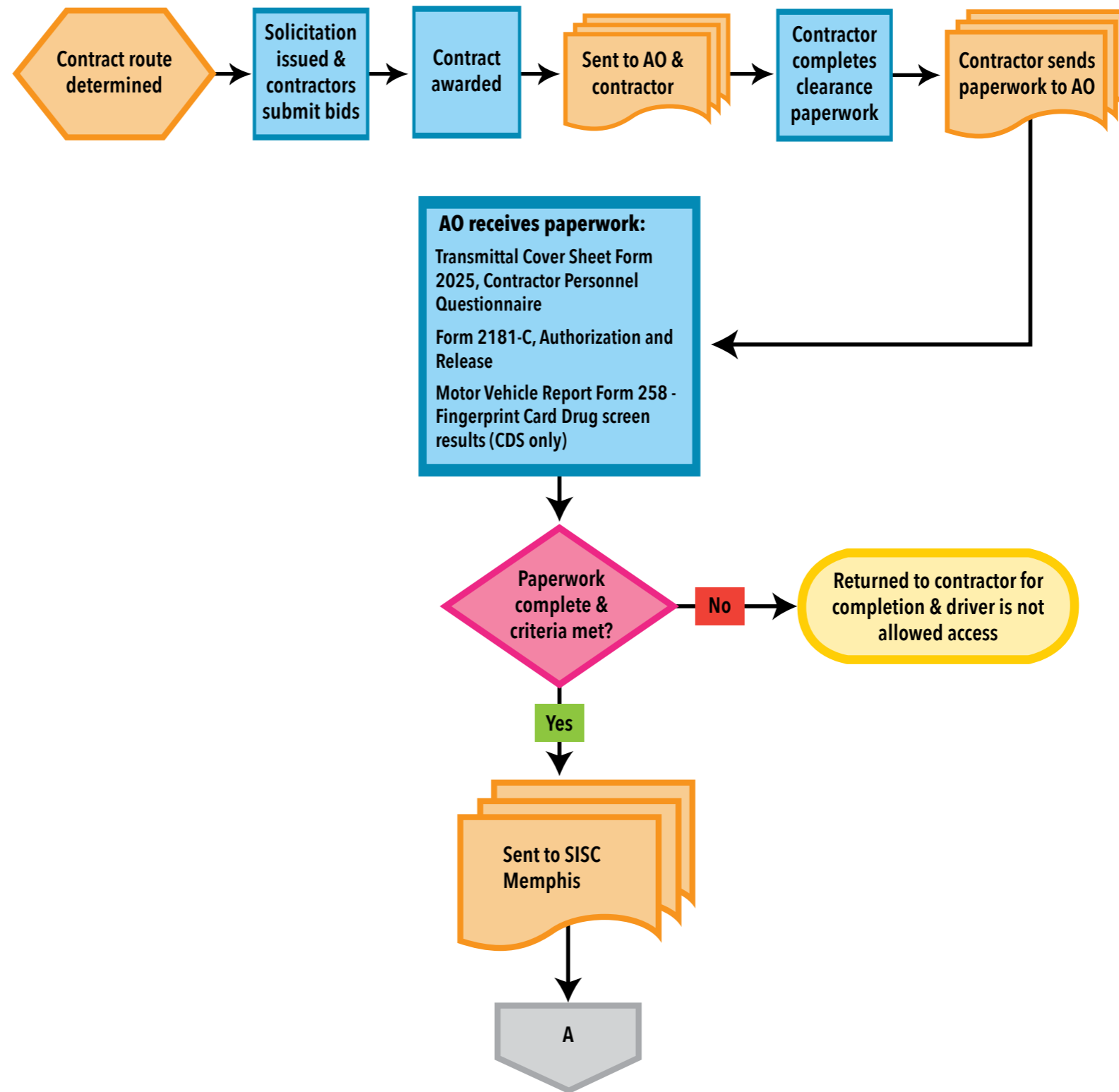
¹³ A software application used to administer, document, track, report, and deliver online training programs.

