

Service Performance of Election Mail for the 2022 Mid-Term Elections

AUDIT REPORT

Report Number 22-187-R23 | March 27, 2023



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Highlights

Background:

Election Mail is any mailpiece that an authorized election official creates for voters participating in the election process and includes ballots and voter registration materials. The U.S. Postal Service has specific policies and procedures on the proper acceptance, processing, delivery, and recording of Election Mail.

What We Did:

Our objective was to evaluate the U.S. Postal Service's service performance of Election Mail during the November 2022 mid-term elections. To evaluate the service performance of Election Mail, we reviewed Election Mail policies, analyzed service performance data, and conducted 104 observations at mail processing facilities and 793 observations at delivery units.

What We Found:

The Postal Service successfully prioritized the timely processing and delivery of Election Mail during the 2022 election cycle and was able to deliver 97.3 percent of identifiable and measurable ballots sent to voters on-time. This was an increase from the 2018 and 2020 elections and nearly six percentage points higher than the target. To ensure the highest level of service performance, the Postal Service enacted several key practices and extraordinary measures. However, these practices and measures impacted revenue and costs for the Postal Service. For example, the Postal Service authorized Marketing Mail to be processed expeditiously as First-Class Mail, the Postal Service received less revenue per piece, and potentially could have earned an additional \$23 million in revenue.

In addition, we found the Postal Service was not always in compliance with their policies and procedures for processing and delivering Election Mail. Specifically, we identified compliance issues during 43 of 104 (41.3 percent) mail processing facility observations and 233 of 793 (29.4 percent) delivery unit observations. However, these compliance issues did not appear to impact the Postal Service's ability to process and deliver Election Mail timely. Additionally, some controls are redundant with other Election Mail policies and procedures and may not have an impact on the Postal Service's ability to timely process and deliver Election Mail.

Recommendations:

We recommended management develop a plan to analyze costs associated with processing and delivering Election Mail, explore opportunities to be compensated for the Election Mail key practices and extraordinary measures, and evaluate the necessity of some of the Postal Service policies and procedures.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

March 27, 2023

MEMORANDUM FOR: ISAAC CRONKHITE
CHIEF PROCESSING AND DISTRIBUTION OFFICER
AND EXECUTIVE VICE PRESIDENT

JEFFREY JOHNSON
VICE PRESIDENT, ENTERPRISE ANALYTICS

ADRIENNE MARSHALL
DIRECTOR, ELECTION AND GOVERNMENT MAIL SERVICES

Mary H. Lloyd

FROM: Mary Lloyd
Deputy Assistant Inspector General for Mission Operations

SUBJECT: Audit Report – Service Performance of Election Mail for the 2022
Mid-Term Elections (Report Number 22-187-R23)

This report presents the results of our audit of Service Performance of Election Mail for the 2022 Mid-Term Elections.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Todd Watson, Director, Network Processing, 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 Service Performance of Election Mail for the 2022 mid-term elections (Project Number 22-187). Our objective was to evaluate the U.S. Postal Service's service performance of Election Mail during the November 2022 mid-term elections. See [Appendix A](#) for additional information about this audit.

Background

The Postal Service plays a vital role in the American democratic process. Its role continues to grow as the volume of Election Mail increases. There is a trend towards Americans choosing to vote by mail and avoid in-person voting. The total number of identifiable ballots mailed to voters between April 1, 2022, to December 31, 2022, was over 103 million.

The 2022 United States mid-term elections were held on Tuesday, November 8, 2022. There was a total of 469 seats in the U.S. Congress up for election, including all 435 seats in the U.S. House of Representatives and 34 of the 100 seats in the U.S. Senate. According to the National Conference of

“The Postal Service plays a vital role in the American democratic process. Its role continues to grow as the volume of Election Mail increases.”

State Legislatures, 36 states have provisions allowing certain elections to be conducted entirely by mail. However, every state allows at least some of its citizens to vote by mail with an absentee ballot.

Election Mail is any mailpiece an authorized

election official creates for voters participating in the election process and includes ballots and voter registration materials. Election Mail may be sent to the voters as either First-Class Mail, which takes

one-to-five-days to be delivered; or as Marketing Mail, which is more cost-effective for the mailer, but takes three-to-ten-days to be delivered. However, all return ballots must be sent as First-Class Mail. The Postal Service can only identify, measure and track Election Mailpieces sent to voters if they are sent full service¹ and receive necessary processing scans to provide visibility into the mailstream.

The Postal Service established an Election and Government Mail Services Organization to oversee Election Mail for accountability and to align with the Postal Service structure. This office serves as the primary point of contact with election officials and secretaries of state nationwide and has teams to address emerging Election Mail issues. The Postal Service has specific policies on proper acceptance, processing, delivery, and recording of Election Mail. These policies include:

- Maintaining a website as a centralized source for internal guidance on handling Election Mail.
- Providing Election Mail training for employees prior to election season.
- Recording Election Mail volumes through the entire mailstream and forwarding completed logs to plant management and the Election Mail team.
- Checking facilities for dropped or misplaced Election Mail daily during election season and certifying that they are clear of Election Mail daily.
- Designating a staging area for Election Mail.
- Postmarking all return ballots.

