

# Safety and Health Program Training

## AUDIT REPORT

Report Number 22-120-R23 | February 9, 2023



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# Highlights

## Background:

The Safety and Health Program is intended to provide guidance through effective training to support and sustain the U.S. Postal Service's work environment. Industrial accidents involve personal injuries as well as property damage that can include motor vehicle damage under certain conditions. Nationwide, most industrial accidents involved mail carriers assigned to retail and delivery facilities from fiscal years 2017 to 2021.

## What We Did:

Our objective was to assess the effectiveness of the Postal Service's Safety and Health Program training applicable to industrial accidents, the use of Accident Reduction Plans, and efforts to promote safety awareness. For this audit, we judgmentally selected 12 retail and delivery facilities to conduct site visits.

## What We Found:

Management at the 12 visited facilities did not always provide employees with consistent and relevant safety and health training and some employees did not complete required refresher training after an industrial accident. Additionally, management did not always present safety talks to employees properly or adequately document and maintain records of completed safety talks; did not always ensure employees were trained in first-aid, or service safety equipment such as fire extinguishers and first-aid kits effectively; ensure employees wore proper footwear; and display visual media intended to promote safety awareness.

## Recommendations:

We recommended management (1) provide training on the Safety and Health Management Tool for facility level action planning activity and for the Accident Reduction Plans; (2) reiterate policies and procedures on presenting and documenting safety talks to applicable facility level management; (3) revise applicable guidance to define the purpose and intent of safety talks and communicate revised guidance to employees; (4) provide formal training on proper maintenance of fire extinguishers and first-aid kits; and implement a process to verify the inspection of fire extinguishers and that first-aid supplies are readily available; (5) provide formal training to responsible personnel on administering first-aid and cardiopulmonary resuscitation; (6) provide formal training on approved footwear; (7) dispose of obsolete items and prevent other items from obscuring safety awareness media displays.

# Transmittal Letter



OFFICE OF INSPECTOR GENERAL  
UNITED STATES POSTAL SERVICE

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February 9, 2023

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

SCOTT RAYMOND  
VICE PRESIDENT, ATLANTIC AREA RETAIL AND DELIVERY  
OPERATIONS

ERIC HENRY  
VICE PRESIDENT, CENTRAL AREA RETAIL AND DELIVERY  
OPERATIONS

TIMOTHY COSTELLO  
VICE PRESIDENT, SOUTHERN AREA RETAIL AND DELIVERY  
OPERATIONS

EDUARDO RUIZ  
VICE PRESIDENT, WESTPAC AREA RETAIL AND DELIVERY  
OPERATIONS

A handwritten signature in black ink, appearing to read "Alan MacMullin".

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

**SUBJECT:** Audit Report – Safety and Health Program Training  
(Report Number 22-120-R23)

This report presents the results of our audit of the U.S. Postal Service's Safety and Health Program training.

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



# Results

## Introduction/Objective

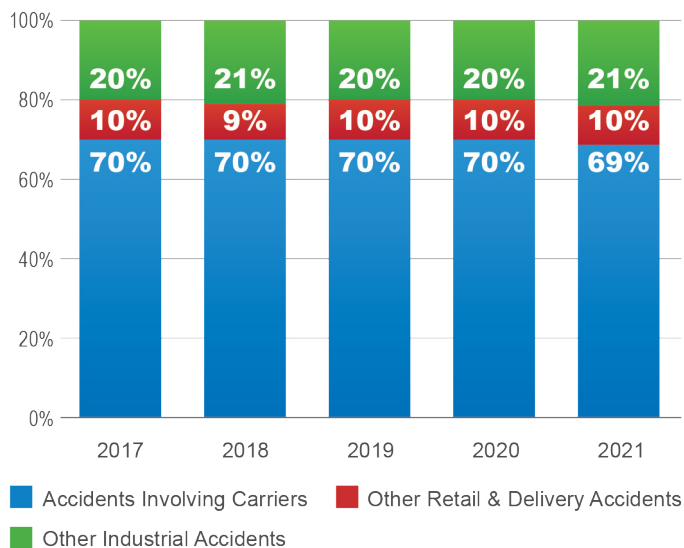
This report presents the results of our self-initiated audit of the U.S. Postal Service's Safety and Health Program training (Project Number 22-120). Our objective was to assess the effectiveness of the Postal Service's Safety and Health Program training associated with industrial accidents, the development and use of Accident Reduction Plans (ARP), and efforts promoting safety awareness. See [Appendix A](#) for additional information about this audit.

## Background

Postal Service management considers employee safety and health a top priority and their philosophy is centered on three major concepts: 1) accidents are predictable and avoidable events, 2) all injuries are preventable, and 3) safety and health training never ends. They believe that 90 to 100 percent of all accidents are avoidable, including industrial accidents. These accidents may involve personal injuries and/or property damage, which can include motor vehicle damage under certain conditions. For example, an industrial accident occurs when a vehicle is legally parked and struck by an object. Industrial accidents can be eliminated or controlled with preventive measures.

Nationwide, most industrial accidents involved mail carriers assigned to retail and delivery facilities from fiscal year (FY) 2017 to FY 2021. Of the 299,198 total industrial accidents that occurred during the scope of our audit, 238,417, or about 80 percent, involved employees assigned to retail and delivery facilities. Specifically, mail carriers were involved in 209,393, or 70 percent, of all industrial accidents. We noted these trends remained consistent across the five fiscal years of our audit scope (see Figure 1).

**Figure 1. Nationwide Composition of Yearly Total Industrial Accidents from FY 2017 to FY 2021**



Source: Enterprise Data Warehouse (EDW).

