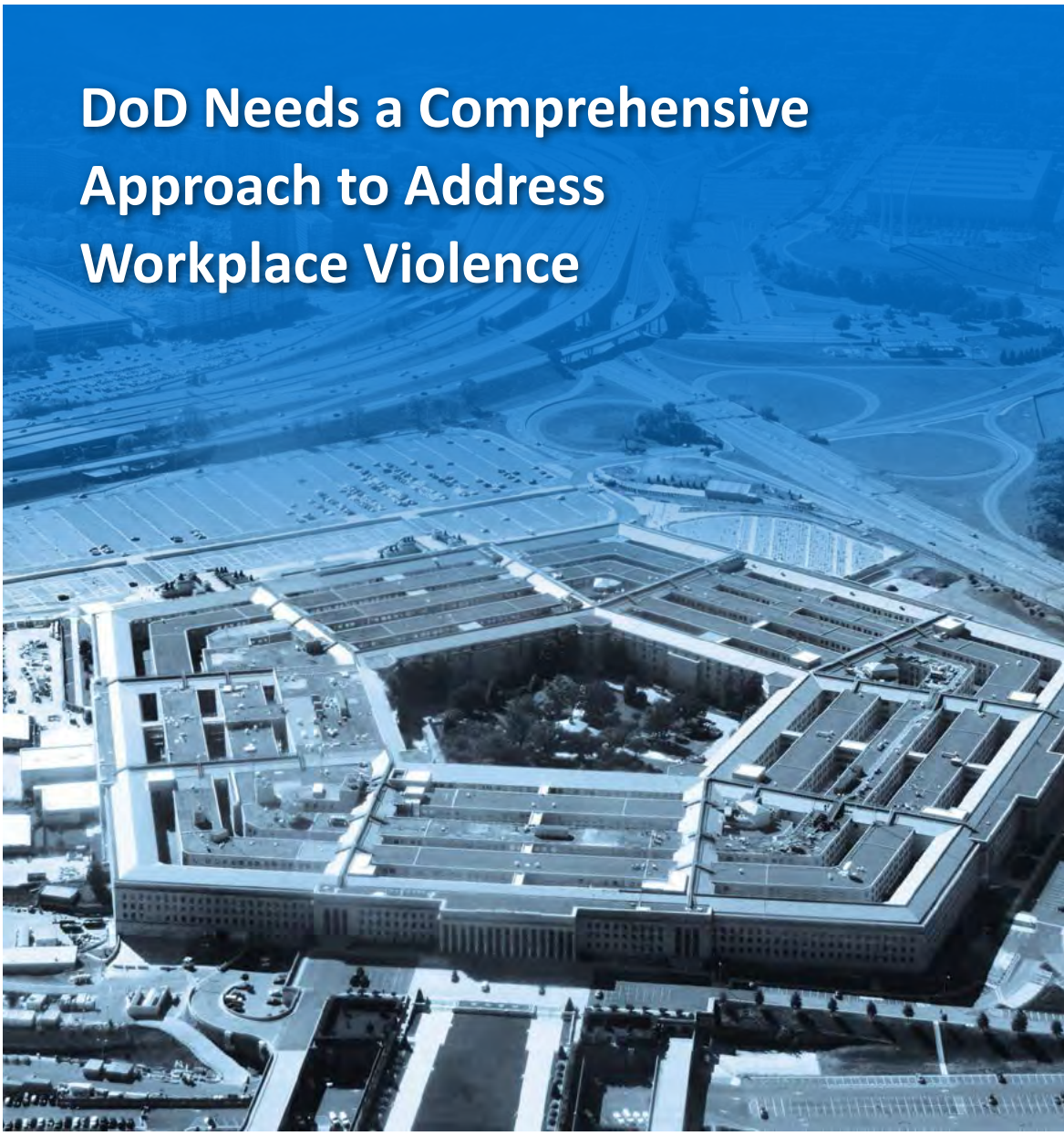
Report No. DODIG-2016-002

INSPECTOR GENERAL

U.S. Department of Defense

OCTOBER 15, 2015

DoD Needs a Comprehensive Approach to Address Workplace Violence



INTEGRITY ★ EFFICIENCY ★ ACCOUNTABILITY ★ EXCELLENCE

INTEGRITY ★ EFFICIENCY ★ ACCOUNTABILITY ★ EXCELLENCE

Mission

Our mission is to provide independent, relevant, and timely oversight of the Department of Defense that supports the warfighter; promotes accountability, integrity, and efficiency; advises the Secretary of Defense and Congress; and informs the public.

Vision

Our vision is to be a model oversight organization in the Federal Government by leading change, speaking truth, and promoting excellence—a diverse organization, working together as one professional team, recognized as leaders in our field.

For more information about whistleblower protection, please see the inside back cover.

