

Unsecured Assets at the Washington Network Distribution Center

MANAGEMENT ALERT

Report Number 22-185-1-R23 | June 28, 2023



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Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

June 28, 2023

MEMORANDUM FOR: DANE A. COLEMAN
VICE PRESIDENT, PROCESSING OPERATIONS,
EASTERN DISTRICT

A handwritten signature in black ink, reading "Amanda H. Stafford", is centered below the recipient information.

FROM: Amanda H. Stafford
Deputy Assistant Inspector General for Retail,
Marketing & Supply Management

SUBJECT: Management Alert – Unsecured Assets at the Washington Network
Distribution Center (Report Number 22-185-1-R23)

This management alert presents issues identified during our ongoing audit of Internal Controls Over the Annual Capital Property Review (Project Number 22-185). The objective of this management alert was to provide U.S. Postal Service officials immediate notification of issues identified during our ongoing audit. These issues require immediate attention and remediation.

We appreciate the cooperation and courtesies provided by your staff. If you have questions or need additional information, please contact Shirian Holland, Director, Infrastructure and Supply Management, or me at 703-248-2100.

Attachment

cc: Postmaster General
Corporate Audit Response Management

Results

Introduction

This management alert presents issues the U.S. Postal Service Office of Inspector General (OIG) identified during the *Internal Controls Over the Annual Capital Property Review* audit (Project Number 22-185). Our objective is to provide immediate notification of these issues for accelerated attention and action. Specifically, we found weaknesses in the internal controls pertaining to the management oversight of assets and safety conditions at the Washington Network Distribution Center (NDC) in Capitol Heights, Maryland.

See [Appendix A](#) for additional information about this audit.

Background

The Washington NDC is a highly mechanized U.S. Postal Service mail processing plant that distributes standard mail and packages in piece and bulk form. To carry out its mission, the Washington NDC owns the following types of assets:

- **Capital assets** have a unit cost of \$10,000 or more, are acquired through purchase, transfer, or donation, and depreciate.¹ In calendar year 2014, the threshold for capital assets was increased from \$3,000 to \$10,000.
- **Expendable assets** cost less than \$10,000 and include items such as repair parts, replacement components, mail transport equipment, and workroom furniture.
- **Sensitive assets** are a subcategory of expendable assets and consist of assets vulnerable to theft or loss, and include items such as computers, laptops, cell phones, digital cameras, and other valuable portable equipment.

Assets can be stored onsite in internal stockrooms or outside in storage facilities. Washington NDC management utilizes a 6,375 square foot external portable structure – built in 1995 – to store equipment and repair parts that exceed the storage capacity of its internal stockroom.

The Postal Service is responsible for protecting these types of assets from loss, theft, damage, and impairment, as well as ensuring they are accounted for through an effective asset management program. Asset management includes maintaining accurate identification and tracking of the assets within their stockrooms and storage facilities, updating data systems as appropriate, and establishing physical safeguards over the assets.

The Vice President, Supply Management is responsible for establishing and maintaining national asset management policies, programs, and procedures. Within a facility, asset accountability is the responsibility of the facility head, material accountability officers (MAO),² and stockroom personnel.³ Asset management responsibilities include identifying and transferring active and inactive assets,⁴ determining the usability of inactive assets, conducting periodic reviews, and prompt and accurate reporting through appropriate inventory management systems.⁵

Finding #1: Ineffective Management Oversight of Assets

Management controls over Postal Service assets, located within the external portable structure, were not effective. We conducted observations and interviews at the Washington NDC during February and March 2023, and found that facility management did not:

- Implement physical safeguards over its assets.

¹ As of February 23, 2023, over 261 capital assets, such as mail processing and handling equipment, with an estimated netbook value (undepreciated balance) of approximately \$6.8 million were located at the Washington NDC. The OIG has an ongoing audit that will evaluate the effectiveness of internal controls over the annual capital property review at the Washington NDC.

² A facility head is one who plans, organizes, directs, guides, controls, and evaluates the efforts of subordinate managers, employees, or both to achieve organizational goals. At larger facilities, like the Washington NDC, facility heads may delegate asset accountability to an employee designated as the MAO.

³ Stockroom personnel are responsible for storing, issuing, and receiving inventory, such as equipment, repair parts, retail products, and other items.

⁴ Inactive assets are referring to property that is not being used because it is either not needed (excess), not yet needed, surplus, obsolete, or in need of repair.

