Audit Report

Election Mail Readiness for the 2022 Mid-Term Elections

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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 Postal Service's readiness for timely processing of Election Mail for the 2022 mid-term election to be held Tuesday, November 8, 2022. To evaluate readiness, during primary elections, we reviewed Election Mail policies, analyzed service performance data, and conducted observations at six Processing and Distribution Centers and 10 delivery units. We also followed up on 14 prior recommendations to determine if the Postal Service's corrective actions were effective.

What We Found

We found that generally, the Postal Service is ready for timely processing of Election Mail for the 2022 mid-term election. The Postal Service established the Election and Government Mail Services Organization, prioritized the timely processing and delivery of Election Mail during 2022 primary elections, implemented prior audit recommendations, and made progress in implementing Election Mail policies. The Postal Service processed nearly 10 million more Election Mail pieces from April 1 through June 30, 2022, than the same period for the 2020 primaries. Even with the significant increase, the Postal Service delivered 97.6 percent of identifiable Election Mail on time, an increase of 1 percentage point when compared to the same period in 2020.

However, we did find examples where the Postal Service was not in compliance with Election Mail policies; specifically, three of six P&DCs and one of 10 delivery units did not complete required checklists, certifications, and postmarking in accordance with policy. Additionally, we found the Postal Service was able to measure service performance for 83.3 percent of identifiable ballots. While the Postal Service has made progress reducing the number of ballots excluded from service measurement, it is important that it continues to identify root causes of ballots excluded from measurement.

Recommendations

We recommended management re-enforce Election Mail policies, develop an official guidebook for processing of Election Mail prior to 2024 primary elections, and retain data on ballots with barcode tracking excluded from measurement and work with mailers of Election Mail to identify why ballots are excluded.

Transmittal Letter

September 26, 2022

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

JEFFREY JOHNSON
VICE PRESIDENT, ENTERPRISE ANALYTICS

Mary Lloyd
Acting Deputy Assistant Inspector General for Mission
Operations

SUBJECT: Audit Report – Election Mail Readiness for the 2022 Mid-Term
Elections (Report Number 22-093-R22)

This report presents the results of our audit of Election Mail Readiness 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
Chief Logistics Officer and Executive Vice President
Chief Retail and Delivery Officer and Executive Vice President
Vice President, Regional Processing Operations, Western
Vice President, Regional Processing Operations, Eastern
Director, Election and Government Mail Services Organization

Results

Introduction/Objective

This report presents the results of our self-initiated audit of Election Mail readiness for the 2022 mid-term elections (Project Number 22-093). Our objective was to evaluate the U.S. Postal Service's readiness for timely processing of Election Mail for the 2022 mid-term elections.

> " *Our objective was to evaluate the U.S. Postal Service's readiness for timely processing of Election Mail for the 2022 mid-term elections.* "
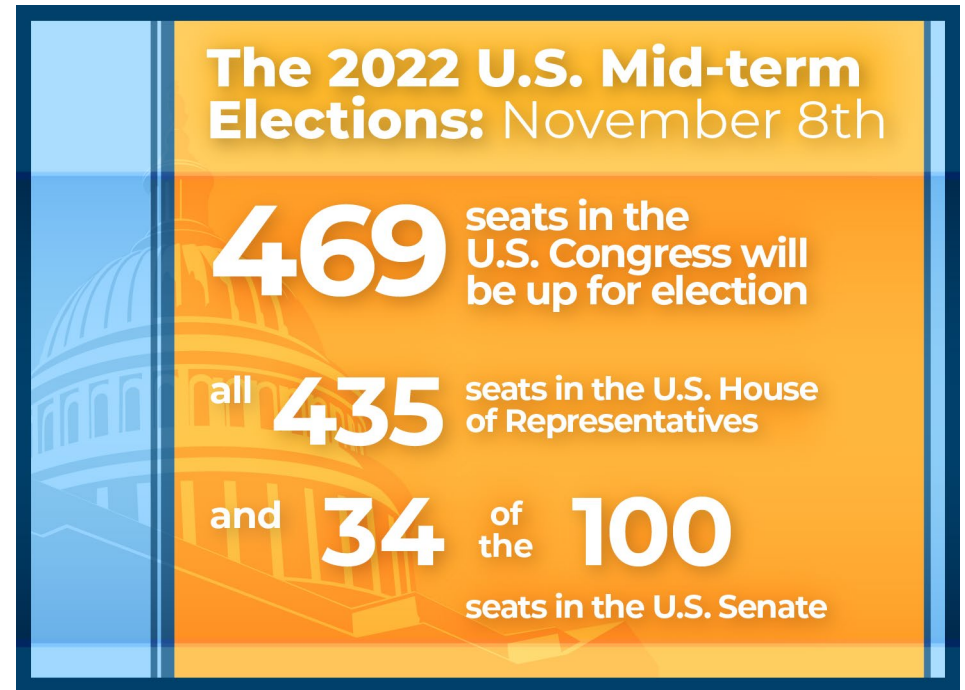
Background

State primary elections began in March 2022 and the 2022 U.S. mid-term elections are scheduled to be held Tuesday, November 8, 2022. There are 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.

