

Election Mail Readiness for the 2024 General Election

AUDIT REPORT

Report Number 24-016-R24 | JULY 30, 2024



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Highlights

Background

The U.S. Postal Service is responsible for processing, transporting, and delivering the nation's Election and Political Mail. The Postal Service is committed to fulfilling its role in the electoral process when policy makers choose to use the mail as a part of their election system. The Postal Service has specific policies and procedures on the proper acceptance, processing, delivery, and documentation of Election and Political Mail.

What We Did

Our objective was to evaluate the Postal Service's readiness for the timely processing and delivery of Election and Political Mail for the 2024 general election. For this audit, we conducted observations at 15 judgmentally selected mail processing facilities and 35 delivery units located in 13 states and Puerto Rico during primary elections in February and March 2024.

What We Found

The Postal Service developed an Election Mail and Political Mail Guidebook that provides employees with many of the key resources that explain the longstanding, special-handling procedures required to facilitate the timely processing and delivery of Election Mail and Political Mail. For the period from December 1, 2023, to April 30, 2024, the Postal Service processed Political and Election Mail with on time processing scores ranging from 97.01 to 98.17 percent. However, as a result of our observations and inquiries, we found that Postal Service personnel did not always comply with policy and procedures regarding all clear certifications, Election and Political Mail logs, and audit checklists. In addition, we identified processes and policies that could pose a risk of delays in the processing and delivery of Election and Political Mail. Further, we identified issues related to some Delivering for America operational changes that pose a risk of individual ballots not being counted.

Recommendations and Management's Comments

We made ten recommendations to address the issues identified in the report. Postal Service management agreed with eight recommendations and disagreed with two. Postal Service management's comments and our evaluation are at the end of each finding and recommendation. The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to recommendations 1, 2, 3, 4, 7, 8, 9, and 10, and corrective actions should resolve the issues in the report. We view management's disagreement with recommendations 5 and 6 as unresolved and will work with management through the formal audit resolution process. See [Appendix C](#) for management's comments in their entirety.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

July 30, 2024

MEMORANDUM FOR: DANE COLEMAN
VICE PRESIDENT, PROCESSING AND MAINTENANCE OPERATIONS

ANGELA CURTIS
VICE PRESIDENT, DELIVERY OPERATIONS

ROBERT CINTRON
VICE PRESIDENT, LOGISTICS

ADRIENNE MARSHALL
DIRECTOR, ELECTION AND GOVERNMENT MAIL SERVICES

A handwritten signature in cursive script that reads "Kelly Thresher".

FROM: Kelly Thresher
Deputy Assistant Inspector General for Field Operations

SUBJECT: Audit Report – Election Mail Readiness for the 2024 General Election
(Report Number 24-016-R24)

This report presents the results of our audit of Election Mail Readiness for the 2024 General Election.

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.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact John Littlejohn, Director, Seasonal Performance and Postal Regulatory Commission, or me at 703-248-2100.

Attachment

cc: Corporate Audit Response Management
Postmaster General
Secretary of the Board of Governors

Results

Introduction/Objective

This report presents the results of our self-initiated audit of Election Mail Readiness for the 2024 General Election (Project Number 24-016). Our objective was to evaluate the U.S. Postal Service’s readiness for timely processing and delivery of Election and Political Mail for the 2024 general election. See [Appendix A](#) for additional information about this audit.

Background

The U.S. Postal Service is responsible for processing, transporting, and delivering the nation’s Election and Political Mail. The Postal Service is committed to fulfilling its role in the electoral process when policy makers choose to use the mail as a part of their election system.

Election Mail is any item mailed to or from authorized election officials that enables citizens to participate in the voting process. Election Mail includes mail-in ballots, balloting materials, voter registration cards, mail-in ballot applications, and polling place notifications. Political Mail is any material mailed for campaign purposes by a registered political candidate, campaign committee, committee of a political party, or a political action committee or organization engaging in issue advocacy or voter mobilization.

For the period from December 1, 2023, to April 30, 2024, the Postal Service processed Political and Election Mail with on time processing scores ranging from 97.01 to 98.17 percent (for a more specific breakdown of types of mail and associated scores, see Table 1). This score is limited to measuring mailpieces within mail processing facilities and does not include final delivery. In addition, Election and Political Mail volume only includes mailpieces with an Intelligent Mail barcode¹ and a Ballot and Political Mail Type Identifier (STID).²

Table 1. Election and Political Mail Volume and Processing Score for the Period From December 1, 2023, to April 1, 2024

Mail Type	Total Pieces Processed	Processing Score (Percent)
Ballots to Voters	33,042,496	97.01
Ballots to Boards of Election	10,258,169	98.17
Non-ballot Election Mail	44,972,903	97.40
Political Mail	298,411,006	97.47

Source: OIG analysis of Postal Service data from Informed Visibility.

The Postal Service established an Election and Government Mail Services (EGMS) Team responsible for coordinating Election Mail policies, resources, and preparedness. The team leads cross-functional collaboration with the Chief Processing and Distribution Officer and Chief Retail and Delivery Officer to develop election and government mail policy.

EGMS developed the 2024 Election Mail and Political Mail Guidebook (2024 Guidebook) that explains the longstanding, special handling procedures required to facilitate the timely processing and delivery of Election and Political Mail. The 2024 Guidebook includes the Processing Operations Management Order (POMO),³ standard work instructions, and links to stand-up talks.

The Postal Service will implement “extraordinary measures” to accelerate delivery of ballots two weeks before the general election day, as they did in prior election years. For example, some offices in specific regions are allowed to bypass processing operations and turn around ballots locally, and retail offices may employ a daily “soft opening” and “soft closing” concept, extending retail hours by 30 minutes on both ends in designated sites. During the primary elections,

¹ Intelligent Mail® barcode (IMb) is a barcode with bars of differing heights that encodes up to 31 digits of mailpiece data, including service type, ZIP Code, and mailer information.

² A unique three-digit code that indicates the service type for an individual mailpiece.

³ The POMO provides the guidance, procedures, and instructions related to processing and distribution for the Election Mail and Political Mail cycle.

there were no nationwide extraordinary measures, but management was authorized to use extra resources for delivery, collections, transportation, and scheduling, as necessary.⁴

We conducted observations at 15 judgmentally selected mail processing facilities⁵ and 35 delivery units located in 13 states and Puerto Rico during February and March 2024 (see Figure 1). Observations at 14 of 15 processing facilities and 30 of 35 delivery units were conducted during the states' presidential primary⁶ dates. See [Appendix B](#) for the listing of the states, sites, and primary dates. We focused our observations and inquiries to evaluate the mail processing facilities' and delivery units' compliance with specific, key processes that are relevant to ensuring proper handling and timely processing and delivery of Election and Political Mail. Such key processes include:

