



Memorandum from the Office of the Inspector General

April 17, 2019

Susan E. Collins, LP 6A-C
Jay C. Stowe, BR 4D-C
Jacinda B. Woodward, LP 2K-C

REQUEST FOR FINAL ACTION – EVALUATION 2018-15605 – QUALIFICATIONS FOR SAFETY-SENSITIVE POSITIONS IN POWER OPERATIONS

Attached is the subject final report for your review and final action. Your written comments, which addressed your management decision and actions planned or taken, have been included in the report. Please notify us when final action is complete. 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 evaluations that remain unresolved after 6 months from the date of report issuance.

If you have any questions or wish to discuss our findings, please contact J. Lauren Pionke, Senior Auditor, at (865) 633-7381, or E. David Willis, Director, Evaluations, at (865) 633-7376. We appreciate the courtesy and cooperation received from your staff during the evaluation.

David P. Wheeler
Assistant Inspector General
(Audits and Evaluations)
WT 2C-K

JLP:FAJ
Attachment
cc (Attachment):

TVA Board of Directors
Clifford L. Beach Jr., WT 7B-K
Janet J. Brewer, WT 7C-K
Christopher R. Carlson, LP 3A-C
Allen A. Clare, LP 2K-C
Robertson D. Dickens, WT 9C-K
Kris G. Edmondson, LP 2K-C
Megan T. Flynn, LP 3A-C
Dwain K. Lanier, MR 6D-C

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Justin C. Maierhofer, WT 7B-K
Jill M. Matthews, WT 2C-K
Sherry A. Quirk, WT 7C-K
Ronald R. Sanders II, MR 5E-C
Michael D. Skaggs, WT 7B-K
Rebecca C. Tolene, WT 7B-K
Wilson Taylor III, WT 7D-K
OIG File No. 2018-15605



Office of the Inspector General

Evaluation Report

To the Senior Vice President and Chief Human Resources Officer; Senior Vice President, Resources and Operations Support; and the Senior Vice President, Power Operations

QUALIFICATIONS FOR SAFETY-SENSITIVE POSITIONS IN POWER OPERATIONS

Evaluation Auditor
J. Lauren Pionke

Evaluation 2018-15605
April 17, 2019

ABBREVIATIONS

CC	Combined Cycle
CT	Combustion Turbine
FY	Fiscal Year
HR	Human Resources
LMS	Learning Management System
PO	Power Operations
SPP	Standard Programs and Processes
SVP	Senior Vice President
T&L	Trades and Labor
TVA	Tennessee Valley Authority

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MEMORANDUM DATED APRIL 11, 2019, FROM SUSAN E. COLLINS, JAY C. STOWE, AND JACINDA B. WOODWARD TO DAVID P. WHEELER



Evaluation 2018-15605 – Qualifications for Safety-Sensitive Positions in Power Operations

EXECUTIVE SUMMARY

Why the OIG Did This Evaluation

During fiscal years (FY) 2017 and 2018, The Tennessee Valley Authority (TVA) filled 195 safety-sensitive positions in Power Operations (PO) through promotion or hire. TVA defines safety-sensitive positions as ones “in which the incumbent, as part of his or her normal, regular duties, has the potential to cause immediate serious physical injury or harm to himself or herself or to the health and safety of other TVA employees, contractors, visitors, property, or the general public.”

TVA Standard Programs and Processes 11.2.0, *Filling Vacant Positions*, states, “In filling vacant positions, TVA strives to select the best applicants available based on the merit and efficiency of the applicant and TVA business needs.” According to TVA’s Talent Acquisition department, once the eligibility of the applicants is confirmed, a talent acquisition consultant will review the applicants for minimum qualifications. This is done by comparing the applicant’s resume to the minimum qualifications or requirements listed on the job description. Only the qualified applicants will be sent to the hiring managers for review.

Due to (1) concerns identified during Evaluation 2018-15557, *Paradise Fossil Plant’s Organizational Effectiveness* and (2) the importance of having qualified personnel in safety-sensitive positions, we initiated an evaluation to determine if minimum job requirements for safety-sensitive positions in PO were met at the time of promotion or hire.