Results in Brief

DoD Needs a Comprehensive Approach to Address Workplace Violence

October 15, 2015

Objective

We determined whether DoD was effectively implementing programs to address workplace violence threats and incidents.

Finding

DoD did not have a comprehensive DoD-wide program to address workplace violence threats and incidents. Specifically, DoD has not developed a workplace violence prevention and response program for the entire DoD workforce (military, civilian, and contractor personnel). In the absence of a comprehensive DoD-wide workplace violence program, the Services and the Defense Threat Reduction Agency used different approaches to address workplace violence.

This occurred because DoD:

- implemented the Secretary of Defense's August 2010 final direction, while the Services and the Defense Threat Reduction Agency implemented the Fort Hood review board's recommendations, and
- did not exercise sufficient oversight to ensure that the Fort Hood and Defense Science Board report recommendations were properly addressed and closed.

As a result, military personnel, DoD civilian employees, and contractors were not equally prepared to prevent and respond to an act of workplace violence, which could jeopardize their safety during a threat or incident.

Visit us at www.dodig.mil

Recommendations

Among other recommendations, we recommend that the Assistant Secretary of Defense for Homeland Defense and Global Security review and analyze the Fort Hood and Defense Science Board recommendations and the concurrent internal reviews conducted by the Military Departments, Combatant Commands, and DoD Components to:

- verify that existing policies and procedures have addressed identified gaps and deficiencies; identify systemic issues not addressed; and identify opportunities for streamlining processes and eliminating redundancies; and
- develop and execute an implementation plan to close existing gaps and deficiencies through cross-functional coordination with DoD Components; employ corrective action to remedy systemic issues identified; streamline processes and eliminate redundancies; and provide completion dates for any outstanding recommendations.

Management Comments and Our Response

The Acting Assistant Secretary of Defense for Homeland Defense and Global Security provided comments on the report but did not address Recommendation 1.a or 1.b. The Acting Under Secretary of Defense for Personnel and Readiness provided comments on the report but did not address Recommendation 2. Comments from the Director, Defense Procurement and Acquisition Policy partially addressed Recommendation 3. As a result of management comments, we renumbered Recommendation 2 as Recommendation 2.a, added Recommendation 2.b, and revised Recommendation 3. Therefore, we request the Acting Under Secretary of Defense for Personnel and Readiness, Acting Assistant Secretary of Defense for Homeland Defense and Global Security, and Director, Defense Procurement and Acquisition Policy provide additional comments on the recommendations by November 16, 2015. Please see the Recommendations Table on the back of this page.

Recommendations Table

Management	Recommendations Requiring Comment	No Additional Comments Required
Under Secretary of Defense for Personnel and Readiness	2.a, 2.b	
Assistant Secretary of Defense for Homeland Defense and Global Security	1.a, 1.b	
Director, Defense Procurement and Acquisition Policy	3	

Please provide Management Comments by November 16, 2015.

INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
4800 MARK CENTER DRIVE
ALEXANDRIA, VIRGINIA 22350-1500

October 15, 2015

MEMORANDUM FOR ACTING UNDER SECRETARY OF DEFENSE FOR PERSONNEL AND READINESS
ACTING ASSISTANT SECRETARY OF DEFENSE FOR HOMELAND DEFENSE
AND GLOBAL SECURITY
DIRECTOR, DEFENSE PROCUREMENT AND ACQUISITION POLICY

SUBJECT: DoD Needs a Comprehensive Approach to Address Workplace Violence
(Report No. DODIG-2016-002)

We are providing this report for review and comment. DoD did not have a comprehensive DoD-wide program to address workplace violence threats and incidents. In the absence of a comprehensive program, the Services and the Defense Threat Reduction Agency used different approaches to address workplace violence. As a result, military personnel, DoD civilian employees, and contractors were not equally prepared to prevent and respond to workplace violence. Although the information we analyzed was from January 2010 through March 2015, the deficiencies we identified still existed as of July 2015 and corrective actions are still needed. We conducted this audit in accordance with generally accepted government auditing standards.

We considered management comments on a draft of this report when preparing the final report. DoD Instruction 7650.03 requires that recommendations be resolved promptly. The Acting Under Secretary of Defense for Personnel and Readiness and the Acting Assistant Secretary of Defense for Homeland Defense and Global Security did not comment on the recommendations. Based on comments from the Director, Defense Procurement and Acquisition Policy, we renumbered Recommendation 2 as Recommendation 2.a, added Recommendation 2.b, and revised Recommendation 3. Therefore, we request the Acting Under Secretary of Defense for Personnel and Readiness, Acting Assistant Secretary of Defense for Homeland Defense and Global Security, and the Director, Defense Procurement and Acquisition Policy provide comments on the report by November 16, 2015.

Please provide comments that state whether you agree or disagree with the finding and recommendations. If you agree with our recommendations, describe what actions you have taken or plan to take to accomplish the recommendations and include the completion dates of your actions. If you disagree with the recommendations or any part of them, please give specific reasons why you disagree and propose alternative action if that is appropriate.

