



**Memorandum from the Office of the Inspector General**

September 28, 2020

David L. Bowling, Jr.

**REQUEST FOR FINAL ACTION – AUDIT 2020-15728 – EMERGENCY  
PREPAREDNESS – ACTIVE SHOOTER**

We included an audit of the Tennessee Valley Authority's (TVA) plans for an active shooter incident in our annual audit plan due to the potential risk of an active shooter incident occurring. Our audit objective was to determine if TVA has adequate plans in place to prevent, prepare for, and manage active shooter incidents. The audit scope included all program documentation and records that support TVA's plans to prevent, prepare for, and manage active shooter incidents as of May 13, 2020.

We compared TVA's procedures around preventing, preparing for, and managing active shooter incidents to best practices recommended by the Department of Homeland Security (DHS). DHS best practices include four steps (Connect, Plan, Train, and Report) to apply in advance of an incident or attack. We found TVA has plans in place to prevent, prepare for, and manage active shooter incidents that include steps to address the connecting and planning phases of DHS recommendations to prepare for active shooter incidents. However, we found the training and reporting steps need improvement. Specifically, we found TVA's Active Threat Awareness program training is not mandatory and less than 10 percent of TVA's employees have taken the training. In addition, portions of best practices related to active threat awareness are included in at least ten TVA Standard Programs and Processes (SPP) rather than a single document and are not easily accessible by employees.

We recommend the Vice President, Resource Management and Operations Services:

1. Consider requiring all TVA employees complete TVA's Active Threat Awareness Program training.
2. Provide active threat reference materials in a single, easily accessible document and communicate pertinent information to all employees on a periodic basis in various forms.

TVA management agreed with our recommendations. See the Appendix for TVA management's complete response.

## **BACKGROUND**

The Federal Bureau of Investigation (FBI) defines an active shooter as one or more individuals actively engaged in killing or attempting to kill people in a populated area. According to the FBI, the active aspect of the definition inherently implies that both law enforcement personnel and citizens have the potential to affect the outcome of the incident based upon their responses to the situation.

The FBI designated 28 shootings in the United States in 2019 as active shooter incidents. Of these 28 incidents, 3 occurred in business environments and 4 occurred on government property. According to DHS, individuals must be prepared both mentally and physically to deal with an active shooter situation because they are often over within 10 to 15 minutes and before law enforcement arrives on the scene.

DHS developed the following best practices encouraging businesses to:

- Connect - Reach out and develop relationships in the community, including local law enforcement. Having these relationships established before an incident occurs can help speed up the response when something happens.
- Plan - Take the time now to plan on how to handle a security event should one occur. Learn from other events to inform the plans.
- Train - Provide employees with training resources and exercise the plans often. The best-laid plans must be exercised in order to be effective.
- Report - "If You See Something, Say Something™" is more than just a slogan. Call local law enforcement (which for TVA is the TVA Police and Emergency Management).

According to DHS, applying these four steps in advance of an incident or attack can help better prepare businesses and their employees to think proactively about the role they play in the safety and security of their businesses and communities.

According to TVA Police and Emergency Management (TVAP) personnel, TVA-SPP-14.110, *Active Threat Response Plan* is the primary SPP related to active shooter preparedness. The objective of the SPP is to provide instruction in the event an active threat/active shooter or multiple-active shooters are engaged in killing, or attempting to kill or seriously injure people at a TVA facility. The SPP does not apply to sites where TVA Nuclear Security has jurisdiction.

According to the SPP, if the active threat is in the vicinity, employees should quickly determine the most reasonable way to protect their own life. It states TVA employees and contractors should react by doing the following:

- React - Quickly determine the most reasonable way to protect your own life.
- Run - Have an escape route in mind. Leave your belongings behind. Go to a safe location out of view of the incident site.

- Hide - Hide in an area out of the shooter's view. Block entry to your hiding place and lock the doors. Do not give your position away. Silence your cell phone and turn off lights.
- Fight - Only when your life is in imminent danger, attempt to disrupt and/or incapacitate the active shooter as aggressively as possible.

### **OBJECTIVE, SCOPE, AND METHODOLOGY**

Our audit objective was to determine if TVA has adequate plans in place to prevent, prepare for, and manage active shooter incidents. The audit scope included all program documentation and records that support TVA's plans to prevent, prepare for, and manage active shooter incidents as of May 13, 2020.

