Exhibit A

Office of Inspector General | United States Postal Service

Management Alert

Timeliness of Ballot Mail in the Milwaukee Processing & Distribution Center Service Area

Report Number 20-235-R20 | July 7, 2020

Case: 3:20-cv-00249-wmc Document #: 433-1 Filed: 07/16/20 Page 3 of 18

BACK *to* COVER

Table of Contents

Cover
Transmittal Letter 1
Results 3
- Introduction 3
- Conclusion 3
  - Ballots Found at the Milwaukee P&DC After Election 4
  - Absentee Ballots Requested on March 22 and 23, 2020 4
  - Absentee Ballots Intended for Delivery to Voters but Returned to the Fox Point Village Election Office 4
  - Postmarks on Absentee Ballots Returned by Voters 5
  - Recommendation #1 5
  - Recommendation #2 6
  - Recommendation #3 6
  - Potential National Issues 6
  - States' Deadlines for Voters to Request Absentee Ballots are Insufficient to Ensure Delivery Before an Election 6
  - Requirements for Postmarks on Ballots 7
  - Ballots Not Always Mailed with Mail Tracking Technology 7
  - Political and Election Mail Coordinators Outreach and Communication 7
  - Recommendation #4 8
- Management's Comments 8
- Evaluation of Management's Comments 9

Appendices 10
- Appendix A: Management's Comments 11

Contact Information 15

BACK to COVER

Transmittal Letter

OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

July 7, 2020

MEMORANDUM FOR: SALVATORE VACCA
ACTING VICE PRESIDENT, GREAT LAKES AREA

DAVID E. WILLIAMS
CHIEF OPERATING OFFICER & EXECUTIVE VICE PRESIDENT

E-Signed by Inspector General
VERIFY authenticity with eSign Desktop

FROM: Darrell E. Benjamin, Jr.
Deputy Assistant Inspector General for Mission Operations

SUBJECT: Management Alert – Timeliness of Ballot Mail in the Milwaukee Processing & Distribution Center Service Area (Report Number 20-235-R20)

This management alert presents issues identified in our review of the Timeliness of Ballot Mail in the Milwaukee Processing & Distribution Center (P&DC) Service Area. This alert responds to a request from U.S. Senators Tammy Baldwin and Ron Johnson and U.S. Representatives Gwen Moore and Bryan Steil to investigate reports of absentee ballots not delivered in a timely manner for the Wisconsin primary election held Tuesday, April 7, 2020. Our objective was 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.

We conducted this performance audit from April through July 2020 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

Case: 3:20-cv-00249-wmc Document #: 433-1 Filed: 07/16/20 Page 5 of 18
BACK to COVER

conclusions based on our audit objective. We discussed our findings and conclusions with management on June 10, 2020, and included their comments where appropriate.

We appreciate the cooperation and courtesies provided by your staff. If you have questions or need additional information, please contact Todd Watson, Director, Network Processing, or me at 703-248-2100.

Attachment

cc: Postmaster General
Vice President, Delivery and Retail Operations
Corporate Audit Response Management

Case: 3:20-cv-00249-wmc Document #: 433-1 Filed: 07/16/20 Page 6 of 18
BACK to COVER

Results

Introduction

Due to the COVID-19 pandemic,[1] there is an expected increase in the number of Americans who will choose to vote by mail and avoid in-person voting. This was evident during the Wisconsin spring election and presidential preference primary, as the Wisconsin Election Commission received over 1.3 million requests for absentee ballots for the April 7, 2020, election, almost 1 million of which were completed and returned by mail to the election offices. This was an increase of over 440 percent from the April 2016 election. The pandemic also played a role in last minute changes to the election rules. The spring election was mandated to be held on the first Tuesday in April (April 7, 2020). On April 2, 2020, a federal judge extended the deadline for requesting absentee ballots to 5:00 p.m. on April 3, 2020, and moved the date for returning absentee ballots to 4:00 p.m. on April 13, 2020. On April 6, 2020, the governor of Wisconsin issued an executive order suspending in-person voting until June 9, 2020, to respond to public health concerns regarding COVID-19.

"Due to the COVID-19 pandemic, there is an expected increase in the number of Americans who will choose to vote by mail and avoid in-person voting."

On April 6, 2020, the Wisconsin Supreme Court overruled the governor's executive order to postpone the date of the election. Subsequently, on the same day, the U.S. Supreme Court ordered that absentee ballots need to be submitted in-person or postmarked by April 7, 2020 and received by the election commission by April 13, 2020, to be counted.