The Postal Service took additional steps to ensure the on-time delivery of Election Mail by implementing measures beyond normal operations to ensure proper handling and timely delivery of Election Mail.²

This audit is a follow-up to our prior audit³ that found the Postal Service was ready for timely processing of Election Mail for the 2022 mid-term election. For this audit, we conducted observations of mail processing facilities and delivery units from October 11, 2022, through December 7, 2022, covering the mid-term and Georgia Runoff elections. We evaluated the

¹ Full-service mail combines the use of unique barcodes and the provision of electronic information regarding the makeup and preparation of mail, which provides end-to-end visibility into the mailstream.

² 2022 General Election Extraordinary Measures Memorandum, dated September 29, 2022.

³ *Election Mail Readiness for the 2022 Mid-Term Elections* (Report Number 22-093-R22, dated September 26, 2022).

Postal Service’s compliance with Election Mail policies and procedures and the service performance of Election Mail.

Finding #1: Postal Service Prioritized Processing and Delivery of Election Mail

The Postal Service displayed commitment to timely processing and delivery of Election Mail during the 2022 election cycle. From April 1, 2022, through December 31, 2022, the Postal Service processed and delivered over 82 million identifiable and measurable⁴ ballots sent to voters (outbound) with 97.3 percent delivered on-time. This was an increase from the 2018 (95.6 percent) and 2020 (96.6 percent) elections and nearly six percentage points higher than the target (see Table 1).⁵ To ensure the highest level of service performance, the Postal Service prioritized Election Mail by enacting several key practices and extraordinary measures. Specifically, the Postal Service instructed⁶ personnel to implement the following key practices:

- Complete all clears⁷ and daily logs to ensure all Election Mail is accounted for and dispatched.
- Authorize Election Mail entered as Marketing Mail to be advanced and processed expeditiously as First-Class Mail.
- Ensure that every return ballot mailed by voters receives a postmark.
- Authorize extra delivery and collection trips to ensure Election Mail continues to move through the Postal Service’s network to reach the

appropriate election official by the state’s Election Day deadline.

- Authorize the use of overtime where needed to deliver Election Mail on time.
- Use extra transportation resources as necessary to ensure Election Mail reaches its destination as quickly as possible.

“The Postal Service displayed commitment to timely processing and delivery of Election Mail during the 2022 election cycle.”

The Postal Service also implemented the following extraordinary measures between October 24, 2022, and November 29, 2022, going above and beyond normal operations to accelerate and ensure proper handling and timely delivery of Election Mail:

- Use Priority Mail Express to move Election Mail.
- Search all trays and tubs to extract Election Mail.
- Extend opening times.
- Provide drive-through ballot drops.
- Provide additional collections.
- Use alternate transportation options.
- Hold ballots for direct delivery to election offices.

Table 1. Service Performance for Ballots

Mail Class	2018		2020		2022		Target
	Total Pieces Measured	Percent On Time	Total Pieces Measured	Percent On Time	Total Pieces Measured	Percent On Time	
First-Class Mail Ballots	3,681,695	97.8%	26,914,852	96.1%	9,081,919	96.6%	91.0%
Marketing Mail Ballots	35,987,820	95.4%	32,973,899	97.1%	73,172,340	97.3%	91.8%
Total Ballots	39,669,515	95.6%	59,888,751	96.6%	82,254,259	97.3%	

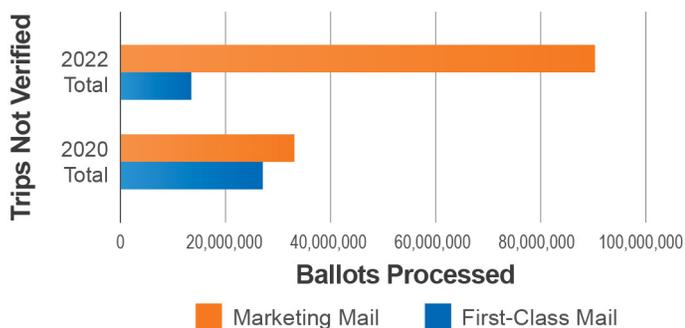
Source: Informed Visibility.

4 Full-service mail combines the use of unique barcodes and the provision of electronic information regarding the makeup and preparation of mail, which provides end-to-end visibility into the mailstream.
 5 First Class service standards were revised October 1, 2021, from one to three day to one to five days. Marketing Mail service standards remained unchanged.
 6 Postal Service Mail Preparedness Memorandum, dated September 26, 2022.
 7 A process used to ensure all Election Mail is accounted for and processed accordingly.