⁵ Handbook AS-701, *Asset Management*, Section 6-1.4.2.

- Conduct a periodic review to identify inactive assets that were appropriate for redistribution, recycling, and disposal.
- Maintain a data system for tracking the assets located in the external portable structure.

Lack of Physical Safeguards over Assets

Facility management did not lock or secure the external portable structure containing many functional Postal Service assets. These assets ranged from various repair parts for processing machines, commercial toolboxes, an air conditioning unit, and custodial and lawncare equipment. Although the public does not have access to the external portable structure, Postal Service employees at the facility – including those without stockroom duties – can enter the structure and remove assets without authorization.

Postal Service policy states that storage room access must be limited to authorized personnel responsible for assets. In addition, no item may be placed in or removed from the storage area (containing equipment or repair parts) without notifying authorized personnel. Furthermore, personnel responsible for storage areas must take all necessary steps to preserve and safeguard material and to promote safety in Postal Service storage operations.⁶

No Periodic Reviews to Identify Inactive Assets

Facility management had not completed any periodic reviews to identify which assets within the portable structure were inactive. Specifically, based on direct observations, we found some assets such as unused repair parts in its original packaging dating back to 2009. Additionally, management confirmed during interviews that these assets could be classified as inactive and consequently redistributed within the organization, recycled, or disposed.⁷ These assets included:

- Forty-one boxes of index level assembly, used as a part of the carriages in Parcel Sorting Machines (PSM) – designed to mechanically sort packages within a facility (see Figure 1).

- Sixteen bollards, used for barriers in front of buildings, in parking lots, or along sidewalks (see Figure 2).
- Fourteen chutes for Automated Parcel and Bundle Sorter machines – designed to sort bundles and small single mail pieces into a series of containers (see Figure 3).
- Eleven motors of various sizes, used as a part in the conveyor belts.
- Seven hampers of carriages, also used as a part in PSMs (see Figure 4).
- Seven drum pulleys of various sizes, used to drive conveyor belts.
- Five control reducers, used as a part in the conveyor belts.
- Three rollers, used to drive conveyor belts that sort mail.

Figure 1. Index Level Assembly



Source: OIG photograph taken at the Washington NDC on March 20, 2023.

⁶ Handbook AS-701, *Asset Management*, Sections 3-6.7 and 3-6.1.

⁷ Inactive and excess inventories, such as equipment or repair parts, are identified as either not appropriate for retention or over the six-month retention limit. Parts over the retention limit are available for either redistribution or disposal.

Figure 2. Bollards



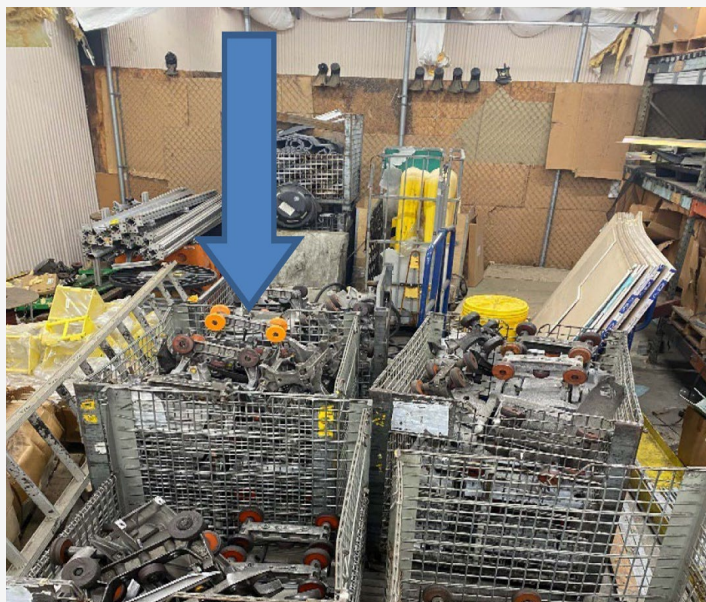
Source: OIG photograph taken at the Washington NDC on March 20, 2023.

Figure 3. Chutes



Source: OIG photograph taken at the Washington NDC on March 20, 2023.

Figure 4. Hampers Containing Carriages



Source: OIG photograph taken at the Washington NDC on March 20, 2023.

