Impact of Management Operating Data System on U.S. Postal Service Costing

AUDIT REPORT

Report Number 24-019-R24 | May 16, 2024

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Highlights

Background

The Management Operating Data System (MODS) uses a systematic approach to gather, store, and report data on workload, workhours, and machine utilization. MODS data is compiled in the web-based application, Web Management Operating Data System (WebMODS). In addition to its operational uses, MODS workhours and volume data are used in Postal Service pricing and costing activities to create cost pools of similar activities as well as to calculate productivities and determine avoided costs and workshare pricing. Therefore, it is important that the Postal Service uses accurate data so that management can make sound strategic and operational decisions.

What We Did

We performed this audit as part of our mandate under the Postal Accountability and Enhancement Act to regularly audit Postal Service data collection systems and procedures used to collect information to prepare reports. Our objective was to assess the impact of WebMODS data on Postal Service costing. For this audit, we focused on how MODS data is collected, its impact on costing activities, and monitoring controls.

What We Found

Opportunities exist to improve the accuracy, reliability, and management of MODS data. Employees were not always clocked into the correct operation number corresponding to their assigned function, which can affect Postal Service costing. In addition, management did not ensure computer software code used to prepare productivity calculations was updated. Further, management did not effectively manage the MODS system review process to verify that facilities were using proper procedures and collecting accurate information.

Recommendations and Management's Comments

We made four recommendations to address the issues identified in the report. Postal Service management agreed with all recommendations. Management comments and our evaluation are at the end of the finding and recommendations. The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to all recommendations. Corrective actions should resolve the issues identified in the report. See Appendix B for management's comments in their entirety.

Transmittal Letter

OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

May 16, 2024

MEMORANDUM FOR: SHARON D. OWENS
VICE PRESIDENT, PRICING AND COSTING

DANE A. COLEMAN
VICE PRESIDENT, PROCESSING AND MAINTENANCE OPERATIONS

LINDA M. MALONE
VICE PRESIDENT, ENGINEERING SYSTEMS

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

SUBJECT: Audit Report – Impact of Management Operating Data System on U.S. Postal Service Costing (Report Number 24-019-R24)

This report presents the results of our audit of the Impact of Management Operating Data System on Postal Service Costing.

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 Laura M. Lozon, Director, Cost and Pricing, or me at 703-248-2100.

Attachment

cc: Postmaster General
Corporate Audit Response Management

Results

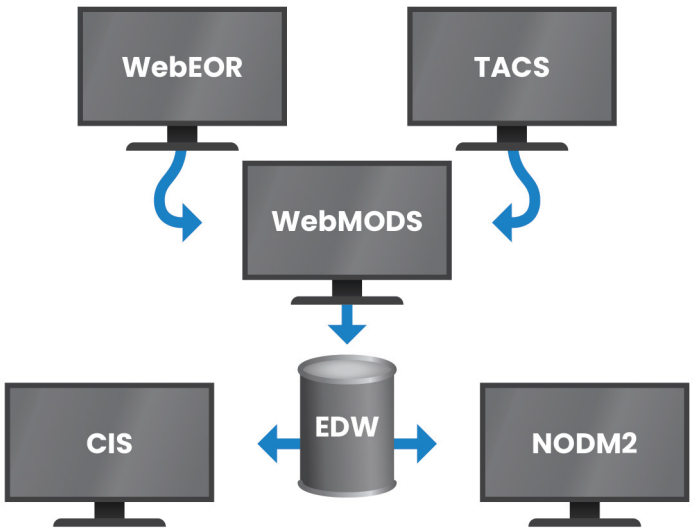
Introduction/Objective

This report presents the results of our mandated audit of the U.S. Postal Service's Web Management Operating Data System (WebMODS) Cost Allocation (Project Number 24-019). Our objective was to assess the impact of WebMODS data on Postal Service costing. See Appendix A for additional information about this audit.

Background

The Management Operating Data System (MODS) uses a systematic approach to gather, store, and report data on workload, workhours, and machine utilization. Data from the Web End-of-Run (WebEOR) system[1] and the Time and Attendance Collection System (TACS)[2] are compiled in the web-based application, WebMODS. This data is then stored in the Enterprise Data Warehouse (EDW)[3] and reports are generated using Corporate Information System (CIS) and Network Operations Data Management (NODM2),[4] as shown in Figure 1.