Finding #2: Postal Service Incurs Additional Costs Associated with the Processing and Delivery of Election Mail

While the prioritization of Election Mail and implementation of key practices and extraordinary measures help ensure Election Mail is processed and delivered on time, they also impacted revenue and costs for the Postal Service. Key practices such as the use of overtime and extra transportation trips to deliver Election Mail on time impacted costs.⁸ In addition, for Election Mail, the Postal Service authorized Marketing Mail to be processed expeditiously as First-Class Mail despite the difference in service standards and revenue received. Election Mail sent as Marketing Mail has a three-to-ten-day service standard, but was processed and delivered as First-Class Mail, which has a one-to-five-day service standard. During the 2022 election cycle, from April 1, 2022, through December 31, 2022, the Postal Service processed 103,976,948 identifiable outbound ballots, of which 90,310,092 (87 percent) were mailed as Marketing Mail. From total pieces measured (see Table 1), the percentage of ballots sent as Marketing Mail increased approximately 34 percent while the percentage of ballots sent as First-Class Mail decreased nearly 34 percent from 2020 (see Figure 1). The Postal Service receives approximately 25 cents less in revenue per piece for Marketing Mail than it does for First-Class Mail; therefore, the Postal Service could have potentially earned an additional \$23 million in revenue. Further, the Postal Service incurred unquantified costs, associated with the implementation of Election Mail key practices and extraordinary measures.

Figure 1. Outbound Ballot Mail Class Comparison



Source: Informed Visibility

⁸ We were unable to identify how much the Postal Service spent to implement extraordinary measures and key practices, as the portion spent for Election Mail is not separated from their total costs.

⁹ *Processing Readiness of Election and Political Mail During the 2020 General Elections* (Report Number 20-225-R20, dated August 31, 2020).

¹⁰ This recommendation remains open as Postal Service continues to explore avenues to create a specific product solution for official Election Mail ballots.

In a 2020 audit report,⁹ we recommended management leverage established partnerships with state and local election officials to work toward creating a separate, simplified mail product exclusively for Election Mail. Implementation of this recommendation would create uniform mail processing and proper mailpiece design of Election Mail. Additionally, by creating a simplified mail product, the Postal Service could create an Election Mail class with its own pricing and service standards unique to its processing and delivery. While the Postal Service continues to explore this initiative,¹⁰ it will be important to evaluate other opportunities to ensure not just timely but also cost-efficient delivery of Election Mail during upcoming election cycles.

Recommendation #1

We recommend the **Director, Election and Government Mail Services**, develop a plan to analyze costs associated with the processing and delivery of Election Mail and explore opportunities to be compensated for the implementation of Election Mail key practices and extraordinary measures.

Finding #3: Issues with Compliance Did Not Appear to Impact Timely Processing or Delivery of Election Mail

We found that while the Postal Service was not always in full compliance with their policies and procedures for the processing and delivery of Election Mail, it did not appear to impact the Postal Service's ability to process and deliver Election Mail timely. The policies and procedures implemented by the Postal Service included:

- Completing daily checks to ensure the facility was clear of Election Mail (daily all clears).
- Completing the Political Mail and Election Mail Audit Checklist.
- Completing the Political Mail and Election Mail Clean Sweep Checklist.
- Completing the Political Mail and Election Mail Log.
- Creating a Political Mail and Election Mail staging area.
- Postmarking all return ballots.

Specifically, we identified compliance issues during 43 of 104 (41.3 percent) of mail processing facility observations (see Table 2) and 233 of 793 (29.4 percent) delivery unit observations (see Table 3). This occurred due to a lack of awareness of certain Election Mail processing policies and procedures, and requirement redundancies. The Postal Service developed a process for consistent communication nationwide of Election Mail requirements prior to each election cycle, as a result of a recommendation from our prior audit.¹¹ In addition, the Postal Service has internal controls in place, which require all plant managers to certify they understand the Election Mail policies and acknowledge they are shared with employees and fully executed.

These compliance issues did not appear to impact timely processing and delivery of Election Mail, as we only identified 4,381¹² pieces of delayed Election

Mail during our observations, which was less than we identified during our 2020 audit¹³. Therefore, we are not making a recommendation related to ensuring Election Mail policies are communicated.

Postal Service has policies and procedures in place to ensure the timely processing and delivery of Election Mail. However, some policies have redundancies and may not be essential to the timely processing and delivery of Election Mail. The following is a detailed breakdown of mail processing facilities' and delivery units' compliance with each policy and procedure we reviewed during our observations.

The procedures are listed, based on our judgement, in their descending order of importance for ensuring Election Mail is compliant with state election laws and is processed and delivered timely.

Table 2. Observations at Mail Processing Facilities

	All Clear ¹⁴	OIG Verification Clear of Delayed Election Mail ¹⁵	Political Mail & Election Mail Audit Checklist	Political Mail & Election Mail Clean Sweep Checklist	Political Mail & Election Mail Log	Election Mail Staging Area
Compliant	102	81	82	83	101	96
Non-Compliant	2	23	22	21	3	8
Percent Non-Compliant	1.9%	22.1%	21.2%	20.2%	2.9%	7.7%

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

Table 3. Observations at Delivery Units

	All Clear Prior to 10:00 a.m.	All Clear in Afternoon Prior to Close of Business	OIG Verification Clear of Delayed Election Mail	Political Mail & Election Mail Checklist	Political Mail & Election Mail Log
Compliant	732	779	772	632	768
Non-Compliant	61	14	21	161	25
Percent Non-Compliant	7.7%	1.8%	2.6%	20.3%	3.2%

Source: OIG Observations

¹¹ *Election Mail Readiness for the 2022 Mid-Term Elections* (Report Number 22-093-R22, dated September 26, 2022).