What the OIG Found

We reviewed minimum job requirements for 56 of 141ⁱ employees who were hired, rehired, or promoted to safety-sensitive positions in PO during FYs 2017 and 2018. We determined some employees did not meet minimum job requirements for safety-sensitive positions upon hire or promotion. Specifically, we determined 4 employees did not meet one or more of the job requirements related to certifications or experience. In addition, we determined 11 employees in safety-sensitive positions did not meet minimum training requirements listed on the job descriptions to be completed after they were promoted. We also identified an opportunity for improvement regarding documentation of required training.

ⁱ We excluded 54 promotions that had “manager” in the title in order to focus on the positions that have the most safety risk.



Evaluation 2018-15605 – Qualifications for Safety-Sensitive Positions in Power Operations

EXECUTIVE SUMMARY

What the OIG Recommends

We recommend management verify applicants meet minimum job requirements, develop training plans, verify training is assigned and completed, and document completion of required training. Our detailed recommendations are listed in the body of this report.

TVA Management's Comments

In response to our draft report, TVA management provided planned actions to address the recommendations. See the Appendix for management's complete response.

Auditor's Response

We concur with TVA's managements planned actions.

BACKGROUND

The Tennessee Valley Authority (TVA) defines safety-sensitive positions as ones “in which the incumbent, as part of his or her normal, regular duties, has the potential to cause immediate serious physical injury or harm to himself or herself or to the health and safety of other TVA employees, contractors, visitors, property, or the general public.” TVA has about 1,200 nonnuclear, safety-sensitive job codes. As of September 30, 2018, there were 1,763 Power Operations (PO) employees in safety-sensitive positions. TVA filled 195 safety-sensitive positions in PO through promotions or hires during fiscal years (FY) 2017 and 2018.

TVA Standard Programs and Processes (SPP) 11.2.0, *Filling Vacant Positions*, states, “In filling vacant positions, TVA strives to select the best applicants available based on the merit and efficiency of the applicant and TVA business needs.” According to the SPP, TVA is committed to (1) making personnel selections that ensure a competent and diverse workforce; (2) fairness in selection; and (3) compliance with federal laws, negotiated agreements with employee unions and organizations, and TVA requirements. The SPP requires the Talent Acquisition and Diversity organization to (1) ensure all federal laws, negotiated agreements with employee unions, and TVA requirements are met when hiring internal and external applicants; (2) post vacancies and review internal and external applicants to ensure they meet all applicable requirements and policies; and (3) route the most qualified applicants to the hiring manager for review and possible selection for interviews. According to Talent Acquisition, once the eligibility of the applicants is confirmed, a Talent Acquisition consultant reviews the applicants for minimum qualifications by comparing the applicant’s resume to the minimum qualifications or requirements listed on the job description and sends qualified applicants to the hiring managers for review.

According to the SPP, managers, in partnership with the Human Resources (HR) generalist and HR’s compensation staff, develop job descriptions including duties of the position and qualifications. According to compensation personnel, trades and labor (T&L) job descriptions are negotiated with the unions. The general agreement between TVA and the T&L council states, “Insofar as the needs of the service can be met, positions are filled by qualified annual employees in the classification and competitive area¹ of the position being filled, giving preference in accordance with length of TVA service.” It also states, “TVA selects from among applicants and shall be the sole judge of all applicants’ qualifications.”

Due to (1) concerns identified during Evaluation 2018-15557, *Paradise Fossil Plant’s Organizational Effectiveness* and (2) the importance of having qualified personnel in safety-sensitive positions, we initiated an evaluation to determine if minimum job requirements for safety-sensitive positions in PO were met at the time of promotion or hire.

