

OFFICE OF INSPECTOR GENERAL UNITED STATES POSTAL SERVICE

Unscheduled Leave in the New York District

Audit Report

Report Number HR-AR-17-007

June 26, 2017

Employee Unscheduled Leave Costs



OFFICE OF INSPECTOR GENERAL UNITED STATES POSTAL SERVICE

Highlights

Our objective was to assess the management of unscheduled leave in the New York District and identify opportunities to reduce unscheduled leave and its associated costs.

Background

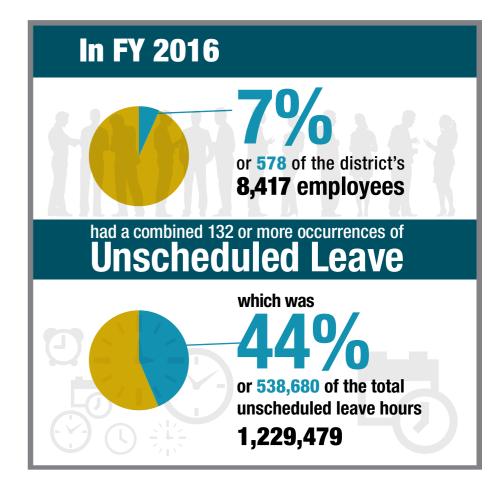
The U.S. Postal Service categorizes unscheduled leave as any absence from work that is not requested or approved in advance. Unscheduled leave could contribute to increased compensation expenses by requiring management to increase workhours and overtime hours.

The U.S. Postal Service Office of Inspector General (OIG) developed a Human Resource Risk Model (risk model) to monitor key Postal Service metrics, including unscheduled leave that could potentially affect productivity, efficiency, costs, and employee morale. For all four quarters of fiscal year (FY) 2016, the risk model identified the New York District in the Northeast Area as having the highest percentage of unscheduled leave in the Postal Service.

Our objective was to assess the management of unscheduled leave in the New York District and identify opportunities to reduce unscheduled leave and its associated costs. This is one in a series of audits in districts with high unscheduled leave activity.

What the OIG Found

The New York District did not adequately manage excessive unscheduled leave, which could be potentially mitigated to acceptable levels by appropriately completing required forms, enforcing disciplinary actions, and providing sufficient supervisory training. We determined employees with a combined 132 or more occurrences of unscheduled leave during FYs 2015 and 2016 to be excessive. In FY 2016, 578 of the district's 8,417 employees (or 7 percent) had a combined 132 or more occurrences of unscheduled leave, which was 44 percent of total unscheduled leave hours (538,680 of 1,229,479).





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The top three unscheduled leave types recorded for the 578 employees were absent without leave, sick leave, and full day leave without pay. These leave types represented 86 percent (464,008 of 538,680) of their unscheduled leave hours taken.

This occurred because Postal Service supervisors did not properly complete, approve, and maintain Postal Service Forms 3971, Request for or Notification of Absence, which they were required to complete when employees returned to work; they did not take appropriate disciplinary action against employees with excessive leave; and they did not receive sufficient training on the unscheduled leave systems/processes or the disciplinary process.

In addition, the current district manager oversight process to monitor unscheduled leave activity is not comprehensive enough to promote adherence to policy, adequate monitoring, and accountability. In FY 2016, Quarter four, per our risk model, 6 percent of the average number of employees in the Northeast Area had 20 or more unscheduled leave occurrences, whereas 19 percent of the New York District's average number of employees had 20 or more occurrences. By reducing the 578 employees with excessive unscheduled leave in New York District to the Northeast Area ratio, the New York District would have reduced their excessive unscheduled leave hours by 68 percent (or 214,579 hours). These hours cost the Postal Service about \$3.9 million in labor and overtime during FY 2016.

What the OIG Recommended

We recommended management issue guidance and reiterate policy on using the Enterprise Resource Management System to manage and document unscheduled leave and to initiate disciplinary actions when appropriate; require managers and supervisors to attend training; and enhance the current district review process to include monitoring protocols to promote supervisor accountability.