Please send a PDF file containing your comments to audrco@dodig.mil. Copies of your comments must have the actual signature of the authorizing official for your organization. We cannot accept the /Signed/ symbol in place of the actual signature. If you arrange to send classified comments electronically, you must send them over the SECRET Internet Protocol Router Network (SIPRNET).

We appreciate the courtesies extended to the staff. Please direct questions to me at (703) 699-7331 (DSN 499-7331).

Carol N. Gorman
Assistant Inspector General
Readiness and Cyber Operations

Contents

Contents (cont'd)

Management Comments


INSPECTOR GENERAL
INTEGRITY
EFFICIENCY
DEPARTMENT OF DEFENSE

Introduction

Objective

Our objective was to determine whether DoD was effectively implementing programs to address workplace violence threats and incidents. See Appendix A for the scope and methodology and prior audit coverage related to the objective.

Background

Workplace violence threats and incidents include a wide range of behaviors from the less severe, such as verbal abuse, to the most extreme acts of violence, such as an active shooter. See Appendix B for a listing of workplace violence severity levels. According to the DoD Defense Civilian Personnel Advisory Service (DCPAS),[1] there are a variety of causes that may trigger a workplace violence incident, such as:

- anger over disciplinary actions or the loss of a job,
- hate incidents or crimes,
- domestic violence, and
- road rage.

The DoD community is not immune to the most extreme acts of violence, as shown in Appendix C. For example, on November 5, 2009, an Army psychiatrist at Fort Hood, Texas, shot and killed 13 people and wounded an additional 43. Although this act was subsequently designated as an act of terrorism in February 2015, in the initial November 2009 response to the shooting, the Secretary of Defense directed the first of a series of reviews to determine whether there were program, policy, or procedural weaknesses within DoD that created vulnerabilities to the health and safety of DoD employees and their families.

Fort Hood Review and Actions Taken

In January 2010, the Fort Hood review board issued, "Protecting the Force: Lessons from Fort Hood," (the Fort Hood report)[2] detailing its findings and recommendations. The report contained 41 findings and 79 recommendations. Finding 2.6 specifically addressed DoD's lack of comprehensive guidance on workplace violence and recommended that DoD revise its policies and procedures to address the prevention and response to workplace violence incidents. The Fort Hood report included several other workplace violence related findings and recommendations. See Appendix D for a listing of those findings and recommendations.

[1] DCPAS is a component of the Office of the Under Secretary of Defense for Personnel and Readiness.

[2] The Fort Hood report was limited to programs, policies, or procedures related to military personnel and DoD civilian employees; it did not address DoD contractors who had access to or work at DoD-controlled locations.

On January 29, 2010, in response to the Fort Hood report, the Secretary of Defense directed the Assistant Secretary of Defense for Homeland Defense and Global Security (ASD[HD&GS])[3] to lead a follow-on review to assess the implementation of the report's 79 recommendations. The Secretary also directed the Secretaries of the Military Departments, the Combatant Commanders, and other DoD Component leaders (referred to collectively in this report as the "DoD Components") to conduct concurrent internal reviews in support of the follow-on review. The purpose of the DoD Component reviews was to assess each component's ability to identify internal threats, force protection, and emergency response programs, policies, and procedures below the headquarters level.

On April 12, 2010, the Secretary of Defense issued a memorandum "Interim Recommendations of the Fort Hood Follow-on Review." In the memorandum, the Secretary directed ASD(HD&GS) to ensure that the recommendations from the follow-on and DoD Component reviews were properly implemented. According to the memorandum, the ASD(HD&GS) was required to provide the Secretary of Defense with routine implementation progress reports until the ASD(HD&GS) concluded that implementation of each recommendation was sufficiently underway and did not require further monitoring.

On August 18, 2010, the Secretary of Defense issued a memorandum "Final Recommendations of the Fort Hood Follow-on Review," which contained direction to the Department concerning the Fort Hood report's 79 recommendations. In the memorandum, the Secretary expressed the need for DoD to review its approach to force protection and broaden force protection policies, programs, and procedures to go beyond their traditional focus on hostile external threats. The Secretary also directed the Defense Science Board (DSB) to conduct a study to identify behavioral indicators of violence and radicalization (extremist views), develop methods to assess threats, and investigate optimal training delivery methods for insider threats.

DSB Review and Actions Taken

In August 2012, DSB issued "Task Force Report: Predicting Violent Behavior," containing recommendations that specifically addressed targeted violence.[4] Although the report title implied that violent behavior could be predicted, the task force concluded that "prevention" of violent behavior, as opposed to prediction, should be DoD's goal. Therefore, the task force recommended a near-term focus

[3] The position was previously titled the Assistant Secretary of Defense for Homeland Defense and Americas' Security Affairs.