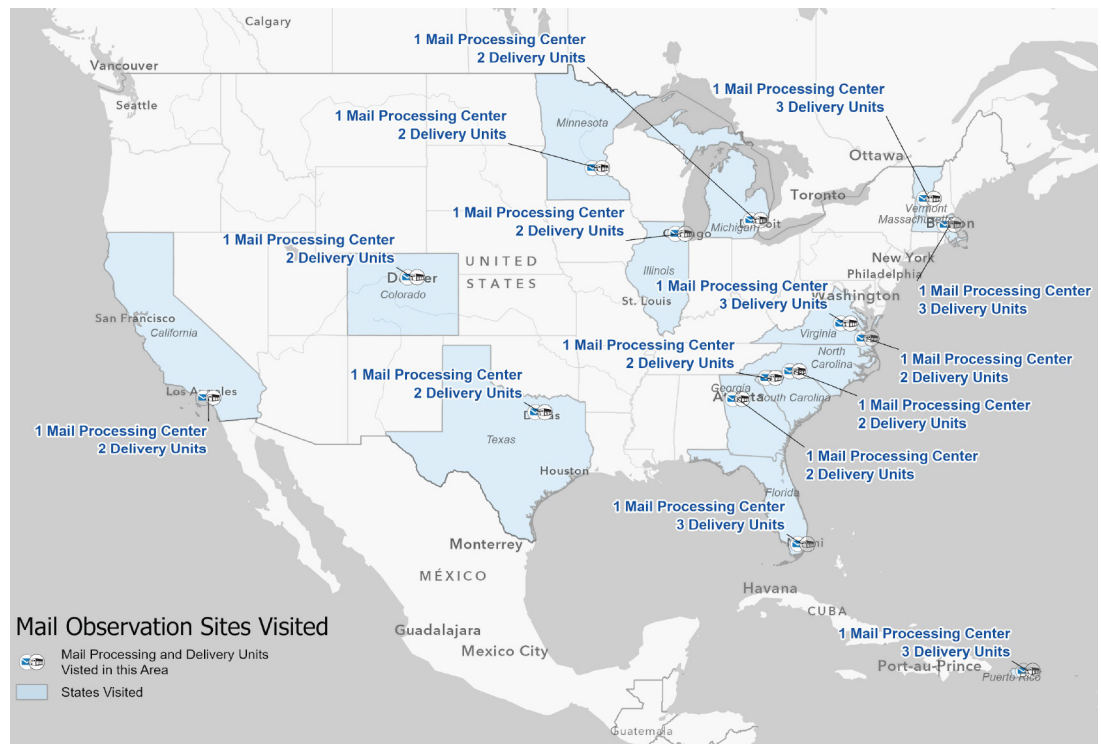
- Mail processing facilities and delivery units completing online, daily all clear certification by a specific time to certify that each facility was all

clear of Election and Political Mail scheduled for processing and delivery.

- Mail processing facilities and delivery units appropriately completing an Election and Political Mail Log daily to document all Election and Political Mail accepted into the facility.
- Mail processing facilities and delivery units ensuring proper postmarking on all ballots going to board of election offices.
- Mail processing facilities using the Operational Clean Sweep Search Checklist.⁷
- Mail processing facilities completing an Election and Political Mail audit checklist daily. This checklist includes verifications that, among other things, the daily all clear certifications are being completed, a designated Political and Election Mail staging area exists, and service talks and procedures are shared with employees and posted on the workroom floor.

Figure 1. OIG Site Observation Locations

Source: Map created by USPS OIG based on judgmentally selected sites.



4 Preparing for the 2024 Election Season Memorandum stand-up talk.

5 Mail processing facilities include two regional processing and distribution centers, one local processing center, 11 processing and distribution centers, and one mail processing annex.

6 Primaries are elections that political parties use to select candidates for a general election. Then each party's candidates run against each other in the general election.

7 This checklist helps ensure processing and distribution operations employees checks and clears key areas in the facility.

The Postal Service is implementing several strategies and initiatives as part of its *Delivering for America* 10-year plan to achieve financial stability and service excellence.⁸ As part of our review in this audit, we looked at multiple operational changes associated with the Delivering for America plan, including Local Transportation Optimization (LTO), Regional Processing and Distribution Centers (RPDC), Local Processing Centers (LPC), and Sorting and Delivery Centers (S&DC).

LTO is a strategy to redesign the Postal Service's surface transportation network to create high performing, lower cost, efficient, and reliable surface transportation capable of moving mail volume on fewer trips. Specifically, the number of transportation trips to and from select delivery units decreased from two or three trips per day to one trip per day. During the primary elections, these impacted delivery units were expected to deliver the ballots to designated "hub sites" that processed and transported the ballots to the respective board of election offices. Specific to the LTO initiative in the Richmond, VA, region, this process started four days prior to the state's primary election day.⁹

According to the Postal Service's *Delivering for America Second-Year Progress Report*,¹⁰ RPDCs are multi-functional distribution centers designed to enable new, effective workflows that will simplify the movement of all classes of mail and packages. LPCs are designed to connect RPDCs to delivery operations

with the primary mission of sorting letter and flat mail to carrier route or delivery walk sequence and serving as a transfer center to aggregate product on its way to delivery. S&DCs are intended to aggregate delivery units into fewer, larger, centrally located facilities to provide faster and more reliable mail and package delivery over a greater geographic area. Among the 15 mail processing facilities we reviewed, we conducted observations at two RPDCs (Richmond, VA, and Atlanta, GA) and one LPC (Norfolk, VA). We also conducted observations at four S&DCs (locations in Richmond, VA, Norfolk, VA, and Atlanta, GA).

Findings Summary

As a result of our observations and inquiries with local management at the judgmentally selected 15 mail processing facilities and 35 delivery units, we found that Postal Service personnel did not always comply with policy and procedures regarding all clear certifications, Election and Political Mail logs, and audit checklists. In addition, we identified processes and policies that could pose a risk of delays in the processing and delivery of Election and Political Mail. Further, we identified issues related to some Delivering for America operational changes that pose a risk of individual ballots not being counted. These issues may adversely affect the Postal Service brand and reputation. As a result, opportunities exist for the Postal Service to improve readiness for timely processing and delivery of Election and Political Mail for the 2024 general election.

⁸ Delivering for America, <https://about.usps.com/what/strategic-plans/delivering-for-america/>.

⁹ We reviewed the LTO process in the Richmond, VA, region in our recent report *Impacts of Local Transportation Optimization in Richmond, Virginia*, Report No. 23-161-1-R24.

¹⁰ USPS Delivering for America *Second-Year Progress Report*, <https://about.usps.com/what/strategic-plans/delivering-for-america/assets/usps-dfa-two-year-report.pdf>.

Finding #1: Non-Compliance With Election Mail Policy and Procedures

We found that Postal Service personnel did not always comply with the Election and Political Mail policy and procedures related to its all clear certifications, Election and Political Mail Log, and audit checklist. Specifically, we found over half of the delivery units and processing facilities we visited were not properly completing the all clear certifications or maintaining the Election and Political Mail Logs.

All Clear Certifications

According to the POMO, all processing facilities are required to certify daily from January 15, 2024, to November 30, 2024, that the facility is clear of all Political and Election Mail by 10 a.m. In addition, the Operational Clean Sweep Search Checklist must be used by employees conducting the all clear actions to document the facility is clear of all Election Mail and Political Mail.