Figure 1. Flowchart of WebMODS Interface



Source: MODS Handbook M-32 dated September 2022.

The WebEOR collects mail volume data and allows users to retrieve, view, and store end-of-run statistics from automated equipment. The TACS system stores and processes employee clock rings[5] to generate workhour data that supports MODS workhours reporting.

The operational workhour and volume data is transferred into MODS and used for planning mail processing activities and projecting workhours and mail volumes. Postal Service field offices are responsible for accurately recording workhour and volume data in MODS timely. Postal Service Operations owns and manages the data, while Pricing and Costing uses the data to create cost pools, as well as calculate productivities and avoided costs[6] by product. The Postal Service must obtain approval from the Postal Regulatory Commission (PRC) for changes in cost calculation methodology.[7]

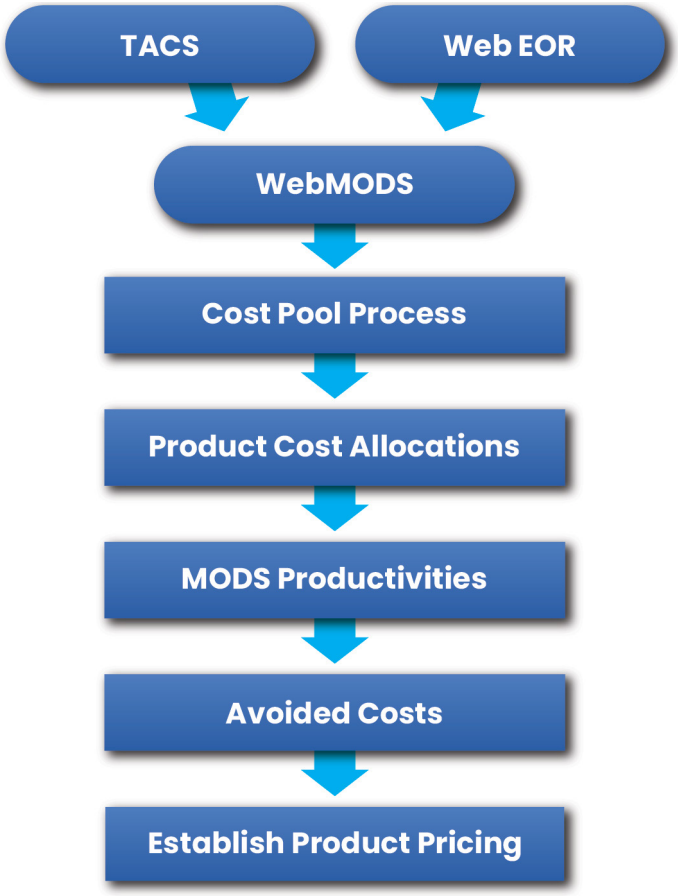
Operation numbers with similar activities are grouped together to form cost pools.[8] Pricing and Costing uses MODS workhour data to calculate totals for cost categories within each cost pool. Cost category totals are then attributed to mail products and services, which helps the Postal Service to determine product prices. Pricing and Costing uses the In-Office Cost System to attribute the labor costs of clerks, mail handlers, city carriers, and supervisors related to handling mail. In-Office Cost System sampling is used to supplement the accounting system labor cost data by sampling mail handled by employees at selected points in time throughout the year. These sampled data, in combination with data from the accounting system and the MODS system, are used to produce detailed estimates of attributable costs for various activities.

1 WebEOR is a web-based application used to collect operational data from automated and mechanized mail processing equipment.
2 TACS is an automated program used in collecting time and attendance data.
3 EDW is an online source for the statistical files of Postal Service financial and operating systems.
4 CIS and NODM2 are report-generating project folders.
5 Employees swipe a badge or timecard on an employee badge reader to record their workhours in TACS; each swipe is referred to as a clock ring. Employees clock in and out of specific operations throughout the day based on what machine or function they are assigned to.
6 Expenses that would not be incurred because of mailer worksharing activities.
7 Title 39, Code of Federal Regulations Section 3050.1.
8 A cost pool represents the cumulative costs incurred from related activities (operations) performed within the Postal Service.