¹² These 4,381 pieces did not meet service standards, but when notified, the Postal Service expedited delivery of these pieces prior to election day.

¹³ *Service Performance of Election and Political Mail During November 2020 General Election* (Report Number 20-318-R21, dated March 5, 2021), identified 43,196 pieces of delayed Election Mail.

¹⁴ Postal Service requires management to ensure all Election Mail is accounted for and processed accordingly and certify compliance in a reporting system.

¹⁵ During OIG observations, we verified if there was delayed Election Mail.

Postmarking Ballots

Postmarks are intended to be a revenue protection mechanism to prevent the reuse of postage; however, postmarks are not required on all mailings. In recognition of the importance of Election Mail, election laws in some states require postmarks for ballots mailed by voters for the ballot to be counted. For the 2022 mid-term elections, the Postal Service continued to alter its normal procedures and strived to postmark every return ballot but acknowledges there will be occurrences where a mailpiece does not receive a postmark. During our observations, we found six of 104 (5.8 percent) mail processing facilities did not ensure all ballots were postmarked. Four of six mail processing facilities were in states that have postmarking requirements.

All Clears

Per Postal Service policy¹⁶, mail processing facilities are required to certify they are clear of Election Mail by 10 a.m. each day and delivery units are required to certify they are clear of Election Mail twice a day, once prior to 10 a.m. and once in the afternoon before close of business. During our observations, we found two of 104 (1.9 percent) mail processing facilities and 61 of 793 (7.7 percent) delivery units did not certify the facility was all clear prior to 10 a.m. Additionally, 14 of 793 (1.8 percent) delivery units' observations did not complete the afternoon all clear prior to close of business.

We also reviewed nationwide daily all clear certification data at all mail processing facilities and delivery units for the period of October 11, 2022, through November 10, 2022. We found 3 percent of mail processing facilities and 22.3 percent of delivery units were not compliant with daily all clear certifications prior to 10 a.m. and 30.3 percent of delivery units' observations were not compliant with daily all clear certifications in the afternoon prior to close of business.

Election Mail Checklists Requirements

Mail processing facilities and delivery units are required to complete daily Political and Election Mail Checklists¹⁷ (see [Appendix B](#)). During observations at mail processing facilities, we found 22 of 104 (21.2 percent) did not complete the Political and Election Mail Audit Checklist and 21 (20.2 percent) did not complete the Operational Clean Sweep Search Checklist. During observations at the delivery units, we found 161 of 793 (20.3 percent) did not complete the Delivery Unit Election Mail and Political Mail Checklist.

Even though these checklists were not completed, they include redundancies with other polices such as verifying all clears are being conducted and mail is logged on Political Mail and Election Mail logs, which were completed.

They also include items requiring completion only once or on a less frequent basis during the election cycle, such as verifying Election Mail trainings are provided and posted, ensuring the facility has an Election Mail staging area, and having contingency plans for late arriving Election Mail.

Political Mail and Election Mail Logs

Mail processing facilities and delivery units are required to manually enter all Political Mail and Election Mail received on a Political Mail and Election Mail Log. During observations, we found 3 of the 104 (2.9 percent) mail processing facilities and 25 of 793 (3.2 percent) delivery units did not properly maintain Political Mail and Election Mail Logs. Despite the ability of the Postal Service to identify, measure, and track Election Mail sent full service, Postal Service personnel continue to manually and redundantly track Election Mail as it moves throughout a facility on these logs.

“The Postal Service altered its normal procedures and strived to postmark every return ballot but acknowledges there will be occurrences where a mailpiece does not receive a postmark.”

Recommendation #2

We recommend the **Director, Election and Government Mail Services**, evaluate if all current Election Mail policies are necessary and eliminate redundancies.

¹⁶ Processing Operations Management Order, dated April 21, 2022.

¹⁷ U.S. Postal Service Election Mail and Political Mail Guidebook 2022.

Table 4. Identifiable Outbound Ballots Included and Excluded from Service Performance Measurement from April 1, 2022, through December 31, 2022

Mail Class	Total Ballots	Ballots Excluded from Measurement	Ballots Included in Measurement	Percent of Ballots in Measurement
First-Class	13,666,856	4,584,937	9,081,919	66.5%
Marketing	90,310,092	17,137,752	73,172,340	81.0%
Total	103,976,948	21,722,689	82,254,259	79.1%

Source: Informed Visibility.

Finding #4: Ballots Excluded from Service Performance Measurement

During our review, we found the Postal service was able to measure service performance for over 82 million (or 79.1 percent) of the 103 million identifiable outbound ballots¹⁸ (see Table 4), which was a higher percentage than the 2020 election.¹⁹ The Postal Service can only measure service performance when ballots are sent full service and receive processing scans. Mailpieces are excluded when they do not comply with business rules or are missing key scan data to be included in service performance measurement. Mailpieces can be excluded from service performance measurement because of mailer or Postal Service issues.

In our prior audit, we recommended the Postal Service retain data on excluded ballots and determine the reasons that ballots are excluded. Management agreed to create a plan for retaining data on excluded ballots and to continue to work with mailers to determine the root causes of exclusion. The Postal Service is still working to implement this recommendation and continues to emphasize the importance of mailing ballots with barcode tracking technology; therefore, we are not making an additional recommendation at this time.