We found 12 of 15 (80 percent) mail processing facilities did not complete all clear certifications according to policy. Management at eight of these facilities had not properly documented their use of the Operational Clean Sweep Search Checklist to verify an accurate certification.¹¹ Three mail processing facilities, including two of the new RPDCs, did not consistently complete the all clear certification or indicated the facility was non-compliant – meaning they had not cleared all Election Mail from the facility by the cut off. Management at a final facility was not on site when they completed the certification, and it was done after the designated cut-off time.

In addition, we found Election Mail in seven facilities after the certification. Specifically, we found between two and 220 ballots at the seven facilities after completion of the all clear process (see Figure 2 for examples).

Regarding delivery unit all clear processes, each facility is responsible for certifying twice daily. All clear AM Certifications are due by 2 p.m. local time, and all

clear PM Certifications are due after the units' retail and/or delivery operations are completed for the day.¹² Various areas such as carrier cases, staging areas, docks, window areas, supervisor desks, and delivery vehicles should be checked for mail. The supervisor or postmaster is required to examine all trays and tubs and carrier satchels to identify any undelivered mail from routes. As part of the delivery unit's all clear certification, the delivery unit management certifies familiarization with required service talks, and they are posted on the workroom floor and shared with employees.

Figure 2. Ballots Found After the All Clear Certification in Processing Facilities



Source: OIG photos taken at the Michigan Processing & Distribution Center on February 27, 2024, and Richmond RPDC on March 5, 2024.

We found 29 of 35 (83 percent) delivery units were inaccurately completing their certifications. Specifically, personnel at 26 of 35 (74 percent) delivery units were completing the AM all clear certifications prior to carriers leaving the unit and/or completing the PM all clear certifications prior to carriers returning to the units. We identified seven delivery units still had Election and Political Mail on hand after the certification, management at two units completed their certifications late, and three units' certifications were completed by personnel not physically located at the unit. These latter three certifications should not have been completed, as the certifications require physical observations. We found between one and 87 pieces of Election and Political Mail in the delivery units. Specifically, two units had

¹¹ Some facilities have multiple issues.

¹² Delivery Unit's Standard Work Instructions for All Clear Certifications, revised on February 16, 2024.

Political Mail on hand, and six units had Election Mail, which included ballots, on hand (see Figure 3 for examples).

These conditions existed due to an overall lack of training and management oversight at both mail processing facilities and delivery units. Management at mail processing facilities did not monitor operations to ensure required certifications and checklists were accurately and appropriately completed. Also, four processing facilities had either outdated information or no Election Mail information posted around the workroom floor, and at one processing facility, management stated they did not conduct any training or stand-up talks related to the Election and Political Mail policies and procedures. In addition, certain high-volume areas such as the Low-Cost Reject Encoding Machine¹³ and manual operations are not included in the Operational Clean Sweep Search Checklist for processing facilities. Both areas frequently contain mailpieces that, for one reason or another, were rejected by processing machines and are both high risk areas for delayed Election and Political Mail.

Management at all 35 delivery units certified being familiar with the required service talks, posting them on the workroom floor, and sharing with employees. However, we were unable to obtain any evidence that stand-up talks were provided to employees at five of 35 units (14 percent). In addition, personnel at 12 of 35 delivery units (35 percent) stated they either did not receive any training or communication or were not aware of the 2024 policies and procedures.

Election and Political Mail Logs

According to the POMO, all Election and Political Mail must be logged through the entire mailstream. As part of the daily facility all clear certification, processing facilities certify they are using the official logs from the POMO. As part of processing's self-audit checklist, each facility is required to correctly document the Election and Political Mail arrivals in the log. Further, according to the Standard Work Instructions for completing the Delivery Unit Election and Political Mail Log, delivery units are to document all Political and Election Mail received for proper tracking and handling of mail.

Figure 3. Ballots Found After the All Clear Certification in Delivery Units



Source: OIG photos taken at the Montbello Station on March 4, 2024, Downtown Charlotte Station on March 5, 2024, and Miami General Mail Facility on March 18, 2024.

¹³ A processing system that encodes addresses on letter mail rejected from other equipment due to failed printing of the barcode.

We found mail processing facility and delivery unit personnel did not maintain logs correctly. Specifically, personnel at three of 15 (20 percent) mail processing facilities and at seven of 35 (20 percent) delivery units did not record any Election or Political Mail during the 2024 primary election cycle. In addition, personnel at six of 15 (40 percent) mail processing facilities and at 17 of 35 (49 percent) delivery units used an outdated log, recorded required information incorrectly, and/or did not maintain photocopies of the mailpiece, as required.¹⁴

We observed these logs positioned throughout processing and delivery facilities. They are typically completed by staff, but there was an overall lack of monitoring and oversight by management to ensure Election and Political Mail Logs were accurate and properly completed.

Audit Checklists

We found personnel at processing facilities did not complete the daily audit checklists as required by policy, and we found some personnel were inaccurately marking items as completed. Specifically, we found:

- Four of 15 (27 percent) mail processing facilities did not complete the Election and Political Mail audit checklist.
- Two of 15 (13 percent) mail processing facilities indicated they had an Election and Political Mail Staging Area when no staging area existed.
- Three of 15 (20 percent) mail processing facilities indicated they shared and posted service talks and POMOs on the workroom floor with employees. However, we did not observe the posted 2024 service talks and POMOs.

Per the Election Mail and Political Mail Operations Policy and POMO, a self-audit must be completed daily by the Business Mail Entry Unit¹⁵ and Mail

Processing using the Election Mail and Political Mail Audit Checklist. Some of the items in the checklist requiring attestation include completion of daily all clear checks after each tour, designation of Election and Political Mail staging areas, and sharing of service talks and POMOs with all employees and posting the information on the workroom floor.

These conditions existed due to a lack of management oversight and monitoring to ensure that Election Mail and Political Mail audit checklists were properly completed with accurate information.

Without full compliance, implementation, and a clear understanding of the Election and Political Mail policies and procedures, there is a risk of improper handling, untimely processing, and late delivery of Election and Political Mail. This can increase the risk of negative publicity regarding the Postal Service's practices and conduct that may adversely affect the Postal Service brand and reputation. In addition, failing to log in Election or Political Mail can put the Postal Service at risk if delivery concerns or legal issues arise.

Recommendation #1

We recommend the **Vice President, Processing and Maintenance Operations**, and the **Vice President, Delivery Operations**, work with **Division Directors and District Managers** to provide oversight and implement additional monitoring controls that verify Election and Political Mail policy and procedures are being followed at all facilities.

Recommendation #2

We recommend the **Director, Election and Government Mail Services**, in conjunction with the **Vice President, Processing and Maintenance Operations**, update the Operational Clean Sweep Search Checklist to include the Low-Cost Reject Encoding Machine and manual operation areas.