In addition, MODS workhour and volume data are used to calculate productivities[9] for various mail processing operations and to prepare mailflow models that distribute costs by mail zone, mail entry point, or presort levels. MODS data are merged with datasets, indicating assignments of 3-digit MODS operations to operation groups, and TACS default operations are screened before aggregation. TACS designates certain 3-digit operation numbers in operations where the designated activity may not be present. Prescreening reduces the potential for the default workhours to bias the affected productivities. Productivities are calculated by dividing total pieces by workhours.[10] Management also uses MODS workhours and volume data in Postal Service pricing and costing activities to determine avoided costs and workshare pricing,[11] as shown in Figure 2.

Each Postal Service MODS office[12] conducts a MODS system review that covers all phases and requirements of MODS and helps ensure each facility is using proper procedures and collecting accurate information. A MODS review worksheet[13] is provided to assist facilities in reviewing operations. These reviews should be conducted whenever a change in operations or mail volume dictates. Reviews are a collaborative effort between Finance and In-Plant Support to cover all phases and requirements of MODS and copies of the official review must be sent to the MODS coordinators once completed.

Figure 2. MODS Data Flowchart



Source: Postal Service Management.

9 Productivity is defined as volume divided by workhours.
10 Management calculates productivities via STATA software code, which are filed annually with the PRC.
11 Workshare pricing includes worksharing activities generally involved with mailers preparing, barcoding, sorting, or transporting mail to qualify for reduced postage rates.
12 MODS offices located in mail processing facilities.
13 The worksheet includes questions for the facility to address.

Finding # 1: Accuracy, Reliability, and Management of MODS Data

Opportunities exist to improve the accuracy, reliability, and management of MODS data. Specifically, we found employees did not clock into operations correctly, and management did not ensure the computer software code used to prepare productivity calculations was updated with current MODS operation numbers. In addition, management did not effectively manage MODS system reviews, which facilities personnel conduct to verify that everyone is using proper procedures and collecting accurate information.

MODS Operation Numbers

Employees were not always clocked into the correct operation number corresponding to their assigned function. These operation numbers designate activities (operations) employees perform in Postal Service facilities (e.g. primary/secondary incoming, induction, primary/secondary distribution, outbound). During our observations at six processing and distribution centers (P&DCs), we found 44 of 253 employees (17 percent) were clocked into the incorrect operation number, as shown in Table 1.

Specifically, we found:

- 31 of the 44 incorrect operation numbers and associated hours (70 percent) were not recorded in the correct cost pool category,[14] as shown in Figure 3. For example, an employee was clocked into operation number 146[15] (included in the Automated Flat Sorting Machine 100 cost pool category) but should have been clocked into operation number 060[16] (included in the Manual Flats cost pool category).
- 27 of 44 incorrect operation numbers and associated hours (61 percent) were not recorded in the correct productivity group,[17] as shown in Figure 4. For example, an employee was clocked into operation number 030[18] (included in productivity group 14) but should have been clocked into operation number 040[19] (included in productivity group 15).

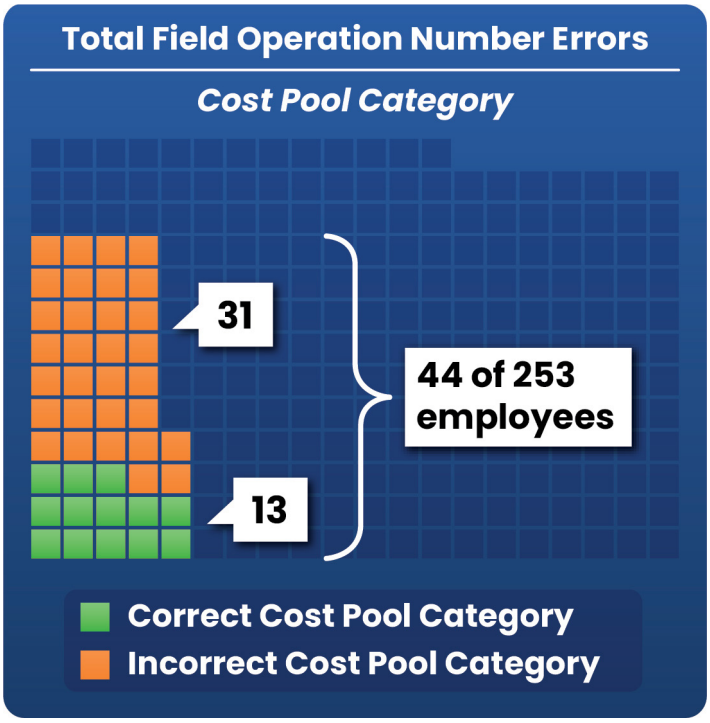
Table 1. Employees Clocked Into Incorrect Operation Number