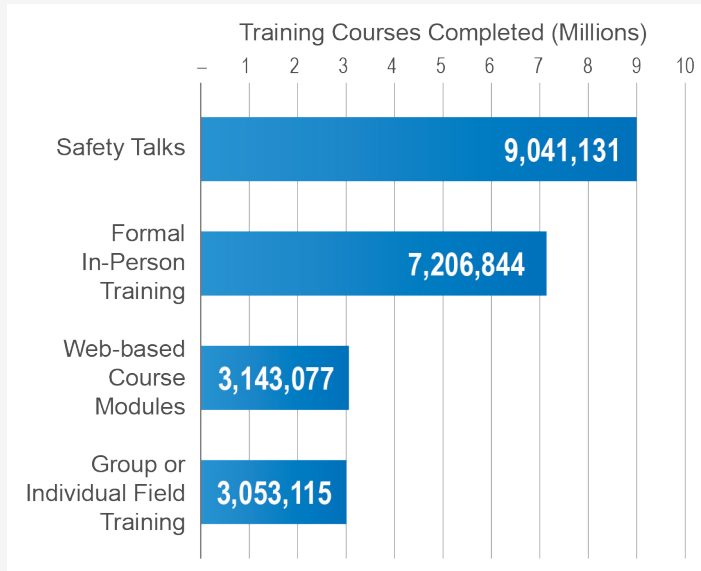
Postal Service management at all levels are responsible for employee safety and health, just as they are responsible for operations. To comply with the Occupational Safety and Health Act (OSHA), the Postal Service developed a Safety and Health Program managed by the Occupational Safety and Health (OSH) team. The OSH team develops safety and health-related materials that are incorporated into safety and health training. The intent of the program is to provide effective training to support a work environment where employees are empowered to affect their personal safety and health and remain accident and injury-free.

Facility level management is responsible for the safety and health training and education of employees and must provide employees with both required and voluntary training and development activities that emphasize workplace safety. For example, new carriers participate in a mandatory 40-hour training that includes an eight-hour orientation and 32 hours of Carrier Academy,

which covers a variety of topics including safety and health. Additionally, each employee shares in the responsibility of ensuring that his or her own safety and health training is relevant to their work environment.<sup>1</sup> Several safety and health training courses are available to employees on the Postal Service’s HERO<sup>2</sup> training platform, such as Sprains and Strains; Back Injury and Safety Prevention; and Avoiding Slips, Trips, and Falls.

Facility level management use HERO to access safety and health training courses and materials and track completion of assigned training.<sup>3</sup> The Postal Service provides a variety of training formats from classroom settings to web-based instruction. After their initial in-person training,<sup>4</sup> mail carriers typically receive safety talks as their primary form of training. Facility level management use safety talks to promptly communicate to a large number of employees both mandatory and routine safety and health messages, including informal instruction intended to inform employees of hazards and best practices or to promote safety and health awareness. Figure 2 shows the number of courses completed for the top four forms of training the Postal Service used nationwide from FY 2017 through FY 2021.

**Figure 2. Nationwide Top Four Training Formats from FY 2017 to FY 2021**



Source: HERO.

1 *Employee and Labor Relations Manual (ELM)* 52, Chapter 7, Training and Development, Section 711.13, Responsibility, page 675, March 2022.

2 An integrated, multi-faceted application for Human Resources services.

3 The Postal Service used the Learning Management System before migrating to HERO on October 1, 2018.

4 Initial training includes courses, such as new hire orientation and Carrier Academy.

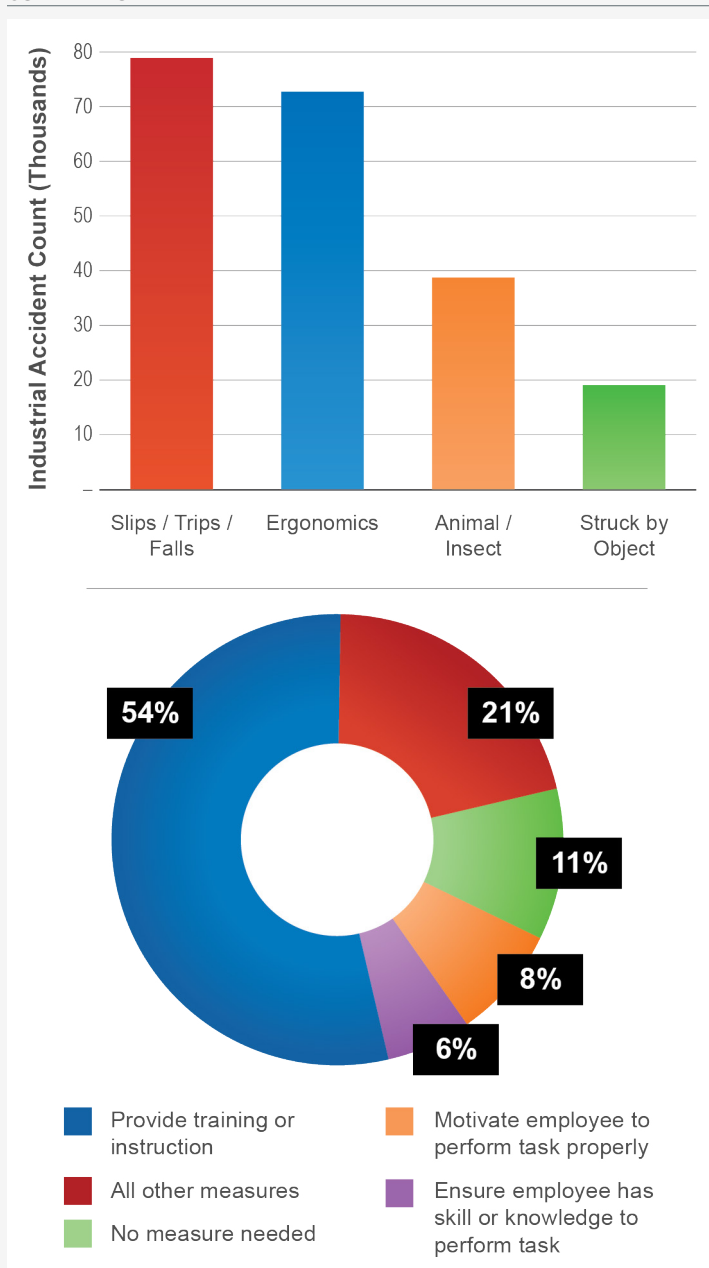
5 Launched in October 2021, SHMT replaced the Employee Health and Safety system and the previous version of the Safety Toolkit. SHMT is intended to identify where process failures and errors have occurred to help prevent accidents in the future, and allows the Postal Service to report regulatory obligations to OSHA and Office of Workers’ Compensation Programs (OWCP).