OIG interviews with different levels of management confirmed that a consistent process to identify whether the assets were considered active or inactive did not exist. For example, one manager noted that some parts within the external portable structure had been there for 15 years or more with no clear indication of the assets' status or need going forward.

Postal Service policy states inventory should be regularly evaluated to manage potentially inactive assets. This may be facilitated through cycle counting,⁸ which is the preferred method of maintaining inventory accuracy, to identify inactive assets.⁹

Assets Not Tracked in Inventory Management Systems

Facility management did not maintain a data system for tracking the assets located in the external portable structure. All active and inactive assets should be tracked in an inventory management system.¹⁰ However, management was unable to provide the OIG with a complete asset listing and the duration that they had been stored or unused.

Since the Postal Service did not maintain a historical asset inventory listing, including the asset quantity

⁸ Process of counting the entire stockroom inventory incrementally over a given period. The frequency of cycle counting will vary by type of inventory and is generally stipulated in management policies specific to the commodities being managed, e.g., retail products are cycle counted on a monthly basis whereas maintenance parts inventories are counted on a daily basis.

⁹ Handbook AS-701, *Asset Management*, Sections 4-6.2 and 6-1.4.

¹⁰ Handbook AS-701, *Asset Management*, Section 4-1.5.

and types (capital, expendable, or sensitive) stored in the external portable structure, we judgmentally selected 40 assets to review and determine whether they were tracked in any inventory management systems for accuracy and completeness. We found that 37 out of 40 sampled assets (93 percent) were expendable assets and were not in any inventory management system.¹¹ Furthermore, facility management was not able to provide supporting documentation, such as packing slips, bill of lading, or invoices, for any of the 37 assets. Thus, the OIG was not able to verify the purchase date and cost of these assets.

Postal Service policy states that all assets, including expendable assets, such as repair parts, replacement components, and motors, should be tracked and managed in an inventory management system,¹² such as the *Maintenance Activity Reporting & Scheduling* (eMARS) system,¹³ the *Material Distribution Inventory Management System* (MDIMS),¹⁴ or the *Solution for Enterprise Asset Management* (SEAM) system.¹⁵

Collectively, these three issues occurred because facility management did not provide sufficient oversight of assets in the external portable structure. Specifically, facility management:

- Was not aware of or did not comply with Postal Service policies requiring the need to place physical safeguards or limit personnel access over its assets.
- Did not communicate and define roles and responsibilities for the designated individual responsible to conduct periodic reviews and complete the disposition of assets (i.e., recycles, transfers, or disposals).
- Did not prioritize entering assets in the external portable structure into required inventory management systems.

“While management stated they are currently developing plans to review the contents of the structure and implement on-going inventory processes, the ineffective asset management oversight places the Postal Service at financial and operational risk.”

While management stated they are currently developing plans to review the contents of the structure and implement on-going inventory processes, the ineffective asset management oversight places the Postal Service at financial and operational risk. Specifically, as a result of:

- Improper safeguards over the assets maintained within the structure, there is an increased risk of loss or theft of critical parts and equipment, which have financial value¹⁶ and are essential to maintaining continuity of network and distribution mail operations. In addition, there may have been other types of items – at one point held within the external portable structure – that were considered assets or accountable items at risk.¹⁷
- Facility management not conducting periodic reviews of inactive assets, the Postal Service is at risk of purchasing repair parts or equipment that is already available at the facility or not having essential assets to maintain operations. In addition, the Postal Service can realize cost savings and additional revenue through proper identification of assets that require redistribution, recycling, and disposal.
- Facility management not recording or tracking all active and inactive assets in an inventory management system, the Postal Service is at

¹¹ Of the three remaining assets, management stated that two items were not expendable and were prior building improvement parts such as an air-conditioning unit attached to the main Washington NDC facility. In addition, we were able to trace one expendable asset in an inventory management system.

¹² Handbook AS-701, *Asset Management*, Section 5-1.5 (d).

¹³ eMARS tracks inventory (including prices and part numbers) for maintenance operations, adjusts the inventory accordingly, and notifies when an item needs to be reordered.

¹⁴ MDIMS is used to perform material distribution, warehousing and inventory management business functions for the Postal Service.

¹⁵ SEAM is a system that captures inventory data to forecast, plan, replenish, track, and control the replenishment of assets.