¹⁴ Standard Work Instruction: Completing the Delivery Unit Election Mail / Political Mail Log, January 2024, instructs personnel to photocopy one piece of the mailing to keep for records and enter a description of the mailing. Capturing an image and writing a brief description allows for quick identification of a mailing if needed once the mailing has gone out for delivery.

¹⁵ The function of a Business Mail Entry Unit is to accept, verify, and prepare properly paid bulk mail for movement to dispatch areas.

Recommendation #3

We recommend the **Vice President, Processing and Maintenance Operations**, and the **Vice President, Delivery Operations**, work with Divisional Directors and District Managers at all the facilities to provide stand-up talks and training to all employees and maintain evidence the training was conducted as well as post the stand-up talks and relevant procedures around the workroom floor.

Postal Service Response

Management agreed with the finding and recommendations 1, 2, and 3. Regarding the finding, management acknowledged that there were instances of employees failing to follow Election Mail policy and procedures, but they stated there are aspects of the findings that may not accurately reflect Postal Service policies. For example, regarding the all clear process, finding ballots after completion of the all clear does not necessarily mean that the all clear was incorrect. Instead, ballot mail identified in the plant may not be committed for delivery that day (which is what the certification represents).

Regarding recommendation 1, the Postal Service stated it will work to reinforce Election Mail policies and procedures and continue to monitor

compliance throughout the 2024 election cycle and beyond. Regarding recommendation 2, management stated it will update the Operational Clean Sweep Search Checklist to include the Low-Cost Reject Encoding Machine and manual operation areas. The target implementation date for recommendations 1 and 2 are September 1, 2024. Regarding recommendation 3, management stated it will continue to provide Election Mail training to all employees and strengthen training certification processes. Specifically, the Postal Service will update instructions to ensure all relevant stand-up talks and standard work instructions are posted on the work room floor in every facility. The target implementation date for recommendation 3 is November 15, 2024.

OIG Evaluation

Regarding the finding, the OIG was careful in our analysis of election mail in the facility after all clear certifications to verify this mail was delayed, rather than it being mail not committed for delivery that day. Regarding recommendations 1, 2, and 3, the OIG considers management's comments responsive, and the corrective actions should resolve the issues identified in the report.

Finding #2: Operational Risks That Can Delay Timely Processing and Delivery of Election Mail

During our observations at the mail processing facilities and delivery units, we identified inconsistent processes and insufficient policy that could pose a risk for delays in the processing and delivery of Election and Political Mail. Specifically, we found inconsistent election day coordination, a lack of processes to segregate Election Mail out of Postal Automated Redirection System (PARS) Mail,¹⁶ and confusion around postmarking.

Election Day Operations

On the primary election day, we found between one and 82 ballots at eight of 14¹⁷ (57 percent) mail processing facilities that would not make it to the board of election offices on time to be counted.

Contributing elements included:

- Four mail processing facilities did not have any processes to separate out ballots during primary election day for expedited processing. In addition, at one of these four facilities, management stated they were not aware of the state ballot receipt requirements.
- Two mail processing facilities had plans in place to deliver ballots directly to the board of election offices on primary election day, but personnel stopped segregating the ballots about four hours prior to when ballots needed to be received at the board of election offices. In addition, during discussions on the first day of our visit, local management at one facility stated they were not aware primary election day was that week.
- Delivery units did not coordinate with two mail processing facilities about ballots going to board of election offices on primary election day. There was no communication or implementation of a process to deliver ballots received in collections on election day to the board of election offices in time to be counted.

The Postal Service provided a “pitch-catch-clear process for election ballots” standard work instruction for plants and delivery units in January 2024.¹⁸ The pitch-catch-clear process document outlines the coordination between processing facilities, logistics, delivery units, and board of election offices for the timely delivery of ballots. The document instructs management to identify external and internal point of contacts, share contact information with all parties, and notify all parties on the process. However, this standard work instruction lacked specificity around what elections it applied to and how far in advance management should begin using the process.

PARS Mail

We observed large volumes of PARS mail at four of 15 (27 percent) mail processing facilities, to include one facility with an estimated 300,000 pieces of PARS mail. Some of these facilities are designated hubs for PARS mail for their region. At two of these four facilities, we found Election Mail — undeliverable ballots being sent to voters — in the PARS mail. During our fieldwork, we looked through a small, judgmental sample of PARS mail by conducting a random search of certain letter trays, rather than reviewing every piece of mail. At some of the facilities, PARS mail was about two months behind in processing. At one facility, we found one ballot in PARS, but this ballot did not have the required indication of why it was being returned to the sender. In the other facility, we found 22 ballots in PARS mail going to the voter from the board of elections office.

Postal Service policy¹⁹ states voter-returned ballots should not be in PARS; however, the policy does not speak to other types of Election Mail. While PARS mail is an area listed on the Operational Clean Sweep Search Checklist requiring review during the all-clear process, the volume of PARS mail we identified was so large it would have taken days to conduct an exhaustive search.

¹⁶ Postal Automated Redirection System (PARS) Mail is mail identified as undeliverable-as-addressed during processing.

¹⁷ We did not include Puerto Rico in this count since we did not conduct observations on primary election day.

¹⁸ Standard Work Instruction: Pitch-Catch-Clear Process for Election Ballots, January 2024.

¹⁹ Stand-up talk: *No Voter-Returned Ballots in PARS*.

Ballots and other Election Mail being sent to recipients that cannot be delivered needs to be returned to board of election offices expeditiously so the offices can fix address issues and recipients can cast their votes. Without the proper process and controls in place to identify and segregate Election Mail, there is a risk that Election Mail is not efficiently identified, processed, and delivered in a timely manner.

Postmarking

While we were at each site, we asked personnel about how they handle postmarking ballots. We identified two issues – first, personnel did not know postmarking policy, and, second, policy compliance could lead to ineligible ballots.

Regarding the first issue, personnel at seven of 15 (47 percent) mail processing facilities did not know postmarking policy, and personnel at eight of 35 (23 percent) delivery units did not know postmarking policy. In addition, some of these offices reported that they would execute postmarking in ways that were outside of policy.

In the normal course of operations, the Postal Service does not postmark every piece of mail in the system. However, during elections, the Postal Service deviates from its normal procedures and tries to ensure that every return ballot mailed by voters receives a postmark. Postal Service policy²⁰ states every effort should be made to postmark any uncanceled ballots in the originating²¹ operation, including by hand-cancelation. Each facility must also certify their manual operations have a date hand-canceler and ensure the date is updated correctly and verified each day. However, policy states, if any non-postmarked ballots were found in the destinating²² operation after such ballots had gone through the originating operation, a postmark should not be applied to those ballots. Further, delivery units should not apply a postmark to non-postmarked ballots after the mailpieces have gone through the outgoing operation.

Regarding the second issue, this policy introduced risk because it could lead to non-postmarked, mail-in ballots not being counted. Specifically, some election officials rely on the postmark as proof that a return ballot was timely mailed, so it is essential that every returning ballot gets a legible postmark. For example, in Virginia and California, mail-in ballots must have a postmark on or before election day and arrive to the board of election office by a specific date after the election. Without a postmark, these ballots may not be counted.