On April 9 and April 16, 2020, we received requests from U.S. Senators Tammy Baldwin and Ron Johnson and U.S. Representatives Gwen Moore and Bryan Steil to investigate reports of absentee ballots not delivered in a timely manner for the Wisconsin primary election held Tuesday, April 7, 2020. The requests mentioned the following issues:

- Three tubs of absentee ballots from Appleton and Oshkosh were found at the Milwaukee Processing & Distribution Center (P&DC) after polls closed on April 7, 2020.
- Absentee ballots requested on March 22 and 23, 2020, were not delivered to voters.
- The Postal Service returned absentee ballots to the Fox Point Village three weeks prior to the election without explaining why they were returned and not delivered. The Fox Point Village manager drove to the post office but could not get an answer as to why they were returned.
- Three hundred ninety ballots that were mailed by voters did not receive postmarks. The election office was unable to determine whether they were received by the Postal Service in time to be included in the official count.

This management alert responds to the congressional requests and presents our results and recommendations to address the issues identified in this report.

Conclusion

The Postal Service generally followed its procedures for processing and delivering ballots for the Wisconsin spring election and presidential preference primary of April 7, 2020. However, we identified opportunities to improve communication and coordination between the Postal Service and election offices and strengthen adherence to procedures. We also identified potential nationwide issues integrating election office's vote by mail processes with the Postal Service processes which could impact future elections. Specifically, for ballots processed in the Milwaukee area, we found issues related to the timeliness of ballots being mailed to voters, correcting misdelivery[2] of ballots, an inability to track ballots, and inconsistent postmarking of ballots. Nationally, we noted potential concerns with the deadlines set by the states to request absentee ballots, ballots postmarks,

1 The President of the United States issued the national emergency declaration concerning the novel Coronavirus disease outbreak (COVID-19) on March 13, 2020.
2 Delivery to the wrong address.

Case: 3:20-cv-00249-wmc Document #: 433-1 Filed: 07/16/20 Page 7 of 18
BACK to COVER

ballots mailed without mail tracking technology, and the ratio of Political and Election Mail coordinators to election offices in certain locations.

Ballots Found at the Milwaukee P&DC After Election

Three tubs containing 749 undelivered voter ballots were discovered at the Milwaukee P&DC after the polls closed on election day, April 7, 2020. This occurred because the ballots were not presented to the Postal Service until the end of the day on April 7, 2020 (the date of the election), which did not allow enough time for the Postal Service to process and deliver the ballots. The state of Wisconsin permitted residents to request an absentee ballot until 5:00 p.m. on Friday, April 3, 2020. The city of Appleton provided voter ballots to a third-party mailer on Monday, April 6, 2020. The third-party mailer presented the three tubs of ballots to the Postal Service around 6:00 p.m. on Tuesday, April 7, 2020. As a result, they were not delivered until after election day.[3]

"Ballots were not presented to the Postal Service until the end of the day on April 7, 2020."

Absentee Ballots Requested on March 22 and 23, 2020

The Milwaukee Election Office received complaints from voters about not receiving ballots that were requested on March 22 and 23, 2020. Milwaukee Election officials stated that the return rate for ballots requested on those dates was about 25 percent, which was much lower than the normal return rates of 65-70 percent. The election office uses a third-party mailer to induct ballots into the Postal Service network; however, the ballots did not have Intelligent Mail Barcodes[4] (IMb). IMbs allow mailers and the Postal Service to track each mailpiece from acceptance to delivery and would have enabled both the Postal Service and election offices to track ballots as they moved through the Postal Service and to identify delays in near real time. The third-party mailer confirmed the ballots were co-mingled with other pieces of mail, meaning they were unable to provide the exact number of ballots presented to the Postal Service. Subsequent to the congressional request, the Milwaukee Election Office staff determined there was a computer glitch on March 22, 2020, and they believe almost 2,700 requested ballots were never sent to voters.[5] This could explain the low return rates on ballots requested on March 22 and 23, 2020.

Absentee Ballots Intended for Delivery to Voters but Returned to the Fox Point Village Election Office

We found multiple factors contributing to the delay and misdelivery issues experienced by the Fox Point Village Election Office. First, about 160 ballots going to voters were erroneously returned to the Fox Point Village Election Office by a Postal Service city carrier. The carrier, who also had the election office on her route, admitted to not reviewing each ballot to confirm the destination address before returning them to the Fox Point Village.