Transmittal Letter

MEMO	RANDUM FOR:	E LORRAINE G. CASTELLANO MANAGER, NEW YORK DISTRICT		
		E-Signed by Charles Turley ? ERIP authenticity with esign Deskte		
FROM:	:	Charles L. Turley Deputy Assistant Inspector General for Supply Management and Human Resources		
SUBJECT:		Audit Report – Unscheduled Leave in the New York District (Report Number HR-AR-17-007)		
SUBJE	ECT:	•		
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This rep District We app questio	port presents the r (Project Number 7 preciate the coope ons or need addition Resources and S	(Report Number HR-AR-17-007) results of our audit of Unscheduled Leave in the New York 17SMG011HR000). eration and courtesies provided by your staff. If you have any onal information, please contact Monique P. Colter, Director,		

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Findings

Unscheduled leave is any absence from work that is not requested or approved in advance and could contribute to increased compensation expenses by requiring management to increase workhours and overtime hours.

Introduction

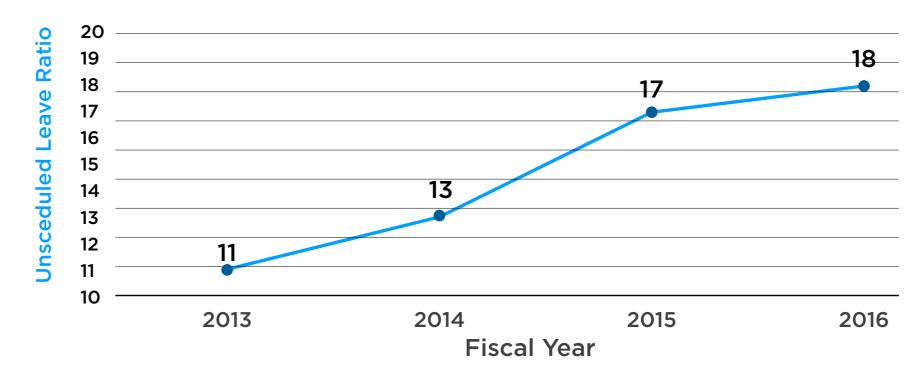
This report presents the results of our audit of Unscheduled Leave in the New York District (Project Number 17SMG011HR000). This is a self-initiated audit based on an analysis of the U.S. Postal Service Office of Inspector General's (OIG) fiscal year (FY) 2016 Human Resources Risk Model, which identifies risks that could impact productivity, efficiency, costs, and employee morale. Our objective was to assess management of unscheduled leave in the New York District and identify opportunities to reduce unscheduled leave and its associated costs. This is one in a series of audits in districts with high unscheduled leave activity.

Unscheduled leave is any absence from work that is not requested or approved in advance and could contribute to increased compensation expenses by requiring management to increase workhours and overtime hours. An OIG risk model metric monitors unscheduled leave and ranked the New York District in the Northeast Area as number one in unscheduled leave use during all four quarters of FY 2016. The risk model bases district rankings using an unscheduled leave occurrence ratio calculated with Enterprise Resource Management System (eRMS)¹ data. The ratio identifies the percentage of employees with 20 or more occurrences of unscheduled leave per 100 employees.

In addition, unscheduled leave in the New York District has increased each fiscal year from 2013 through 2016. In FY 2013, the unscheduled leave occurrence ratio was 11 while the ratio in FY 2016 was 18 (see Figure 1).

See Appendix A for additional information about this audit.

Figure 1: New York District Unscheduled Leave Trend



Source: OIG Human Resources Risk Model.

1 A system that provides a consistent and standardized approach to handle incoming calls for unscheduled absences and to assist in managing scheduled and unscheduled absences. eRMS provides real time data and report management functions to supervisors.

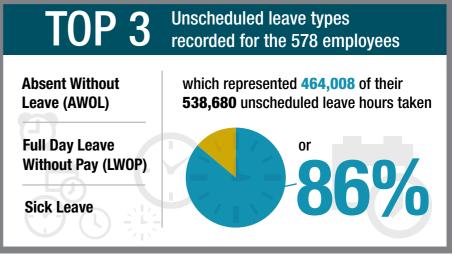
This report has not yet been reviewed for release under FOIA or the Privacy Act. Distribution should be limited to those within the Postal Service with a need to know.

Summary

The New York District did not adequately manage excessive unscheduled leave, which management could potentially mitigate to acceptable levels by appropriately completing required forms, enforcing disciplinary actions, and providing sufficient supervisory training.