Election Mail is any mailpiece an authorized election official creates for voters participating in the election process and includes ballots and voter registration materials. The customer can send Election Mail to the voters as either First-Class Mail, which takes 2 to 5 days to be delivered; or as Marketing Mail, which is more cost-effective, but takes 3 to 10 days to be delivered. Although Marketing Mail has a longer standard for delivery, the Postal Service has practices[1] to prioritize Election Mail that is entered as Marketing Mail, regardless of the paid mail class, when capacity permits and mailpieces are identified as Election Mail. However, ballots returned by voters must be sent as First-Class Mail.

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.

The 2022 U.S. Mid-term Elections: November 8th

469 seats in the U.S. Congress will be up for election

all **435** seats in the U.S. House of Representatives

and **34** of the **100** seats in the U.S. Senate

- 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 for dropped or misplaced Election Mail daily during election season and certifying that facilities are clear of Election Mail.

- Designating a staging area for election mail.

The Postal Service established an Election and Government Mail Services Organization to oversee Election Mail for accountability and to align with Postal Service structure. This office is the primary point of contact with election officials and secretaries of state nationwide and has cross-functional strike teams to address emerging Election Mail issues.

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1   Postal Bulletin 22591, *Your 2022 Election and Political Mail Guide*, dated 10 February 2022.

Table 1. Site Selection with 2022 Primary Election Date

Region	Area	P&DC	Delivery Units	2022 Primary Election Date
Eastern	Atlantic	Philadelphia	Conshohocken Carrier Annex / Chester Post Office	May 17
Eastern	Atlantic	Greensboro	Graham Post Office / Greensboro Post Office	May 17
Eastern	Southern	Atlanta	Fayetteville Post Office / Jonesboro Post Office	May 24
Western	Central	Cleveland	Cleveland Carrier Annex / Painesville Post Office	May 3
Western	WestPac	Los Angeles[2]	N/A	June 7
Western	WestPac	Denver	Denver Mile High Station / Littleton Main Post Office	June 28

Source: U.S. Postal Service Office of Inspector General (OIG) Election Mail observations.

In prior audits[3] we found concerns integrating stakeholder processes with Postal Service processes to help ensure the timely delivery of Election Mail. These concerns included 1) ballots mailed without barcode mail tracking technology, 2) ballot mailpiece designs that result in improper processing, 3) Election Mail likely to be mailed too close to the election, resulting in insufficient time for the Postal Service to process and deliver the mailpieces, 4) ballots not receiving postmarks, making them invalid in some states, and 5) voter addresses that were out of date. In these prior audits we found opportunities for the Postal Service to increase the volume of ballots included in service performance[4] and improve its internal communication on Election Mail guidance and processes. These prior audits included 14 recommendations, agreed to by Postal Service management, to address prior Election Mail audit findings.

We conducted this audit during primary elections held in May and June 2022 at six judgmentally selected Processing and Distribution Centers (P&DC) and 10 delivery units associated with those P&DCs that serviced an election office (see Table 1). We evaluated the Postal Service's readiness for timely processing and service performance of Election Mail leading up to the 2022 mid-term election and reviewed the effectiveness of the Postal Service's corrective actions taken on the 14 prior audit report recommendations.

Finding #1: Election Mail Policies Not Always Followed

> *Generally, the Postal Service is ready for timely processing of Election Mail for the 2022 mid-term election.*

Generally, the Postal Service is ready for timely processing of Election Mail for the 2022 mid-term election. The Postal Service established the Election and Government Mail Services Organization, provided resources and training to the field on Election Mail, prepared staging areas, and completed Election Mail logbooks. Additionally, the Postal Service prioritized the timely processing and delivery of Election Mail and implemented 13 of the 14 recommendations from our prior reports.

The Postal Service processed nearly 10 million more Election Mail pieces from April 1 through June 30, 2022, than the same period for the 2020 primaries.

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2 The Los Angeles P&DC did not have a delivery unit that serviced an election office; rather the election office picked up directly from the P&DC.
3 *Timeliness of Ballot Mail in the Milwaukee Processing and Distribution Center Service Area* (Report Number 20-235-R20, dated July 7, 2020), *Service Performance of Election and Political Mail During 2020 General Election* (Report Number 20-318-R21, dated March 5, 2021), and *Processing Readiness of Election and Political Mail During the 2020 General Elections* (Report Number 20-225-R20, dated August 31, 2020).
4 Service performance is the time it takes mail to enter and exit the mailstream measured in the number of days from the point of entry by the mailer to the point of delivery by USPS.