The Fox Point Village manager brought the ballots back to the station multiple times to ask why they were returned, but the issue kept occurring. The station manager eventually became aware of the issue but believed it had been resolved when local processing changes occurred and did not follow-up with the Fox Point Village to ensure resolution of the issue. Further, the station was not aware that the returned ballots were due to one carrier's lack of attention until we identified it. Additionally, the station did not record the ballots on a Political Mail Log, which may have identified the same ballots being returned to the village multiple times. According to Postal Service policy, post offices are required to record all Political Mailings and Official Election Mailings on the Political Mail Log.[6]

The second issue involved the addressing and design of the ballots. The first line of the address for ballots mailed to voters included "Village of Fox Point" right above the recipient's address, which could cause confusion as to the location the ballots should be delivered. Additionally, the address labels included a block

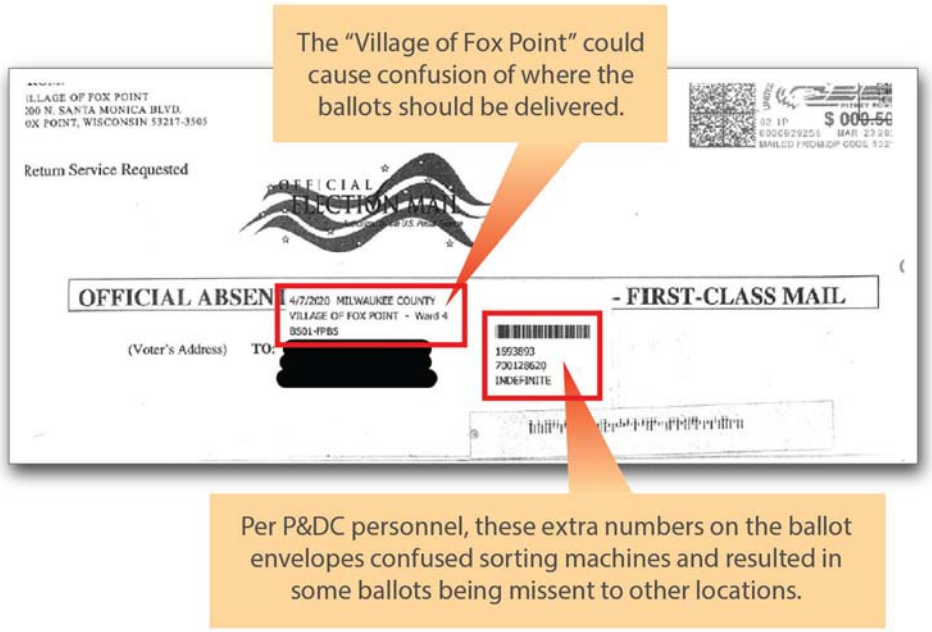
3 The Postal Service's First-Class mail delivery standard is two to five days.
4 IMbs are used to sort and track letters, cards, and flats on automated equipment. The barcode encodes tracking information that identifies the mailer, type of service, and serial number and the routing code and routing information that contains the delivery point ZIP Code.
5 Wisconsin Election Commission *April 7, 2020 Absentee Voting Report*, page 20, dated May 15, 2020.
6 *Political Mail And Official Election Mail Standard Operating Procedure (SOP) For Acceptance Units, Detached Mail Units and Post Offices,* pages 3 and 4.

Case: 3:20-cv-00249-wmc Document #: 433-1 Filed: 07/16/20 Page 8 of 18
BACK to COVER

directly to the right with a barcode and several rows of numbers. P&DC personnel stated that these non-postal related numbers confused sorting machines and resulted in a few ballots (we were unable to determine the number) being missent to other locations (see Figure 1).

The State Election Commission worked with the Postal Service on the overall ballot design; however, local election offices design address labels without input from the State Election Commission or the Postal Service. Postal Service guidelines state that District Marketing Managers are responsible for scheduling and publicizing mail preparation seminars to all candidates, political mailers, and election officials.[7]

Figure 1. Example of Ballot Sent to Voter



Source: Photograph of absentee ballot for Village of Fox Point taken April 7, 2020.

Postmarks on Absentee Ballots Returned by Voters

The Milwaukee Election Office reported their receipt of about 390 voter completed ballots with varying postmark issues including illegible postmarks, lack of a postmark, undated postmarks, or hand-stamped postmarks. The Postal Service worked with the election office after the election to help determine the validity of postmarks and was able to validate all but about 40 postmarks. Postal Service guidance[8] issued in fiscal year 2018 states that all ballots should be postmarked by machine or by hand.

> *"The Postal Service worked with the election office after the election to help determine the validity of postmarks."*

In response to the circumstances of absentee ballots not delivered in a timely manner, the Manager, Lakeland District, is planning actions for future elections. Specifically, the District Manager will communicate with all Postal Service employees involved in the processing of election mail to clarify their roles and responsibilities and Postal Service policies and procedures. Multiple subject matter experts will be assigned to assist the Political and Election Mail coordinator to better support election offices. In addition, each election office will be sent Kit 600[9] as well as current Postal Service webpage links to be used as resources for designing and mailing ballots.

Recommendation #1

We recommend the **Acting Vice President, Great Lakes Area,** develop and implement a plan to communicate with the Wisconsin Election Commission and associated election offices the last day ballots can be mailed out to voters and arrive before an election based on the service standards of the Postal Service; the benefits of using the Intelligent Mail Barcode; and the importance of proper mailpiece addressing and design.