After an accident occurs, facility level management must investigate and determine the root cause. Facility level management were required to develop Accident Reduction Plans (ARP) to remedy the root causes of the most common accidents that occurred at a facility or district. The ARPs should have included preventative measures, such as providing safety and health training or instruction, to prevent or reduce recurring accidents and should have been reviewed for effectiveness on a quarterly basis.

The Postal Service implemented the Safety and Health Management Tool (SHMT) in October 2021, which contains an action plan process that replaced the facility level ARPs.<sup>5</sup> The SHMT tracks accidents, hazards, results of inspections, accident investigations, root cause analysis, and action plans designed to prevent recurrences. The OSH team designed the action plan to consolidate root cause analysis and corrective actions for each accident.

Nationwide, the four accident categories shown in [Figure 3](#) represented 216,946 (or 73 percent) of the 299,198 industrial accidents from FY 2017 to FY 2021. [Figure 3](#) also shows that training or instruction was the most common preventative measure selected to address the causes of industrial accidents. Facility level management identified these measures for 161,915 (or 54 percent) of the 299,198 industrial accidents during the same period.

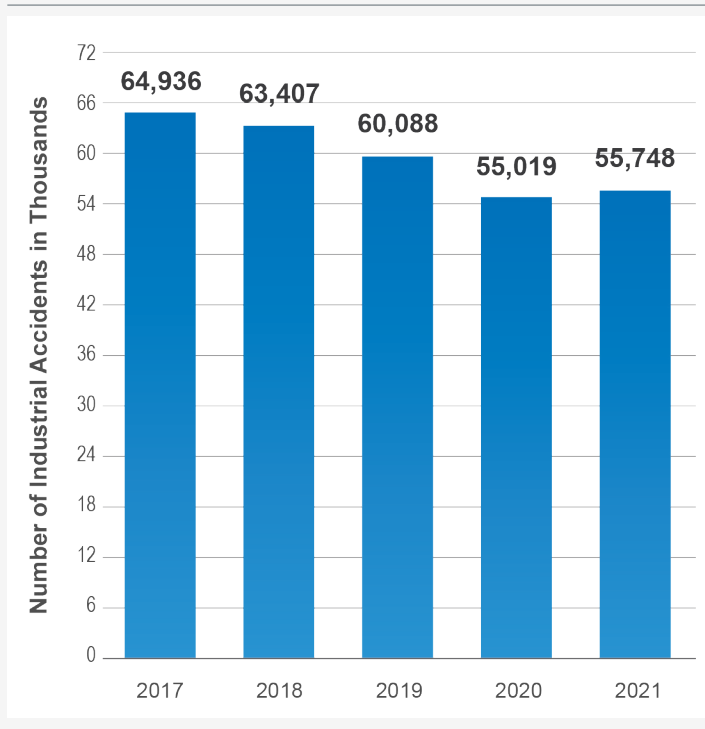
**Figure 3. Nationwide Top Industrial Accident Causes and Preventative Measures from FY 2017 to FY 2021**



Source: EDW.

Nationwide, the Postal Service experienced a drop in industrial accidents from FY 2017 to FY 2020. Specifically, as shown in Figure 4, industrial accidents decreased from a high of about 65,000 in FY 2017 to a low of about 55,000 in FY 2020 (a decrease of about 15 percent). Total accidents then slightly increased from FY 2020 to FY 2021.

**Figure 4. Nationwide Industrial Accidents from FY 2017 to FY 2021**



Source: EDW.

### Finding #1: Relevant and Refresher Training

The Postal Service provides employees access to a variety of safety and health training topics and formats. However, facility level management did not always ensure employees received consistent and relevant safety and health training or instruction at 12 retail and delivery facilities visited.<sup>6</sup>

Management is responsible for implementing adequate safety and health training and educating their employees.<sup>7</sup> They must also implement preventative measures,<sup>8</sup> such as relevant refresher training for recurring and common accidents.<sup>9</sup> Creating a culture of safety requires standardization and consistency; therefore, facility level management must set a pattern of training.<sup>10</sup>

We found that some employees did not complete available training relevant to the four most common accident causes after being involved in industrial accidents at the 12 facilities from FY 2017 to FY 2021. For example, 204 employees were involved in animal encounter accidents; however, only eight employees had records for completed courses relevant to animal-related accidents (see Figure 5).

<sup>6</sup> These facilities represented judgmentally selected post offices, stations, and annexes in each of the four retail and delivery areas.

<sup>7</sup> Handbook EL-801, *Supervisor's Safety Handbook*, Section 1-2(d), Postal Service Safety Philosophy, page 2, July 2020.

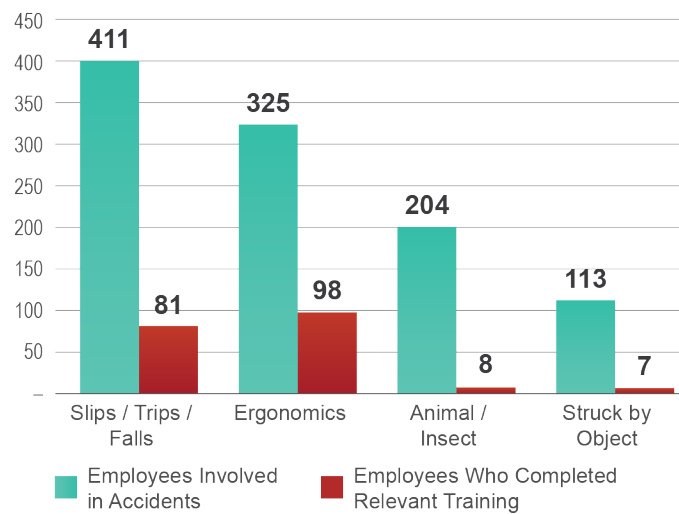
<sup>8</sup> EL-801, Section 2-3.3(e), *Examples of Corrective Measures*, page 11.

<sup>9</sup> ELM 52, Section 817.6, *Refresher Training*, page 715.

<sup>10</sup> *New Supervisor Program Participant Guide*, Module 14: Creating a Culture of Safety, pages 14-8 and 14-9, July 2022.