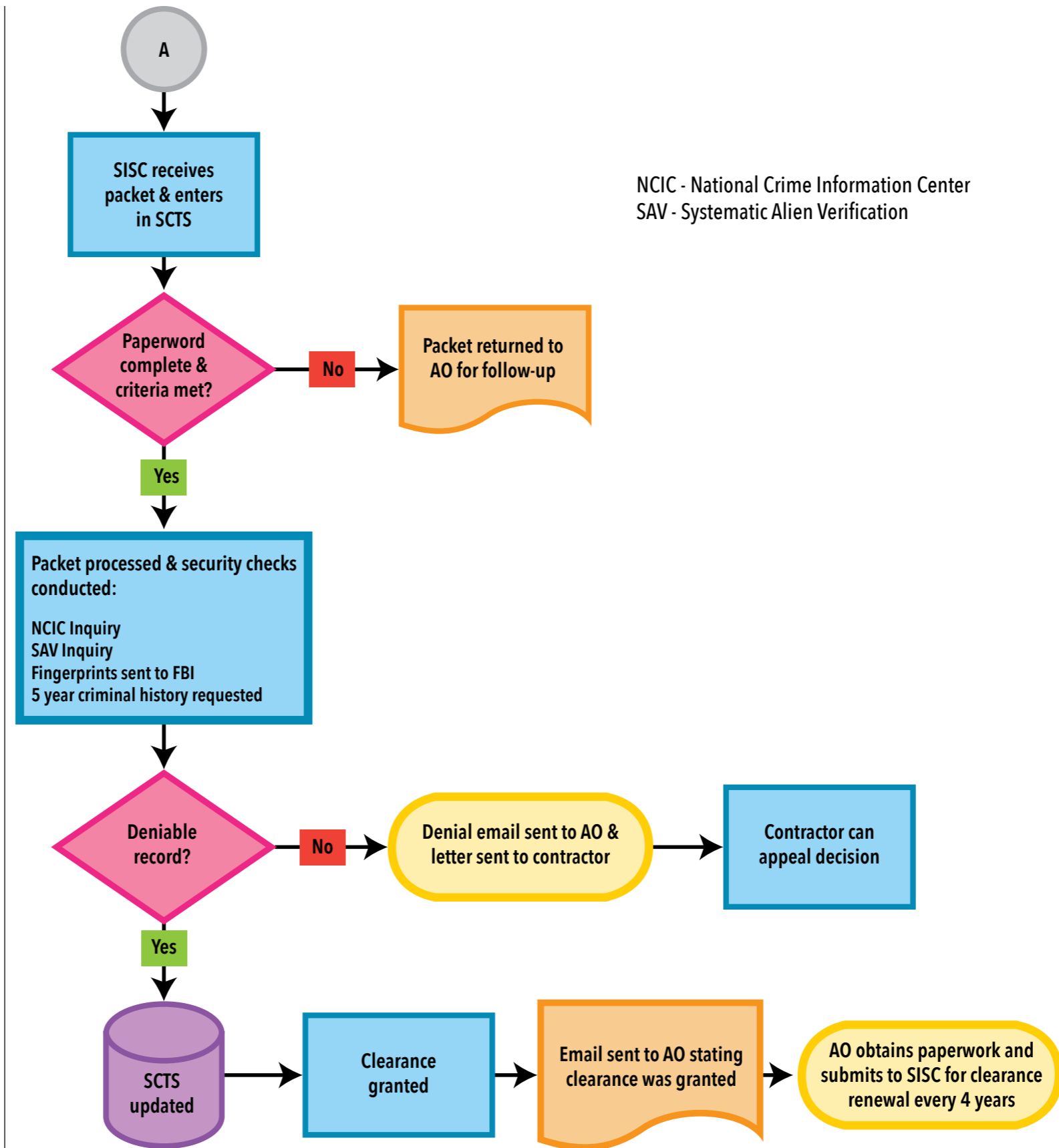
Prior Audit Coverage

On September 12, 2012, we issued a report on the Postal Service's state of security, *State of Security* (Report Number HR-AR-12-005, dated September 12, 2012) and found it has made progress in enhancing security; however, our report found additional opportunities exist to improve security controls and processes. Recent efforts to ensure that contractors have the required security clearances include the Postal Inspection Service conducting HCR reviews in 73 districts in FY 2011. The reviews found that contract drivers did not always possess the required security clearances and some lacked valid driver's licenses and badges. Management has taken steps to strengthen controls to ensure that contractors have the proper security clearances before they are allowed access to Postal Service information and resources. Postal Inspection Service officials stated that they expect to continue HCR reviews in FY 2013 to identify and address deficiencies. As a result of actions taken by management to ensure all contract personnel met screening requirements, we did not make any recommendations regarding this issue.

Appendix B: Security Clearance Process for Contract Drivers

The flowchart provides an overview of the security clearance process for contract drivers from contract initiation to clearance renewal.





Source: OIG analysis.

Appendix C: Security Clearance Deficiencies

Postal Service District and Route Type	Total Contract Drivers Reviewed by District and Route Type	Contract Driver Did Not Have Valid Security Clearance	Contract Driver Was Not Re-screened	AOs Did Not Maintain Security Clearance File for Contract Drivers
██████████	97	24	11	44
CDS	8	2	2	2
Combination	10	7	6	10
HCR	79	15	3	32
██████████	72	6	5	13
CDS	4	2	2	4
HCR	68	4	3	9
██████████	68	27	9	28
CDS	29	13	4	18
Combination	11	6	1	6
HCR	28	8	4	4
██████████	89	29	21	22
CDS	12	10	5	11
HCR	77	19	16	11
██████████	118	54	35	56
CDS	60	40	27	45
Combination	2	0	0	1
HCR	56	14	8	10
██████████	60	16	8	34
CDS	4	3	2	4
Combination	14	2	1	5
HCR	42	11	5	25
Total	504	156	89	197

Source: OIG analysis.