To achieve our audit objective, we:

- Interviewed TVAP personnel and reviewed program documentation including the following TVA SPP's to identify procedures related to preventing, preparing for, and managing active shooter incidents:
  - TVA-SPP-14.100, *Workplace Violence Prevention & Prohibited Items*
  - TVA-SPP-14.110, *Active Threat Response Plan*
  - TVA-SPP-14.120, *Insider Threat Program*
  - TVA-SPP-14.310, *Bomb Threat, Sabotage, Vandalism, Terrorism, and Other Security Related Incidents*
  - TVA-SPP-14.350, *Photography and Video Monitoring*
  - TVA-SPP-35.100, *Agency Emergency Response Plan*
  - TVA-SPP-35.200, *Emergency Preparedness Programs*
  - TVA-SPP-35.400, *Continuity of Operations Program*
  - TVA-SPP-35.420, *TVA Business Continuity Program*
  - TVA-SPP-35.500, *TVA Emergency Situational Awareness Program*
- Participated in TVA Employee Active Threat Awareness Program training to gain an understanding of TVA's processes for preparing employees for active shooter incidents.
- Compared TVA's current processes for preventing, preparing for, and managing active shooter incidents to best practices recommended by DHS.
- Obtained listing of all active TVA employees to determine the total number of employees as of January 31, 2020.
- Reviewed TVA Learning Management System training records for the past 5 years to determine how many TVA employees have received Employee Active Threat Awareness Program training.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

## **FINDINGS**

We compared TVA's procedures for preventing, preparing for, and managing active shooter incidents to best practices recommended by DHS. We found TVA has plans in place to prevent, prepare for, and manage active shooter incidents that include steps to address the connecting and planning phases of DHS recommendations. However, we found the training and reporting steps need improvement. In addition, portions of best practices related to active threat awareness are included in at least ten SPPs and are not easily accessible by employees. The following provides a detailed discussion of our findings.

### **TVA ACTIVE THREAT AWARENESS PROGRAM TRAINING IS NOT MANDATORY**

We found that while TVAP's training division has developed an Active Threat Awareness Program training module, this training is not mandatory for TVA employees. We found less than 900 employees (under 10 percent of TVA employees) have taken the Employee Active Threat Awareness Program training as of January 31, 2020. According to DHS, businesses should provide employees with training resources and create a system for reporting signs of potentially violent behavior. The DHS active shooter booklet, *Active Shooter How to Respond*, states, "Intuitive managers and coworkers may notice characteristics of potentially violent behavior in an employee."

When we asked how TVA addresses these best practices, TVAP personnel stated it addressed them (1) by placing "See Something, Say Something signage in facilities throughout the valley," (2) in portions of the Active Threat Awareness Program training module, and (3) in the SPPs listed in the Background section above. However, without proper training, employees are not aware of the indicators of potential violence that should be reported.

### **EMERGENCY PREPAREDNESS INFORMATION IS NOT EASILY ACCESSIBLE**

We found active threat awareness information is not easily accessible by employees. Specifically, we noted portions of best practices related to active threat awareness are included in at least ten SPPs. For instance, TVA-SPP-14.100, *Workplace Violence Prevention & Prohibited Items*, describes warning indicators of potential workplace violence and guidance for reporting these incidents while TVA-SPP-14.310, *Bomb Threat, Sabotage, Vandalism, Terrorism, and Other Security-Related Incidents*, describes the importance of awareness, a questioning attitude, and prompt and accurate reporting. TVA employees would be able to stay better informed, to prepare for, and prevent an active shooter situation if the active threat awareness information was included in a single easily accessible document.

## **RECOMMENDATIONS**

We recommend the Vice President, Resource Management and Operations Services:

1. Consider requiring all TVA employees complete the Active Threat Awareness Program training.
2. Provide active threat reference materials in a single, easily accessible document and communicate pertinent information to all employees on a periodic basis in various forms.

**TVA Management's Comments** – TVA management agreed with our recommendations. See the Appendix for TVA management's complete response.

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Please review this report and notify us when final action is complete. Your written comments, which addressed your management decision and actions planned or taken, have been included in the report. In accordance with the Inspector General Act of 1978, as amended, the Office of the Inspector General is required to report to Congress semiannually regarding audits that remain unresolved after 6 months from the date of report issuance.

If you have any questions or wish to discuss our observations, please contact Michael A. Driver, Audit Manager, at (423) 785-4813 or Rick C. Underwood, Director, Financial and Operational Audits, at (423) 785-4824. We appreciate the courtesy and cooperation received from your staff during the audit.



David P. Wheeler  
Assistant Inspector General  
(Audits and Evaluations)

CWS:FAJ

cc: TVA Board of Directors  
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OIG File No. 2020-15728

September 26, 2020

David P. Wheeler, WT 2C-K

RESPONSE TO REQUEST FOR COMMENTS - DRAFT AUDIT 2020-15728 - EMERGENCY  
PREPAREDNESS - ACTIVE SHOOTER

Our response to your request for comments regarding the subject draft report is attached. Please let us know if your staff has any concerns with TVA's comments.

We would like to thank Michael Driver and Rick Underwood, including the audit team, for their professionalism and cooperation in conducting this audit. If you have any questions, please contact Jack Paul, Sr. Program Manager, Security Compliance.



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Todd Peney  
Director, TVA Police & Emergency  
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OIG File No. 2020-15728

**Audit 2020-15728**  
**Emergency Preparedness - Active Shooter**  
**Response to Request for Comments**

<b>Recommendation</b>	<b>Comments</b>
1. Consider requiring all TVA employees complete the Active Threat Awareness Program training.	Management agrees to look at the feasibility of requiring all TVA employees to complete the Active Threat Awareness Training Program.
2. Provide active threat reference materials in a single, easily accessible document and communicate pertinent information to all employees on a periodic basis in various forms.	Management agrees.