



441 G St. N.W.  
Washington, DC 20548

September 26, 2013

The Honorable Darrell E. Issa  
Chairman  
Committee on Oversight and Government Reform  
House of Representatives

**U.S. Postal Service: *Information on Workforce Injuries Arising During Mail Delivery***

Dear Mr. Chairman:

According to United States Postal Service (USPS) officials, USPS employee injuries are largely due to the often physically demanding, industrial, and highly repetitive nature of their work. Mail carriers—who delivered mail to nearly 132 million delivery points nationwide in fiscal year 2012<sup>1</sup>—can be injured while delivering mail in a number of ways, for example by being bitten by a dog or being involved in a vehicle collision. According to USPS officials, in fiscal year 2012 there were 32,213 injuries for the entire postal workforce of nearly 630,000 employees,<sup>2</sup> of which 11,717 (36 percent) occurred during mail delivery.<sup>3</sup> The Federal Employees' Compensation Act (FECA) program provides for cash benefits and medical benefits to eligible federal employees who suffer temporary or permanent disabilities resulting from work-related injuries or illnesses. FECA cash benefits include payments for wages lost when employees cannot work because of work-related disabilities due to traumatic injuries or occupational illnesses.<sup>4</sup> Medical benefits can include vocational rehabilitation and medical care for injured workers. Like other federal agencies, USPS pays its workers' compensation costs through the federal workers' compensation program administered by the Department of Labor. USPS's workers' compensation costs have increased in recent years. USPS's workers' compensation expense for fiscal year 2012 was \$3.7 billion, compared to \$2.2 billion in fiscal year 2009, a 68 percent increase.<sup>5</sup>

As we have previously reported, USPS is in a serious financial crisis and has not generated sufficient revenue to cover its expenses and financial obligations as mail volume continues to

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<sup>1</sup>Post Office Boxes comprise about an additional 20 million delivery points. According to USPS, mail delivery to Post Office boxes is generally performed by clerks and is not the same delivery function as delivering mail to a centralized mailbox outside of a Post Office.

<sup>2</sup>Unless otherwise noted, year references are for fiscal year.

<sup>3</sup>According to USPS, its employees filed a total of 43,268 claims in fiscal year 2012 with the Department of Labor's Office of Workers' Compensation Programs, which includes injuries, illnesses, and non-injuries.

<sup>4</sup>5 U.S.C. § 8101 et seq.; 20 C.F.R. Part 10.

<sup>5</sup>USPS reported in its 2012 Form 10-K report that the various components of the total workers' compensation expense includes the impact of discount rate changes, actuarial reevaluations of existing cases, the costs of new cases, and administrative fees.

decline.<sup>6</sup> In its *Five-Year Business Plan* issued in April 2013, USPS stated that there has been a 25 percent decline in mail volume that, despite regular price increases, has reduced annual revenue by about \$10 billion since fiscal year 2007. According to USPS, the agency needs to save up to \$20 billion annually over the next 5 years to help it regain financial self-sufficiency. USPS proposed initiatives in the *Five-Year Business Plan* to help it achieve these cost savings, nearly half of which, according to USPS, will require legislative action. Some of the USPS-proposed initiatives focus on mail delivery, which is USPS's largest expense, costing about \$23 billion and representing about 49 percent of USPS's personnel costs for fiscal year 2012. For example, USPS proposed delivery-related cost savings initiatives, including expanding the centralization of delivery points, to help save \$1.0 billion in 2014.<sup>7</sup> Recent legislative proposals for postal reform in both the House of Representatives and the United States Senate also consider provisions that include the expansion of centralized delivery points to achieve cost savings.<sup>8</sup>

You asked us to review available information on injuries related to mail delivery. This letter addresses postal workforce injuries and other health issues arising from different types of mail delivery routes. We have another ongoing review that will report separately on the other questions raised in your request letter, including the costs and barriers of different mail delivery modes.