Personnel at the facilities we visited did not know postmarking requirements because of a lack of awareness of, and training about, the postmarking policy. According to Postal Service management, the policy was created to align with other postmarking policy, which intends to give the recipient an accurate date for when the Postal Service gained possession of a mailpiece. Once a ballot is in destinating operations, heading back to a board of election office, it would have already been in the Postal Service's possession and would therefore have missed the typical postmarking window. The policy does not consider the use of postmarking in many states' laws – to show that the ballot was sent before election day.

Once a voter places a ballot into the mailstream, they are relying on the Postal Service to complete the process by postmarking the piece and delivering it to the board of election office. While most ballots are postmarked at processing facilities, some may make it back to delivery units without the proper markings. Allowing delivery units and destinating operations at processing facilities to postmark ballots being sent back to the board of election offices that is not already postmarked would help the Postal Service meet board of election offices' requirements for ballots to ensure they are eligible to be counted. In addition, more clearly and consistently communicating policy will help the Postal Service meet its postmarking obligation.

20 Election Mail and Political Mail Operations Policy and POMO.

21 Outgoing mail and local mail that enter the mailstream that is the point of origin for mail processing and delivery.

22 Incoming mail arriving for its point of final delivery through a processing facility.

Recommendation #4

We recommend that the **Director, Election and Government Mail Services**, in conjunction with the **Vice President, Delivery Operations, Vice President, Processing and Maintenance Operations**, and **Vice President, Logistics**, clarify the pitch-catch-clear process to include timeframes and the elections for which this process is required.

Recommendation #5

We recommend the **Director, Election and Government Mail Services**, in conjunction with the **Vice President, Delivery Operations and Vice President, Processing and Maintenance Operations**, develop and implement a process for delivery units to segregate Election Mail identified as Postal Automated Redirection System Mail prior to sending it back to a mail processing facility.

Recommendation #6

We recommend the **Director, Election and Government Mail Services**, in conjunction with the **Vice President, Delivery Operations and Vice President, Processing and Maintenance Operations**, evaluate the postmarking policy and adjust as necessary to ensure that all mail-in ballots receive a postmark.

Recommendation #7

We recommend the **Director, Election and Government Mail Services**, in conjunction with the **Vice President, Delivery Operations and Vice President, Processing and Maintenance Operations**, clearly communicate the postmarking policy to all operations.

Postal Service Response

Management disagreed with the finding, partially agreed with recommendations 4 and 5, disagreed with recommendation 6, and agreed with recommendation 7. Regarding the finding, management stated the report was not always clear in distinguishing between year-round operational readiness measures and the Extraordinary Measures, which are

only applicable in the period immediately preceding the general election. Management also stated it was not clear why ballots found in processing operations on Primary Day were necessarily indicative of a failure on the part of the Postal Service. Management also disagreed with the portion of the finding regarding its postmarking policy introducing risk. Management stated the postmarking policy is not new and contends allowing for postmarking at downstream operations risks the integrity of the postmark.

Regarding recommendation 4, management stated it will update instructions to clarify the timeframes and specific elections for which the pitch-catch-clear process is required. Management clarified the Vice President, Delivery Operations would not have a role in closing this recommendation but provided a target implementation date of September 1, 2024.

Regarding recommendation 5, management stated the Postal Service will continue to reinforce that no voter-returned ballots be in the PARS mail. However, the Postal Service will not include all Election Mail in this policy, as the PARS is a trusted system whereby mail may be intercepted and redirected appropriately. Management stated to segregate Election Mail within the PARS or to deviate from established processes would introduce unwarranted risk. Management provided a target implementation date of September 1, 2024.

Regarding recommendation 6, management stated the Postal Service's postmarking policy is designed to ensure that the date of the postmark reflects the day the Postal Service took custody of the mail piece. Allowing for postmarking at downstream operations risks putting an inaccurate date on the envelope, which would undermine the integrity of the postmark and the credibility of the Postal Service. The Postal Service also said it should not change their postmarking practices to accommodate certain state laws, given the differences in the role of the postmark

across election jurisdictions. The Postal Service concluded that this recommendation does not consider situations where applying a postmark at delivery would invalidate an otherwise valid ballot.

Regarding recommendation 7, management stated it will continue to communicate the postmarking policies to all employees through existing communication channels and the publication of the 2024 Postmarking Memo. The target implementation date is September 30, 2024.

OIG Evaluation

Regarding the finding, the OIG witnessed four processing facilities with large amounts of PARS mail. At some of the facilities, PARS mail was about two months behind in processing; this creates a risk for all Election Mail, not just voter-returned ballots. Regarding postmarking, the

audit team witnessed ballots missing a postmark, and as the Postal Service acknowledges, multiple states have laws requiring postmarks. An operational adjustment that allows for postmarking on ballots that erroneously did not receive one could help voters feel more confident that their ballot will receive a postmark. A scenario in which applying a postmark at delivery could invalidate a vote would be if the postmark was applied after election day, which, in many states, would already invalidate the ballot.

Management's comments were responsive to recommendations 4 and 7, and corrective actions should resolve the issues identified in the report. We view the partial agreement with recommendation 5 and the disagreement with recommendation 6 as unresponsive and will work with management through the formal audit resolution process.

Figure 5. Trucks Lined Up at the Atlanta RPDC



Source: OIG photo taken on March 11, 2024.

At the S&DCs we visited, we did not find any delayed ballots; however, all sites were not completing all clear certifications according to policy and personnel at two of four did not know postmarking policy. These issues were included in Finding 1 of the report.

The Postal Service made mail flow changes while election changes were also in process, causing confusion. Management at the Richmond RPDC was not aware of the overall election mail flow changes from offices impacted by LTO, and it was therefore not putting measures in place when ballots from those impacted offices were identified. At the Atlanta RPDC, management stated the Election and Political Mail processes were not properly prioritized.

Inadequate planning and changes to processing during the elections could put the Postal Service at risk for Election and Political Mail delays that could lead to individual ballots not being counted and harm the reputation of the Postal Service.

Recommendation #8

We recommend that **Director, Election and Government Mail Services**, in conjunction with the **Vice President, Logistics**, and **Vice President, Delivery Operations**, develop and implement a plan to communicate Election and Political Mail processing, transportation, and delivery processes to any facilities impacted by the Local Transportation Optimization initiative, including those with mail that crosses state lines.

Recommendation #9

We recommend the **Vice President, Processing and Maintenance Operations**, reinforce procedures and create a plan so that the Regional Processing and Distribution Centers have appropriate procedures and resources in place to prioritize Election Mail processing.

Recommendation #10

We recommend the **Vice President, Delivery Operations**, **Vice President, Processing and Maintenance Operations**, and **Vice President, Logistics**, pause implementation of scheduled Delivering for America operational changes during September through November 8, 2024.