Even with the significant increase, the Postal Service delivered 97.6 percent of identifiable Election Mail on time, an increase of 1 percentage point when compared to the same period in 2020. This was about 6 percentage points higher than their targets.

However, we found instances where the Postal Service was not in compliance with its Election Mail readiness policies.[5] Specifically, we found that three P&DCs and one delivery unit did not complete the Election Mail Audit Checklist or the Operational Clean Sweep Checklist,

> " *The Postal Service could be at risk of not processing and delivering ballots on time.* "

certify that they were clear of all committed Election Mail, or postmark all ballots. We found this was due to a lack of awareness of Postal Service Election Mail policies. Without full compliance and implementation of policy, the Postal Service could be at risk of not processing and delivering ballots on time.

Readiness for Timely Processing

Three of the six P&DCs we reviewed were compliant with the Postal Service's policies to stage Election Mail, complete audit and operational clean sweep checklists, certify they were all clear of Election Mail, postmark all ballots, and log Election Mail. Conversely, three of the six P&DCs were not compliant with one or more Election Mail policies (see Table 2).

Table 2. Summary of OIG Election Mail Observations at P&DCs

P&DC	Has Election Mail Staging Area	Completed Election Mail Audit Checklist	Used Operational Clean Sweep Checklist	Entered All Clear Certification	Completed Election Mail Log	Postmarking All Ballots
Philadelphia	Yes	No	No	No	Yes	Yes
Greensboro	Yes	Yes	Yes	Yes	Yes	Yes
Atlanta	Yes	Yes	Yes	Yes	Yes	Yes
Cleveland	Yes	Yes	Yes	Yes	Yes	No
Los Angeles	Yes	Yes	Yes	Yes	Yes	Yes
Denver	Yes	Yes	No	Yes	Yes	No

Source: OIG observations.

During our delivery unit observations, we found that nine of 10 were compliant with the policies to certify they were all clear of Election Mail, send ballots to the P&DC for postmarking, and log Election Mail. Conversely, one of the 10 delivery units was not compliant with certifying daily all clears in accordance with policy or sending

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5   *Delivery, Retail, Customer Service Operations Political/Election Mail Guidebook (Election Mail Guidebook)* and Processing Operations Management Order, *2022 Political and Election Mail Policies and Procedures*, dated April 21, 2022.

ballots to the P&DC for processing to receive postmarking (see Table 3). Additionally, we found delayed ballots at two delivery units. Postal Service management at those delivery units stated that the observed delayed ballots had arrived the day of our observations and were delayed prior to arrival at the delivery unit.

Table 3. OIG Election Mail Observations at Delivery Units

Delivery Units	State	Completed All Clear Certification	Number Delayed Election Mail	Sent Ballots to P&DC for Postmarking	Completed Election Mail Log
Chester Post Office	PA	Yes	0	Yes	Yes
Conshohocken Carrier Annex PA	PA	Yes	0	Yes	Yes
Greensboro Post Office	NC	Yes	0	Yes	Yes
Graham Post Office	NC	Yes	0	Yes	Yes
Jonesboro Post Office	GA	No[6]	0	No	Yes
Fayetteville Post Office	GA	Yes	0	Yes	Yes
Cleveland Carrier Annex	OH	Yes	12	Yes	Yes
Painesville Post Office	OH	Yes	0	Yes	Yes
Denver Mile High Station	CO	Yes	8	Yes	Yes
Littleton Main Post Office	CO	Yes	0	Yes	Yes

Source: OIG observations.

Election Mail Audit Checklist

One of the six P&DCs reviewed did not complete the daily Election Mail Audit Checklist. According to Postal Service policy, the checklist must be completed daily. This checklist verifies readiness to receive and process Election Mail and includes items such as verifying daily all clear checks, evaluating the setup of a staging area, and logging the arrival of Election Mail.

Operational Clean Sweep Checklist

Two of the six P&DCs reviewed did not use the Operational Clean Sweep Checklist, which was recommended in a prior OIG report.[7] Postal Service management agreed with our recommendation and issued guidance in July 2020 to require use of the Operational Clean Sweep Checklist. Employees use this checklist, which provides a list of minimal areas to check within the mail processing facility, to perform a daily Election Mail search. Additionally, on April 21, 2022, management issued an updated Processing Operations Management Order, *2022 Political and Election Mail Policies and Procedures*,

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6   Jonesboro certified that both daily all clears occurred, but did not certify as required by policy.
7   *Processing Readiness of Election and Political Mail During the 2020 General Elections* (Report Number 20-225-R20, dated August 31, 2020).

continuing required use of the Operational Clean Sweep Checklist. We found that management at these two P&DCs were not aware of the continued requirement to use the standardized Operational Clean Sweep Checklist.