7 *Political Mail And Official Election Mail Standard Operating Procedure (SOP) For Acceptance Units, Detached Mail Units and Post Offices,* page 1.
8 David E. Williams (April 23, 2018), Postmarks on Ballots [Memorandum], United States Postal Service.
9 Kit 600, 2020 Official Election Mail Kit, is a comprehensive resource which contains election mail facts and publications.

Case: 3:20-cv-00249-wmc Document #: 433-1 Filed: 07/16/20 Page 9 of 18
BACK to COVER

Recommendation #2
We recommend the **Acting Vice President, Great Lakes Area,** ensure all retail and delivery units and mail processing facilities use the political mail log to record ballot mail.

Recommendation #3
We recommend the **Acting Vice President, Great Lakes Area,** ensure Political and Election Mail coordinators coordinate with election offices to ensure they are aware of proper ballot mailing processes.

Potential National Issues

While conducting our review, we also identified potential nationwide issues integrating election office's vote by mail processes with the Postal Service processes which could impact future elections. We plan to conduct additional audit work on these issues during our ongoing Processing Readiness and Service Performance of Election and Political Mail During the 2020 General Elections audit and develop additional recommendations as necessary.

"We also identified potential nationwide issues integrating election office's vote by mail processes with the Postal Service processes which could impact future elections."

On May 29, 2020, the Postal Service issued a letter[10] to local and state election officials to provide an understanding of Postal Service procedures to consider when planning to use vote-by-mail. The letter explains how election mail can be sent, how mail delivery standards need to be considered when determining ballot return dates, how proper labeling helps prevent delivery delays and increases mailpiece visibility, how IMbs improve a mailer's ability to track individual mailpieces, and how consulting with Political and Election Mail coordinators before printing mailpieces benefits the election offices.

States' Deadlines for Voters to Request Absentee Ballots are Insufficient to Ensure Delivery Before an Election

States have deadlines for voters to request absentee ballots prior to an election. However, 11 states' deadlines (those with no deadline or a deadline within three days of the election) do not provide sufficient time for election offices to generate a ballot and for the Postal Service to process and deliver the ballots to voters before the election. Additionally, we identified 13 other states with deadlines (4-6 days before election) that put ballots at high risk of not being delivered to voters before an election (see Table 1).

Table 1. States with Ballot Request Deadlines Less Than Seven Days Before Election Day

Number of Days Before Election Day						
No Deadline	1 day	2 days	3 days	4 days	5 days	6 days
NH	CT	—	OH	GA	AL	OK
ND	MA			LA	DE	WV
WA[11]	MN			MI	IL	
	MT			NM	ME	
	SD			SC	OR	
	VT				WI	
	WY					

Source: Vote.org.

10 Thomas J. Marshall (May 29, 2020), Election Mail [Letter], United States Postal Service.
11 Washington is an "all-mail elections" state which means that every registered voter receives a ballot by mail. However, for voters that did not receive a ballot in the mail, there is no deadline for when a ballot can be requested.

"Ballots requested less than seven days before an election are at a high risk of not being delivered, completed by voters, and returned to the election offices in time"

States that use vote-by-mail[12] require voters, on average, to request a ballot at least seven days prior to an election. In our opinion, ballots requested less than seven days before an election are at a high risk of not being delivered, completed by voters, and returned to the election offices in time. This is due to the time required for election commissions to produce ballots and Postal Service delivery standards. For the Wisconsin primary election held Tuesday, April 7, 2020, the state of Wisconsin allowed voters to request ballots up until 5:00 p.m. on Friday, April 3, 2020. Many election offices provided these ballots to the Postal Service on Monday, April 6, 2020, one day before the election. The Postal Service's First-Class Mail delivery standard is two to five days (depending on delivery location) after it is received.

Requirements for Postmarks on Ballots

Many states use the postmark as the official timestamp for the ballot to be counted. As a result, the return processing and postmarking of ballots is considered critical to election results. Postal Service guidance[13] issued on April 23, 2018, states that all ballots mailed back from voters must have a cancellation postmark including absentee ballots, vote-by-mail ballots, and business reply mail ballots. The Postal Service applies a postmark to a ballot when its processed on a machine or by hand if not processed on a machine. However, there can be breakdowns or exceptions to this process which would prevent a ballot from receiving a postmark. For example, ballots may be double fed on a machine, machines applying postmarks may run out of ink, or ballots may be comingled with certain mail that is not processed on machinery that applies a postmark.