**Figure 5. Top Four Accident Causes Compared to Completed Relevant Training<sup>11</sup>**



Source: EDW and HERO.

Additionally, we found that supervisors did not verify that employees received instruction or completed refresher training after being involved in industrial accidents. For example, supervisors determined that providing training or instruction to the 288 employees involved in slips/trips/falls accidents would address the accidents’ root causes. However, management could not provide documentation to support that any of these employees received instruction or completed refresher training.

Also, our analysis of training records showed some employees did not receive safety and health training regularly. For example, of the 1,361 bargaining unit employees<sup>12</sup> at the 12 facilities, 482 (or 35 percent) did not have any records of completed safety and health training in a three-year period, from FY 2019 to FY 2021. In addition, 666 (or 49 percent) employees did not have any records of completed safety and health training during at least one year of our five-year audit period from FY 2017 to FY 2021. Ensuring that employees receive, and document training related to the most common accidents could reduce or prevent reoccurrence of industrial accidents.

Facility level management did not always develop and update ARPs on a quarterly basis which would allow them to easily identify relevant or refresher training necessary to address the root cause of

common accidents. Specifically, management at 10 (or 83 percent) of the 12 facilities visited did not provide an ARP for any of the 20 quarters representing the five-year scope of our audit. The remaining two facilities each provided one ARP covering only one quarter. These managers did not always complete ARPs because they 1) believed the ARP was no longer required after the Safety Toolkit<sup>13</sup> was retired, 2) thought the ARP was solely a district-level function, or 3) were not focused on accident reduction. In October 2021, SHMT action plans replaced ARP and headquarters level management stated training was provided to facility level management via Zoom meetings and videos prior to implementation. However, headquarters level management was unable to provide documentation showing who completed the training. Furthermore, during our facility visits, some employees who are responsible for ensuring compliance with safety and health policies and procedures indicated they were unaware of the SHMT action plan feature or had not completed SHMT-related training.

Also, employees did not receive safety and health training on a regular basis because policies and guidance do not define consistent safety and health training intervals or patterns. In addition, management at the 12 facilities did not emphasize the importance of providing proactive training to prevent industrial accidents. Of the 23 facility level managers interviewed, 10 (or 43 percent) stated that, due to time constraints, they primarily provided training as a response to recent accidents.

While providing refresher safety and health training is an effective way to address the root cause of an industrial accident after it has occurred, continuous and proactive training can prevent future accidents from occurring. Training employees to properly input accident and corrective action plan data into SHMT can improve management’s ability to track the status and progress of safety and health program activities at all levels of the Postal Service.

**Recommendation #1**

We recommend the **Vice President, Human Resources**, provide training on the use of the Safety & Health Management Tool for action planning activity and for facility level Accident Reduction Plans with the goal of reducing recurrence of accidents.

<sup>11</sup> These are the top four accident causes by employee count from FY 2017 to FY 2021 at the 12 facilities visited and the number of employees who completed training relevant to the causes at these facilities.  
<sup>12</sup> These are employees who are covered under a collective bargaining agreement and were assigned to the visited facilities as of May 27, 2022 and employed with the Postal Service during FY 2017 to FY 2021.  
<sup>13</sup> A resource for managers and other employees responsible for completing specific safety tasks. It was used to prepare and manage accident reduction, hazard abatement, and program improvement plans.

## Finding #2: Safety Talks

While safety talks are an effective method for management to provide employees with information on a variety of topics as part of the Postal Service's Safety Awareness Program,<sup>14</sup> we identified areas where they could improve their safety talks.

### Safety Talk Presentation

Facility level management must select safety talk topics that are interesting, relevant, and important to employees.<sup>15</sup> Additionally, safety talks should not be given over the intercom.<sup>16</sup> As shown in Figure 2, employees received safety talks more than any other form of training nationwide, from FY 2017 through FY 2021. Similarly, at the 12 visited facilities, safety talks accounted for 17,471 (or 40 percent) of the 43,878 safety and health trainings completed by employees during the same period. However, we found that facility management did not always properly present safety talks to employees at the 12 facilities visited. For example:

- Safety talks were conducted daily at three facilities to promote safety awareness. However, this repetitive daily approach led some employees to feel disengaged, stating that they generally ignored daily safety talks for this reason.
- Employees conducted safety talks over the facility's loudspeaker at five facilities, which was generally inaudible and difficult to understand. We observed mail carriers sorting mail during safety talks instead of listening to the information being disseminated.

Interviewed employees provided positive feedback regarding adaptations to routine safety talks that they believe added value to the safety awareness program. Specifically, some facility level managers supplemented routine safety talks by bringing in outside resources, such as police and animal services personnel, to address matters involving personal safety and animal interactions. By incorporating these additional resources, management enhanced safety talks. According to one postmaster, safety talks are more effective when they are interactive, personal, or relatable. This postmaster asks employees to participate in safety talks after

involvement in accidents by sharing their experiences and lessons learned.

### Record Maintenance

Facility level management must conduct safety talks at least once a week with their employee groups. Postal Service policy states that facility management should develop and present routine safety talks to meet the weekly requirement<sup>17</sup> and maintain a record of completion locally for three years.<sup>18</sup>

We found that facility management did not adequately document and maintain records of completion for weekly routine safety talks at all 12 facilities. For example, management at six (or 50 percent) of the facilities could not produce any requested training records. Additionally, some managers used a timekeeping system report as a basis for employee attendance; however, they did not verify that employees on the clock attended the safety talks.

According to facility level management, they did not always present safety talks in accordance with applicable policies and procedures because of time constraints. Furthermore, they stated they did not always adequately document safety talks because applicable policies and guidance do not provide a clear definition of the purpose and intent of safety talks. Facility and district level management stated that they were unsure whether safety talks are considered training or merely a way to promote safety awareness. For example, policies and guidance disseminated by the Postal Service's Safety and OSHA Compliance Office mention that safety talks are intended to promote safety awareness,<sup>19</sup> while those disseminated by Postal Service Retail Operations assert that safety talks are an informal training method.<sup>20</sup> Although management is in the process of updating some of the applicable guidance,<sup>21</sup> these two definitions make the purpose of safety talks unclear to district and facility level management.