Facility	Employees Observed[20]	Employees Observed in Incorrect Operation Code	Percentage
Denver, CO P&DC	86	22	25.6%
Louisville, KY P&DC	30	4	13.3%
Margaret Sellers, CA P&DC	35	6	17.1%
Pennwood Place, PA P&DC	32	4	12.5%
Pittsburgh, PA P&DC	35	1	2.9%
Raleigh, NC P&DC	35	7	20.0%
Total	**253**	**44**	**17.39%**

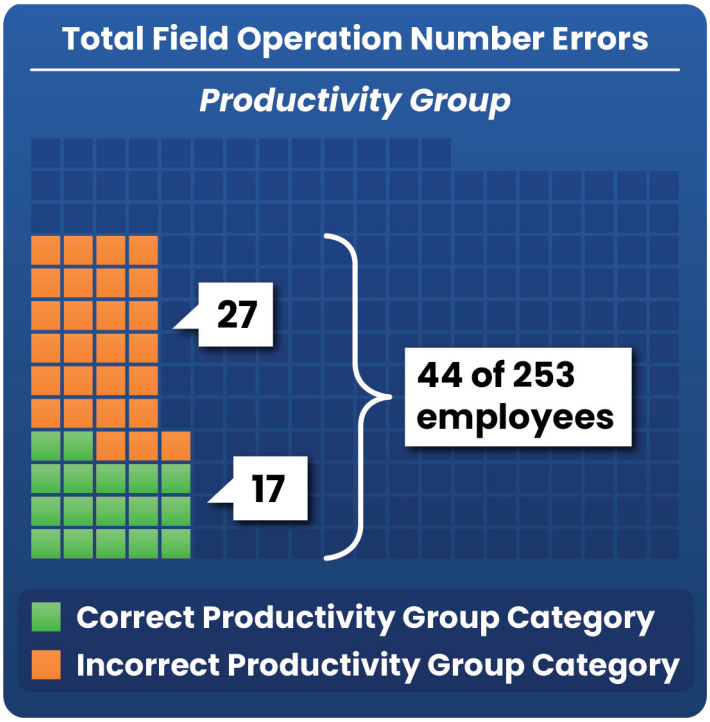
Source: OIG analysis based on observations.

14 Cost pool category represents the cumulative costs incurred from related activities performed within an organization.
15 Automated Flat Sorting Machine 100 Automated Tray Handling System/Automated Induction, Secondary Incoming.
16 Manual Flat, Primary Distribution – Outgoing.
17 Productivity groups are sets of operation numbers that represent homogenous sortation activities.
18 Manual Letter, Primary Distribution – Outgoing.
19 Manual Letter, Secondary Distribution – Outgoing.
20 Observations were conducted at all facilities during tour 2 except for the Raleigh, NC, P&DC, which was observed during tours 2 and 3.

Figure 3. Cost Pool Category Errors Figure 4. Cost Productivity Group Errors



Source: OIG analysis based on observations.



Source: OIG analysis based on observations.

This occurred due to employees not following correct timekeeping procedures and supervisors not monitoring timekeeping reports.[21] While management tracks errors[22] after employee tour completion, management did not have a process in place to track and correct errors during the employee tour. Errors that occur on the floor are not captured on the exception reports if an employee switches jobs during the tour.

Policy[23] states employees must use correct timekeeping procedures to ensure that hours are recorded in the operation where the work is performed. Postal Service's time and attendance policy[24] states supervisors must ensure employees clock in and out according to their assigned schedules, approve all daily clock rings, examine timecards and workhour records, and make needed corrections in TACS.

During our site visits, we identified examples of good practices at the Margaret Sellers, CA, Louisville, KY, and Pittsburgh, PA, P&DCs related to employee clocking that included:

- Disabling the numeric keypad on the time clocks so only preset operation codes can be used when clocking in.
- Positioning time clocks with preset operation codes that coincide with operations in that vicinity.
- Using a white board at the beginning of each tour to list employees and their assigned operation number.
- Performing daily stand-up talks at the beginning of the day to highlight the importance of clocking into the correct operation.