¹⁶ While facility management initially stated that there was no financial value associated with the assets stored inside, they later stated that these assets were safety stock essential for mail processing operations.

¹⁷ Assets or accountable items at risk of loss because of inadequate internal controls.

risk of maintaining inaccurate, incomplete, or outdated data. This may lead to the Postal Service making improper stocking decisions such as keeping too much inventory on-hand, which they are unable to use, and increasing overhead expenses.

Recommendation #1

We recommend **Vice President, Processing Operations, Eastern Region**, instruct the **Manager, Washington NDC**, to establish physical safeguards over the assets in the external portable structure, in accordance with Handbook AS-701, *Asset Management*.

Recommendation #2

We recommend **Vice President, Processing Operations, Eastern Region**, instruct the **Manager, Washington NDC**, to define and communicate who is responsible for the assets in the external portable structure and require staff to conduct periodic reviews of the assets to identify inactive items for appropriate disposition, in accordance with Handbook AS-701, *Asset Management*.

Recommendation #3

We recommend the **Vice President, Processing Operations, Eastern Region**, instruct the **Manager, Washington NDC**, to conduct a physical inventory of all assets located in the external portable structure and record assets in the appropriate inventory management systems.

Finding #2: Insufficient Safety and Maintenance Conditions

We found that the repair parts and equipment were stored in an environment which may impair or damage the service life of assets and can be unsafe for employees. Specifically, management did not maintain the external portable structure in accordance with applicable building safety and maintenance standards. We observed:

- Damaged ceiling with exposed insulation (see Figure 5).
- Rodent feces on Postal Service assets (see Figure 6).
- Dust, debris, and trip hazards (see Figure 7).
- Broken door closure (see Figure 8).
- Flammable materials, such as paint¹⁸ and sealant, which were not properly stored.

“Management did not maintain the external portable structure in accordance with applicable building safety and maintenance standards.”

Figure 5. Damaged Ceiling



Source: OIG photograph taken at the Washington NDC on March 20, 2023.

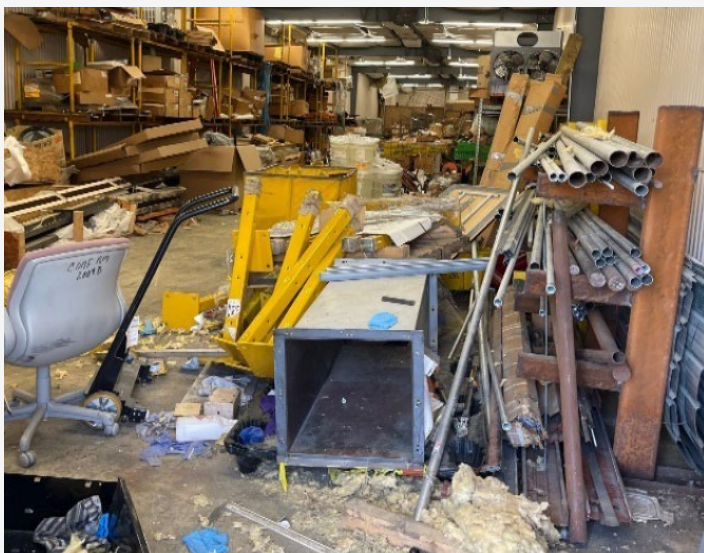
Figure 6. Rodent Feces



Source: OIG photograph taken at the Washington NDC on March 20, 2023.

¹⁸ Management stated that the hazardous commodities should not have been stored in the external portable structure.

Figure 7. Dust, Debris, and Trip Hazards



Source: OIG photograph taken at the Washington NDC on February 8, 2023.

Figure 8. Broken Door Closure



Source: OIG photograph taken at the Washington NDC on March 20, 2023.

Postal Service policies¹⁹ require facilities to be maintained in accordance with prescribed standards to provide a safe and healthy environment for employees. This includes good housekeeping practices, which ensure that employees organize work areas so that all pieces of equipment have a designated place.²⁰ In addition, hazardous

commodities such as grease, paints, oils, thinners, kerosene, and other flammable liquids, require special handling and storage.²¹ It is the responsibility of the facility manager to ensure that maintenance is conducted in accordance with prescribed policies.²²

These issues occurred because management did not provide sufficient oversight, conduct timely reporting of safety and maintenance issues, and coordinate with custodial management to ensure a prompt resolution. As a result of these maintenance and safety issues, postal employees may be at increased risk of injury. In addition, poor housekeeping practices may increase the risk of loss or damage to repair parts and equipment that are critical to Postal Service operations that provide the nation with reliable, affordable, and universal mail service.