Management’s Comments

Management generally agreed with the findings, recommendations and monetary impact. See [Appendix C](#) for management’s comments in their entirety.

Regarding recommendation 1, management stated they will pursue the establishment of a new product or price category for ballot mail. The Election and Government Mail Service team will examine the feasibility and utility of a product or price category for ballot mail during FY 2023. Based on the outcome of that examination, if such a product or price category has utility and is feasible, management will develop methods to measure unit revenue and attributable costs. The target implementation date for this recommendation is December 31, 2023.

Regarding recommendation 2, management stated they have begun a thorough review of the Election Mail policies, procedures, and associated documentation. Management will identify and eliminate unnecessary and/or redundant policies. The Election and Government Mail Services Team expects to complete its initial review on or before August 31, 2023, and subsequently complete any implementation effort, including removing unnecessary or redundant content. The target implementation date for this recommendation is November 30, 2023.

Regarding monetary impact, management stated the OIG focused on the amount of estimated lost revenue experienced by the Postal Service by providing First-Class Mail service to Election Mail that paid Marketing Mail prices. This approach assumed that Election Mail volume that paid Marketing Mail prices would not have been impacted by higher First-Class Mail prices. However, faced with higher First-Class prices, jurisdictions may have reduced their Election Mail volume sent at Marketing Mail prices.

¹⁸ It is likely that these figures do not fully represent the total number of ballots, as these mailpieces can only be identified, measured, and tracked by the Postal Service if they have a barcode.

¹⁹ From September 1, 2020, to November 3, 2020, the Postal Service was only able to measure service performance for 71.5 million (or 52.9 percent) of the 135 million identifiable ballots.

Evaluation of Management's Comments

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

Regarding management's response to recommendation 1, management stated they will pursue the establishment of a new product or price category for ballot mail. This will address part of the recommendation, but does not address exploring opportunities to be compensated for the implementation of Election Mail key practices and extraordinary measures. We will evaluate supporting documentation when the Postal Service submits a request to close this recommendation, to ensure its full implementation before closure.

Regarding management comments for the monetary impact, while volumes could change if customers had to pay First-Class rates, this change is unknown. Therefore, we calculated an estimate based on actual volumes sent at Marketing Mail rates.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. 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 our audit was the Postal Service's service performance of Election Mail during the November 2022 mid-term election. To accomplish our objective, we:

- Reviewed Postal Service's Election Mail processing and delivery strategies, policies, procedures, and related documents and tools.
- Judgmentally selected and conducted 104 unannounced mail processing facilities observations and 793 unannounced delivery unit observations from October 11, 2022, through December 7, 2022. We selected facilities in every state, the District of Columbia, and Puerto Rico, covering the mid-term and Georgia run-off elections.
- Inspected mail processing facilities and delivery units to determine if they:
 - Performed daily all-clears to ensure Election Mail had been processed and was not delayed.
 - Completed the daily Political Mail and Election Mail Checklists, Operational Clean Sweep checklist, and logs.
 - Had any delayed ballots.
 - Experienced any significant challenges with ballots.
 - Followed ballot postmarking processes.
- Communicated with Postal Service Headquarters officials on additional resources used, and key practices and extraordinary measures implemented, for the mid-term election.
- Analyzed Postal Service data on Election Mail service performance, amount delivered on-time, amount excluded, and mailed class from April 1, 2022, to December 31, 2022, and compared data to prior elections.

We conducted this performance audit from September 2022 through March 2023 in accordance with the Council of the Inspectors General on Integrity and Efficiency Quality Standards for Inspection and Evaluation. 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 February 24, 2023 and included their comments where appropriate.

We assessed the reliability of computer-processed data from Informed Visibility by interviewing agency officials knowledgeable about the data and comparing the data with other related data. 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
<i>Election Mail Readiness for the 2022 Mid-Term Elections</i>	Evaluate the Postal Service's readiness for timely processing of Election Mail for the 2022 mid-term elections.	22-093-R22	9/26/2022
<i>Service Performance of Election and Political Mail During the November 2020 General Election</i>	Evaluate the Postal Service's performance in processing Election and Political Mail for the 2020 general and special elections.	20-318-R21	3/5/2021
<i>Processing Readiness of Election and Political Mail During the 2020 General Elections</i>	Evaluate the Postal Service's readiness for timely processing of Election and Political Mail for the 2020 general elections.	20-225-R20	8/31/2020
<i>Management Alert - Timeliness of Ballot Mail in the Milwaukee Processing & Distribution Center Service Area</i>	Determine the cause of delayed ballot mail in the Milwaukee, WI P&DC service area for the spring election and presidential primary of April 7, 2020.	20-235-R20	7/7/2020

Appendix B: Election Mail Checklists

We found the Operational Clean Sweep Checklist (see Figure 2), Election Mail Audit Checklist (see Figure 3), and the Delivery Unit Election Mail and Political Mail checklist (see Figure 4) include redundancies with other controls. For example, each checklist has a section to certify the mail processing facilities or delivery units are clear of Election Mail. The Postal Service has a separate system where facilities

and units certify electronically they are clear of Election Mail. Further, the checklists also include items that do not need to be completed daily, such as verifying Election Mail trainings are provided and posted, the facility has an Election Mail staging area, and contingency plans are in place for late arriving Election Mail.