[4] The DSB report describes that individuals engaged in "targeted violence" consider, plan, and prepare before engaging in acts of violence against specific individuals, populations, or facilities, with perpetrators engaging in behaviors that precede and are related to their attacks.

to establish Threat Management Units (TMU)[5] to provide an assessment and management of criminal and other concerning behaviors. Those behaviors include workplace violence, stalking, and threatening communications. See Appendix E for a listing of the recommendations related to workplace violence.

On March 26, 2013, in response to the DSB report, the Secretary of Defense issued a memorandum "Final Recommendations of the Defense Science Board Report on Predicting Violent Behavior." In the memorandum, the Secretary directed DoD to implement, no later than October 2013, a TMU-like capability and establish policy that required DoD Components to develop or maintain a threat management capability. By March 2014, DoD Components were to establish implementing guidance for their organizations. The memorandum also required DoD to establish minimum policy requirements and provide oversight of DoD's threat management capabilities.

ASD(HD&GS) Oversight and Implementation Strategy

In February 2010, the ASD(HD&GS) established the Fort Hood Senior Steering Group (SSG)[6] to provide oversight of the follow-on review. In his August 18, 2010, memorandum, the Secretary of Defense directed the ASD(HD&GS) to monitor the implementation of the Fort Hood report recommendations. The ASD(HD&GS) established the Force Protection (FP) SSG on December 3, 2010, to address concerns related to force protection, insider threat, and law enforcement activities. One of the FP SSG's responsibilities was to coordinate and oversee DoD-wide initiatives so that threats to DoD information and resources posed by an insider were identified and neutralized.

The FP SSG established the Insider Threat Working Group to examine threats within the areas of antiterrorism, information assurance, information and personnel security, and counterintelligence. The Insider Threat Working Group was required to examine insider threats from three perspectives:

1. workplace violence,
2. terrorism, and
3. security threats.

FP SSG members were also required to monitor and report on the status of the Fort Hood report's open recommendations.

[5] The DSB report defines a TMU as a cross-functional, multi-disciplinary team approach to assist in the assessment of threatening situations and development of plans that minimize the potential risk of violence. Team members should have professional competence in law enforcement; risk assessment; clinical, medical, and psychological expertise; and social and behavioral training.

[6] According to an Under Secretary of Defense for Policy representative, the Fort Hood SSG was later disestablished with all open Fort Hood review board recommendations transitioning to the Force Protection SSG.

On March 1, 2013, the FP SSG was disestablished and all responsibility to monitor the remaining Fort Hood recommendations transitioned to the Mission Assurance (MA) SSG. The MA SSG established the following five working groups at its inaugural meeting on March 28, 2013, to address the tasks under its authority:

- Insider Threat,
- Fort Hood,[7]
- Assessment,
- Risk Management, and
- MA Strategy Implementation Framework.

Review of Internal Controls

DoD Instruction 5010.40[8] requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified weaknesses over DoD's development and implementation of a comprehensive DoD-wide program to address workplace violence threats and incidents. In the absence of a comprehensive DoD-wide workplace violence program, the Services and the Defense Threat Reduction Agency (DTRA) used different approaches to address the prevention and response to workplace violence threats and incidents. We will provide a copy of the report to the senior officials responsible for internal controls at the Office of the Under Secretary of Defense for Personnel and Readiness, the Office of the Assistant Secretary of Defense for Homeland Defense and Global Security, and Defense Procurement and Acquisition Policy.

[7] The MA Fort Hood Working Group was tasked to monitor and oversee completion of the open recommendations of the Fort Hood and DSB reports. As of July 2015, the MA Fort Hood Working Group continues to meet monthly.

[8] DoD Instruction 5010.40, "Managers' Internal Control Program Procedures," May 30, 2013.

Finding

DoD Lacked a Comprehensive Workplace Violence Prevention and Response Program

DoD did not have a comprehensive DoD-wide program to address workplace violence threats and incidents. Specifically, DoD has not developed a workplace violence prevention and response program for the entire DoD workforce (military, civilian, and contractor personnel). In the absence of a comprehensive DoD-wide workplace violence prevention and response program, the Services and DTRA used different approaches to address workplace violence threats and incidents. This occurred because DoD:

- implemented the Secretary of Defense's August 2010 final direction, while the Services and DTRA implemented the Fort Hood review board's recommendations, and
- did not exercise sufficient oversight to ensure that the Fort Hood and DSB report recommendations were properly addressed and closed.

As a result, military personnel, DoD civilian employees, and contractors were not equally prepared to prevent and respond to an act of workplace violence, which could jeopardize their safety during a workplace violence threat or incident.