Ballots Not Always Mailed with Mail Tracking Technology

The Postal Service and mailers are not able to track ballots that don't have IMbs. While there is no requirement for ballots to have IMbs, election offices should be educated on the benefits IMbs provide.[14] The ballots requested on March 22 and 23, 2020, for the Wisconsin election did not have IMbs. Therefore, neither the Postal Service nor the election office were able to determine what happened with those ballots beyond those that the election commission believes were not actually sent to voters by the election commission due to a computer glitch. The Milwaukee Election Office was unaware of the tracking capabilities of IMb prior to the election, but the Wisconsin Election Commission is working with a third-party mailer to consider implementing IMbs.

Political and Election Mail Coordinators Outreach and Communication

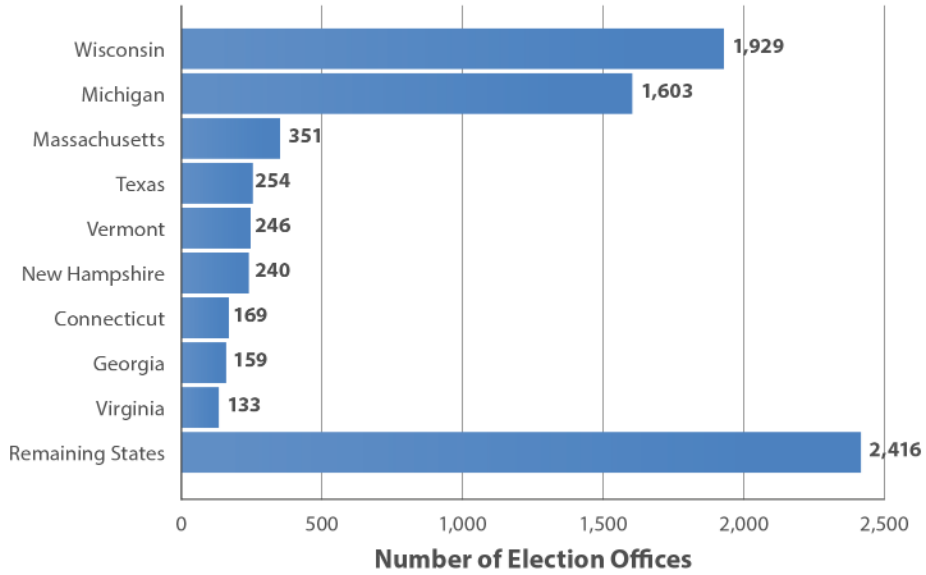
Postal Service personnel in each area and district are assigned the role of Political and Election Mail coordinator in addition to their normal duties. The coordinator is tasked with communicating with the election offices prior to and after each election to mitigate any known issues. However, some states have numerous elections offices which could make it more challenging for a Political and Election Mail coordinator to effectively communicate with all their assigned

"Some states have numerous elections offices which could make it more challenging for a Political and Election Mail coordinator to effectively communicate with all their assigned election offices."

12 In vote-by-mail states, ballots are mailed out well ahead of Election Day and voters have an "election period," not just a single day, to vote.
13 David E. Williams (April 23, 2018), Postmarks on Ballots [Memorandum], United States Postal Service.
14 IMbs are used to sort and track letters, cards, and flats on automated equipment. IMbs can be used by both the Postal Service and the mailer to track the delivery and return of ballots as they move through the Postal Service's network.

election offices. For example, the district Political and Election Mail coordinator in the Milwaukee area stated that he oversees about 1,400 of the 1,929 election offices in Wisconsin, which has the largest number of election offices, while states such as Maine and Alaska each have one election office. See Figure 2 for the states with the most election offices.

Figure 2. Number of Election Offices by State



Source: https://www.fvap.gov/search-offices.
Note: The states not shown have 120 or fewer election offices.

Recommendation #4
We recommend the **Chief Operating Officer & Executive Vice President,** develop and implement an action plan with timelines to address the potential national issues (ballot deadlines, postmarks, tracking technology, Political and Election Mail coordinators outreach) identified in this report.

Management's Comments

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

Regarding recommendation 1, management stated that they will continue to follow the established plan to communicate with Wisconsin Election officials about the Postal Service's election mail recommendations and requirements, including their delivery standards, the benefits of using IMb and having proper mailpiece addressing and design. They met with Wisconsin Election officials on April 30, 2020, to discuss the various requirements and will continue to hold additional outreach meetings on these topics. Postal Service management considers this recommendation completed.

Regarding recommendation 2, management stated they will ensure that all retail and delivery units and mail processing facilities use the political mail log to record ballot mail as required by policies. They will also reissue the policies and perform Service Talks across the Great Lakes Area and continue to reinforce and monitor compliance with the policies. The target implementation date is July 17, 2020.