Productivity Calculations

Opportunities exist to improve the software code management used to prepare productivity calculations to ensure it is accurate and aligns with guidance. The MODS Handbook M-32 lists specific default operation numbers to exclude for

21 These reports can include On-The-Clock or Clock Ring reports.
22 Management uses Exception Reports to identify invalid operation codes with employee workhours assigned.
23 Handbook M-32, *Management Operating Data System*, 4-2, *Clock Ring Procedures*, dated September 2022.
24 Handbook F-21, *Time and Attendance*, dated August 2016.

the productivity calculations to prevent outlier data (e.g., the data contains workhours and no associated volume) from being used in the calculations. However, we found that the software code used to prepare the fiscal year (FY) 2022 productivity calculations excluded MODS operation numbers not in the MODS Handbook M-32.[25]

This occurred because management did not have a process in place to ensure the software code used to prepare productivity calculations was updated. While management used PRC-approved methodology from 2014 to prepare pricing and costing productivity calculations, they did not revisit calculation methodology when postal operations changed.

Federal Internal Control Standards[26] state management should periodically review procedures and related control activities for relevance and effectiveness in achieving objectives or addressing related risks. If there is a significant change, management should review the process timely to determine if the control activities are designed and implemented appropriately.

> "Management should periodically review procedures and related control activities for relevance and effectiveness in achieving objectives or addressing related risks."

Management of MODS System Reviews

Management did not effectively manage the MODS system review process to ensure each facility was using proper procedures and collecting accurate information, as required by policy.

We found MODS personnel were not familiar with the roles, responsibilities, and details of the MODS system review. Specifically, regional MODS coordinators were unaware of the MODS system review and although the facility MODS coordinators submitted reviews, management was not aware of these submissions. In addition, while policy stated that reviews should be sent to the Headquarters MODS coordinator, management could not identify the Headquarters MODS coordinator.

This occurred due to lack of oversight of the MODS review process, management not updating guidance to reflect current roles and responsibilities, and inconsistent reporting frequency requirements. Specifically, management did not designate employees to positions and assign responsibilities. While policy refers to an area MODS coordinator, the Postal Service's current organizational structure does not include "areas" within its structure, and policy had not been updated to reflect the new structure. During the audit, management clarified the assignment of the roles and responsibilities in the current organization; however, they did not specifically assign a Headquarters MODS coordinator. In addition, Postal Service policy is not clear on the required frequency for these reviews. For example, the *MODS Coordinator Guidebook* states reviews should be completed periodically and annually. Correspondence sent to facilities states that reviews should be completed annually, and Handbook M-32 states reviews should be completed when operational changes or volume dictate.

Federal Internal Control Standards[27] note management should establish an organizational structure and assign responsibility to achieve objectives. In addition, the Standards state that management should periodically review policies, procedures, and related control activities for continued relevance and effectiveness in achieving the organization's objectives or addressing related risks.

25 The MODS Handbook M-32 includes other default operation codes not used in the productivity calculations.
26 *Standards for Internal Control in the Federal Government*, dated September 2014.
27 *Standards for Internal Control Standards in the Federal Government*, Principle 3, *Establish Structure, Responsibility, and Authority,* Section 3.02 Organizational Structure, and Principle 12, *Implement Control Activities,* Section 12.05 Periodic Review of Control Activities, dated September 2014.

> "It is important that the Postal Service uses accurate data so that management can make sound strategic and operational decisions."

As a result of employees using incorrect operation numbers when clocking in and outdated software code, there is increased risk that data used in cost pool formation and productivity calculations are not accurate, which could affect avoided cost calculations and pricing decisions. Specifically, when employee workhours are not assigned to the correct productivity group, MODS productivity calculations can change at the price category level.[28] While management stated that the In-Office-Cost-System sampling minimizes this risk for cost pools, significant employee clocking errors may undermine the original intent of the cost pool methodology approved by the PRC. Therefore, it is important that the Postal Service uses accurate data so that management can make sound strategic and operational decisions. In addition, when MODS system reviews are not analyzed and policies are inconsistent, there is a missed opportunity to identify systemic issues and provide training.

Recommendation #1

We recommend the **Vice President, Processing and Maintenance Operations**, reiterate policy and coordinate with **Vice President, Engineering Systems** to identify opportunities for automated controls to verify that employees are clocking into the correct operation number and supervisors are regularly monitoring timekeeping reports.