If safety talks are not properly presented, employees may not gain the knowledge and skills necessary to comply with safety and health policies and procedures. If completed safety talks are not properly documented, management at all levels will not be

<sup>14</sup> Publication 129, *Safety Talks*, Section 1-1, page 1, August 2019.

<sup>15</sup> Publication 129, Section 1-4a, page 1.

<sup>16</sup> Publication 129, Section 1-4c, page 2.

<sup>17</sup> Handbook EL-801, Section 1-7, Safety Talk Requirements, page 7.

<sup>18</sup> ELM 52, Section 817.9 Training Records, page 716.

<sup>19</sup> Handbook EL-801, Section 1-7, Safety Talk Requirements, page 7.

<sup>20</sup> Handbook PO-209, *Retail Operations Handbook*, Section 9-1, Retail Training Overview, page 51, October 2012.

<sup>21</sup> As of September 2022, management could not provide details of changes being made to policies and procedures.

able to determine whether employees are receiving adequate safety and health training.

### Recommendation #2

We recommend the **Vice President, Human Resources**, reiterate policies and procedures and the importance of properly presenting and documenting attendance of safety talks to all applicable facility level management.

### Recommendation #3

We recommend the **Vice President, Human Resources**, revise applicable guidance to include a clear definition of the purpose and intent of safety talks and communicate the revised guidance to all employees.

## Finding #3: Preventive Measures

Management did not always effectively maintain preventive measures to encourage safety awareness and acceptance of safe work practices at the 12 facilities visited. Specifically, safety equipment was not always serviced, we observed employees not wearing proper footwear, and the display of visual media intended to promote safety awareness needed strengthening.

### Emergency Preparedness

Management must demonstrate a commitment to providing a safe and healthy working environment

in all its facilities.<sup>22</sup> However, management did not always ensure responsible employees inspected fire extinguishers or serviced first-aid kits. Specifically:

- **Fire Extinguishers:** Postal Service policy requires the monthly visual inspection of portable fire extinguishers to ensure they are available and operational. Any deficiency identified must be immediately corrected or the extinguisher replaced.<sup>23</sup> OSHA establishes standards regarding the number, type, location, maintenance, and inspection of fire extinguisher equipment and systems.<sup>24</sup> At four (or 33 percent) of the 12 facilities, management allowed extinguishers to be blocked by equipment or other objects (see Figure 6). The following observations show a need to improve fire extinguisher inspections:

- At three facilities, three extinguishers were missing from designated slots.
- At two facilities, indicator gauges on five extinguishers were in the red, which indicated the extinguishers needed servicing.
- At seven facilities, 22 extinguishers were missing certification tags, signatures, and/or dates. This indicated required monthly inspections did not occur.

Figure 6. Missing and Underserviced Fire Extinguishers



Source: OIG photographs taken in the New Jersey and Illinois I Districts the weeks of June 6 and June 13, 2022.

22 ELM 52, Section 811.21(a), Management Commitment, Involvement, and Accountability, page 701.

23 Handbook MS-56, *Fire Prevention and Control*, Section 481-1, page 4-10, March 15, 2006.

24 OSHA Standards 29 CFR 1910.157-1910.163; ELM 52, Section 856.2, page 755.



- **First-Aid:** Postal Service policy requires management to make sure that one or more persons is adequately trained to render first-aid to injured employees. Additionally, management must ensure that adequate first-aid supplies are readily available and checked regularly. First-aid kits must include items necessary for emergency situations in addition to the basic first-aid supplies, such as a cardiopulmonary resuscitation mask and logbook.<sup>25</sup>

Management did not always make sure responsible employees were properly trained in first-aid or understood how to adequately service first-aid kits, as required. None of the six safety captains<sup>26</sup> interviewed at the 12 facilities were trained to administer first-aid<sup>27</sup> or cardiopulmonary resuscitation. Fully stocked first-aid kits, as well as first-aid skills, are essential and may be required in day-to-day Postal Service activities to treat injured employees. Therefore, emphasizing first-aid capabilities can promote safety awareness. As shown in Figure 7, some kits were not always readily available with sufficient supplies.

The fire extinguisher and first-aid issues occurred because management did not always prioritize emergency preparedness over other duties. Specifically, some managers allowed fire extinguishers to be blocked due to facility overcrowding. One manager stated that he pulled an extinguisher from its slot for maintenance and did not replace it. Additionally, management stated that they did not stress emergency preparedness training due to competing obligations and employee unavailability.

### Proper Footwear

Shoes that employees wear to work must be fully enclosed at the heel, toe, or sides; and be constructed of leather or a substantial synthetic material. Canvas and nylon are not acceptable.<sup>28</sup> The supervisor with jurisdiction over a work location must determine whether a particular shoe is acceptable on the workroom floor, periodically check to ensure employees are wearing approved footwear,<sup>29</sup> and correct employees wearing unacceptable footwear.<sup>30</sup>

**Figure 7. First-Aid Kits Without Appropriate Supplies**



Source: OIG photographs taken at the New Jersey and Texas 1 Districts the week of June 6, 2022.

25 Handbook EL-801, Section 8-6, page 59.

26 A safety captain is an employee who assists management in getting all employees involved in the safety program by communicating safety procedures to new and reassigned employees, participating in safety meetings, soliciting ideas for safety program improvements, and inspecting work areas for hazards.