We determined that employees with a combined 132 or more occurrences² of unscheduled leave during FYs 2015 and 2016 to be excessive. In FY 2016, 578 of 8,417 district employees (or 7 percent) had 132 or more occurrences of unscheduled leave, which comprised 44 percent of total unscheduled leave hours (538,680 of 1,229,479).

The top three unscheduled leave types recorded for the 578 employees were absent without leave (AWOL), sick leave, and full day leave without pay (LWOP), which represented 464,008 of their 538,680 unscheduled leave hours taken (or 86 percent).



This occurred because Postal Service supervisors did not properly complete, approve, and maintain Postal Service (PS) Forms 3971, Request for or Notification of Absence, which they were required to complete when employees returned to work; they did not take appropriate disciplinary action on employees with excessive leave; and they did not receive sufficient training on the unscheduled leave systems/processes or the disciplinary process. In addition, the current district manager oversight process to monitor unscheduled leave activity is not comprehensive to promote adherence to policy and accountability.

Excessive Unscheduled Leave

We determined that New York District employees with a combined 132 or more unscheduled leave occurrences during FYs 2015 and 2016 was excessive.³ In FY 2016, these employees consisted of 578 of the district's employees (or 7 percent) who used nearly half (44 percent) of the district's unscheduled leave hours (see Table 1).

Table 1: Unscheduled Leave Hours in the New York District

Employee Occurrences	Number of Employees	Percentage of Employees	Unscheduled Leave Hours	Percentage of Unscheduled Leave Hours
131 or fewer	7,839	93%	690,799	56%
132 or more	578	7%	538,680	44%
Total	8,417	100%	1,229,479	100%

Source: Enterprise Data Warehouse (EDW).

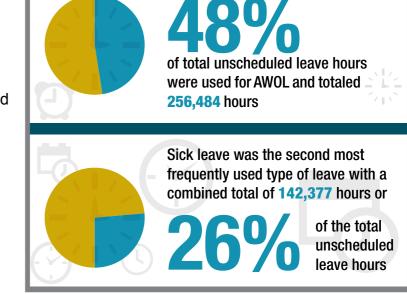
2 We considered each day of unscheduled leave an occurrence.

3 We used FYs 2015 and 2016 data to determine the standard deviation that allowed us to identify the unscheduled leave amount that is considered excessive. The standard deviation is a statistic that calculates how closely data points are clustered around the mean in a set of data.

The New York District did not adequately manage excessive unscheduled leave, which management could potentially mitigate to acceptable levels by appropriately completing required forms, enforcing disciplinary actions, and providing sufficient supervisory training. During FY 2016, the top three unscheduled leave types recorded for the 578 employees with 132 or more occurrences of unscheduled leave were AWOL, sick leave, and LWOP, which represented 86 percent of all unscheduled leave hours. About 48 percent of total unscheduled leave hours were used for AWOL and totaled 256,484 hours. Sick leave was the second most frequently used type of leave. It represented a combined total of 142,377 hours of total unscheduled leave (26 percent) and is composed of the following categories:

Full Day LWOP – In Lieu of Sick Leave

- Sick Leave Regular
- Annual Leave In Lieu of Sick Leave



Full day LWOP was the third most frequently used type of leave. It represented about 65,147 hours of total unscheduled leave (12 percent). See Table 2.

Table 2: Type of Leave Most Frequently Used by the 578 Employees With 132 or More Unscheduled Leave Occurrences

Rank	Leave Type	Unscheduled Leave Hours	Percentage Total Unscheduled Leave Hours
1	Absent Without Leave - AWOL	256,484	48%
2	Sick Leave		
	 Full Day LWOP – In Lieu of Sick Leave 	93,633	
	Sick Leave – Regular	34,218	
	Annual Leave – In Lieu of Sick Leave	14,526	
	Sick Leave Sub-Total	142,377	26%
3	Full Day LWOP	65,147	12%
	Other ^₄	74,672	14%
Total		538,680	100%

Source: EDW.

The Postal Service used overtime hours as a mitigating factor to offset unscheduled leave and from FYs 2013 through 2016, the number of overtime hours has consistently increased in the New York District (see Figure 2).