Recommendation #2

We recommend the **Vice President, Pricing and Costing**, update procedures to include an annual review of software code to verify Management Operating Data System operation numbers used in productivity calculations reflect current Time and Attendance Collection System base default operation numbers.

Recommendation #3

We recommend the **Vice President, Processing and Maintenance Operations** establish a process to assess and analyze Management Operating Data system review results.

Recommendation #4

We recommend the **Vice President, Processing and Maintenance Operations**, update Handbook M-32, *Management Operating Data System (MODS)* policy and coordinate with **Vice President, Engineering Systems**, to update the *MODS Coordinator Guidebook* to identify current roles and responsibilities and clarify the frequency of Management Operation Data system reviews to ensure consistency.

Postal Service Response

Management agreed with the finding and recommendations. See Appendix B for management's comments in their entirety.

Regarding recommendation 1, management agreed to reiterate policy regarding MODS Exception Reports and error remediation. Management stated that the Vice President, Processing and Maintenance Operations, will coordinate with the Vice President, Engineering Systems, to identify opportunities for automated controls to improve MODS data accuracy and will provide periodic status updates on October 31, 2024, and April 30, 2025. The target implementation date is October 31, 2025.

Regarding recommendation 2, management agreed to develop modified procedures to review the accuracy of the software code used in the productivity calculations. The target implementation date is December 31, 2024.

Regarding recommendation 3, management agreed to establish a process to assess and analyze MODS system review results. The target implementation date is November 30, 2024.

Regarding recommendation 4, management agreed to update Handbook M-32 and the MODS Coordinator Handbook with current roles and responsibilities and clarify the frequency of Management Operation

28 A price category a subdivision of a class or product by type of price, such as single piece, presorted, and automation prices, or retail, Commercial Base, Commercial Plus prices or Marketing Mail.

Data system reviews. Management stated they will provide periodic status updates on October 31, 2024, April 30, 2025, and October 31, 2025. The target implementation date is April 30, 2026.

OIG Evaluation

The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to the recommendations in the report and corrective actions should resolve the issues identified.

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

Appendices

Appendix A: Additional Information

Scope and Methodology

The scope of this audit includes FYs 2022 and 2023 MODS data used for cost pools and productivity calculations.

To accomplish our objective, we:

- Analyzed and evaluated the FYs 2022 and 2023 MODS data to determine operation numbers with low or zero mail volume or low or zero workhours. We judgmentally selected higher risk sites based on the amount of mail volume relative to workhours or workhours relative to mail volume. We conducted site visits to observe employee timekeeping functions and supervisor oversight of timekeeping procedures and good practices at:
  - Margaret Sellers, CA, P&DC
  - Denver, CO, P&DC
  - Louisville, KY, P&DC
  - Raleigh, NC, P&DC
  - Pennwood Place, PA, P&DC
  - Pittsburgh, PA, P&DC
- Consulted with the Postal Regulatory Commission to obtain a better understanding of the MODS data.
- Reviewed Postal Service Pricing and Costing cost pool and productivity calculation processes and methodologies to determine how MODS data is used in cost calculations.
- Interviewed Postal Service Headquarters, field, and division management regarding MODS reporting.
- Conducted a sensitivity analysis to show productivity calculations effect on cost.

We conducted this performance audit from October 2023 through May 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on April 19, 2024, and included their comments where appropriate.

In planning and conducting the audit, we obtained an understanding of the Postal Service's MODS operational oversight and Pricing and Costing 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 the Control Environment and Control Activities components 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 Environment and Control Activities were significant within the context of our objectives. Our recommendations, if implemented, should correct the weaknesses we identified.

We assessed the reliability of MODS data by performing logical tests of completeness, accuracy, and reasonableness on key fields. We determined the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
Management Operating Data System Errors and Adjustments	To assess the accuracy and reliability of MODS data for Postal Service costing.	CP-AR-19-001	4/3/19	$0

Appendix B: Management's Comments

UNITED STATES POSTAL SERVICE

May 9, 2024

JOHN CIHOTA
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Impact of Management Operating System Data on U.S. Postal Service Costing (24-019-DRAFT)

Thank you for providing the Postal Service an opportunity to review and comment on the findings contained in the draft audit report titled: *Impact of Management Operating System Data on U.S. Postal Service Costing*

Finding #1: Accuracy, Reliability, and Management of MODS Data

Management agrees with this finding that opportunities exist to improve the accuracy reliability, and management of MODS data. These opportunities include continuing ongoing efforts to increase compliance with existing policies and procedures and developing modified procedures to review the software code used to compute productivities.