All Clear Daily Certifications

One of the six P&DCs reviewed did not certify that the facility was all clear of Election Mail by 10:00 a.m. Per Postal Service policy, P&DCs are required to certify their facility is all clear of committed Election Mail by 10:00 a.m. each day. We also found that one of 10 delivery units did not certify the facility was all clear as required by Postal Service policy. Specifically, this delivery unit entered both daily all clear certifications at 10:58 a.m. on one day and at 11:40 a.m. and 11:57 a.m. on other days. Per Postal Service policy, delivery units are required to certify their facilities are all clear of committed Election Mail twice a day, once prior to 10:00 a.m. and once in the afternoon before close of business.

> " *Delivery units are required to certify their facilities are all clear of committed Election Mail twice a day.* "

Additionally, we reviewed the daily all clear certification data for all P&DCs and delivery units nationwide for the period of April 15 through May 31, 2022. We found that 98.7 percent of all P&DCs' daily all clear certifications were compliant, 75.7 percent of all delivery units' a.m. daily all clear certifications were compliant, and only 60.4 percent of all delivery units' afternoon certifications were compliant. When P&DCs and delivery units are not certifying the all clear in accordance with Postal Service policy, there is a greater chance that committed Election Mail remains at the facility and gets delayed.

Postmarking Ballots

Postmarks are not required on all mailings and are intended to be a revenue protection mechanism to prevent the reuse of postage. However, the Postal Service has altered its normal processes to accommodate the timely

processing of Election Mail and help meet the needs of election offices. Specifically, Postal Service policy states that every completed ballot mailed by voters is to receive a postmark. However, it also acknowledges there will be occurrences where a mailpiece does not receive a postmark.

Two of the six P&DCs reviewed did not ensure that all ballots were postmarked. We also found that one delivery unit did not send return ballots to the P&DC for postmarking. Postal Service management stated that all Election Mail is to be sent to the P&DC for postmarking;[8] however, the Jonesboro Post Office was bypassing the P&DC for postmarking and delivering ballots directly to the election office because they thought the *Extraordinary Measures Memorandum*, dated October 20, 2020, was in effect. Additionally, at the Denver delivery units we observed ballots ready for delivery to election offices that were not postmarked. Denver P&DC management stated this occurs because ballots are commingled with mail directed to sorting rather than for postmarking. And at the Cleveland Carrier Annex, we observed ballots without postmarks, but were unable to identify the cause.

Recommendation #1

We recommend the **Director, Election and Government Mail Services**, re-enforce policies for completing daily all clears, utilizing the Operational Clean Sweep Checklist, and requiring Election Mail to be postmarked at P&DCs.

Recommendation #2

We recommend the **Director, Election and Government Mail Services**, develop and implement an official guidebook for processing of Election Mail prior to 2024 primary elections.

Finding #2: Election Mail Excluded from Service Measurement

The Postal Service processed over 69 million identifiable[9] Election Mail pieces — including 41.3 million identifiable ballots — from April 1 through June 30, 2022. This was nearly 10 million more Election Mail pieces than the same period in

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8   *Postal Bulletin* 22591, dated February 10, 2022, stated that every completed ballot mailed by voters are to receive a postmark and employees are instructed throughout the country to adhere to the policy.
9   For the purpose of this report, we are defining identifiable mail as mail that has a barcode and can be tracked.

2020 and 30 million more than in 2018. Even with the significant increase, the Postal Service delivered 97.7 percent of identifiable Election Mail on time, an increase of 1 percent compared to the same period in 2020. This was about 6 percentage points higher than their targets. See Table 4 for a breakdown of Election Mail scores by mail class.

During our review, we found that the Postal Service was able to measure service performance for 34.4 million (or 83.3 percent) of the 41.3 million identifiable ballots[10] (see Table 5). The Postal Service can only measure service performance if ballots are sent full service[11] and receive necessary processing scans to provide end-to-end visibility into the mailstream.

Table 4. Election Mail Service Performance

Mail Class	2018		2020		2022		
	Count	Percent On Time	Count	Percent On Time	Count	Percent On Time	Target
First-Class	3,681,695	97.8%	26,914,852	96.1%	9,632,500	95.4%	91.0%
Marketing	35,987,820	95.4%	32,973,899	97.1%	59,412,460	97.9%	91.8%
Total	**39,669,515**	**95.6%**	**59,888,751**	**96.6%**	**69,044,960**	**97.7%**	

Source: Informed Visibility.

Table 5. Ballots Service Performance

	April 1 through June 30, 2022			
Mail Class	Total Ballots	Ballots Excluded from Measurement	Ballots Included in Measurement	Percent of Ballots in Measurement
First-Class	5,611,112	2,058,049	3,553,063	63.3%
Marketing	35,710,754	4,852,197	30,858,557	86.4%
Total	**41,321,866**	**6,910,246**	**34,411,620**	**83.3%**

Source: Informed Visibility.

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

11   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.