Postal Service Response

Management disagreed with the finding but agreed with recommendations 8, 9, and 10. Regarding the finding, management stated it was overbroad and misleading. Management said the OIG's analysis was limited to the Atlanta RPDC and LTO in Virginia, and the report should likewise reflect this limitation. As currently drafted, the Postal Service stated a reader could interpret the analysis to be relevant to all the Delivering for America plan, but it is based upon a small sample size of a subset of those initiatives. The Postal Service also said significant improvements have been made over the past few months in Georgia. The Atlanta RPDC was opened on February 24, 2024, and the audit took place on March 12, 2024, just 17 days after opening. Also, the Postal Service stated the assertion that North Carolina locations serviced

by the Richmond RPDC were not included in the LTO plan is incorrect. Management contends the observations detailed in the finding apparently resulted from an error in execution or communication of the LTO Key Activities as implemented.

Regarding recommendation 8, the Postal Service stated it has developed and communicated operating plans for each LTO impacted location to date and will continue this process going forward. The target implementation date is October 31, 2024.

Regarding recommendation 9, the Postal Service said it will reinforce procedures and have appropriate resources in place to prioritize Election Mail processing at all plants, including RPDCs. The target implementation date is September 1, 2024.

Regarding recommendation 10, the Postal Service stated it has already committed to not implement any mail moves until January 2025, or any other LPC/RPDC moves that could disrupt operations. The Postal Service stated the same is true for LTO, as they have not finalized any further LTO locations beyond those currently planned through August 2024, and no LTO implementations will take place from September to November 2024. The target implementation date is September 1, 2024.

OIG Evaluation

Regarding the finding, the OIG visited every fully operational RPDC during the primary elections. In addition, we observed LTO practices in Virginia because it was one of two states to have LTO operations during the primary elections. The OIG acknowledges the Atlanta RPDC opened just 17 days before the primary election, but felt it was

important to conduct observations and inform the Postal Service of any challenges we identified. Making major operational changes days before a primary election could put ballots at risk. In addition, in conversations with Postal Service management, the OIG requested documentation showing the Election Mail process for the North Carolina region serviced by Virginia, and it was not provided. In our upcoming election performance work, we will continue to assess how operational changes related to the Delivering for America plan impact Election and Political Mail processing and delivery.

Management's comments were responsive to recommendations 8, 9, and 10, and corrective actions should resolve the issues identified in the report.

Looking Forward

While we found inconsistent application of policy and areas that would benefit from additional clarification, overall, the Postal Service processed over 97 percent of ballots sent with an IMb and STID between December 1, 2023, and April 30, 2024, on time. The Postal Service has teams dedicated to its success during election season and has informed us that it will employ extraordinary measures during the 2024 general election to process, transport, and deliver all Election and Political Mail timely. As we are dedicated to oversight of the Postal Service's processes to ensure that voters using the mail to cast their votes can rely on the Postal Service, we will conduct unannounced site visits in all states throughout the country during our audit of the Postal Service's performance during the 2024 general election. In addition, we plan to review IMb and STID usage on Election and Political Mail and assess visibility of Election and Political Mail in the network.

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Appendix A: Additional Information

Scope and Methodology

The scope of our audit includes the controls and processes in place as it relates to the Postal Service's timely processing and delivery of Election and Political Mail and compliance with the policies and procedures during the presidential primaries from February to March 2024. To accomplish our objective, we:

- Reviewed the Postal Service's 2024 *Election and Political Mail Guidebook* that includes policy and procedures and compared to 2022 procedures for significant changes.
- Judgmentally selected and conducted 15 unannounced mail processing facilities observations and 35 unannounced delivery unit observations from February 23 through March 20, 2024. We selected facilities in 13 states and Puerto Rico covering the presidential primary elections in the 13 states. At each location, we verified compliance with specific Election and Political Mail policy and procedures and noted any opportunities for improvement.
- Interviewed Postal Service Headquarters Management within the Chief Processing Distribution Office, Chief Retail and Delivery Office, Chief Logistics Office, and the Director of Election and Government Mail Services to understand significant changes to Election Mail related procedures and any impact to operations.
- Analyzed ballots, non-ballot Election Mail, and Political Mail service processing scores from December 1, 2023, to April 30, 2024, and compared to USPS service performance Fiscal Year 2024 targets.

We conducted this performance audit from November 2023 through July 2024 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform

the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We discussed our observations and conclusions with management on July 3, 2024, and included their comments where appropriate.

In planning and conducting the audit, we obtained an understanding of Election and Government Mail Services, Processing, and Retail and Delivery Operations' internal control structure to help determine the nature, timing, and extent of our audit procedures. We reviewed the management controls for overseeing the program and mitigating associated risks. Additionally, we assessed the internal control components and underlying principles, and we determined that control environment, control activities, information and communicating, and monitoring were significant to our audit objective.

We developed audit work to ensure that we assessed these controls. Based on the work performed, we identified internal control deficiencies related to the control activities component that were significant within the context of our objectives. Our recommendations, if implemented, should correct the weaknesses we identified.

We assessed the reliability of the ballot, non-ballot Election Mail, and Political Mail volume and service processing data by reviewing existing information, comparing summarized data to the underlying source data, and validating the underlying data with Postal Service officials knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Service Performance of Election Mail for the 2022 Mid-Term Elections</i>	To evaluate the U.S. Postal Service's service performance of Election Mail during the November 2022 mid-term elections.	22-187-R23	March 27, 2023	\$23,033,770
<i>Election Mail Readiness for the 2022 Mid-Term Elections</i>	To evaluate the Postal Services readiness for timely processing of Election Mail for the 2022 mid-term election to be held Tuesday November 8, 2022.	22-093-R22	September 26, 2022	None
<i>International Election Mail Observations for the 2020 General and 2021 Georgia Senate Runoff Elections</i>	To evaluate the Postal Service's international mail operations during the 2020 general election and the state of Georgia Senate runoff elections.	21-007-R21	April 29, 2021	None
<i>Service Performance of Election and Political Mail During the November 2020 General Election</i>	To evaluate the U.S Postal Service's service performance of Election and Political Mail during the November 2020 general election. We also evaluated the handling of mail for the Georgia Senate runoff election held on January 5, 2021.	20-318-R21	March 5, 2021	None
<i>Processing Readiness of Election and Political Mail During the 2020 General Elections</i>	To evaluate the U.S. Postal Service's readiness for timely processing of Election and Political Mail for the 2020 general election.	20-225-R20	August 31, 2020	None
<i>Timeliness of Ballot Mail in the Milwaukee Processing & Distribution Center Service Area</i>	To determine the cause of delayed ballot mail in the Milwaukee, WI P&DC service area for the spring election and presidential preference primary of April 7, 2020.	20-235-R20	July 7, 2020	None
<i>Service Performance of Election and Political Mail During the 2018 Midterm and Special Elections</i>	To evaluate the Postal Service's performance in processing Election and Political Mail for the 2018 midterm and special elections.	19XG010NO000-R20	November 4, 2019	None
<i>Processing Readiness for Election and Political Mail for the 2018 Midterm Elections</i>	To evaluate the Postal Service's readiness for timely processing of Election and Political Mail for the 2018 Midterm Elections.	NO-AR-18-007	June 5, 2018	None