Nonetheless, Management believes that the risk of using outdated software code cited on page 8 is lessened because MODS productivities are aggregated to mitigate effects of non-systematic measurement error and screened so that productivities that fall into the top and bottom one percentiles are deleted before the final productivities are computed.

Management removed the outdated code and recomputed the productivities that were initially presented in Docket No. ACR2022, USPS-FY22-23. Management found that this change resulted in higher productivities for two groups (8 and 62), and in both instances, the revised productivities were less than two percent greater than the corresponding productivities presented to the Commission in Docket No. ACR2022, USPS-FY22-23. Additionally, group 62 measures a productivity associated with manual flats sortation that is not used in the avoided cost models because for manual activities, the avoided cost models use productivities measured in FY 2015. As such, the cost impact of using outdated computer code was limited to productivity group 8 (Outgoing BCS Secondary), and its effect on avoided cost was likely negligible since the underestimate of the productivity, in percentage terms, was small.

Following are our comments on each of the four recommendations:

Recommendation 1: We recommend the Vice President, Processing and Maintenance Operations, reiterate policy and coordinate with Vice President, Engineering Systems to identify opportunities for automated controls to verify that employees are clocking into the correct operation number and supervisors are regularly monitoring timekeeping reports.

Management Response/Action Plan:

Management agrees with this recommendation. Management will reiterate policy, including reinforcing the responsibility to review and take necessary action on errors reported on the MODS Exceptions Report. The Vice President, Processing and Maintenance Operations will coordinate with Vice President, Engineering Systems to identify opportunities for automated controls to improve the accuracy of MODS data.

Target Implementation Date: October 31, 2025

Management will provide periodic updates on the effort to identify opportunities for automated controls on the following dates: October 31, 2024, and April 30, 2025.

Responsible Official: Sr. Director Processing Operations, Vice President Engineering

Recommendation 2: We recommend the Vice President, Pricing and Costing, update procedures to include an annual review of software code to verify Management Operating Data System operation numbers used in productivity calculations reflect current Time and Attendance Collection System base default operation numbers.

Management Response/Action Plan:

Management agrees with this recommendation. Management will develop modified procedures to review the accuracy of the software code used in the productivity calculations that are presented to the Commission in Annual Compliance Report (ACR) folder 23 (USPS-FYXX-23).

Target Implementation Date: December 31, 2024

Responsible Official: Director, Cost Attribution

Recommendation 3: We recommend the Vice President, Processing and Maintenance Operations establish a process to assess and analyze Management Operating Data system review results.

Management Response/Action Plan:

Management agrees with this recommendation. Management will establish a process to assess and analyze Management Operating Data system review results.

Target Implementation Date: November 30, 2024

Responsible Official: Sr. Director Strategic Planning & Implementation

Recommendation 4: We recommend the Vice President, Processing and Maintenance Operations, update Handbook M-32, *Management Operating Data System (MODS)* policy and coordinate with Vice President, Engineering Systems, to update the *MODS Coordinator Guidebook* to identify current roles and responsibilities and clarify the frequency of Management Operation Data system reviews to ensure consistency.

Management Response/Action Plan:

Management agrees with this recommendation. Management will update the M-32 and the MODS Coordinator Guidebook to identify current roles and responsibilities and clarify the frequency of Management Operation Data system reviews.

Target Implementation Date: April 30, 2026

Management will provide periodic updates on its Action Plan on the following dates: October 31, 2024; April 30, 2025; and October 31, 2025.

Responsible Official: Sr. Director Strategic Planning & Implementation

E-SIGNED by JASON.R DE CHAMBEAU
on 2024-05-09 15:26:22 EDT

Jason DeChambeau for Dane Coleman
Vice President, Processing and Maintenance Operations

E-SIGNED by SHARON.D OWENS
on 2024-05-09 15:56:10 EDT

Sharon Owens
Vice President, Pricing & Costing

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Linda Malone
Vice President, Engineering Systems

cc: Corporate Audit Response Management

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