Regarding recommendation 3, management stated that the Great Lakes Area will continue to coordinate with election offices to ensure they are aware of proper mailing processes. Each district should have contacted the Board of Elections within its jurisdiction prior to June 30, 2020, to reinforce proper ballot procedures. In addition, on June 16, 2020, the Postal Service held a meeting with the Wisconsin Election Commission regarding ballot design and preparation and are working with the Wisconsin Election Commission to perform outreach to their various Board of Elections. The target implementation date is July 17, 2020.

Regarding recommendation 4, management stated that the Postal Service has been and will continue to conduct outreach with state and local election officials to discuss the Postal Service's delivery standards, the state's deadlines, the availability of IMb tracking technology, and the comprehensive set of Election Mail resources on the Postal Service's website. Management also reiterated the

Case: 3:20-cv-00249-wmc Document #: 433-1 Filed: 07/16/20 Page 12 of 18
BACK to COVER

Postal Service's policy requiring the postmarking of all returned ballots is being emphasized and monitored. In subsequent conversations with management they stated they have a plan to perform future outreach and actions to further address these issues and communicate their importance to the various state and local election commissions. The plan includes regularly scheduled meetings with Secretaries of State and various state and local election officials as well as bi-weekly meetings with stakeholders on topics such as mail standards versus state's election timelines, IMb, and informed delivery.

Evaluation of Management's Comments

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

Regarding recommendation 4, while we consider management's comments to be responsive, we will not close this recommendation until we receive the detailed plan with all anticipated implementation dates.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. Recommendations 2 through 4 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 consider recommendation 1 closed with the issuance of this report.