¹ T&L positions are assigned to classes on the basis of established classification standards. Where such standards are not clearly defined, positions are classified on the basis of comparable duties and responsibilities and related qualification requirements. Depending on the T&L position, competitive area could be defined as specific to site or organization.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of our review was to determine if current employees in PO safety-sensitive positions met the minimum job requirements when they were promoted or hired. We limited our scope to include PO employees as of September 30, 2018, who were promoted or hired into PO safety-sensitive positions in FYs 2017 and 2018. To achieve our objective, we:

- Reviewed TVA-SPP-11.2.0, *Filling Vacant Positions*, and other related documentation to gain an understanding of TVA's process for filling vacant positions and how minimum job requirements are determined and verified.
- Identified safety-sensitive positions using TVA's HR system.
- Interviewed TVA personnel in PO, HR Business Partnerships, Compensation, Talent Acquisition, and Technical Training to gain an understanding of how minimum job requirements are determined, reviewed, and/or waived.
- Reviewed job postings, training plans, training assignments, and other related documentation to determine minimum job requirements for each position.
- Reviewed resumes, TVA's Learning Management System (LMS) training records, TVA's HR system records, selection matrices, and other related documentation for 56 of 141 hires, rehires, and selections for higher grade positions (promotions) to determine if minimum job requirements were met upon promotion or hire for PO safety-sensitive positions in FYs 2017 and 2018.
 - Hires – We selected all 16 employees who were hired into new positions.
 - Rehires – We selected the 2 employees who were rehired.
 - Promotions – We statistically selected 38 of 123² employees who were promoted using rate of occurrence estimation sampling with a 95 percent confidence level. We did not project the results of our statistical sample.

This evaluation was performed in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

FINDINGS

We reviewed minimum job requirements for 56 of 141 employees who were hired, rehired, or promoted to safety-sensitive positions in PO during FYs 2017 and 2018. We determined some employees did not meet minimum job requirements for safety-sensitive positions upon hire or promotion. Specifically, we determined 4 employees did not meet one or more of the job requirements related to certifications or experience. In addition, we determined 11 employees in safety-sensitive positions did not meet minimum training requirements listed on the job

² There were 177 promotions; however, we decided to exclude 54 that had "manager" in the title from possible sample selection in order to focus on the positions that have the most safety risk.

descriptions to be completed after they were promoted. We also identified an opportunity for improvement regarding documentation of required training.

SOME EMPLOYEES DID NOT MEET MINIMUM JOB REQUIREMENTS WHEN HIRED OR PROMOTED

Our review of 56 PO employees who were hired, rehired, or promoted to safety-sensitive positions in FYs 2017 and 2018 found there were 3 new hires and 1 individual promoted that did not meet one or more minimum job requirements.³ The 4 employees did not meet minimum job requirements related to certifications or experience.

Certification-Related Minimum Job Requirements Were Not Met

We determined not all certification requirements for a safety-sensitive position, analyst, technical services (PO) – B, were met for 3 hires. The minimum job requirements for the senior (B) level position included certifications in several maintenance technologies. Three individuals were hired for this position even though they did not meet all of the certification requirements. The job postings for the vacancies allowed the positions to be filled at a lower (A) level which did not require the certifications. After discussion with TVA personnel, they agreed the individuals were incorrectly hired at the B level.

Related-Experience Minimum Job Requirements Were Not Met

We determined the minimum job requirements for a safety-sensitive position, conveyor car dumper operator, were not met for an employee who was promoted. Specifically, it does not appear the individual promoted had any prior related operating experience or associated training with the equipment, as required. According to Talent Acquisition personnel, the promotion was made in accordance with the union agreement. The union agreement states “positions are filled by qualified annual employees in the classification and competitive area of the position being filled.” However, in this instance, the employee did not meet the minimum qualifications related to job experience.

As stated previously, Talent Acquisition consultants are responsible for screening all applicants to verify they meet minimum qualifications listed on job descriptions. However, since the employee did not meet the job experience requirements, we determined Talent Acquisition should not have sent the applicant to the hiring manager for review.

SOME EMPLOYEES DID NOT MEET MINIMUM TRAINING REQUIREMENTS AFTER PROMOTION

Our review of 56 PO employees who were hired, rehired, or promoted to safety-sensitive positions in FYs 2017 and 2018 found there were 11 employees who did

³ There were 4 other employees, as discussed later in the report, where we could not verify a minimum job requirement related to training was met due to incomplete or inaccurate recording; however, TVA personnel stated all required training was completed.

not meet one or more training requirements listed on the job descriptions to be completed after they were promoted.