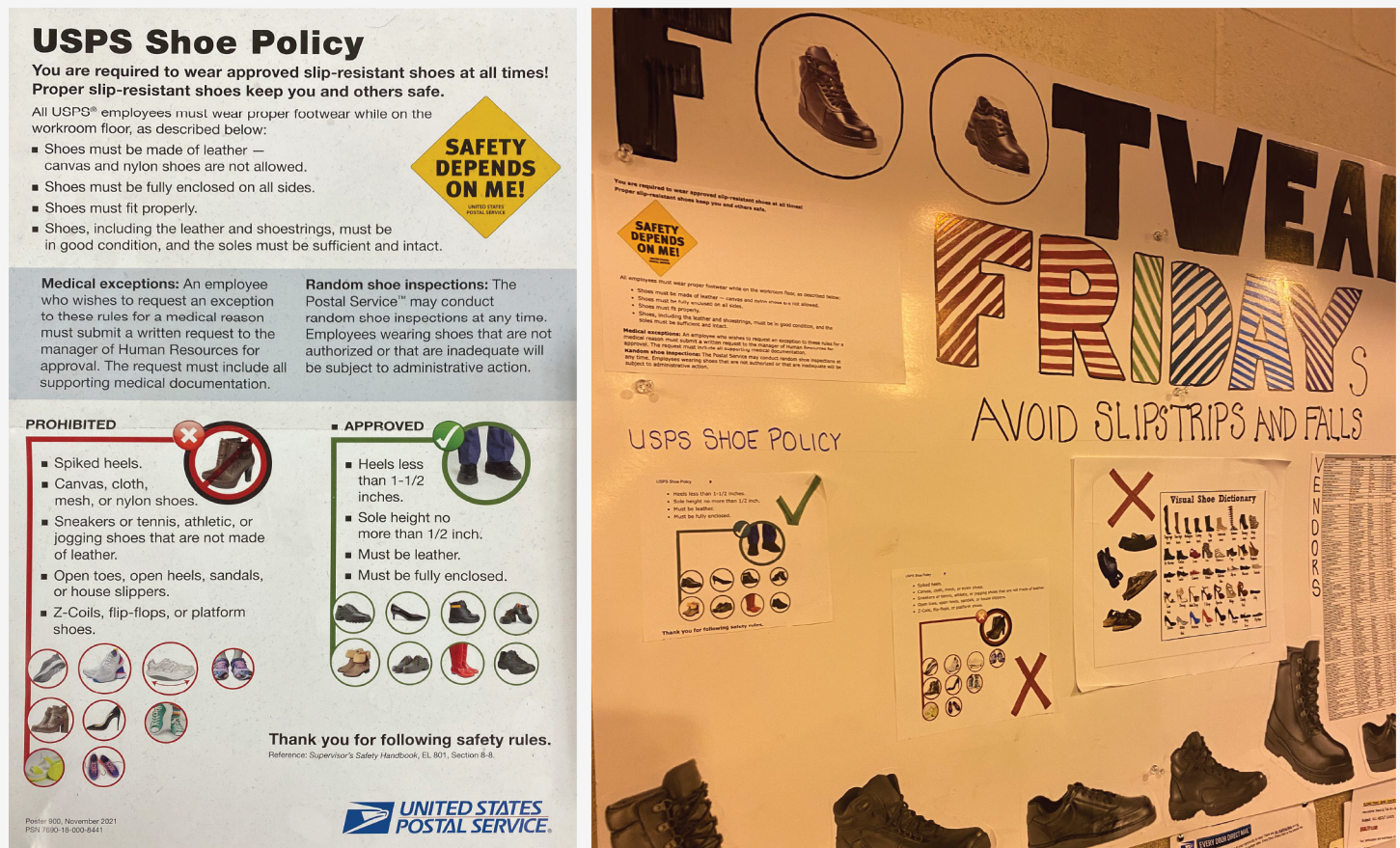
27 According to OSHA, first-aid refers to medical attention that is usually administered immediately after the injury occurs and at the location where it occurred. It often consists of a one-time, short-term treatment and requires little technology or training to administer. First-aid can include cleaning minor cuts, scrapes, or scratches; treating a minor burn; applying bandages and dressings; using non-prescription medicine; draining blisters; removing debris from the eyes; massaging; and administering fluids to relieve heat stress.

28 Handbook EL-801, Section 8-8.2, page 61 and Handbook EL-814, *Postal Employee's Guide to Safety*, page 15, July 2020.

29 Handbook EL-801, Section 3-3.3, page 16, and *Postal Employee's Guide to Safety*, page 15.

30 Handbook EL-801, Section 8-8.4, page 61.

Figure 8. Shoe Policy Observations



Source: Posters observed at New Jersey and Texas 1 Districts the week of June 6, 2022.

Employees did not always wear Postal Service-approved footwear, which must be slip-resistant to help reduce the risks of slips, trips, and falls, which were the most common type of industrial accident both nationwide and at the 12 facilities from FY 2017 to FY 2021. We observed employees wearing non-approved footwear during our facility visits. According to these employees, they were aware of the Postal Service shoe policy yet continued to wear non-approved footwear. This occurred at nine (or 75 percent) of the 12 facilities despite clear visibility of posted footwear guidelines, examples of which are shown in Figure 8.

For instance, of the 83 bargaining unit employees interviewed, we observed 52 of these employees' footwear. We noted that 22 (or 42 percent) of the 52 were not wearing approved footwear. Of these 22, 19 were mail carriers and three were clerks. These employees wore non-approved shoes on the job, such as sneakers and canvas athletic or jogging shoes. However, three of the 19 carriers interviewed indicated their approved footwear was in their vehicle

or they would change into approved shoes before leaving for their routes.<sup>31</sup>

This issue occurred because management did not ensure employees understood the importance of proper footwear through adequate formal training. In addition, responsible personnel did not periodically inspect employees' shoes to ensure compliance with policies. Additionally, employees believed the approved footwear to be uncomfortable, unaffordable, or not durable. Management stated that employees at all levels must embrace safety by wearing the proper footwear. Per union agreements, some bargaining employees must wear a uniform and receive a uniform allowance. While some employees are not required to wear a uniform, all employees must wear Postal Service-approved footwear.

### Visual Media

Effective promotional programs must be based on a thorough study of local needs. Accurate planning and analysis are essential to achieving program

<sup>31</sup> We were unable to verify that these carriers changed into approved footwear due to coinciding interviews and route delivery start times.



objectives.<sup>32</sup> Postal Service facilities should procure or develop and distribute posters, publications, films, bulletins, pamphlets, newsletters, displays, etc., based on current and projected accident trends and display the most current safety posters distributed by Postal Service Headquarters.<sup>33</sup> Additionally, management must ensure prompt and proper disposal of all material declared to be obsolete, surplus, or not repairable, and authorized for disposal.<sup>34</sup> Furthermore, they must take advantage of the opportunity to maximize employee participation in safe work practices by displaying visual media effectively.<sup>35</sup>

We found that management’s promotion of safety awareness through the public display of visual media needed improvement at the 12 visited facilities. Specifically, management did not always effectively use safety bulletin boards, posters, or other visual media at facilities to promote safety awareness. For example, at one facility, the safety bulletin board had been removed a year before and had not been replaced at the time of our visit. At 11 (or 92 percent) of the 12 facilities, posters featuring preventive measures for topics such as trips and falls had

not been updated or replaced. These posters were outdated, water damaged, and/or torn. In addition, as shown in Figure 9, displays at five (or 42 percent) of the 12 facilities were obscured, covered, or blocked by mail transport equipment, obsolete items, doors, boxes, or non-safety related postings.