Case: 3:20-cv-00249-wmc Document #: 433-1 Filed: 07/16/20 Page 13 of 18

BACK *to* COVER

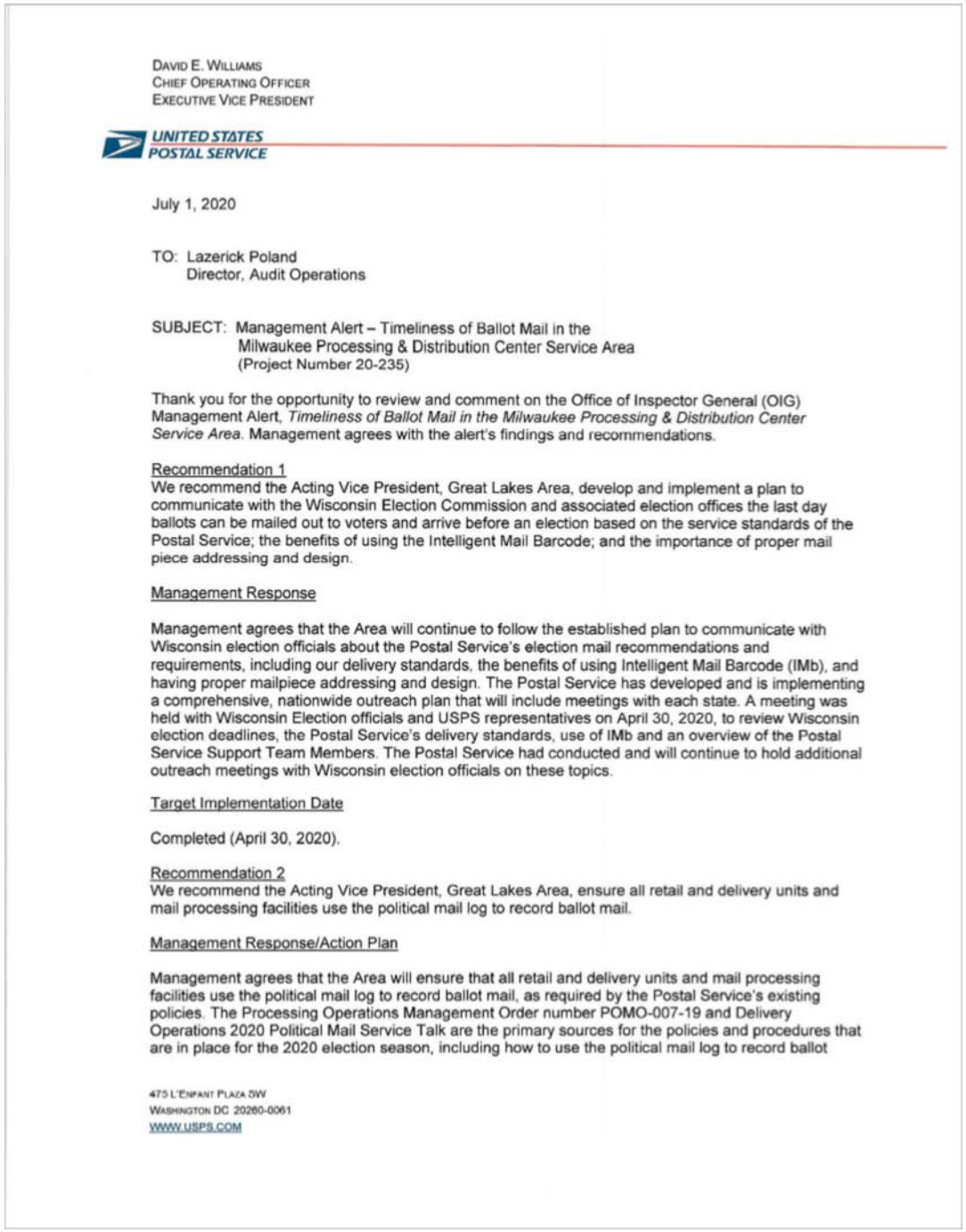
Appendices

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

Appendix A: Management's Comments..... 11

Case: 3:20-cv-00249-wmc Document #: 433-1 Filed: 07/16/20 Page 14 of 18
BACK to COVER

Appendix A: Management's Comments



DAVID E. WILLIAMS
CHIEF OPERATING OFFICER
EXECUTIVE VICE PRESIDENT

UNITED STATES POSTAL SERVICE

July 1, 2020

TO: Lazerick Poland
Director, Audit Operations

SUBJECT: Management Alert – Timeliness of Ballot Mail in the Milwaukee Processing & Distribution Center Service Area (Project Number 20-235)

Thank you for the opportunity to review and comment on the Office of Inspector General (OIG) Management Alert, *Timeliness of Ballot Mail in the Milwaukee Processing & Distribution Center Service Area*. Management agrees with the alert's findings and recommendations.

Recommendation 1
We recommend the Acting Vice President, Great Lakes Area, develop and implement a plan to communicate with the Wisconsin Election Commission and associated election offices the last day ballots can be mailed out to voters and arrive before an election based on the service standards of the Postal Service; the benefits of using the Intelligent Mail Barcode; and the importance of proper mail piece addressing and design.

Management Response

Management agrees that the Area will continue to follow the established plan to communicate with Wisconsin election officials about the Postal Service's election mail recommendations and requirements, including our delivery standards, the benefits of using Intelligent Mail Barcode (IMb), and having proper mailpiece addressing and design. The Postal Service has developed and is implementing a comprehensive, nationwide outreach plan that will include meetings with each state. A meeting was held with Wisconsin Election officials and USPS representatives on April 30, 2020, to review Wisconsin election deadlines, the Postal Service's delivery standards, use of IMb and an overview of the Postal Service Support Team Members. The Postal Service had conducted and will continue to hold additional outreach meetings with Wisconsin election officials on these topics.

Target Implementation Date

Completed (April 30, 2020).

Recommendation 2
We recommend the Acting Vice President, Great Lakes Area, ensure all retail and delivery units and mail processing facilities use the political mail log to record ballot mail.

Management Response/Action Plan

Management agrees that the Area will ensure that all retail and delivery units and mail processing facilities use the political mail log to record ballot mail, as required by the Postal Service's existing policies. The Processing Operations Management Order number POMO-007-19 and Delivery Operations 2020 Political Mail Service Talk are the primary sources for the policies and procedures that are in place for the 2020 election season, including how to use the political mail log to record ballot

475 L'ENFANT PLAZA SW
WASHINGTON DC 20260-0061
WWW.USPS.COM

mail. These policies will be reissued across the Great Lakes Area and all facilities will be required to certify that they have received and reviewed these materials. The Postal Service, and the Great Lakes Area specifically, will continue to reinforce and monitor compliance with these policies. In addition, prior to each election, Delivery and Plant self-audit checklists must be sent to the Area the day before, day of and day after the election. Tracking for ballots received for delivery to the Board of Elections is required beginning one week prior to the election and continuing through three days after the election.

Target Implementation Date

July 17, 2020.

Responsible Official

[redacted] Great Lakes Area Political Mail Coordinator

Recommendation 3
We recommend the Acting Vice President, Great Lakes Area, ensure Political and Election Mail coordinators coordinate with election offices to ensure they are aware of proper ballot mailing processes.

Management Response/Action Plan

Management agrees that the Area will continue to coordinate with election offices to ensure they are aware of proper ballot mailing processes. Each District must contact the Boards of Elections within its jurisdiction prior to June 30, 2020, to reinforce the Postal Service's recommendations for mailing ballots, ensure proper mailing procedures are being followed, and any questions raised are answered. Completed outreach is tracked by the District Coordinators on the Political and Election Mail webpage.

In addition, on June 16, 2020, the Postal Service held a meeting with the Wisconsin Election Commission (WEC) regarding ballot design and preparation. Postal representatives have been working with the WEC and have conducted over 700 outreach meeting with the Boards of Elections regarding the Postal Service's ballot mailing recommendations and IMb, since Wisconsin decided to include IMb on its return ballots for improved visibility.