In our prior audit, which reviewed service performance during the November 2020 general election,[12] we found that the Postal Service was only able to measure service performance for 71.5 million (or 52.9 percent) of the 135 million identifiable ballots in Postal Service data. We recommended the Postal Service determine why ballots were excluded and take action(s) to address each cause identified. The Postal Service agreed with this recommendation and established a Mailers' Technical Advisory Committee[13] work group to address potential reasons for exclusion from service performance measurement and work with mailers to identify root causes. Additionally, the Postal Service developed a dashboard for mailers to give visibility to commercial mail[14] excluded from measurement by giving users the ability to filter what mail is being excluded and the exclusion reason.

> " *Postal Service management stated that they could not determine the root causes for ballots excluded from service performance measurement .* "

However, Postal Service management stated that they could not determine the root causes for ballots excluded from service performance measurement because the data was only retained for 120 days. While the Postal Service has made progress reducing the number of ballots excluded from service measurement, it is still important for the Postal Service to retain the data and identify root causes of ballots excluded from measurement.

Recommendation #3
We recommend the **Vice President of Enterprise Analytics**, establish a policy to retain data on ballots with barcode tracking that are excluded from measurement and continue working with mailers of Election Mail to identify why ballots are excluded.

Other Matters
Stakeholder-Related Election Mail Issues

In prior audits, we found concerns integrating stakeholder processes with Postal Service processes related to the timely delivery of Election Mail. These concerns included 1) ballots mailed without barcode mail tracking technology, 2) Election Mail likely to be mailed too close to the election, resulting in insufficient time for the Postal Service to process and deliver the mailpieces, and 3) voter addresses that are out of date. Our current review identified that similar issues still exist. Specifically, we noted issues with outdated voter addresses that, although outside of the direct control of the Postal Service, continue to challenge its ability to process Election Mail in a timely manner. We also observed the Postal Service receiving return ballots from voters that did not have the election office address included on the envelope or postage (see Figure 1). In addition, at the Denver Mile High Station, we observed approximately 7,500 ballots (see Figure 2) staged for return to election officials because the ballot could not be delivered to the voter due to incorrect or out of date addresses.

Figure 1. Example of Ballot Return Envelope with No Address

Source: Photo taken at Philadelphia P&DC on May 4, 2022.

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12 *Service Performance of Election and Political Mail During November 2020 General Election* (Report Number 20-318-R21, dated March 5, 2021).

13 A group of mailing industry representatives and USPS officials that shares technical information and receives recommendations from mailers on products and services that can enhance and expand the use of products and services.
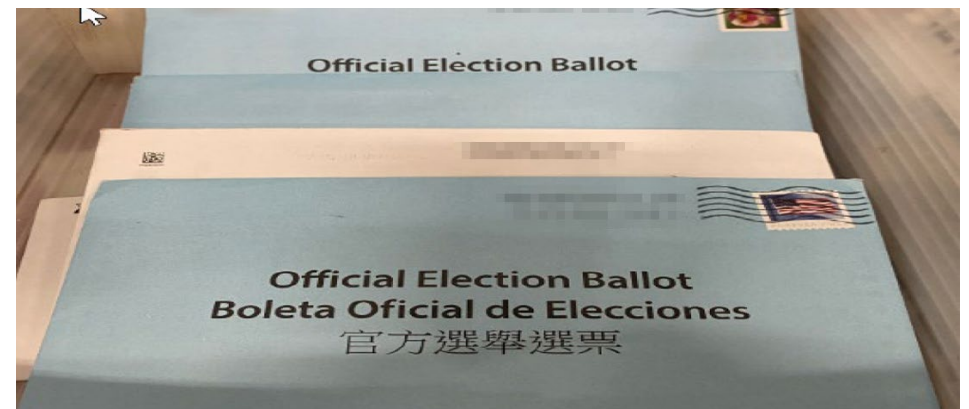
14 A general term for the types of mail products used by business mailers that require advanced preparation such as barcoding and sortation.

Figure 2. Example of Outdated Voter Addresses

Source: Photo taken at Denver Mile High Station on June 21, 2022.

The Postal Service has continued taking steps to communicate and educate election officials and mailers including designating District Managers of Customer Relations, previously referred to as Election Mail coordinators. These District Managers of Customer Relations are responsible for conducting outreach to state and local election officials and distributing the Election Mail toolkit[15] to facilitate vote by mail processing and tracking of ballots.

> **" The Postal Service has continued taking steps to communicate and educate election officials and mailers."**

Despite Postal Service efforts, we continued to observe ballots without mailpiece tracking, improper design, and outdated voter addresses and forwarding issues during our audit, further highlighting the need for the Postal Service to create a separate, simplified

mail product exclusively for Election Mail as recommended in a prior report.[16] Postal Service management stated that they are still working to address our prior recommendation to create a simplified Election Mail product.