Figure 2. Operational Clean Sweep Search Checklist

**Operational Clean Sweep Search Checklist
Political and Election Mail**

The checklist below may be used by CPDO employees conducting ALL CLEARS to assist in their effort to clear all mail processing facilities of Election Mail and Political Mail on a daily basis is thorough and complete.

District: _____ **Date:** _____ **Name:** _____

Title: _____ **Phone#:** _____

Check box when checked	Section/Operation: <i>Defines the work area to be searched.</i>	Comments: <i>Specifics: include copies of PMOD label and /or container placard. Names of individuals contacted</i>
<input type="checkbox"/>	Incoming dock	
<input type="checkbox"/>	BMEU & BMEU Plant Staging	
<input type="checkbox"/>	Opening Units	
<input type="checkbox"/>	AO / Station dispatch area	
<input type="checkbox"/>	Outbound dock	
<input type="checkbox"/>	Outgoing Dispatch Area	
<input type="checkbox"/>	Trailers in the yard (Yard Check)	
<input type="checkbox"/>	MTE Plant Staging Area	
<input type="checkbox"/>	MTE Trailers	
<input type="checkbox"/>	Site MTE SC	
<input type="checkbox"/>	PARS Staging and Operations	
<input type="checkbox"/>	Rewrap Operations	
<input type="checkbox"/>	CFS (if applicable)	
<input type="checkbox"/>	BRM/Postage Due	

Auditor _____ **Position** _____

Date _____

Source: U.S. Postal Service Election Mail and Political Mail Guidebook 2002, dated October 13, 2022

Figure 3. Election Mail and Political Mail Audit Checklist

				
Enter responses in spaces provided. Any Y/N question answered as "No" requires an entry in section 31 below.				
General Information / Communication: (TO BE COMPLETED SEVERAL TIMES DURING THE PROCESSING WINDOW)				
1 MGMT - Has the site certified that ALL Service Talks and POMOs were shared with ALL employees?	Yes		No	N/A
2 OPS - Was the daily all clear check completed and certified after each tour and end of day on the website?	Yes		No	N/A
3 OPS - Is there a designated Political and Election Mail Staging area?	Yes		No	N/A
4 OPS - Is the staging space clearly identified with proper lines and signs?	Yes		No	N/A
5 OPS - Does the plant have Political and Election mail properly staged in the designated staging area as applicable?	Yes		No	N/A
6 OPS - Was the Political and Election mail correctly reported on the appropriate MCV Manual Line item?	Yes		No	N/A
7 OPS - Is ALL Election mail being cancelled on the AFCSSs, AFSMs or hand cancellation?	Yes		No	N/A
8 OPS - Has operations correctly documented their Political and Election Mail arrivals into the P/E log?	Yes		No	N/A
9 OPS - Are all P/E mail alerts being shared and documented in the log upon arrival?	Yes		No	N/A
10 OPS - Are all containers with P/E mail properly identified indicating that there is P/E mail in that container?	Yes		No	N/A
11 OPS - Have the POMOs and Service talks been posted on the workroom floor?	Yes		No	N/A
12 OPS - Are the employees knowledgeable about the POMOs and Service Talks for Political and Election Mail?	Yes		No	N/A
13 OPS - Are the BRM Political and Election Mail procedures being followed?	Yes		No	N/A
14 OPS - Are the POSTAGE DUE Election Mail procedures being followed - DELIVER THE MAIL/DO NOT RTS?	Yes		No	N/A
15 OPS - Do the employees know what to do with a container with a Tag 57 or 191?	Yes		No	N/A
16 OPS - Does the site know how to handle the Military/Overseas/Absentee ballots?	Yes		No	N/A
17 OPS - Have manual operations including Shortpaid, Damaged mail and PARS been swept for all P/E mail?	Yes		No	N/A
18 OPS - Have trailer yard checks being completed in each tour including trailers at the dock?	Yes		No	N/A
19 OPS/BMEU - Do the OPS and BMEU teams meet to compare and validate the Political and Election mail logs?	Yes		No	N/A
20 BMEU - Is the BMEU Political and Election mail logs up to date and current?	Yes		No	N/A
21 IPS - Is IV reviewed daily to assess Political and Election Mail Performance?	Yes		No	N/A
22 IPS - Did IPS audit the MCV counts and validate the counts and oldest dates on the floor?	Yes		No	N/A
23 IPS - Are mail conditions and All Clear certification being reviewed and discussed at the daily tour turnover meetings?	Yes		No	N/A
24 IPS - Is IPS reviewing Election Mail ballot envelopes that reject from the AFCSSs and communicating findings to the District Strike Team?	Yes		No	N/A
25 COORDINATOR - Does the site have a local Political and Election mail plan?	Yes		No	N/A
26 COORDINATOR - Does the local P/E mail plan include a contingency plan to get LAMM and delayed P/E mail delivered to the customer?	Yes		No	N/A
27 COORDINATOR - Does the plant and District Strike Team meet regularly?	Yes		No	N/A
29 COORDINATOR - Are all issues being entered with detailed documentation in the HQ Issue Log?	Yes		No	N/A
30 COORDINATOR - Are the issues/problems from Electionmail.org being resolved within 24 hrs (where applicable)?	Yes		No	N/A
31 For any "No" response in the Y/N items, provide the changes necessary to abate the issue below and when that action will be completed:				