Target Implementation Date

July 17, 2020.

Responsible Official

[redacted] Great Lakes Area Political Mail Coordinator

Responses to potential issues identified in the report are listed below.

Ballots requested less than seven days before an election are at a high risk of not being delivered, completed by voters, and returned to the election offices in time.

Management agrees that ballots requested less than seven days before an election are at high risk of not being completed and returned to election offices in time to be counted. The Postal Service has been and will continue to be conducting outreach with state and local election officials. As part of these outreach meetings, the Postal Service discusses the Postal Service's delivery standards and the state's deadlines. The Postal Service is committed to delivering ballots in a timely manner, and our delivery standards reflect our operational capabilities. We endeavor to deliver ballots entered

Case: 3:20-cv-00249-wmc Document #: 433-1 Filed: 07/16/20 Page 16 of 18
BACK to COVER

close to the election date as soon as possible. However, we cannot guarantee a specific delivery date or alter standards to comport with individual state election law.

Breakdowns or exceptions in the postmark process may lead to some ballots not being postmarked.

Management agrees that isolated incidents may occur during processing that could cause a ballot to not receive a postmark, despite the Postal Service's policy. The Postal Service's policy provides that all returned ballots must be postmarked. This policy has been in effect since April 23, 2018. The Postal Service has instructed and equipped employees and has developed and monitored processes to ensure that ballots are postmarked, and the Postal Service will continue those efforts.

Election offices should be educated on the benefits provided by IMb.

Management agrees that election offices should be educated on the benefits provided by IMb. The Postal Service has explained and will continue to emphasize the benefits of including an IMb on ballot envelopes, and other Election Mail, during outreach meetings with state and local boards of election. In addition, the benefits of using an IMb were explained in Kit 600, *2020 Election Mail Guide*, which was distributed to 11,500 election officials in March 2020. The May 29, 2020, letter to election officials and state party officials (containing Publication 632, *State and Local Election Mail Users' Guide*) reemphasized the Postal Service's recommendation that election officials include IMbs on all Election Mail. We also maintain a comprehensive set of Election Mail resources on our website at https://about.usps.com/election-mail/electionmail-resources.htm.

Some states have numerous elections offices which could make it more challenging for a Political and Election Mail coordinator to effectively communicate with all their assigned election offices.

Management agrees that it is potentially more challenging to communicate with election officials in states with numerous election offices, however the Postal Service has taken several steps to facilitate communication with all election offices and minimize the potential for challenges. We have appointed full-time Political and Election Mail Coordinators at the state and district level. In addition, many districts support the full-time coordinators with additional coordinators. The Postal Service also uses technology to hold remote meetings with large groups of election officials.

Recommendation 4

We recommend the Chief Operating Officer & Executive Vice President, develop and implement an action plan with timelines to address the potential national issues (ballot deadlines, postmarks, tracking technology, and Political and Election Mail coordinators) identified in this report.

Management Response/Action Plan

Management agrees with this recommendation. The Postal Service has communicated its delivery standards and the available IMb tracking technology to election officials multiple times since the beginning of the year. We distributed Kit 600 in March 2020, issued our Guidance Letter in May 2020, which included copies of Publication 632, and have conducted outreach meetings with state and local board of election beginning in February 2020. We also maintain a comprehensive set of Election Mail resources on our website at https://about.usps.com/election-mail/electionmail-resources.htm.

It is our national policy to postmark all ballots. We have communicated and will continue to emphasize this policy to all employees through Processing Operations Management Orders and Service and Stand Up Talks, as well as redistributing the policy letter.

Case: 3:20-cv-00249-wmc Document #: 433-1 Filed: 07/16/20 Page 17 of 18
BACK to COVER

Political and Election Mail Coordinators have been assigned in each Area and District and are dedicated to the Election Mail process. In states with high numbers of election offices, additional personnel assist with outreach to election officials. The Postal Service also employs various tools to facilitate remote meetings with multiple election jurisdictions at one time.

Target Implementation Date

Completed

David E. Williams
Chief Operating Officer & Executive Vice President

Salvatore N. Vacca
Acting Area Vice President
Great Lakes Area

cc: *Manager, Corporate Audit Response Management*

Case: 3:20-cv-00249-wmc Document #: 433-1 Filed: 07/16/20 Page 18 of 18
BACK to COVER

OFFICE OF
INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

Contact us via our Hotline and FOIA forms.
Follow us on social networks.
Stay informed.

1735 North Lynn Street
Arlington, VA 22209-2020
(703) 248-2100

For media inquiries, contact Agapi Doulaveris
Telephone: 703-248-2286
adoulaveris@uspsoig.gov