Best Practices

Postal Service management enacted several nationwide and facility-specific improvements and best practices designed to improve service performance and efficiency. During our observations, we identified several best practices employed by the Postal Service, including:

- **Political and Election Mail Monitor (PEM)** - at the Cleveland P&DC, we identified the use of a designated employee during each shift who is well versed in Election Mail policies. The employee usually has multiple years of Election Mail processing experience and wears a yellow vest marked with "PEM" in large letters across the back. The employee can be found on the workroom floor and is available to address any issues or answer questions pertaining to Election Mail processing.

- **Tracking the Transfer of Ballots** - at the Conshohocken Carrier Annex and Chester Post Office, the postmaster used a tracking spreadsheet to record the transfer of ballots from the Postal Service to the election officials. The spreadsheet listed the number of ballots transferred and was signed and dated by the election official and the postmaster.

- **Training Materials and Records Available** - at the Greensboro and Los Angeles P&DCs; the Fayetteville Post Office; the Mile High Post Office Station; and the Littleton Main Post Office, Election Mail training documentation was maintained to show that Stand-Up talks[17] were provided to all employees. The training documentation was not maintained at the other facilities observed.

Ensuring that these best practices are implemented nationwide, if applicable, increases the potential to improve timely processing of Election Mail and the Postal Service's Election Mail readiness.

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15 2022 Official Election Mail – Kit 600.
16 *Service Performance of Election and Political Mail During November 2020 General Election* (Report Number 20-318-R21, dated March 5, 2021).
17   Stand-Up talks are designed to communicate job-related information.

Management's Comments

Management generally agreed with the findings and recommendations.

See Appendix B for management's comments in their entirety.

Management stated they had concerns on how the findings are portrayed in the report. Specifically, for Finding 1, they stated Table 2 does not provide context for the OIG observations at the processing and retail facilities, but rather only provides "yes" or "no" responses. Additionally, in the "postmarking all ballots" column of Table 2, they stated this does not fully evaluate whether the Postal Service is following its long-standing policy to ensure that every return ballot mailed by voters receives a postmark and grading the Postal Service's efforts on a pass/fail basis could overstate the issues.

Regarding recommendation 1, management stated they are committed to continuous improvement, and remain open to opportunities to further enhance performance. For that reason, the Postal Service agreed to reinforce policies for All Clears, Operational Clean Sweep Checklists, and postmarking, by issuing memorandums, certifying Election Mail policies are discussed with employees, and conducting weekly webinars. Additionally, the Postal Service will reinforce the existing postmarking policy—to postmark returning ballots at retail counters upon acceptance, origin processing, or by Retail Operations when the office is utilizing local turnaround. The target implementation date for this recommendation is November 8, 2022.

Regarding recommendation 2, management stated they will develop a guidebook for Election Mail processing and share with employees in processing, retail and delivery operations prior to the November 8, 2022, mid-term election. Additionally, the guidebook will be refined based on lessons learned from the 2022 election season, for use prior to the 2024 primary elections. The target implementation date for this recommendation is January 15, 2024. Since the implementation date is over a year from the date of management's comments, in subsequent

correspondence, management provided interim milestones outlining their plan for implementing the recommendation. These interim milestones include, finalizing and publishing the 2022 guidebook no later than October 31, 2022; conducting internal operational reviews to update the guidebook no later than June 30, 2023; updating the guidebook and election mail policies based on lessons learned and best practices no later than November 30, 2023; publishing the updated guidebook no later than December 31, 2023; and distributing and reinforcing the updated guidebook no later than January 15, 2024.

Regarding recommendation 3, management stated this recommendation is not consistent with the scope of the audit to assess the operational readiness for the 2022 elections. Additionally, management stated the recommendation fails to recognize that the measurement system in place is valid, properly retains data consistent with current policy, and meets regulatory intent. However, management agrees to establish a specific retention schedule for data on ballots with barcode tracking that are excluded from measurement and will continue to engage with election mailers to resolve their concerns. The target implementation date for this recommendation is December 31, 2022.

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 concerns about how Finding 1 was portrayed in the report, Table 2 provides a snapshot of the OIG's on-site findings and observations. The paragraphs following Table 2 provide the context and analysis of these findings and observations. As for the Postal Service's longstanding postmarking policy, the audit report referenced these policies and acknowledged the non-standard efforts taken to try to ensure that every return ballot mailed by voters receives a postmark.

Regarding management's concerns about recommendation 3, the scope of the audit included follow-up on 14 previously agreed to recommendations from prior audits. Recommendation 1 from our Service Performance of Election and Political Mail During November 2020 General Election (20-318) report recommended that the Postal Service work with mailers on Election Mail to identify why full-service ballots from the 2020 General Election were excluded from service performance measurement. The Postal Service agreed with the recommendation but stated they could not determine the root cause for ballots excluded from service performance measurement because data was only retained for 120 days. In this report, we stated that the Postal Service made progress reducing the number of ballots excluded from service measurement, but it is still important for the Postal Service to retain the data and identify root causes of ballots excluded from measurement.

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.