Source: U.S. Postal Service Election Mail and Political Mail Guidebook 2002, dated October 13, 2022

Figure 4. Delivery Units Election and Political Mail Checklist

Delivery Unit Election and Political Mail Checklist					
Manager/Supervisor Name:					
		Date:			
Office Name:					
ZIP Code of Office:					
District:					
Retail Counter		Yes	No	N/A	Comments: (Action taken to remediate any findings)
1	Has the retail area been cleared of all outgoing mail and dispatched?				
2	Have all units, collection boxes, including lobby drops been collected and dispatched on every available transportation? Including the final dispatch of value (DOV), and does CPMS show all points collected?				
3	Has all Election Mail been consolidated with outgoing collection mail and not held out separately or trayed? Check retail counter (on top and under), collection prep area, PO Box section, Dutch Door area, Supervisor desk, mPOS cart (if applicable), distribution cases, hotcase, throwback case, and lobby drop boxes.				
Back Office		Yes	No	N/A	Comments: (Action taken to remediate any findings)
4	Does the unit maintain a Headquarters-approved Political/Election Mail log and is it current with sample photocopies? (Record date of last entry)				
5	Is the unit familiar with the required service talks? Are they posted on the workroom floor and being shared with employees?				
6	Does the unit know how to handle military, overseas, and absentee ballots?				
7	Does the delivery unit have a contingency plan to deliver late arriving/missent Political Mail/Election Mail?				
8	Is the unit clear of Business Reply Mail (BRM) today? If no, comment.				
9	Does the unit have the Business Reply Mail (BRM) and Short Paid Ballots memos posted near the area where the BRM is worked?				
10	Are the postage due/short paid Election Mail procedures being followed? Absentee ballots must not be detained or held for postage payment. DO NOT delay delivery of balloting materials. Willful delay of absentee balloting material or other Election Mail is a violation of policies, ethics, and law.				
11	Is the unit free of curtailed and delayed Political Mail/Election Mail? (Distribution case, Carriers Case, Hotcase, Flat case, RFS location, PO Box section, and supervisor's desk)				
12	If there was delayed/curtailed Political Mail/Election Mail, was it properly reported in Delivery Condition Visualization (DCV), identified on your HQ approved political log, and your district customer relations managers notified?				

13	Is all available mail being dispatched on the earliest possible transportation?				
14	Are back door audits and satchel checks being conducted to ensure all Election Mail has been dispatched? Check all empty MTE prior to dispatching: (check trays and tubs and turn sacks inside out)				
15	Are all delivery and collection vehicles checked in the PM verified to be free of Political Mail and Election Mail?				
16	Is the Political Mail/Election Mail "All Clear" certification being completed daily?				

Carrier Cases		Yes	No	N/A	Comments: (Action taken to remediate any findings)
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17	Are carrier cases clear of Political Mail and Election Mail? Are carriers aware of the policy to hold unknown recipient mail for ten days before returning to sender?				
18	Are carrier cases clear of mailpieces overlooked after strapping out?				
19	Has management verified that non-forwardable Political Mail and Election Mail is not co-mingled with Undeliverable Bulk Business Mail (UBBM)? Non-forwardable includes: unendorsed non-profit, standard, marketing mail, Address Service Requested (ASR), Change Service Requested (CSR), Electronic Service Requested (ESR), Forward Service Requested (FSR), Return Service Requested (RSR) and Temp-Return Service Requested (TRSR).				
20	Is Undeliverable as Addressed (UAA) and Undeliverable Bulk Business Mail (UBBM) [reference DMM 507.1.1] being properly recorded on the Headquarters-approved Destination Delivery Unit (DDU) log?				

Additional Process Checks		Yes	No	N/A	Comments: (Action taken to remediate any findings)
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21	Is Undeliverable Bulk Business Mail (UBBM) carrier cases and PO Box section being worked/processed daily?				
22	Is Undeliverable as Address (UAA) - letters (PARS) and flats (FPARS) trayed, and parcels processed in RFS and dispatched to the plant?				
23	If the unit has an on-site Bulk Mail Entry Unit (BMEU), is a Headquarters-approved Political/Election Mail log present and current with sample photocopies?				
24	Are Red Tag 191, Political Campaign Mailing and/or Green Tag 191, Domestic and International Ballots being used in the unit to identify Political Mail and/or Election Mail? Tag 57 is used to identify containers with Political Mail in it. Tag 191 is the tag used to identify Ballot Mail. This tag is only used on trays or sacks.				
25	Are Contract Postal Units, Village Post Offices, and Community Post Offices cleared of all outgoing mail and dispatched?				