Appendix D: Nationwide Security Clearance Deficiency Projections

We conducted statistical sampling on a total of 504 HCR, CDS, and combination route contract drivers in six districts to identify potential deficiencies in security clearance procedures. Based on our statistical sample, we found:

- 156 of 504 contract drivers (31 percent) did not have a valid security clearance.
 - Of the 156 contract drivers, security clearances for 89 (57 percent) had expired.
- 197 of 504 security clearance files (39 percent) were either not maintained at all or did not contain the required documentation.

To determine nationwide projections of these deficiencies, we:

- Conducted a risk assessment on all Postal Service districts based on a prior Postal Inspection Service personnel security review of contract drivers.
- Selected six districts for review that represented the four quadrants (north, south, east, and west) of the U.S. from our risk assessment.
- Randomly selected contracts for review from those districts and contract drivers from that subset.
- Identified security clearance deficiencies with contract drivers in each of the districts selected from our risk assessment.
- Projected each type of deficiency using a 95 percent confidence interval with +/- 7 percent precision.

Appendix E: Management's Comments



LORI LAU DILLARD
DIRECTOR, AUDIT OPERATIONS

Subject: Security Clearances for Postal Service Contract Drivers
(Report Number HR-AR-15-DRAFT)

Thank you for providing the Postal Service with the opportunity to review and comment on the recommendations contained in the draft audit report, Security Clearances for Postal Service Contract Drivers. Management is in general agreement with the findings and recommendations associated with the draft report and will address each separately below.

Management would like to clarify the following statement in the report:

- Introduction: "The Security Investigations Service Center (SISC) oversees the security clearance process for all regular and contract Postal Service personnel."
 - The SISC does not currently process Special Agency Checks with Inquiries (SACI) clearances.