Appendices

Click on the appendix title below to navigate to the section content.

Appendix A: Additional Information

Scope and Methodology

The scope of our audit was Election Mail processing for the 2022 primary elections. To accomplish our objective, we:

- Analyzed service performance data on Election Mail.

- Reviewed the Postal Service's Election Mail processing strategies, policies, and related documents and tools, including the Postal Service's Election Mail website.

- Conducted site visits to six P&DCs and 10 delivery units to assess actions taken in preparation for elections, identify potential best practices, verify compliance with Election Mail policies, and note any opportunities for improvement.

- Interviewed Postal Service Headquarters management, regional and division officials, and the Director of Election and Government Mail Services.

- Identified lessons learned and analyzed actions taken since the 2020 election mail readiness audit.

- Conducted follow-up on 14 recommendations from the OIG's prior audit reports to determine whether implemented corrective actions were effective.

We conducted this performance audit from March through September 2022 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 finding and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objective. We discussed our observations and conclusions with management on August 19, 2022, and included their comments where appropriate.

We assessed the reliability of computer-processed data from IV 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
Service Performance of Election and Political Mail During the November 2020 General Election	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
Processing Readiness of Election and Political Mail During the 2020 General Elections	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
Management Alert - Timeliness of Ballot Mail in the Milwaukee Processing & Distribution Center Service Area	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: Management's Comments

UNITED STATES POSTAL SERVICE

September 12, 2022

JOHN CIHOTA
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Election Mail Readiness for the 2022 Mid-Term
Elections (Report Number 22-093-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 2022 Mid-Term Elections*.

The Postal Service generally agrees with the findings and recommendations of the audit, which concludes that the Postal Service is ready for timely processing of Election Mail for the 2022 Mid-Term Election. The Postal Service has demonstrated an unwavering commitment to the timely processing and delivery of Election Mail. We are working tirelessly to ensure our operational preparedness for the 2022 November General Election and continue to look for opportunities to further strengthen our proven processes.

Our preparations for the 2022 General Election follow the robust and proven processes we have used for years. These established processes have produced strong results. For the 2020 General Election season, on average, we delivered ballots to voters in 2.1 days and importantly, on average, we delivered ballots from voters to election officials in just 1.6 days. During the 2021 Election Cycle, we delivered ballots to voters, on average, in 2.2 days and we delivered completed ballots from voters to election officials in an average of just 1.4 days. Our success was due to the extensive operational and organizational preparation leading up to the General Election, our ongoing utilization of procedures to expedite the processing and delivery of ballots entered close to or on Election Day (as we have done in prior election cycles), and our strong working relationships with election officials. All of this is in place leading up to the 2022 General Election and we are looking forward to once again delivering for the American public.

That said, we are committed to continuous improvement, and always remain open to opportunities to further enhance our performance. For that reason, the Postal Service agrees with the recommendation to reinforce policies for All Clears, Operational Clean Sweep Checklists, and postmarking, with the understanding that OIG is asking us to reinforce our existing postmarking policy—to postmark returning ballots at retail counters upon acceptance, origin processing, or by Retail Operations when the office is utilizing local turnaround. We also agree to develop a guidebook for Election Mail processing before the 2024 primary elections, and to create a data retention policy for ballot barcode data.

Although we agree with the spirit of your recommendations and intend to implement them, we do feel constrained to point out some elements of your findings that are likely well intentioned, but potentially misleading. By way of example, the Postal Service has

concerns that the manner in which certain of the audit findings are portrayed may be overstated, and thus may be misconstrued, particularly with respect to Finding 1 regarding the OIG's observations at our processing and retail facilities. Table 2 provides a summary of the OIG's Election Mail Observations at P&DCs, identifying whether the Postal Service is following its Election Mail policies. However, instead of providing context for the observations, the summary provides only "yes" or "no" responses. For example, in the "postmarking all ballots" column, rather than fully evaluating whether the Postal Service is following its long-standing policy to try to ensure that every return ballot mailed by voters receives a postmark, this observation measures whether every return ballot received a postmark. As identified previously, the Postal Service does not postmark, or "cancel," every piece of mail in our system in the normal course of operations, and the policy to try to apply a postmark to every ballot is therefore a nonstandard process. As such, circumstances can arise that prevent ballots from receiving a legible postmark. In other words, it is possible for the Postal Service to have processes in place to try to postmark every return ballot, and for one ballot to make it through without a postmark. While such a result is not consistent with our effort to postmark every ballot, grading our efforts on a pass/fail basis would have a tendency to overstate the issue.

The Postal Service has similar concerns with Finding 2 regarding the Postal Service's service measurement system. While the Postal Service agrees to implement the related recommendation, we believe the Finding paints with too broad of a brush that could result in inaccurate conclusions being reached about the Postal Service's operational readiness for the 2022 elections. By way of further explanation, while it is certainly true that an individualized full-service bar code is necessary to have end-to-end visibility and to measure service performance with confidence for any single specific ballot, the finding fails to recognize that the normal measurement system in place is valid, meets the regulatory intent, and is a good proxy for our service performance for ballots generally that do not include an individualized bar code.