During FY 2016, the top three

unscheduled leave types

recorded for the 578 employees

with 132 or more occurrences of

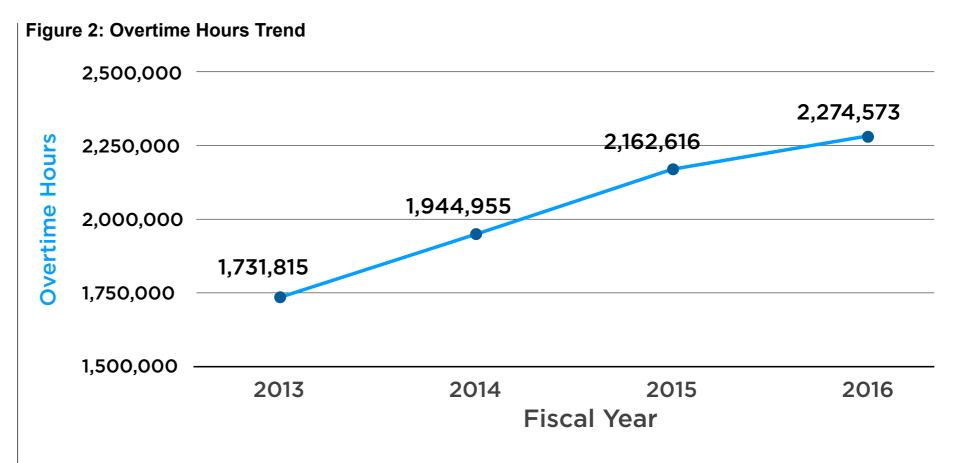
unscheduled leave were AWOL,

sick leave, and LWOP, which

represented 86 percent of all

unscheduled leave hours.

⁴ The "Other" total consists of the sum of the unscheduled leave hours of the remaining available leave types.



Source: EDW.

We conducted interviews with supervisors⁵ of employees who used excessive unscheduled leave and supervisors at one site⁶ with employees who used low amounts of unscheduled leave. The three sites with excessive leave had 306 of 578 employees (53 percent) with 132 or more unscheduled leave occurrences. In addition, those employees used 256,443 of 538,680 unscheduled leave hours (or 48 percent). See Table 3.

Table 3: Employees with 132 or More Unscheduled Leave Occurrences at the Three Sites Reviewed

Group	Complement	Unscheduled Leave Hours	Percentage Total Unscheduled Leave Hours
Morgan P&DC	258	208,998	
Murray Hill Annex	27	23,439	
Manhattanville Station	21	24,006	
Total	306	256,443	48%
Other Employees in District	272	282,236	52%
Grand Total	578	538,680	100%

Source: EDW.

5 Murray Hill Annex, Manhattanville Station, and Morgan Processing and Distribution Center (P&DC).

6 West Farms Station.

Managers at the site with low unscheduled leave explained that they allow employees the flexibility to switch their scheduled days off, when appropriate, so they do not have to take unscheduled leave. Supervisors at the three sites with employees who had excessive unscheduled leave cited several contributing factors, including:

- Station managers and supervisors did not take appropriate disciplinary action against employees with excessive unscheduled leave.
- Station managers and supervisors did not take appropriate disciplinary action against employees with excessive unscheduled leave.⁷ New York District management considered three unscheduled leave occurrences in a three-month period to be excessive. There was no noted disciplinary action taken in eRMS for 33 of 50 employees (or 67 percent) with excessive leave at the three sites visited. In addition, the New York District has high supervisory turnover that can affect the timeliness of the disciplinary process. When supervisors do not document disciplinary action for excessive unscheduled leave and leave their position, the next supervisor has to start from step one rather than continuing with the previous supervisor's disciplinary actions.
- We reviewed the training records of 112 managers and supervisors at the three sites with employees with high amounts of unscheduled leave and found that 105 of them (or 94 percent) did not receive supervisory eRMS training. Additionally, 30 of them (or 27 percent) did not receive leave control training and 98 of them (or 88 percent) did not receive Time and Attendance Collection System (TACS)⁸ training. While not required, these trainings are valuable tools for managing leave. In addition, based on need, the New York District details employees into acting supervisor roles and acting supervisors do not receive supervisor training. The Postal Service began offering a training course in January 2017 called "Time is Money: Time and Attendance for Supervisors," which includes sections on eRMS, TACS, and attendance control. This course, which is not mandatory, combines aspects of the three other training courses and would be beneficial to all managers and supervisors— specifically acting supervisors since they do not receive supervisor training.