### Scope and Methodology

We obtained available USPS data and interviewed USPS officials on injuries related to mail delivery. USPS collects data on workforce injuries using an electronic "Accident Report" form with standardized codes.<sup>9</sup> The main responsibility for the initial accident report lies with the supervisor and affected employee, and the form itself is completed by an injured employee's supervisor. The form is to be reviewed by a senior manager and headquarters staff in an effort to assure accurate reporting and help minimize data entry errors. In addition, agency officials said that internal audits (performed by USPS safety staff) and external audits (performed by the Department of Labor's Occupational Safety and Health Administration (OSHA)) are conducted to ensure the accuracy of data reported on the Accident Report form. Codes and associated data on injuries that occur during mail delivery by different route types, including those performed on foot and those performed in vehicles, are to be included on the Accident Report form.<sup>10</sup> For example, supervisors are to note on the form the circumstances leading to an

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<sup>6</sup>GAO, *U.S. Postal Service: Urgent Action Needed to Achieve Financial Sustainability*, [GAO-13-562T](#) (Washington, D.C.: Apr. 17, 2013); and *High-Risk Series: An Update*, [GAO-13-283](#) (Washington, D.C.: February 2013).

<sup>7</sup>Other delivery-related cost savings initiatives that USPS proposed in its *Five Year Business Plan* include delivery optimization (i.e., consolidating some facilities and routes) and capturing reduced volume and workload (i.e., better matching workloads to current mail volumes).

<sup>8</sup>See e.g., Postal Reform Act of 2013, H.R., 2748, 113th Cong. (2013); Postal Reform Act of 2013, S. 1486, 113th Cong. (2013).

<sup>9</sup>In its Accident Report, USPS refers to two types of employment-related injuries: traumatic injuries and occupational illnesses. For the purposes of this report, we refer to both types of employment-related injuries as "injuries" except in cases where the Accident Report makes a distinction between injuries and illnesses.

<sup>10</sup>USPS officials told us that the classification of route type on the Accident Report form is determined by the employee and supervisor completing the form, and may vary from the route type as classified by USPS's Delivery Operations. For example, mail carriers assigned to park-and-loop routes by Delivery Operations might report their injuries occurred on a foot route because they were injured on the walking part of their route. All information on

injury—such as a dog bite, falls from porches, or vehicle collisions—as well as the severity of the injury—ranging from no injury to death—using standardized codes. Not all fields on the Accident Report form, including codes that would identify the route type, are required to be completed. We obtained 2009 through 2012 USPS data on workforce injuries by various route types (as classified by USPS’s Office of Safety and Health, Employee Resource Management), including data on the frequency, circumstance leading to injury, the severity of injuries, and the nature of the most severe injury. Because the circumstance, severity, and nature of the most severe injury are spread across numerous codes, we provide only the most frequently reported (top three) codes for these variables. For example, for injuries occurring in 2012 on routes that are primarily conducted on foot, circumstances leading to injury were reported using 39 different codes. These circumstances leading to injury ranged from less than 1 percent (for being struck by flying objects) to about 17 percent (for dog bites). We analyzed these data, assessed their reliability—for example, we reviewed related documentation and interviewed knowledgeable agency officials—and determined that USPS’s data on injuries occurring during mail delivery were reliable for providing descriptive information on postal workforce injuries by route type for these fiscal years.

We conducted this performance audit from June 2013 to September 2013 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## **Results in Brief**

In fiscal year 2012, there were 32,213 reported injuries, 11,717 (36 percent) of which were sustained by carriers delivering mail on three different types of routes as specified on USPS’s Accident Report form: foot routes, rural routes, and park-and-loop routes. According to USPS’s 2012 data, the most frequently reported cause of injury for routes that are primarily conducted on foot is dog bites, while the most frequently reported cause of injury for delivery on rural routes—which is often conducted in vehicles—is vehicular collisions. Additionally, USPS’s data indicate that most injuries that occurred from 2009 through 2012 on mail delivery routes were caused by falls and dog bites. Falls to the ground were among the most common circumstances leading to injury that resulted in either restricted work activity or days away from work, but repetitive motions were the most common cause of long-term occupational illnesses regardless of severity or route type.

## **Background**

As categorized in USPS’s Accident Report, postal employees, including mail carriers, generally sustain two types of employment-related injuries: traumatic injuries and occupational illnesses. Traumatic injuries are linked to a specific event, such as when a mail carrier trips and falls while delivering mail. In contrast, occupational illnesses can develop from prolonged workplace exposures and repetitive motion activities, such as when a mail carrier develops a back, shoulder, or rotator cuff injury by repeatedly twisting and stretching to reach mail in the back of the delivery vehicle.