Recommendation 1:
We recommend the Director, Election and Government Mail Services, re-enforce policies for completing daily all clears, utilizing the Operational Clean Sweep Checklist, and requiring Election Mail to be postmarked at P&DCs.

Management Response/Action Plan:
Management agrees with the intent of this recommendation and has plans in place to reinforce key Election Mail policies and procedures, including those identified in Recommendation 1. Election and Government Mail Services will reenforce the Postal Service's policies for All Clears, the Operational Clean Sweep Checklist, and postmarking, among other topics, by issuing guidance memorandums; implementing certification procedures to ensure that Election Mail policies (e.g., Stand-Up Talks, Standard Work Instructions, Processing Operations Management Order) have been shared and discussed with employees; and conducting a weekly educational webinar series, called Election and Political Mail Educational Sessions with Processing Operations and Election and Political Mail Learn and Grows with Retail and Delivery Operations.

Additionally, Management agrees to reinforce our existing postmarking policies, but would like to clarify that our policy is not to postmark all Election Mail at P&DCs. As

acknowledged in the body of your audit, it has been the longstanding policy of the Postal Service to postmark completed ballots returned through the mail, in recognition of the importance some states place on the postmark as evidence that a ballot was timely. It is important to understand that this policy is limited to returning ballots, not all Election Mail, and deviates from our normal procedures. In the normal course of operations, the Postal Service does not postmark, or "cancel," every piece of mail in the system, which can include Election Mail other than returning ballots, since the primary purpose of cancellation is to ensure that postage cannot be reused, and some categories of postage are pre-cancelled before they enter the mailstream. It is also important to understand that despite our best efforts, circumstances can arise that prevent ballots from receiving a legible postmark (e.g., ink smears on a machine, the mailpiece is stuck to another when it runs through the canceller machine, a ballot is included in a tray of metered return mail from a business that bypasses the cancellation machine as part of normal processing procedures, or if an employee does not recognize the mailpiece as a ballot). Our goal continues to be to try to ensure that every identifiable return ballot sent by mail receives a cancellation postmark.

Our policy of postmarking returning ballots also does not require that such postmarks be applied only at P&DCs. Postmarks contain the Postal Service's official representation of the date on which the Postal Service accepted custody of the mailpiece. As a result, the postmark can be applied only at certain points during the Postal Service's operations, but this is not restricted to P&DCs. Postmarks can be applied at Retail Operations if a customer asks for a ballot to be hand cancelled at acceptance, during origin processing at a plant, or by Retail Operations engaged in local turnaround efforts as part of our Extraordinary Measures efforts. We will reinforce our longstanding postmarking policies and procedures, and believe this to be consistent with the underlying intent of your recommendation.

Target Implementation Date: Ongoing through November 8, 2022.

Responsible Official: Director, Election and Government Mail Services

Recommendation 2:
We recommend the Director, Election and Government Mail Services, develop and implement an official guidebook for processing of Election Mail prior to 2024 primary elections.

Management Response/Action Plan:
Management agrees with this recommendation.

Election and Government Mail Services is developing a guidebook with key Election Mail policies for processing, retail and delivery operations. This guidebook will be shared with employees in processing, retail and delivery operations prior to the November 8, 2022 General Election. Based on lessons learned from the 2022 election season, the guidebook will be further refined for use in the 2024 election season prior to the 2024 primary elections.

Target Implementation Date: January 15, 2024.

Responsible Official: Director, Election and Government Mail Services

Recommendation 3:

We recommend the **Vice President of Enterprise Analytics**, establish a policy to retain data on ballots with barcode tracking that are excluded from measurement and continue working with mailers of Election Mail to identify why ballots are excluded.

Management Response/Action Plan:

Management agrees with this recommendation.

As explained above, the Postal Service does not believe that this recommendation is consistent with the scope of the audit to assess the operational readiness for the 2022 elections, and it fails to recognize that the measurement system in place is valid, properly retains data consistent with current policy, and meets regulatory intent. However, Enterprise Analytics agrees to establish a specific retention schedule for data on ballots with barcode tracking that are excluded from measurement and will continue to engage with election mailers to resolve their concerns.

Target Implementation Date: December 31, 2022.

Responsible Official: Vice President of Enterprise Analytics

E-SIGNED by Isaac.S Cronkhite
on 2022-09-12 15:57:44 CDT

Isaac S. Cronkhite
Chief Processing and Distribution Officer & Executive Vice President

E-SIGNED by Jeffrey.C Johnson
on 2022-09-12 16:09:20 CDT

Jeffrey C. Johnson
Vice President, Enterprise Analytics

cc: *Manager, Corporate Audit Response Management*

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