Appendix B: List of States and Observation Sites

Number	State	Presidential Primary Date	Mail Processing Facility	Delivery Unit
1	South Carolina	February 24, 2024	Greenville Processing and Distribution Center/Facility	Greenville Main Post Office
				Pleasantburg Station
2	Michigan	February 27, 2024	Michigan Metroplex Processing and Distribution Center	Pontiac Main Post Office
				Troy Main Post Office
3	California	March 5, 2024	Santa Ana Processing and Distribution Center/Facility	Santa Ana Main Post Office
				Bristol Station
4	North Carolina	March 5, 2024	Charlotte Processing and Distribution Center/Facility	Downtown Charlotte Station
				Ballantyne Station
5	Colorado	March 5, 2024	Denver Processing and Distribution Center/Facility	Mile High Station
				Montbello Station
6	Texas	March 5, 2024	North Texas Processing and Distribution Center/Facility	McKinney Main Post Office
				Coppell Main Post Office
7	Vermont	March 5, 2024	White River Junction Processing and Distribution Center/Facility	White River Junction Administrative Post Office
				Windsor Main Post Office
				Woodstock Administrative Post Office
8	Virginia	March 5, 2024	Richmond, VA Regional Processing and Distribution Center	Richmond, VA Sorting & Delivery Center
				Amelia Court House Administrative Post Office
				Goochland Administrative Post Office
			Norfolk, VA Local Processing Center	Norfolk, VA Sorting & Delivery Center
				Portsmouth Main Post Office
9	Massachusetts	March 5, 2024	Boston Processing and Distribution Center/Facility	Fort Point Station
				Allston Carrier Section
				Cambridge Main Post Office
10	Minnesota	March 5, 2024	Minneapolis Processing and Distribution Center/Facility	Minneapolis Main Post Office
				Richfield Branch
11	Georgia	March 12, 2024	Atlanta Regional Processing Distribution Center	North Atlanta GA Sorting & Delivery Center
				South Atlanta GA Sorting & Delivery Center
12	Florida	March 19, 2024	Miami Processing and Distribution Center/Facility	Milam Annex Carrier Annex
				General Mail Facility Miami
				Olympia Heights Branch
13	Illinois	March 19, 2024	Carol Stream Processing and Distribution Center/Facility	Carol Stream Main Post Office
				Wheaton Main Post Office
14	Puerto Rico	April 21, 2024	San Juan Mail Processing Annex 2	Guaynabo Post Office
				Toa Baja Post Office
				Bayamon Post Office

Appendix C: Management's Comments



July 24, 2024

JOHN CIHOTA
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Election Mail Readiness for the 2024 General Election (Report Number 24-016-DRAFT)

Thank you for providing the Postal Service an opportunity to review and comment on the findings and recommendations contained in the draft audit report, *Election Mail Readiness for the 2024 General Election*.

The Postal Service is committed to providing a secure, efficient, and effective way for citizens to participate when policymakers and voters decide to use mail as part of their elections. We have proven processes for proper handling and timely delivery of Election Mail, and during every federal election cycle we make efforts across the nation to inform local and state election officials about mailing procedures, our operational standards, and our recommended best practices for utilizing the mail. We also work closely with election officials at all levels of government to provide recommendations on mailpiece design, mailing preparation and entry, and delivery timing. And as always, we will work tirelessly to ensure our operational preparedness for the election season, and we will be reinforcing key messages with our frontline employees throughout the year.

Finding #1: Noncompliance with Election Mail Policy and Procedures

Management acknowledges that there were instances of our employees failing to follow our Election Mail Policy and Procedures, and therefore we agree with this aspect of this finding. That said, there are aspects of the findings that may not accurately reflect our policies. For example, regarding the all-clear process, finding ballots after completion of the all-clear does not necessarily mean that the all-clear was incorrect. Ballot mail identified in the plant may not be committed for delivery that day (which is what the certification represents).

Finding #2: Operational Risk That Can Delay Timely Processing & Delivery of Election Mail

Management disagrees with the finding on Operational Risk That Can Delay Timely Processing & Delivery of Election Mail. The discussion draft is not always clear in distinguishing between year-round operational readiness measures and the Extraordinary Measures which are only applicable in the period immediately preceding the general election. It is also not clear why ballots found in processing on Primary Day is necessarily indicative of a failure on the part of the Postal Service.

As indicated by our responses to the recommendations, the Postal Service is always working to reinforce our policies and procedures across the organization. Though it is also important to note that overall performance for Ballot Mail was strong during the period of the audit, and throughout the Primary season.

Management also disagrees with the finding that our postmarking policy introduces risk. Our postmarking policy is not new, and it is unclear why the OIG is recommending changes now. The policy is designed to ensure that the postmark accurately reflects the date when we took custody of the mailpiece. Allowing for postmarking at downstream operations risks the integrity of the postmark (and the reason why some election jurisdictions rely on the postmark).

Finding #3: Observations Regarding Delivering for America Operational Changes

Management disagrees with the finding on Observations Regarding Delivering for America Operational Changes. This finding is overbroad and misleading. The OIG's analysis is limited to the Atlanta RPDC and LTO in Virginia, and the report should likewise reflect this limitation. As currently drafted, a reader could interpret the analysis to be relevant to all of DFA, but it is based upon a small sample size of a subset of DFA initiatives. This is particularly true given the timing of the observations in Georgia, as significant improvements have been made over the past few months. Specifically, the Atlanta RPDC was opened on February 24, 2024, and the audit took place on March 12, 2024, just 17 days after opening. The Atlanta RPDC was in transition with major staffing movement and still in the process of training new employees of overall processing in the new facility.

During the recent May and June Georgia elections, a cross-functional effort was deployed to coordinate all communication, logistics and mail processing activities. Also, the assertion that North Carolina locations serviced by the Richmond RPDC were not included in the LTO plan is incorrect. North Carolina 279 offices impacted by the LTO initiative were included in the LTO operating and communication plan. The observations detailed in the finding apparently resulted from an error in execution or communication of the LTO Key Activities as implemented.

Recommendation 1:

OIG recommends the Vice President, Processing and Maintenance Operations, and the Vice President, Delivery Operations, work with Division Directors and District Managers to provide oversight and implement additional monitoring controls that verify Election and Political Mail policy and procedures are being followed at all facilities.

Management Response/Action Plan:

Management agrees with this recommendation. The Postal Service will work to reinforce our Election Mail policies and procedures and continue to monitor compliance throughout the 2024 election cycle and beyond.

Target Implementation Date:

09/01/2024

Responsible Official:

CPDO & CRDO

Recommendation 2:

OIG recommends the Director, Election and Government Mail Services, in conjunction with the Vice President, Processing and Maintenance Operations, update the Operational Clean Sweep Search Checklist to include the Low-Cost Reject Encoding Machine and manual operation areas.