Workplace Violence Prevention and Response Program Was Not Comprehensive

DoD did not develop or implement a comprehensive DoD-wide program to address workplace violence threats and incidents as recommended by the Fort Hood review board. However, DoD issued workplace violence prevention and response guidance in May 2012[9] and January 2014.[10] This guidance applies only to DoD civilians, not military personnel or contractor employees who work on DoD installations. DoD also issued guidance in September 2014[11] to assist the DoD Components in addressing insider threats, including workplace violence.

[9] DCPAS Guide, "Workplace Violence Prevention and Response," May 2012.

[10] DoD Instruction 1438.06, "DoD Workplace Violence Prevention and Response Policy," January 16, 2014. The DoD Instruction defines workplace violence as, "any act of violent behavior, threats of physical violence, harassment, intimidation, bullying, verbal or non-verbal threat, or other threatening, disruptive behavior that occurs at or outside the work site."

[11] DoD Directive 5205.16, "The DoD Insider Threat Program," September 30, 2014.

In an effort to broaden the applicability of DoD Instruction (DoDI) 1438.06, the Acting Under Secretary of Defense for Personnel and Readiness (USD[P&R]) prepared and signed, "Department of Defense Workplace Policies," on April 11, 2014, which states that all DoD individuals "deserve and should expect workplace conditions that are free from unacceptable conduct such as violence (including sexual assault), threats of violence, harassment, intimidation, and other unacceptable behavior." According to USD(P&R) personnel, although signed, the memorandum was not released because of the workplace violence incident that happened in April 2014. As of July 2015, USD(P&R) had not distributed the memorandum.

Even if the memorandum is released, DoDI 1438.06 will still not apply to all DoD personnel because the DoDI referenced and incorporated the use of the Interagency Security Committee (ISC) publication, "Violence in the Federal Workplace: A Guide for Prevention and Response." The ISC guide assists Federal agencies in developing and implementing agency-specific workplace violence prevention programs. The ISC guide is intended for facilities in the United States occupied by Federal employees for nonmilitary activities.

In addition to the guidance issued by USD(P&R), the Under Secretary of Defense for Intelligence (USD[I]) issued DoD Directive (DoDD) 5205.16. One of the purposes listed in the Directive is to ensure that appropriate DoD policies, including workplace violence policies, are evaluated and modified to effectively address insider threats to DoD. The Directive states that information derived from workplace violence acts will be used to identify, minimize, and counter insider threats. However, the Directive does not specify how this will be accomplished, especially when a comprehensive DoD-wide policy or program on workplace violence does not exist.

Approach to Addressing Workplace Violence Policy Gaps Varied by Component

In the absence of a comprehensive DoD-wide workplace violence prevention and response program, the Services and DTRA used different approaches to identify and address policy gaps. Specifically, the Marine Corps developed and implemented a Service-wide violence prevention and response program. The Army, Navy, and Air Force updated or developed guidance that discussed or addressed aspects of workplace violence. Although DTRA issued a memorandum stating it would focus on ways to address various threats, DTRA had not issued guidance specifically addressing workplace violence. See Appendix F for a list of Service and DTRA guidance relating to the prevention and response to workplace violence threats or incidents.

Marine Corps

In response to the Fort Hood report, the Marine Corps issued Marine Corps Order (MCO) 5580.3, "Violence Prevention Program," on December 1, 2012. MCO 5580.3 establishes Marine Corps policy concerning workplace violence prevention and response and includes roles and responsibilities, training and reporting requirements, and response strategies for when a workplace violence incident is reported.

According to the MCO, the violence prevention program's purpose is to protect Marines, other military personnel, civilian employees, family members, contractors, customers, and visitors from any act of physical violence against persons or property, physical or verbal threats, intimidation, harassment, or other inappropriate, disruptive behavior that causes fear for personal safety at or outside the work site.

The MCO provides guidance to identify warning signs and indicators of potential violence. The MCO establishes training requirements to increase awareness of concerning behaviors, prevention tools, and response techniques. Five training courses are offered to different target audiences so participants can learn their specific roles in preventing violence. Although the course materials vary their focus on audience roles and responsibilities, the five courses contain basic concepts such as:

- definitions of what violence is and is not,
- warning signs and indicators of potential violence, and
- how to react if involved in a violent incident.

The MCO requires Marine Corps personnel to timely report warning signs and indicators of potential violence to their chain of command or appropriate supervisor, contractor representative, or anonymously through the installation Inspector General hotline, Eagle Eyes program,[12] or Naval Criminal Investigative Service Text Tip hotline. Once a threat or incident is reported, subject matter experts assess the concerning behavior and, if necessary, develop and implement intervention strategies to de-escalate the potential of a violent act occurring.

The MCO requires commanders to maintain a Force Preservation Council to implement the program at the unit level and coordinate with subject matter experts during initial inquiries and threat assessments. The Force Preservation Council gathers information and develops preventive courses of action to assist commanders and leaders in their decision-making process.