Posters featuring preventive measures had not been updated or replaced because facility level management stated that they did not place emphasis on safety awareness programs due to conflicting priorities. Displays of visual media were obscured because facility level management did not promptly dispose of obsolete items and other items obscuring visual safety awareness media. At two of the facilities, management stated that their facility was overcrowded and there was no other location to store the equipment.

Without implementation and proper maintenance of preventive measures, there is an increased risk of serious injury and/or property damage. By correcting safety and maintenance deficiencies, management can reduce the risk of injuries to employees and protect the Postal Service brand.

**Figure 9. Obstructed Safety Bulletin Boards**



Source: OIG photographs taken at the New Jersey and California 5 Districts during the weeks of June 6 and June 13, 2022.

32 ELM 52, Section 841.2, Local Needs, page 744.

33 ELM 52, Section 841.3, Media, page 744.

34 Handbook AS-701, *Asset Management*, Section 5-1.4.2, page 74, September 2020.

35 ELM 52, Section 841.1, Objectives, page 744.



#### Recommendation #4

We recommend the **Vice Presidents, Area Retail and Delivery Operations**, provide formal training to responsible personnel on proper maintenance of fire extinguishers and first-aid kits, and implement a process to verify the inspection of fire extinguishers and first-aid supplies so they are readily available at the 12 facilities visited listed in Appendix A.

#### Recommendation #5

We recommend the **Vice Presidents, Area Retail and Delivery Operations**, provide formal training to responsible personnel on administering first-aid and cardiopulmonary resuscitation at the 12 facilities visited listed in Appendix A.

#### Recommendation #6

We recommend the **Vice Presidents, Area Retail and Delivery Operations**, provide formal training to employees on policies regarding approved footwear with the goal of correcting noncompliance with the policy at the 12 facilities visited listed in Appendix A.

#### Recommendation #7

We recommend the **Vice Presidents, Area Retail and Delivery Operations**, reiterate the requirement to keep safety posters current, dispose of obsolete items, and prevent other items from obscuring safety awareness media displays to improve visibility at the 12 facilities visited listed in Appendix A.

Regarding recommendation 5, management will provide formal training to responsible personnel on administering first-aid and cardiopulmonary resuscitation at the districts listed in Appendix A.

Regarding recommendation 6, management will provide formal training to all employees on proper footwear at the districts listed in Appendix A.

Regarding recommendation 7, management will reiterate requirements to keep safety posters current, dispose of obsolete items, and prevent items from obscuring safety awareness media at the districts listed in Appendix A.

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

### Evaluation of Management's Comments

The OIG considers management's comments to all recommendations responsive and planned corrective actions should satisfy the intent of the recommendations. All recommendations require OIG concurrence before closure. The OIG requests written confirmation when corrective actions are completed. All recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendation can be closed.

## Management's Comments

Management agreed with all findings and recommendations. Their target implementation date for all seven recommendations is May 1, 2023.

Regarding recommendation 1, management will determine if existing training materials need to be updated and provide training to field level management.

Regarding recommendation 2, management will communicate the importance of properly presenting and documenting safety talks to field level management.

Regarding recommendation 3, management will communicate the purpose and intent of safety talks to all employees.

Regarding recommendation 4, management will provide formal training to responsible employees on the proper maintenance of fire extinguishers and first-aid kits, and implement a process to verify the inspection of fire extinguishers and first-aid supplies at the districts listed in Appendix A.

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# Appendix A: Additional Information

## Scope and Methodology

We reviewed and analyzed nationwide industrial accident and safety and health training data from the EDW and HERO, respectively, from FY 2017 through FY 2021.

To accomplish our objective, we:

- Obtained and reviewed Postal Service and OSHA policies and procedures related to safety and health, including industrial accidents, training requirements, safety awareness, safety talks, fire prevention and control, first-aid, and accident reduction or action plans.
- Obtained and analyzed accident data from EDW to identify trends, risk areas, and anomalies.
- Obtained and analyzed safety and health training course and participant data from HERO.
- Interviewed facility, district, and headquarters management to identify accident reporting policies and procedures, systems and applications, and training requirements.
- Interviewed 83 bargaining employees to gain an understanding of the safety and health training they have received, accidents they have experienced, and hazards in their work environment.
- Conducted facility visits at six stations, four carrier annexes, two post offices, and one district office in the California 5, Illinois 1, New Jersey, and Texas 1 Districts.
- Identified and reviewed relevant OIG hotline submissions and allegations.

## Facility Selection

Based on our data analysis, we judgmentally selected 12 retail and delivery facilities with a combination of high and low number of industrial accidents per employee (accident ratio). See Table 1. These facilities represented stations, carrier annexes, and post offices in each of the four retail and delivery areas.

**Table 1. 12 Judgmentally Selected Facilities**

	Retail & Delivery Area	District	Post Office/Station/Annex
1	Atlantic	New Jersey	Tom's River, NJ Post Office
2	Atlantic	New Jersey	Trenton, NJ Post Office
3	Atlantic	New Jersey	South Hackensack Annex, Hackensack, NJ
4	Central	Illinois 1	Lincoln Park Carrier Annex, Chicago, IL
5	Central	Illinois 1	Fort Dearborn Station, Chicago, IL
6	Central	Illinois 1	Auburn Park Station, Chicago, IL
7	Southern	Texas 1	Northwest Station, Plano, TX
8	Southern	Texas 1	North Carrier Annex, Fort Worth, TX
9	Southern	Texas 1	Polytechnic Station, Fort Worth, TX
10	WestPac	California 5	Los Feliz Station, Los Angeles, CA
11	WestPac	California 5	Greenmead Station, Los Angeles, CA
12	WestPac	California 5	North Carrier Annex, Long Beach, CA

Source: EDW.