Management Response/Action Plan:

Management agrees with this recommendation. The Postal Service will update the Operational Clean Sweep Search Checklist to include the Low-Cost Reject Encoding Machine and manual operation areas.

Target Implementation Date:

09/01/2024

Responsible Official:

EGMS & CPDO

Recommendation 3:

We recommend the Vice President, Processing and Maintenance Operations, and the Vice President, Delivery Operations, work with Divisional Directors and District Managers at all the facilities to provide stand-up talks and training to all employees and maintain evidence the training was conducted as well as post the stand-up talks and relevant procedures around the workroom floor.

Management Response/Action Plan:

Management agrees with this recommendation and will continue to provide Election Mail training to all employees and strengthen training certification processes. The Postal Service will update instructions to ensure all relevant stand-up talks and standard work instructions are posted on the work room floor in every facility.

Target Implementation Date:

The implementation timeframe will begin immediately and will continue through November 15, 2024, which is the end of our "extraordinary measures" period.

Responsible Official:

CPDO & CRDO

Recommendation 4:

We recommend that the Director, Election and Government Mail Services, in conjunction with the Vice President, Delivery Operations, Vice President, Processing and Maintenance Operations, and Vice President, Logistics, clarify the pitch-catch-clear process to include timeframes and the elections for which this process is required.

Management Response/Action Plan:

Management partially agrees with this recommendation. The Postal Service will update instructions to clarify the timeframes and specific elections for which the pitch-catch-clear process is required.

Management does not agree with the including the Vice President, Delivery Operations in the recommendation as the Vice President, Delivery Operations is not responsible for management of the pitch-catch-clear process.

Target Implementation Date:

09/01/2024

Responsible Official:

EGMS, CPDO & CLO

Recommendation 5:

We recommend the Director, Election and Government Mail Services, in conjunction with the Vice President, Delivery Operations and Vice President, Processing and Maintenance Operations, develop and implement a process for delivery units to segregate Election Mail identified as Postal Automated Redirection System Mail prior to sending it back to a mail processing facility.

Management Response/Action Plan:

Management partially agrees with this recommendation to the extent it pertains to ballots being returned by voters. In that regard, the Postal Service will continue to reinforce the policy outlined in the Stand-Up Talk: No Voter-Returned Ballots in PARS to ensure the correct preparation of incoming PARS volume. To the extent the Recommendation was intended to apply more broadly to Election Mail generally, the Postal Automated Redirection System Mail is a trusted system whereby mail may be

intercepted and redirected appropriately. To segregate Election Mail within the PARS system or to deviate from established processes introduces unwarranted risk.

Target Implementation Date:

09/01/2024

Responsible Official:

EGMS, CRDO & CPDO

Recommendation 6:

We recommend the Director, Election and Government Mail Services, in conjunction with the Vice President, Delivery Operations and Vice President, Processing and Maintenance Operations, update the postmarking policy so that all operations can postmark mail-in ballots.

Management Response/Action Plan:

Management disagrees with this recommendation. The Postal Service's postmarking policy is designed, among other things, to ensure that the date of the postmark reflects the day the Postal Service took custody of the mail piece. Allowing for postmarking at downstream operations risks putting an inaccurate date on the envelope. Applying a postmark with an inaccurate date undermines the integrity of the postmark and the credibility of the Postal Service.

Moreover, we should not change our postmarking practices to accommodate certain state laws, given the differences in the role of the postmark across election jurisdictions. This recommendation does not consider situations where applying a postmark at delivery would invalidate an otherwise valid ballot.

Target Implementation Date:

Not Applicable

Responsible Official:

Not Applicable

Recommendation 7:

We recommend the Director, Election and Government Mail Services, in conjunction with the Vice President, Delivery Operations and Vice President, Processing and Maintenance Operations, clearly communicate the postmarking policy to all operations.

Management Response/Action Plan:

Management agrees with this recommendation and will continue to communicate the Postmarking Policies to all employees through existing communication channels and the publication of the 2024 Postmarking Memo.

Target Implementation Date:

09/30/2024

Responsible Official:

EGMS, CRDO & CPDO

Recommendation 8:

We recommend that Director, Election and Government Mail Services, in conjunction with the Vice President, Logistics and Vice President, Delivery Operations, develop and implement a plan to communicate Election and Political Mail processing, transportation, and delivery processes to any facilities impacted by the Local Transportation Optimization initiative, including those with mail that crosses state lines.

Management Response/Action Plan:

Management agrees with this recommendation. We have developed and communicated operating plans for each Local Transportation Optimization impacted location to date and will continue this process going forward.

Target Implementation Date:

10/31/2024

Responsible Official:

EGMS, CPDO, CRDO

Recommendation 9:

We recommend the Vice President, Processing and Maintenance Operations, reinforce procedures, and create a plan so that the Regional Processing and Distribution Centers have appropriate resources in place to prioritize election mail processing.

Management Response/Action Plan:

Management agrees with this recommendation to the extent that the Postal Service will reinforce procedures and have appropriate resources in place to prioritize Election Mail processing at all plants, including RPDCs, to prioritize Election Mail. Management

assumes in concurring with this recommendation that the OIG acknowledges that the plan for RPDCs is the same plan for all other processing facilities. Procedures for handling Election Mail are already established and applied to each RPDC, but they will be reiterated and reinforced. RPDC facilities use the same procedures and resources as other mail processing facilities.

Target Implementation Date:

09/01/2024

Responsible Official:

CPDO

Recommendation 10:

We recommend the Vice President, Delivery Operations, Vice President, Processing and Maintenance Operations, and Vice President, Logistics, pause implementation of Delivering for America operational changes during September through November 8, 2024.

Management Response/Action Plan:

Management agrees with this recommendation to the extent it suggests that we consider pausing implementation of significant operational changes during the relevant period that might impact Election Mail service performance.

In that regard, the Postal Service has already committed to not implement any mail moves as part of our MPFR process until January 2025, or any other LPC/RPDC moves that could disrupt operations. The same is true for LTO, as the Postal Service has not finalized any further LTO locations beyond those currently planned through August 2024, and no LTO implementations will take place from September to November 2024.

The Postal Service will also use its discretion to avoid unnecessary optics or perception concerns, even when not related to new initiatives, and even when there is no real possibility that they will impact the Election Mail performance of the Postal Service. For example, management will suspend certain activities around collection management. Changes, such as replacement (unless due to vandalism) or removal of collection boxes, time changes to collections, or changes to eLocks, will be suspended.

All that said, we feel constrained to point out that as stated this recommendation could be read to be overbroad and misleading, since it inappropriately ties the recommendation to the DFA Plan and leaves the impression that the OIG discovered broader issues with the DFA and Election Mail, despite the very limited sample size of a small subset of DFA initiatives. Moreover, there are many aspects of the Delivering for America Plan, that are not covered by the report, and that do not introduce transition risk to the network.

Target Implementation Date:

September 1, 2024

Responsible Official:

CPDO, CRDO, and CLO

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on 2024-07-24 16:40:32 EDT

Isaac S. Cronkhite
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cc: Manager, Corporate Audit Response Management

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