For 7 employees, the job descriptions indicated successful completion of fully qualified training plans in relation to the position was required. There were 4 positions with this minimum requirement, including:

- Combustion turbine (CT) maintenance coordinator
- Coal operations maintenance coordinator
- Maintenance supervisor (PO)
- Lead shift operations supervisor (PO)

TVA personnel provided related documentation for the 4 positions; however, one was a draft document titled, “Initial Training for FPG [Fossil Power Group] Maintenance Supervisors and Coordinators,” which TVA stated was never initiated, and one procedure, “Lead Shift Operations Supervisor and Shift Operations Supervisor Training,” which TVA stated was never utilized and was ultimately canceled. Therefore, we determined applicable training plans specified in the job descriptions were never formally implemented for any of the 4 positions, and, as a result, the 7 employees could not complete the required training after they were promoted into these positions.

In addition, we identified 4 employees who did not complete all of the required training after they were promoted for 2 positions—combined cycle (CC) lead operations technician and CT site foreman. For example, one of the minimum job requirements for the CC lead operations technician position indicated employees must maintain any training related to the emergency liaison role, and we found 3 employees who had not completed all emergency liaison training.

OPPORTUNITY FOR IMPROVEMENT RELATED TO TRAINING DOCUMENTATION

We identified an opportunity for improvement regarding the documentation of training to meet minimum job requirements. TVA training personnel were unable to provide documentation that 14 of 56 employees had completed necessary prerequisites and/or accrediting exams. The training documentation issues were related to the following:

- Unit Operator – TVA could not provide support that 6 employees completed all prerequisites or phases required by the assistant unit operators to unit operators upgrade training program. The training program appendix detailed a five-phase process for the training program. We were able to verify completion of some of the phases in LMS for each employee, including the final phase, but were unable to verify completion of all phases.
- CC Lead Operations Technician - TVA could not provide support that 7 employees completed all prerequisites and/or accrediting exams for the CC

or CT technician training program. TVA training personnel provided a list of LMS numbers for the CC and CT training program since the associated appendix did not specify the course numbers. We determined all 7 employees were missing support of completion of several prerequisites. In addition, 2 of 7 employees were missing support of the accrediting exams, and 2 showed completion of the wrong accrediting exams in LMS.

- CT Site Foreman - TVA could not provide support that an employee completed several prerequisites in the CT technician training program.

TVA training personnel stated all required training was completed but was not properly recorded in LMS. TVA training personnel believed the training was completed because accrediting exams cannot be taken prior to completion of all prerequisites; however, there was no documentation verifying the training was completed.

RECOMMENDATIONS

We recommend the Senior Vice President (SVP) and Chief Human Resources Officer:

- Verify applicants meet minimum job requirements or document why minimum job requirements were waived.

We recommend the SVP, Resources and Operations Support:

- Verify all required training in association with minimum job requirements is assigned.
- Document completion of all required training in LMS.

We recommend the SVP, PO:

- Develop training plans in order to meet the minimum job requirements listed on the job descriptions or reevaluate the minimum job requirements.
- Verify all required training in association with minimum job requirements is completed.
- Verify all accrediting exams have been completed in accordance with the training programs assigned.

TVA Management's Comments – In response to our draft report, TVA management provided planned actions to address the recommendations. These actions include:

- Reviewing all applicants for the selection process and verifying the minimum job requirements are met and documented.

- Reevaluating the minimum job requirements listed on job descriptions to determine the need for training plans relevant to the position and ensure that the appropriate curriculum for required training programs is assigned.
- Reviewing all joint training programs to ensure each phase has an LMS course number and is assigned to trainees entering the programs.
- Evaluating training plans to ensure the curriculum is relative to the position, updated as needed, and training plans are aligned to the appropriate job descriptions.
- Reviewing/verifying the completion of current training requirements for existing safety-sensitive positions and establishing a periodic reporting structure for PO leadership.
- Completing a review of training records of employees in the identified safety-sensitive population.