In addition, supervisors at all four sites visited did not properly complete, approve and maintain PS Forms 3971.⁹ We reviewed 55 employees' PS Forms 3971 for all unscheduled leave hours and determined that of 31,810 unscheduled leave hours reviewed, managers at the four sites could not provide properly completed and approved PS Forms 3971 for 30,953 hours (97 percent). The forms were either not available or were missing the necessary dates and signatures. The supervisors stated that they did not approve and maintain PS Forms 3971 because they were not fully aware of the policy and, at times, other duties took priority.

Lastly, the current district manager oversight process to monitor unscheduled leave activity is not comprehensive enough to promote adherence to policy and accountability. District management conducts weekly meetings with postmasters where unscheduled leave is a topic discussed. Postmasters will then meet with station managers to discuss unscheduled leave. Beginning in 2015, district management started meeting with station managers at individual sites where there was excessive unscheduled leave to determine if they took any disciplinary action. However, based on the exceptions identified, the district could enhance its oversight process to ensure that supervisors are following established guidance and disciplinary action district-wide.

In FY 2016, quarter four, per our risk model, 6 percent of the average number of employees in the Northeast Area had 20 or more unscheduled leave occurrences, whereas 19 percent of the New York District's average number of employees had 20 or more occurrences.¹⁰ The risk model bases district rankings on eRMS data showing the ratio of employees with 20 or more unscheduled leave occurrences per 100 employees. By reducing the New York District unscheduled leave occurrence ratio (19) to the Northeast

⁷ Employee Labor Relations Manual (ELM) 41, Section 665.41, Requirement of Regular Attendance, dated September 2016.

⁸ The system used by all installations to automate the collection of employee time and attendance information.

⁹ ELM 41, Section 511.42, Management Responsibilities, dated September 2016.

¹⁰ The average unscheduled leave ratio in the Northeast Area was about 6 percent in FYs 2015 and 2016.

Area average (6), with adequate oversight and controls, the New York District could have reduced its excessive unscheduled leave by about 68 percent in FY 2016 and 67 percent in FY 2015. These reduced hours equated to about \$3.1 and \$3.9 million in labor and overtime costs during FY 2015 and FY 2016, respectively for a total of \$7 million. These costs had a direct impact on Postal Service's controllable income, which primarily consists of workhours and transportation costs.¹¹ The \$7 million in labor and overtime costs contributed to about \$3.9 million of the \$610 million of controllable income net loss in FY 2016, and about \$3.1 million of the \$1.2 billion of controllable income net loss in FY 2015.¹²

The \$7 million in labor and overtime costs contributed to about \$3.9 million of the \$610 million of controllable income net loss in FY 2016, and about \$3.1 million of the \$1.2 billion of controllable income net loss in FY 2015.

Lastly, employees with excessive unscheduled leave (AWOL in particular) are still counted against the district's employee compliment. If that district is at full complement, the Postal Service cannot replace the employees taking excessive unscheduled leave until that employee is officially terminated and removed from payroll.

¹¹ Postal Service Regulatory Commission 2016 Form 10-K.

¹² We identified numerous causes but focused on additional labor costs when quantifying impact.

Recommendations

We recommend management issue guidance and reiterate policy on using the eRMS; require managers and supervisors to attend training; and enhance the current district review process. We recommend the Manager, New York District:

- 1. Issue guidance to managers and supervisors to reiterate policies for using the Enterprise Resource Management System to manage and document unscheduled leave and to initiate disciplinary actions when appropriate.
- 2. Require managers and supervisors, including detailed supervisors, to attend training that covers Enterprise Resource Management System, Time and Attendance Control System, and leave control.
- 3. Enhance the current district review process to include formal monitoring protocols to promote supervisor accountability to follow policies for managing unscheduled leave and initiating appropriate disciplinary action.

Management's Comments

Management agreed with all recommendations and disagreed with the monetary impact. Although silent in their response, in a subsequent email communication, management stated they agreed with all of the findings.