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injuries by route type that GAO reports throughout this correspondence reflects the route type as reported on the Accident Report form.

FECA provides for cash benefits to eligible federal employees who suffer temporary or permanent disabilities resulting from occupational-related injuries or illnesses. The U.S. Department of Labor’s Division of Federal Employees’ Compensation in the Office of Workers’ Compensation Programs administers the FECA program and charges federal agencies for which the injured employees worked for the benefits provided to those injured employees. We have previously reported that a large proportion of FECA beneficiaries were employed by USPS at the time of their injury—43 percent of 2010 FECA beneficiaries were USPS employees, accounting for over 130,000 employees.<sup>11</sup> We have also reported that USPS has aggressively pursued the return of employees to work as soon as possible as a means to help employees recover more quickly and stay up-to-date with workplace changes, and to reduce USPS’s costs for workers’ compensation.<sup>12</sup>

USPS has stated that it is committed to the safety and health of all its employees. USPS noted in its fiscal year 2011 annual report that occupational-related injury rates were reduced by almost 50 percent over the previous 10 years. USPS’s reported illness and injury rate—an indicator of an agency’s safety record as reported to OSHA—has changed only slightly over the last few years (see table 1).<sup>13</sup>

**Table 1: USPS’s OSHA Illness and Injury Rates for All Employees, 2009 to 2012**

	2009	2010	Change from previous year	2011	Change from previous year	2012	Change from previous year
<b>Rate</b>	5.62	5.49	2% decrease	5.67	3% increase	5.44	4% decrease

Source: GAO analysis of USPS data.

From 2009 through 2012, an average of 34,000 postal workforce injuries were reported each year, about 13,000 of which were attributed to mail delivery. USPS’s OSHA illness and injury rate for all USPS employees in 2012 was 5.44 per 100 employees. According to USPS, declines in injury rates over the last decade are due to continued emphasis on safety by employees and management, including having safety as a part of management’s pay-for-performance evaluations, stressing development of Accident Reduction Plans, and completion of safety inspections, as well as timely abatement of identified deficiencies. However, despite recent declines in USPS’s OSHA illness and injury rate, the Congressional Research Service reported that USPS employees are injured on the job at rates disproportionate to the rest of the federal government.<sup>14</sup> For example, the Congressional Research Service’s report stated that although USPS employees make up about 22 percent of the federal workforce, they are responsible for

<sup>11</sup>GAO, *Federal Employees’ Compensation Act: Analysis of Proposed Changes on USPS Beneficiaries*, [GAO-13-142R](#) (Washington, D.C.: Nov. 26, 2012); and *Federal Employees’ Compensation Act: Benefits for Retirement-Age Beneficiaries*, [GAO-12-309R](#) (Washington, D.C.: Feb. 6, 2012).

<sup>12</sup>GAO, *U.S. Postal Service: The Program for Reassessing Work Provided to Injured Employees Is Under Way, but Actions Are Needed to Improve Program Management*, [GAO-10-78](#) (Washington, D.C.: Dec. 14, 2009).

<sup>13</sup>USPS noted the following in its fiscal year 2012 annual report to Congress: “The injury and illness rate is calculated using an industry-wide formula recommended by the Occupational Safety and Health Administration (OSHA): ‘Total number of OSHA injuries and illnesses (multiplied) by 200,000 hours (divided) by the number of exposure hours worked by all employees. The 200,000 hours represents 100 employees working 2,000 hours per year. It provides the standard base for calculating incidence rates.’”

<sup>14</sup>Scott D. Szymendera, Congressional Research Service, *The Federal Employees’ Compensation Act (FECA): Workers’ Compensation for Federal Employees*, R42107 (Washington, D.C.: June 4, 2013).

about 39 percent of the injuries, illnesses, and fatalities that resulted in FECA cases in fiscal year 2012.