Recommendation #4

We recommend the **Vice President, Processing Operations, Eastern Region**, instruct the **Manager, Washington NDC**, to develop and implement an action plan to address all exterior portable structure safety and maintenance issues identified during our audit.

Management's Comments

Management partially agreed with findings 1 and 2 and agreed with all recommendations in the report.

Regarding finding 1, management stated that the report implied all employees at the facility can enter the structure and remove assets without authorization. They noted only employees with access to the yard can enter the external portable structure and not all employees have access to enter the yard.

In addition, management clarified that an assets' suitability for redistribution, recycling, and/or disposal was determined prior to local storage. Assets that were required to be returned to the Mail Transportation Equipment Service Center were returned, items deemed as trash were disposed of, and assets that could be classified as inactive can be stored locally until a decision is made on those items.

19 Maintenance Management Order, MMO-127-09, updated November 9, 2009; PO-209, *Retail Operations Handbook*, Section 4.8, updated October 2012; and Handbook EL-801, *Supervisor's Safety Handbook*, updated July 2020.

20 Handbook EL-801, *Supervisor's Safety Handbook*, Section 8-10 and 8-10.3, updated July 2020.

21 *Administrative Support Manual*, Section 733.222.

22 PO-209, *Retail Operations Handbook*, Section 4.8, updated October 2012, and EL-814, *Postal Employees Guide to Safety*.

Regarding finding 2, management stated that the external portable structure is used to protect the assets from being stored outside and exposed to weather conditions. Some of the observations identified in the report do not have a strong correlation to damage of the equipment.

Regarding recommendation 1, management stated they will secure the external portable structure with additional physical safeguards including locks. In addition to the added physical safeguards, access to the storage area will be limited to authorized personnel only. The target implementation date is August 31, 2023.

Regarding recommendation 2, management stated they will oversee the external portable structure's inventory and ensure an annual inventory is conducted. The target implementation date is September 8, 2023.

Regarding recommendation 3, management stated they will conduct an inventory of the external portable structure to catalog the contents and identify inactive items for disposal or redistribution as appropriate. Items will be entered into appropriate inventory management system or locally created inventory control sheet for parts with no part numbers. The target implementation date is September 8, 2023.

Regarding recommendation 4, management stated they will develop an action plan and begin addressing all exterior safety and maintenance issues identified in the report. The target implementation date is November 30, 2023.

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

Evaluation of Management's Comments

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

Regarding management's partial agreement with finding 1, we did not observe any indicators to restrict employee access to the yard from inside the facility. During our site visit, [REDACTED]

In addition, we recognize that a determination may have been made of assets' suitability prior to local storage; however, as noted in the report, some assets found in the external portable structure dated back to 2009. Furthermore, management stated they did not maintain a historical asset inventory listing for any of the selected assets; therefore, the OIG could not validate any authorizations or actions taken for the disposition of these assets prior to being stored in the external portable structure.

Regarding management's partial agreement with finding 2, as noted in the report, the external portable structure had visible issues with building safety and maintenance standards. The exposed ceiling and rodent feces observed may damage parts or equipment, which are critical to Postal Service operations. In addition, the improper storage of flammable materials may result in extensive damage to the structure or equipment in the event of a fire.

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

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Appendix A: Additional Information

Scope and Methodology

The scope of this management alert focused on the unsecured assets stored in the Washington NDC external portable structure. To accomplish our objective, we:

- Conducted multiple site visits at the Washington NDC.
- Judgmentally selected 40 assets stored within the external portable structure for review based on the following criteria: potential value of assets, assets still in boxes, assets that looked unusable, and assets laying on the floor.
- Determined if selected assets could be reconciled with any inventory management system, such as eMARS, MDIMS, and the SEAM.
- Interviewed Washington NDC management and Headquarters Asset Management, to obtain a better understanding of asset management procedures, controls, and oversight over the process.
- Corresponded with Asset Accountability Inventory Control specialists²³ regarding MAO responsibilities.

We conducted this performance audit from February through June 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.

On May 16, 2023, we notified management prior to issuing the draft of this management alert. We discussed our observations and conclusions with management on June 1, 2023, and included their comments where appropriate.