Regarding recommendations 1 and 2, management stated that all Executive and Administrative Schedule (EAS) employees attended a Human Resource Symposium where attendance control was covered. The dates of the symposium were May 3, 17, and 23 and June 7 and 13, 2017. Management stated they will complete the training by July 31, 2017.

Regarding recommendation 3, management stated that the New York District Human Resources Manager and Finance Manager currently facilitate a daily conference call with the outlier units which focuses on expected adherence to Postal Policy relative to attendance control (use of eRMS, types of leave issued, and corrective action issued due to poor attendance). In addition, Customer Service Operations managers continue to certify their units' monthly eRMS reviews. Management stated that they have completed this action.

Regarding the monetary impact, management stated that we included in the total AWOL hours for 43 employees who each charged a minimum of at least 1,800 hours (85,536 total hours). Since these absences were primarily continuous, they were known absences, instead of unscheduled absences. Management stated that, in theory, management could have hired non-career employees as replacements instead of resorting to overtime. See Appendix B for management's comments in their entirety.

Evaluation of Management's Comments

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

Regarding the monetary impact, we disagree with management's response. An AWOL classification occurs when no type of leave can be granted either because the employee did not obtain advance authorization or the employee's request for leave was denied. Employees using these absences did not obtain advance authorization and were properly recorded as unscheduled leave occurrences. Although district managers could use non-career employees as replacements, the district has restrictions on the number of non-career employees they can hire. Therefore, management must take disciplinary action to remove AWOL employees in order to hire replacements. When employees take unscheduled leave, a career or non-career employee has to perform their job responsibilities. We based our calculation for AWOL savings on the additional overtime pay rate (1/2 of the mail handler pay rate) that was the lowest of labor rates available for career and non-career employees. We consider the calculation to be conservative.

Recommendations 1 and 2 require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. We consider recommendation 3 closed with the issuance of this report.

Appendices

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Appendix A: Additional Information

Employees are expected to maintain their assigned schedules, make every effort to avoid unscheduled absences, and provide acceptable supporting documentation for absences when required.

Background

This audit was based on analysis of the OIG's FY 2016 Human Resources Risk Model, which ranked the New York District number one in unscheduled leave use during all four quarters of FY 2016. Unscheduled leave percentages for these quarters ranged from 18 to 19 percent. In FY 2016, the average unscheduled leave ratio in the Northeast Area was 6 percent. District rankings are based on eRMS data showing the ratio of employees with 20 or more unscheduled leave occurrences to the average number of employees in the district, per 100 employees.

Unscheduled leave is any absence from work that is not requested or approved in advance and could contribute to increased compensation expenses by requiring management to increase workhours and overtime hours. Employees are expected to maintain their assigned schedules, make every effort to avoid unscheduled absences, and provide acceptable supporting documentation for absences when required. Employees should maintain regular attendance and failure to comply could result in disciplinary action.

Postal Service management is responsible for controlling unscheduled leave by informing employees of leave regulations, discussing attendance records with individual employees when warranted, and maintaining and reviewing PS Forms 3971 and 3972, Absence Analysis. There are policies in place for station managers and supervisors to monitor unscheduled leave using eRMS and take disciplinary action when appropriate. eRMS' primary focus is to aid a manager's efficiency in managing their resources and workload and provide reports and assistance in tracking employee leave balances and usage.

eRMS automates the unscheduled leave process by providing employees with a telephone number to call when an unscheduled leave situation occurs. eRMS generates an electronic PS Form 3971 form and routes it to the appropriate supervisor, eliminating manual intervention. Supervisors must then approve or disapprove employee leave requests on the PS Form 3971 and, upon returning to work, the employee must immediately sign the form and provide supporting documentation to the supervisor, if required.

In regard to disciplinary action, the supervisor must first conduct informal conversations with the employee when corrective action is necessary. The process can progress to a pre-disciplinary interview to allow the employee the opportunity to address the alleged poor attendance. If the excessive unscheduled leave continues, the supervisor can decide to take further disciplinary action by first issuing a letter of warning in which the employee is given a certain amount of time to improve attendance. Lastly, the supervisor can decide to continue with disciplinary action with a seven-day suspension, followed by a 14-day suspension and then removal.

There are also many TACS tools available to supervisors to control attendance (see Table 4).