We conducted this performance audit from May 2022 through February 2023 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 January 11, 2023, and included their comments where appropriate.

We assessed the reliability of accident reporting and training data by discussing and verifying the data with management officials knowledgeable about the data. We worked with facility management to further validate the completeness of training data and determined that the data were sufficiently reliable for the purposes of this report.

### **Prior Audit Coverage**

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

# Appendix B: Management's Comments



January 30, 2023

JOHN CIHOTA  
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Safety & Health Program Training (Report Number [22-120-DRAFT])

Thank you for the opportunity to review and comment on the above-mentioned draft audit report (Draft Report) prepared by the Office of Inspector General (OIG), and to address the findings and recommendations contained therein. The Postal Service agrees to continue to improve on the success of our Safety & Health Training Programs and we concur with all the findings from the OIG in this report.

**Recommendation [ 1 ]:**

**We recommend the Vice President, Human Resources, provide training on the use of the Safety & Health Management Tool for action planning activity and for facility level Accident Reduction Plans with the goal of reducing recurrence of accidents.**

**Management Response/Action Plan:**

Management agrees with this recommendation. Existing training materials will be reviewed for needed updates and will be provided to field level management.

**Target Implementation Date:**

May 1, 2023

**Responsible Official:**

Sr. Director, Occupational Safety and Health

**Recommendation [ 2 ]:**

**We recommend the Vice President, Human Resources, reiterate policies and procedures and the importance of properly presenting and documenting attendance of safety talks to all applicable facility level management.**

**Management Response/Action Plan:**

Management agrees with this recommendation. Communication regarding the importance of properly presenting and documenting safety talks will be issued to field level management.

**Target Implementation Date:**

May 1, 2023

**Responsible Official:**

Sr. Director, Occupational Safety and Health

**Recommendation [ 3 ]:**

**We recommend the Vice President, Human Resources, revise applicable guidance to include a clear definition of the purpose and intent of safety talks and communicate the revised guidance to all employees.**

**Management Response/Action Plan:**

Management agrees with this recommendation. Communication regarding the purpose and intent of safety talks will be disseminated to all employees.

**Target Implementation Date:**

May 1, 2023

**Responsible Official:**

Sr. Director, Occupational Safety and Health

**Recommendation [ 4 ]:**

**We recommend the Vice Presidents, Area Retail and Delivery Operations, provide formal training to responsible personnel on proper maintenance of fire extinguishers and first-aid kits, and implement a process to verify the inspection of fire extinguishers and first-aid supplies so they are readily available at the 12 sites visited listed in Appendix A.**

**Management Response/Action Plan:**

Management agrees with this recommendation. Communication regarding the formal training will be shared with responsible personnel on proper maintenance of fire extinguishers and first-aid kits, and implement a process to verify the inspection of fire extinguishers and first-aid supplies so they are readily available will be sent to the districts listed in Appendix A.

**Target Implementation Date:**

May 1, 2023

**Responsible Official:**

Respective Postmasters/Station Managers of these units will be responsible for monthly inspection and ensuring that the fire extinguishers and first aid kits are readily available.



**Recommendation [ 5 ]:**

**We recommend the Vice Presidents, Area Retail and Delivery Operations, provide formal training to responsible personnel on administering first-aid and cardiopulmonary resuscitation at the 12 sites visited listed in Appendix A.**

**Management Response/Action Plan:**

Management agrees with this recommendation. Communication regarding the formal training will be shared with the responsible personnel on administering first-aid and cardiopulmonary resuscitation will be sent to the districts listed in Appendix A.

**Target Implementation Date:**

May 1, 2023

**Responsible Official:**

Area Occupational Health Nurse Administrator and Integration managers of respective areas.

**Recommendation [ 6 ]:**

**We recommend the Vice Presidents, Area Retail and Delivery Operations, provide formal training to employees on policies regarding approved footwear with the goal of correcting noncompliance with the policy at the 12 sites visited listed in Appendix A.**

**Management Response/Action Plan:**

Management agrees with this recommendation. Communication regarding the formal training will be provided to employees on policies regarding approved footwear with the goal of correcting noncompliance with the policy will be sent to the districts listed in Appendix A.

**Target Implementation Date:**

May 1, 2023

**Responsible Official:**

Respective Postmasters/Station Managers of these units of these units will be responsible for ensuring that the unit employees are following the proper footwear.

**Recommendation [ 7 ]:**


**We recommend the Vice Presidents, Area Retail and Delivery Operations, reiterate the requirement to keep safety posters current, dispose of obsolete items, and prevent other items from obscuring safety awareness media displays to improve visibility at the 12 facilities visited listed in Appendix A.**

**Management Response/Action Plan: Management agrees with this recommendation. Communication regarding the requirement to keep safety posters current, dispose of obsolete items, and prevent other items from obscuring safety awareness, media displays to improve visibility will be sent to the districts listed in Appendix A.**


**Target Implementation Date:  
May 1, 2023**

**Responsible Official:**


**Respective Postmasters/Station Managers of these units will be responsible for ensuring these items are kept current.**

 E-SIGNED by Simon.M Storey  
on 2023-01-27 12:43:21 CST

Simon Storey, Vice President, Human Resources

 E-SIGNED by Scott.P Raymond  
on 2023-01-27 13:07:26 CST


Scott Raymond, Vice President, Atlantic Area Retail and Delivery Operations

 E-SIGNED by Eric.E Henry  
on 2023-02-02 15:24:31 CST

Eric Henry, Vice President, Central Area Retail and Delivery Operations

 E-SIGNED by Timothy.R Costello  
on 2023-01-27 16:12:25 CST

Timothy Costello, Vice President, Southern Area Retail and Delivery Operations

 E-SIGNED by Eduardo.H Ruiz  
on 2023-02-02 15:26:27 CST

Eduardo Ruiz, Vice President, WestPac Area Retail and Delivery Operations

cc: *Manager, Corporate Audit Response Management*

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