Management is committed to making improvements to the current contract driver security clearance process and will establish a team with representatives from various functional areas to explore opportunities for enhancements. While all the recommendations are logical, implementation will be a large effort that can only be accomplished through a long term, coordinated plan. An action plan will be developed and implemented based upon the OIG's recommendations. Alternative technology solutions to current processes will be considered and are subject to availability of funds.

Recommendation 1: We recommend the chief postal inspector, in coordination with the vice president, Supply Management, vice president, Network Operations, and vice president, Delivery Operations:

Establish formal procedures to track and monitor contract driver security clearances to ensure drivers have the appropriate clearance and are re-screened, as required. This should include a process to notify appropriate management officials when security clearances have not been renewed.

Management Response/Action Plan: Management agrees with this recommendation. Management will develop a plan to enhance our current processes and procedures to ensure drivers have the appropriate clearance, are re-screened when required and appropriate officials will be notified of non-renewals of security clearances.

475 L'ENFANT PLAZA SW
WASHINGTON DC 20260

Target Implementation Date: September 2015

Responsible Official: Inspector in Charge, Security and Crime Prevention, in coordination with manager, Surface Transportation CMC, Supply Management, manager, Surface Transportation Operations, Network Operations, and manager, Rural Delivery, Delivery Operations

Recommendation 2: We recommend the chief postal inspector, in coordination with the vice president, Supply Management, vice president, Network Operations, and vice president, Delivery Operations:

Establish a formal centralized system that allows for the tracking and monitoring of contract driver security clearances.

Management Response/Action Plan: Management agrees with this recommendation. The Postal Service will explore options for systems and/or process that allows for the tracking and monitoring of contract driver security clearances.

Target Completion Date: September 2015

Responsible Official: Inspector in Charge, Security and Crime Prevention, in coordination with manager, Surface Transportation CMC, Supply Management, manager, Surface Transportation Operations, Network Operations, and manager, Rural Delivery, Delivery Operations

Recommendation 3: We recommend the chief postal inspector, in coordination with the vice president, Supply Management, vice president, Network Operations, and vice president, Delivery Operations:

Establish mandatory and refresher training requirements for Postal Service officials responsible for security clearances to ensure they are aware of their roles and responsibilities regarding the security clearance process.

Management Response/Action Plan: Management agrees with this recommendation. We are in the process of updating current training available through the Learning Management System (LMS). The training outlines Security Control Officer duties for postal employees. We will issue communications to responsible officials that reinforce policy requirements regarding security clearances notifying them of the objectives and availability of this course.

Target Completion Date: July 2015

Responsible Official: Inspector in Charge, Security and Crime Prevention, in coordination with manager, Surface Transportation CMC, Supply Management, manager, Surface Transportation Operations, Network Operations, and manager, Rural Delivery, Delivery Operations

Recommendation 4: We recommend the vice president, Supply Management, in coordination with the chief postal inspector, vice president, Network Operations, and vice president, Delivery Operations

Establish a formal oversight process for contracting officers to validate contract drivers have security clearances when renewing contracts.

Management Response/Action Plan: We agree in part and will consider and evaluate alternatives to establish an oversight process to validate that contract drivers have security clearances when renewing contracts. The roles and responsibilities will be determined within the formal oversight process.

Target Completion Date: September 2015

Responsible Official: Manager, Surface Transportation CMC, Supply Management, in coordination with Inspector in Charge, Security and Crime Prevention, manager, Surface Transportation Operations, Network Operations, and manager, Rural Delivery, Delivery Operations

If you have any questions about this response, please contact Patricia Armstrong at (202) 268-3422.



Guy J. Cottrell
Chief Postal Inspector



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Vice President, Supply Management



David E. Williams Jr.
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Edward F. Phelan Jr.
Vice President, Delivery Operations

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