Depending on the characteristics of a particular area, carriers deliver mail using different route types, including the following three route types specified on USPS's Accident Report form:

- **Foot Route**: The carrier walks to deliver mail and does not drive a vehicle.
- **Rural Route**: A route served by rural carriers. Such carriers typically deliver mail to mailboxes at the curb and drive a vehicle.
- **Park-and-Loop Route**: A carrier parks the vehicle and walks out and back over one or more streets, delivering mail away from and looping back to the vehicle.

USPS officials told us that the classification of route type on the Accident Report form is determined by the employee and supervisor completing the form and may vary from the route type as classified by USPS's Delivery Operations office. For example, mail carriers assigned to park-and-loop routes by Delivery Operations might report their injuries occurred on a foot route because they were injured on the walking part of their route. All information on injuries by route type reported throughout this correspondence reflects the route type as reported on the Accident Report form.

### **Park-and-Loop Routes Had More Injuries Than Other Routes, with Falls and Dog Bites among the Most Frequently Reported Type of Injury for All Routes**

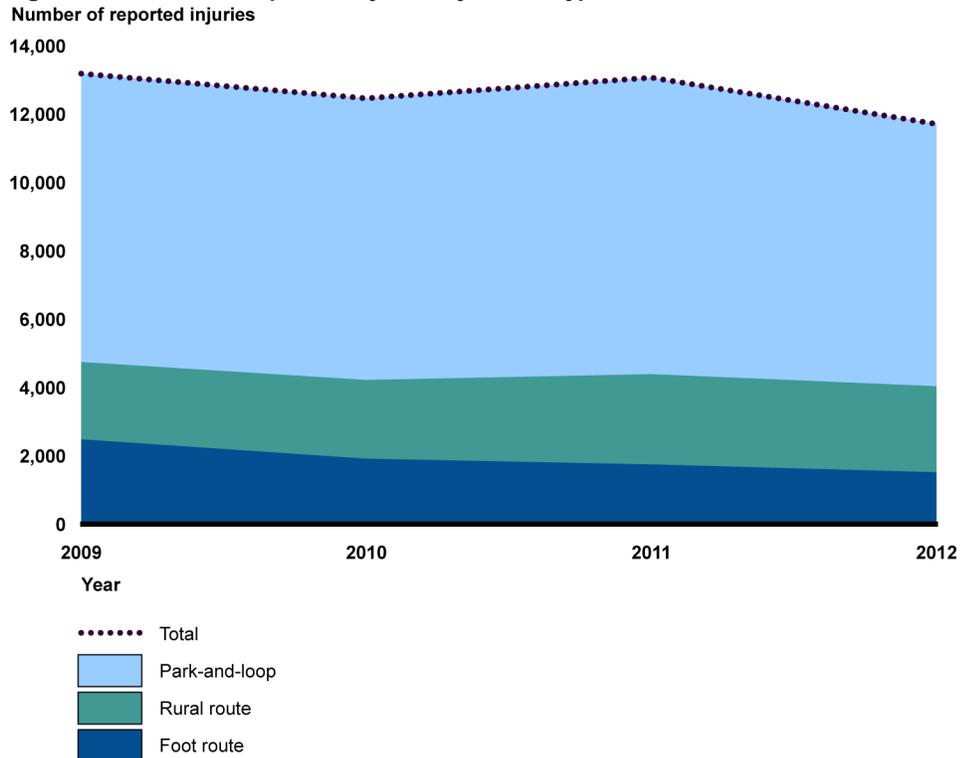
#### Frequency of Injuries

Of the postal workforce injuries reported from 2009 through 2012, park-and-loop routes incurred a higher number of injuries than foot routes or rural routes (see fig. 1). For example, in fiscal year 2012, there were 11,717 injuries that occurred on all three route types: 7,675 on park-and-loop routes (66 percent), 2,517 on rural routes (22 percent), and 1,525 on foot routes (13 percent).<sup>15</sup> Although the number of reported injuries by route type varied during 2009 through 2012, park-and-loop routes always had the greatest number of injuries of the three route types. USPS officials told us that there are more injuries on park-and-loop routes than foot routes or rural routes because park-and-loop routes are the most prevalent route type.

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<sup>15</sup>Percentages do not add to 100 percent due to rounding.