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Source: U.S. Postal Service Election Mail and Political Mail Guidebook 2002, dated October 13, 2022

Appendix C: Management's Comments



March 20, 2023

JOHN CIHOTA
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Service Performance of Election Mail for the
2022 Mid-Term Elections (Report Number 22-187-DRAFT)

Thank you for providing the Postal Service with an opportunity to review and comment on the findings and recommendations contained in the draft audit report, *Service Performance of Election Mail for the 2022 Mid-Term Elections*.

The Postal Service generally agrees with the findings of the audit, which concludes that the Postal Service successfully prioritized the timely processing and delivery of Election Mail during the 2022 election cycle. Our strong service performance for the 2022 General Election is the result of our extensive operational and organizational preparations, the continued use of robust and proven processes, and our strong working relationships with election officials. These established processes have produced strong results. In 2022, the Postal Service continued to deliver for the American people by successfully handling mail-in ballots in a mid-term Congressional election. On average, during the 2022 mid-term election, we delivered ballots to and from voters in less than two days.

Before responding to the report's two recommendations, we would like to briefly clarify some aspects of the report's findings. First, the report does not always distinguish between Election Mail and Ballot Mail, which is a subset of Election Mail consisting solely of mailpieces containing a live ballot, even when such a distinction is appropriate. For example, Finding # 1 provides a list of extraordinary measures that the Postal Service employs to "accelerate and ensure proper handling and timely delivery of Election Mail". As reflected in the 2022 General Election Extraordinary Measures Memorandum and consistent with past practice, our extraordinary measures are used for the processing and delivery of Ballot Mail in the period immediately before an election and are not employed for other types of Election Mail, like polling place notifications or voter registration materials. The Postal Service takes a number of separate steps to more broadly ensure the timely delivery of all Election Mail, including Ballot Mail, as noted elsewhere in Finding # 1.

Second, the report accurately finds that "the Postal Service can only identify, measure, and track Election Mailpieces sent to voters if they are sent full service and receive necessary processing scans to provide visibility into the mailstream." As a point of clarification, the Postal Service can also track inbound (return) ballots, which are sent as Single-Piece First-Class Mail, if they are prepared with a uniquely serialized Intelligent Mail Barcode with the appropriate Ballot Mail Service Type Identifier. We highlight this point of clarification to reinforce to election officials the importance of leveraging these Postal Service visibility tools for ballots both to and from voters.

We would also like to emphasize that the Postal Service's role in the electoral process is limited to processing and delivering the mail. We do not determine state election laws, including ballot deadlines or state-determined envelope design requirements, and are not responsible for complying with state law or ensuring that a particular mailpiece complies with requirements under state law. If anyone has a question about state law, we direct them to consult with state or local election officials. While mailers may be subject to the state laws, our focus is limited to educating election officials and voters how to successfully use the mail, if they choose to do so. Relatedly, we understand the report's references to the Postal Service's "on-time" performance relates to our achievement of our own service-performance standards and does not refer to a mailpiece's timeliness under state election deadlines.

Finally, Management notes that the monetary impact analysis performed by the OIG focused on the amount of estimated lost revenue experienced by the Postal Service by providing First-Class Mail service to Election Mail that paid Marketing Mail prices. This approach assumed that Election Mail volume that paid Marketing Mail prices would not have been impacted by higher First-Class Mail prices. However, faced with higher First-Class prices, jurisdictions may have reduced their Election Mail volume sent at Marketing Mail prices.

Recommendation 1

We recommend the Director, Election and Government Mail Services, develop a plan to analyze costs associated with the processing and delivery of Election Mail and explore opportunities to be compensated for the implementation of Election Mail key practices and extraordinary measures.

Management Response/Action Plan:

Management agrees with this recommendation to the extent that the Postal Service determines to pursue establishment of a new product or price category for ballot mail. In that regard, the Election and Government Mail Service team plans to examine the feasibility and utility of a potential product or price category for ballot mail during FY 2023. If the outcome of that examination reflects that such a product or price category has utility and is feasible, management will seek to develop methods to measure unit revenue and attributable costs and will thereafter decide whether to propose such a product or price category for ballot mail to the Governors.

Target Implementation Date: 12/31/2023

Responsible Official: Director, Election and Government Mail Services

Recommendation 2:

We recommend the Director, Election and Government Mail Services, evaluate if all current Election Mail policies are necessary and eliminate redundancies.

Management Response/Action Plan:

Management agrees with this recommendation. The Election and Government Mail Services Team has begun a thorough review of Election Mail policies, procedures, and associated documentation. As part of this effort, we plan to identify and eliminate unnecessary and/or redundant policies. The Election and Government Mail Services Team expects to complete its initial review on or before August 31, 2023, and complete any implementation effort, including removing unnecessary or redundant content, by November 30, 2023.

Target Implementation Date: 11/30/2023

Responsible Official: Director, Election and Government Mail Services

Signature of Official

Adrienne Marshall

Digitally signed by Adrienne
Marshall
Date: 2023.03.20 17:19:33 -0400

Adrienne Marshall
Director, Election and Government Mail Services

cc: Manager, Corporate Audit Response Management

OFFICE OF INSPECTOR GENERAL

UNITED STATES



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