[12] The Eagle Eyes program, launched in 2004, is a hotline for anyone in the military community to report and raise awareness of suspicious activity.

Army

In response to the Fort Hood report, the Army agreed to develop interim guidance for behavioral indicators of violence until DoD developed an overall workplace violence prevention policy. The Army also agreed to provide a workplace violence training program for civilians by March 2011. In April 2011[13] and October 2013[14] the Army issued interim memorandums that addressed workplace violence. The April 2011 memorandum directed Army leaders to update local training programs and reporting requirements to address behaviors that can lead to violence. The October 2013 memorandum was effective until May 2014 and directed Army leaders to:

- become familiar with the indicators of potential violence,
- ensure their personnel completed training modules on workplace violence,
- use appropriate actions to address the behaviors whether the individual was military, civilian, or a contractor,
- ensure that any suspicious behavior was reported to local law enforcement, and
- ensure that installation emergency action plans were updated to cover all aspects of response to a violent incident.

The Army also revised existing policies and developed new policies to address extreme acts of workplace violence. The policies related to law enforcement, human resources, security, and counterintelligence.

In December 2014, the Army issued Army Regulation (AR) 525-2[15] providing guidance to develop contingency plans for threats, hazards, and risks to commands and installations. The AR applies to military, civilian, and contractor personnel. It integrates multiple programs[16] so commanders and senior leaders can "prevent, prepare, protect, mitigate [reduce or minimize], respond, and recover from an event." The AR covers aspects of planning, preventing, and responding to workplace violence threats or incidents. Although the AR requires annual protection-related training; unlike the October 2013 memorandum, the training does not specifically address workplace violence. It also does not provide information on how to identify and report concerning behaviors.

---

13 All Army Activities 122/2011, "Interim Guidance – Training and Reporting Requirements," April 2, 2011.

14 All Army Activities 285/2013, "Enhancing Protection of Army Installations, Facilities and Workplaces," October 25, 2013.

15 AR 525-2, "The Army Protection Program," December 8, 2014.

16 The Army Protection Program is an overarching program that brings together Antiterrorism, Computer Network Defense, Continuity of Operations, Critical Infrastructure Risk Management, Emergency Management, Fire & Emergency Services, Health Protection, High Risk Personnel, Information Assurance, Law Enforcement, Operations Security, and Physical Security programs.

Before AR 525-2 was issued, the Commander, U.S. Army Installation Management Command (IMCOM) issued Operation Order (OPORD) 12-296[17] to require each Army installation to develop and implement a workplace violence prevention program. The OPORD requires the programs to bring together installation components at different levels to:

- analyze the risk of a workplace violence incident,
- develop local guidance for the installation in accordance with the IMCOM Workplace Violence Guidebook, and
- develop reporting and response procedures for employees and first responders.

Army installations were required to fully implement the OPORD by January 2013. However, as of July 2015, an official at Joint Base Lewis–McChord (JBLM), an Army-led installation visited during the audit, told us the JBLM workplace violence policy was still being drafted.

IMCOM also issued OPORD 14-091[18] that requires each Army installation to integrate tenants[19] into their installation emergency management plans. OPORD 14-091 requires tenants to submit emergency action plans to installation headquarters to ensure coordination with the installation's emergency management plan. However, according to the JBLM Emergency Manager, as of July 2015, not all the tenants we visited at JBLM had synchronized their emergency action plans with the installation.

Navy

In response to the Fort Hood report, the Navy stated it would integrate information on violence and self-radicalization into training for existing programs where necessary. According to the Chief of Naval Operations' existing policy,[20] the Navy intends to reduce suicide and interpersonal violence[21] that could occur in the workplace. However, the Navy did not integrate information on self-radicalization into existing programs.

---

17 OPORD 12-296, "U.S. Army Installation Management Command (IMCOM) Prevention of Workplace Violence Program (U)," September 21, 2012.

18 OPORD 14-091, "U.S. Army Installation Management Command (IMCOM) Installation Emergency Management (IEM) Program Installation Full Operational Capability (FOC) and Status Reporting (U)," July 2, 2014.

19 According to AR 420-1, "Army Facilities Management," August 24, 2012, a tenant is a unit, agency, or activity of one command that occupies facilities on an installation of another command and receives support services from that garrison.

20 Chief of Naval Operations Instruction 6100.2A, "Health and Wellness Promotion Program," March 15, 2007.

21 Navy policy for interpersonal violence reduction includes the Sexual Assault Prevention and Response Program and the Family Advocacy Program.

The Navy included workplace violence as part of the "insider threat" definition in Secretary of the Navy Instruction (SECNAVINST) 5510.37.[22] However, SECNAVINST 5510.37 does not clearly explain the relationship between workplace violence and insider threats. According to a representative from the Navy Office of Civilian Human Resources, the Navy is in the process of developing a workplace violence policy. As of July 2015, the policy is in draft and will apply to military, civilian, and contractor personnel.