**Figure 1: Number of Reported Injuries by Route Type, Fiscal Years 2009 to 2012**



Source: GAO analysis of USPS data.

### Circumstances Leading to Injury

USPS’s Accident Report form asks filers to use a set of codes to describe the circumstances leading to injury, such as falls from elevation, animals, or violence. We found that for all three route types we reviewed, falls to sidewalks or the ground and dog bites were among the most frequently reported circumstance leading to injury. Other circumstances leading to injury differed depending on the route type, for example:

- **Foot Routes:** For foot route injuries that occurred from 2009 through 2012, falls to sidewalks or the ground, dog bites, and other slips and trips were the most frequently reported circumstances leading to injury.
- **Rural Routes:** For rural route injuries that occurred from 2009 through 2012, vehicle collisions in which both vehicles were in motion, falls to sidewalks or the ground, and dog bites were the most frequently reported circumstance leading to injury.
- **Park-and-loop Routes:** For park-and-loop route injuries that occurred from 2009 through 2012, falls to sidewalks or the ground, dog bites, and other slips and trips were the most frequently reported circumstances leading to injury.

### Severity of Injury

Filers of USPS’s Accident Report are also provided with a set of codes to use in describing the severity of an injury, which has codes including no lost work time, days away from work, restricted work, or fatalities. We found that of the data we reviewed, the most common degree of

severity was the same regardless of route type. From 2009 through 2012 the most frequently reported severity of injury for all three route types was an injury with days away from work.

In fiscal year 2012, the most common circumstances leading to injury for each route type varied by route and by severity—particularly whether the accident resulted in traumatic injury or occupational illness. We found that for all three route types we reviewed, falls to the ground were among the most common circumstance leading to injury that resulted in either restricted work activity or days away from work. In addition, we found that repetitive motions were the most common cause of illness, regardless of severity or route type. Other circumstances causing the injury or illness differed depending on route type and severity, for example:

- ***Foot Routes***: For foot route injuries that occurred in 2012 and resulted in days away from work or lost time, falls to the ground, falls on stairs, and dog bites were the most frequently reported circumstances leading to injury. In the same year, repetitive motions led to about 55 percent of illnesses that resulted in days away from work and about 70 percent of illnesses that restricted work activity.
- ***Rural Routes***: For rural route injuries that occurred in 2012 and resulted in days away from work or lost time, collisions with both vehicles in motion, collisions with a stationary object, and falls to the ground were the most frequently reported circumstances leading to injury. In the same year, repetitive motions led to about 65 percent of illnesses that resulted in days away from work and almost 50 percent of illnesses that restricted work activity.
- ***Park-and-loop Routes***: For park-and-loop route injuries that occurred in 2012 and resulted in days away from work or lost time, falls to the ground, dog bites, and slipping or twisting were the most frequently reported circumstances leading to injury. In the same year, repetitive motions led to almost 60 percent of illnesses that resulted in days away from work and about 60 percent of illnesses that restricted work activity.

#### Nature of the Most Severe Injury

Another field that filers of the Accident Report are to complete uses codes to describe the nature of the most severe injury caused by the accident; in essence, the code describes the outcome of the injury, such as contusions, strains, or tendonitis. We found that for those data we reviewed, the most common nature of injury was generally the same regardless of route type.<sup>16</sup> For example, from 2009 through 2012, strains, sprains, and animal or insect bites were among the most frequently reported most severe injuries caused by accidents for all three route types.

#### **Agency Comments**

We provided a draft of this report to USPS and the agency did not have any comments.

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<sup>16</sup>The category “Other Injury” was among the most common nature of injury reported for foot routes in 2011 and for rural routes in 2010 through 2012.

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We are sending copies of this report to relevant congressional committees, the Postmaster General, and other interested parties. In addition, this report will be made available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-2834 or [stjamesl@gao.gov](mailto:stjamesl@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Additionally, Teresa Anderson, Lorraine Ettaro, Geoffrey Hamilton, Jaclyn Nelson, and Daniel Paepke made key contributions to this report.

Sincerely yours,

A handwritten signature in black ink that reads "Lorelei St. James". The signature is written in a cursive style with a large, stylized initial "L".

Lorelei St. James  
Director, Physical Infrastructure Issues

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