See the Appendix for management's complete response.

Auditor's Response – We concur with TVA management's planned actions.

April 11, 2019

David P. Wheeler, WT 2C-K

MANAGEMENT RESPONSE – DRAFT EVALUATION 2018-15605 – QUALIFICATIONS FOR
SAFETY-SENSITIVE POSITIONS IN POWER OPERATIONS

This is in response to your memorandum dated March 12, 2019. First, let me thank your team for the professional manner in which this audit was conducted. After review of the draft evaluation, please see the following response to the recommendations regarding Qualifications for Safety-Sensitive Positions in Power Operations.

RECOMMENDATIONS

We recommend the Senior Vice President (SVP) and Chief Human Resources Officer:

- Verify applicants meet minimum job requirements or document why minimum job requirements were waived.

Response

CHRO Organization is committed to ensuring a thorough review of all applicants for the selection process. During the applicant review process CHRO Organization will ensure verification that the minimum job requirements are met and documented in the requisition folder.

Owner: Erin Washington, CHRO

Due Date: 4/30/19

We recommend the SVP, Resources and Operations Support:

- Verify all required training in association with minimum job requirements is assigned.

Response

Resources & Operations Support acknowledges the importance of assigning required training that meets the minimum job requirements. Resources & Operations Support will collaborate with Power Operations and Human Resources to re-evaluate the minimum job requirements listed on job descriptions to determine the need for training plans and, if needed, are relevant to the position. Resources & Operations Support will then review all of the programs and ensure that the appropriate curriculum for required training programs is assigned.

Owner: Byron Jefferson, Resources & Operations Support

Due Date: 5/31/2019

- Document completion of all required training in LMS.

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Response

Resources & Operations Support acknowledges that training documentation for phase completions in some joint training programs has been inconsistent in the past. Resources & Operations Support will review all of the programs to ensure that each phase has an LMS course number associated with it. Each phase shall then be assigned to the appropriate curriculum and the curriculum shall be assigned to trainees entering these programs.

Owner: Byron Jefferson, Resources & Operations Support
Due Date: 5/31/2019

We recommend the SVP, Power Operations:

- Develop training plans in order to meet the minimum job requirements listed on the job descriptions or re-evaluate the minimum job requirements.

Response

Resources & Operations Support and Power Operations acknowledges the importance of ensuring that an accurate training plan aligns to the job function. Power Operations will collaborate with Resources & Operations Support to evaluate training plans to ensure that curriculum is relative to the position. Once training plans have been evaluated and updated as needed, Resources & Operations Support and Power Operations will collaborate with Human Resources to align training plans to the appropriate job descriptions.

Owner: Linda Taite, Power Operations
Due Date: 12/20/2019

- Verify all required training in association with minimum job requirements is completed.

Response

Power Operations is committed to ensuring that employees are compliant with training requirements. Power Operations will collaborate with Resources & Operations Support to review/verify the completion of current training requirements for existing safety-sensitive positions. Going forward, Power Operations will establish a periodic reporting structure that will provide leadership with status of training for safety-sensitive positions in Power Operations.

Owner: Linda Taite, Power Operations
Due Date: 12/20/2019

- Verify all accrediting exams have been completed in accordance with the training program assigned.

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Response

Power Operations recognizes the importance of accurate documentation of accrediting exams. Resources & Operations Support will complete a review of training records of employees in the identified safety-sensitive population.
Owner: Byron Jefferson, Resources & Operations Support
Due Date: 4/30/2019

Thank you for allowing us to provide these comments. If you need additional information, please let us know.



Susan E. Collins
Senior Vice President and
Chief Human Resources Officer
LP 6A-C



Jay C. Stowe
Senior Vice President
Resources & Operations Support
BR 4D-C



Jacinda B. Woodward
Senior Vice President
Power Operations
LP 2K-C

AAC:WHR:ALH

cc: Clifford L. Beach, Jr., WT 6A-K
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