The Fort Hood and DSB reports cited the Navy's TMU as a model for other DoD Components. The Naval Criminal Investigative Service established the TMU in 1996. TMU personnel are trained to respond to unsolicited communications received from commands or concerned parties regarding suspected and potential threats. In addition, the TMU supports crisis negotiations and investigations including workplace violence, threatening communications, and high risk domestic violence situations. According to an ASD(HD&GS) official, the Department of the Navy is the only DoD Component we reviewed that established a TMU.

Air Force

In response to the Fort Hood report, the Air Force updated or revised its policies to incorporate guidance on workplace violence prevention and response until it could develop a comprehensive workplace violence prevention and response program. The policies were related to law enforcement, human resources, security, and counterintelligence. For example, Air Force Instruction (AFI) 36-703[23] establishes roles and responsibilities for Air Force supervisors and employees to address workplace violence. The AFI also requires commanders to develop local workplace violence awareness and response plans and ensure civilian employees are aware of the plans.

Although the Air Force updated or revised its policies, the changes were not consistent. For example, two policies define workplace violence differently. AFI 36-703, which is applicable only to civilian personnel, uses the DoDI 1438.06 definition of workplace violence. In contrast, Air Force Manual 31-201, Volume 4,[24] uses the Occupational Safety and Health Administration's definition of workplace violence[25] and applies to military, civilian, and contractor personnel.

---

[22] SECNAVINST 5510.37, "Department of the Navy Insider Threat Program," August 8, 2013 defines insider threat as "a person with authorized access, who uses that access, wittingly or unwittingly, to harm national security interests or national security through unauthorized disclosure, data modification, espionage, terrorism, or kinetic actions resulting in loss or degradation of resources or capabilities. The term kinetic can include, but is not limited to, the threat of harm from sabotage or workplace violence."

[23] AFI 36-703, "Civilian Conduct and Responsibility," February 18, 2014.

[24] Air Force Manual 31-201, Volume 4, "High-Risk Response," November 17, 2011.

[25] The Occupational Safety and Health Administration defines workplace violence as, "any physical assault, threatening behavior, or verbal abuse occurring in the work setting."

Travis Air Force Base (AFB) officials integrated a workplace violence policy into its Integrated Defense Plan.[26] The plan outlines different levels of workplace violence, progression of workplace violence, and what actions constitute workplace violence. In addition, the plan directs Commanders and Directors to:

- ensure Violence Awareness Training for employees (to include tenants and contractors) is completed annually,
- conduct regular drills to exercise response procedures (to include tenants and contractors), and
- develop and provide reporting and response procedures for employees and first responders.

However, the 60th Security Forces Squadron did not disseminate the plan to the entire Travis AFB tenant population because the plan defines restricted and controlled areas on Travis AFB and identifies specific criteria for entry into those areas, which is information that may not be disseminated to all Travis AFB tenants.

Defense Threat Reduction Agency

In response to the Fort Hood report, DTRA Headquarters issued a January 25, 2010, memorandum to implement an Enhanced Security Program that would mitigate workplace violence threats. The memorandum requires the Security and Counterintelligence Office to develop exercise scenarios to increase situational awareness and individual responsibilities. The DTRA Chief, Security and Counterintelligence could not provide documentation showing the Enhanced Security Program had been implemented. However, the DTRA Chief, Security and Counterintelligence stated that in May 2014, DTRA Headquarters was a participant in an active shooter exercise on Fort Belvoir, Virginia, that was hosted by the Defense Logistics Agency.

Fort Hood Recommendations Implemented Differently

The ASD(HD&GS) developed an implementation strategy for DoD that differed from the strategies identified and implemented by DoD Components we reviewed.

DoD focused its implementation efforts on the Secretary of Defense's final direction, while the Services and DTRA focused their implementation efforts to address the Fort Hood review board's recommendations. The Secretary of Defense did not require the ASD(HD&GS) to consider the results of the DoD Components reviews to address the Fort Hood recommendations. Instead, the ASD(HD&GS) developed an implementation strategy for DoD that differed from the strategies identified and implemented by DoD Components we reviewed.

[26] 60th Air Mobility Wing Plan 31-1, "Integrated Defense Plan," January 31, 2014.

For example, the Fort Hood review board determined that the Services had programs and policies that addressed prevention and intervention for suicide, sexual assault, and family violence, but guidance concerning workplace violence and the potential for self-radicalization was insufficient (Finding 2.6). The review board stated that suicide prevention, sexual assault prevention and response, and family advocacy programs addressed numerous facets of violence but the policies and procedures at the DoD or Service level that address workplace violence were not comprehensive. According to the review board, "Where current policy or programs exist, they are limited, not widely disseminated, and implemented inconsistently." As a result, the review board recommended that DoD:

- revise current policies and procedures to address preventing violence toward others in the workplace, and
- integrate existing programs such as suicide, sexual assault, and family violence prevention with information on violence and self-radicalization to provide a comprehensive prevention and response program.