We did not use any computer-generated data; therefore, we did not assess the reliability of any computer-generated data 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.

Additional information or recommendations regarding the issues addressed in this management alert may also be included in the final report resulting from our related ongoing audit.

²³ Asset Accountability Inventory Control Specialists act as liaisons for Supply Management Asset Management and provide direct asset accountability guidance and support to the field and Headquarters employees within their service areas. Specific responsibilities include monitoring activities and supporting the implementation of inventory control systems, policies, and procedures.

Appendix B: Management's Comments



June 12, 2023

JOHN CIHOTA
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Management Alert – Unsecured Assets at the Washington Network Distribution Center (22-185-1-DRAFT)

Thank you for providing the Postal Service with an opportunity to review and comment on the findings and recommendations contained in the draft management alert – *Unsecured Assets at the Washington Network Distribution Center*.

Management disagrees, in part, with Finding #1.

In the section titled, "*Lack of Physical Safeguards over Assets*", the report implies all employees at the facility can enter the structure and remove assets without authorization. Only employees with access to the yard, can enter the external portable structure and not all employees have access to enter the yard.

Regarding the section titled, "*No Periodic Reviews to Identify Inactive Assets*", management further clarifies that the determination of the assets' suitability for redistribution, recycling, and/or disposal was determined prior to local storage. Assets that were required to be returned to MTEC were returned, items deemed as trash were disposed of, and assets that could be classified as inactive can be stored locally until a decision is made on those items.

Management disagrees, in part, with Finding #2.

The external portable structure is used to protect the assets from being stored outside and exposed to weather conditions. Some of the observations identified in the report do not have a strong correlation to damage of the equipment.

Following are our comments on each of the four recommendations.

Recommendation 1:

We recommend **Vice President, Processing Operations, Eastern Region**, instruct the **Manager, Washington NDC**, to establish physical safeguards over the assets in the external portable structure, in accordance with Handbook AS-701, *Asset Management*.

Management Response/Action Plan:

Management agrees with this recommendation. The Washington NDC will secure the external portable structure with additional physical safeguards including locks. In addition to the added physical safeguards, access to the storage area will be limited to authorized personnel only.

Target Implementation Date: 08/31/2023

Responsible Official:
Senior Division Director, Chesapeake Division

Recommendation 2:

We recommend **Vice President, Processing Operations, Eastern Region**, instruct the **Manager, Washington NDC**, to define and communicate who is responsible for the assets in the external portable structure and require staff to conduct periodic reviews of the assets to identify inactive items for appropriate disposition, in accordance with Handbook AS-701, *Asset Management*.

Management Response/Action Plan:

Management agrees with this recommendation. The Manager of Maintenance Operations Support will oversee the external portable structure's inventory and ensure an annual inventory is conducted.

Target Implementation Date: 09/8/2023

Responsible Official:
Senior Division Director, Chesapeake Division

Recommendation 3:

We recommend the **Vice President, Processing Operations, Eastern Region**, instruct the **Manager, Washington NDC**, to conduct a physical inventory of all assets located in the external portable structure and record assets in the appropriate inventory management systems.

Management Response/Action Plan:

Management agrees with this recommendation. The Manager of Maintenance Operations Support, along with additional staff, will conduct an inventory of the external portable structure to catalog the contents and identify inactive items for disposal or redistribution as appropriate. Items will be entered into appropriate inventory management system or local-created inventory control sheet for parts with no part numbers (NSNs).

Target Implementation Date: 09/8/2023

Responsible Official:
Senior Division Director, Chesapeake Division

Recommendation 4:

We recommend the **Vice President, Processing Operations, Eastern Region**, instruct the **Manager, Washington NDC**, to develop and implement an action plan to address all exterior portable structure safety and maintenance issues identified during our audit.


Management Response/Action Plan:

Management agrees with this recommendation. The Washington NDC management will develop an action plan and begin addressing all exterior safety and maintenance issues identified in the report.

Target Implementation Date: 11/30/2023

Responsible Official:

Senior Division Director, Chesapeake Division

 E-SIGNED by Dane A Coleman
on 2023-06-20 17:49:33 CDT

Dane Coleman
Vice President, Processing Operations – Eastern Region

cc: Corporate Audit & Response Management

OFFICE OF INSPECTOR GENERAL

UNITED STATES



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