Table 4: Examples of TACS Reports

Report	Description
Missing 091 Transaction	Lists employees with overtime that exceeds the amount of the 091 transaction.
Overtime Alert	Lists employees in an overtime status or approaching overtime for the week.
Employee All	Lists almost everything in the TACS database for a particular employee for a particular year, pay period, and week.
Station Summary	Lists work, overtime, and sick leave hours by LDC for carrier stations.

Source: Time is Money: Time and Attendance for Supervisors Facilitators Guide, September 2017.

Objective, Scope, and Methodology

Our objective was to assess the management of unscheduled leave in the New York District and identify opportunities to reduce unscheduled leave and its associated costs.

We used FY 2016 data to identify employees using unscheduled leave above the average in the New York District, as well as the total amount of unscheduled leave usage for these employees. In addition, we reviewed unscheduled leave and overtime data from FYs 2013 through 2016 to assess trends.

To accomplish our objective, we

- Reviewed the OIG's Human Resources Risk Model to identity districts with high unscheduled leave percentages during FY 2016. The New York District was ranked as the district with the most unscheduled leave.
- Reviewed Postal Service policies and procedures relating to unscheduled leave, employee disciplinary actions for excessive unscheduled leave, return to work procedures, and Labor Relations' involvement.
- Analyzed FY 2015 and FY 2016 unscheduled leave data for the New York District recorded in TACS. We used two standard deviations from the unscheduled leave occurrences mean to identify the unscheduled leave amount that is considered excessive.
- Judgmentally selected the Morgan P&DC, the Murray Hill Annex, and the Manhattanville and West Farms stations for site visits.
- Identified five employees at the Murray Hill Annex, 10 employees at the Manhattanville Station, 30 employees at the Morgan P&DC, and 10 employees at the West Farms Station, who incurred unscheduled leave and reviewed hard copies of PS Forms 3971 and 3972 and other available supporting documentation.
- Interviewed Postal Service district and unit managers and supervisors regarding the processes used to control unscheduled leave and observed their use of eRMS.
- Obtained and reviewed supervisors' training records at the four sites selected.

We conducted this performance audit from January through June 2017, in accordance with generally accepted government auditing standards and included such tests of internal controls, as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on May 25, 2017, and included their comments where appropriate.

We assessed the reliability of eRMS data by validating unscheduled leave occurrence data against the TACS unscheduled leave clock ring occurrence data obtained from the EDW. In addition, we randomly selected ten employees' eRMS data and traced the data to TACS data in the EDW. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact (in millions)
Unscheduled Leave in he Chicago District	Assess unscheduled leave activity in the Chicago District and identify opportunities to reduce it.	HR-AR-15-006	5/21/2015	\$6.5

Appendix B: Management's Comments



Recommendation #2:

Require managers and supervisors, including detailed supervisors, to attend training that covers Enterprise Resource Management System, Time and Attendance Control System, and leave control.

Management Response/Action Plan:

New York District agrees with this recommendation. All EAS employees attended a Human Resources Symposium where eRMS and Attendance Control Policies was covered. Dates of the Symposium were: May 3, 17, 23, 31 and June 7 and 13.

Target Implementation Date:

Completed

Responsible Official: Vanessa Duncan-Smith, Manager, Human Resources

Recommendation #3:

Enhance the current district review process to include formal monitoring protocols to promote supervisor accountability to follow policies for managing unscheduled leave and initiating appropriate disciplinary action.

Management Response/Action Plan:

New York District agrees with this recommendation. The Manager of Human Resources and Manager of Finance currently facilitate a daily conference call with our outlier units which focuses on the expected adherence to Postal Policy relative to Attendance Control (use of eRMS, type of leave issued and corrective action issued due to poor attendance). In addition, our Managers, Customer Service Operations continue to certify their respective Unit monthly eRMS reviews.

Target Implementation Date: Completed

Responsible Official:

Vanessa Duncan-Smith, Manager, Human Resources Francisco Gutierrez, Manager, Finance

Amore Coasean

Lorraine G. Castellano District Manager, New York

cc: VP Controller VP Retail & Customer Service VP Area Operations (Northeast) Controller (Northeast) Manager, Finance (New York) Manager, Corporate Audit Response Management



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