Even though the review board recommended a review of current policies and the integration of existing programs, the Secretary of Defense instead directed the USD(P&R) to:

- develop DoD policy and guidance on the prevention of workplace violence by January 2011, and
- incorporate training on prevention of workplace violence into the Civilian Personnel Management Services' Managerial and Supervisory Training Framework in accordance with the requirements of the National Defense Authorization Act for Fiscal Year 2010 Section 1113.

Using this direction, in January 2014, the USD(P&R) developed and issued DoDI 1438.06 that specifically focused on DoD civilians. The USD(P&R) also developed optional online training for civilian employees titled "Preventing Workplace Violence for Supervisors and Managers," and "Preventing Workplace Violence for Employees." Although military and contractor personnel are not required to take the training, military personnel that supervise civilians can. In addition, the DoDI does not represent a revision of current policies and procedures or an integration of existing violence prevention and response programs as recommended by the review board.

In contrast to DoD's implementation, the Services and DTRA developed and implemented different approaches to address the review board's recommendations. As discussed earlier, the Marine Corps established a violence prevention program to work in collaboration with existing prevention and response programs (such as sexual assault, substance abuse, and family advocacy) without amending or

replacing them. Using a different approach, the Navy stated it would integrate information on violence and self-radicalization into training programs where necessary. The Navy's existing programs provide prevention and response strategies for sexual assault and suicide that could occur in the workplace; however, the Navy did not integrate information on self-radicalization into its programs.

According to ASD(HD&GS) personnel, they did not analyze the DoD Components' implementation of their concurrent internal review strategies. ASD(HD&GS) personnel could have reviewed the strategies and incorporated some of the DoD Components' best practices into overall DoD policy. For example, DoD could have used the Marine Corps strategy as a template to develop a comprehensive and unified DoD-wide violence prevention and response approach that considered existing policies, processes, and programs.

Therefore, the ASD(HD&GS) should review and analyze the Fort Hood recommendations and the concurrent internal reviews conducted by the Military Departments, Combatant Commands, and DoD Components, to verify existing policies and procedures and develop and execute an implementation plan to address gaps and deficiencies; address systemic issues; and identify opportunities for eliminating redundancies.

The USD(P&R) should use the ASD(HD&GS)'s implementation plan to revise current policies and procedures and integrate existing programs to develop a comprehensive DoD-wide approach to address prevention and response to workplace violence.

DoD Did Not Ensure Recommendations Were Properly Closed

The SSGs, under the authority of the ASD(HD&GS), did not exercise sufficient oversight to verify that the recommendations identified in the Fort Hood, DSB, and DoD Component reviews were properly addressed and closed. The Secretary of Defense directed the ASD(HD&GS) to monitor the implementation of the measures he approved and those approved by the DoD Components following their reviews. The ASD(HD&GS) was required to provide the Secretary of Defense with regular implementation progress reports until the ASD(HD&GS) concluded that implementation of each recommendation was sufficiently underway to make further monitoring unnecessary. However, the SSGs recorded recommendations as either complete or in process without verifying they met the intent of the Fort Hood and DSB recommendations.

For example, SSG officials recorded recommendations from Finding 2.6 in the Fort Hood report as completed in 2011 even though DoD continued to work on the recommendations. Specifically, DCPAS issued workplace violence guidance in May 2012, and the USD(P&R) published the DoDI 1438.06 in January 2014. Although DoD issued this guidance and policy, it does not fully satisfy the Secretary of Defense direction because the policies and guidance applied only to DoD civilian personnel.

A USD(P&R), Military Personnel Policy official stated they did not have plans to release a workplace violence policy for military personnel. The official stated that it was unnecessary because the Uniform Code of Military Justice (UCMJ) was sufficient to assist commanders when they addressed military personnel's "bad behavior" in the workplace. However, the UCMJ does not address triggers (such as perceptions of favoritism, being passed over for a promotion, or the end of a significant personal relationship), that could escalate into workplace violence. Therefore, commanders who rely solely on the UCMJ to address workplace violence may not recognize the warning signs that could escalate into more serious incidents.

Officials from USD(AT&L) stated that DoD did not have any regulations related to workplace violence for the contractor workforce.

Similarly, officials from the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics (USD[AT&L]) stated that DoD did not have any regulations related to workplace violence for the contractor workforce. Neither the Federal Acquisition Regulation nor the Defense Federal Acquisition Regulation Supplement contained language or clauses to address issues related to the prevention and response to workplace violence.

The Secretary of Defense also directed the USD(P&R) to incorporate training on prevention of workplace violence into the civilian training framework. To accomplish this, the USD(P&R) developed two online-training courses for civilian employees and made them available in 2011. Although the training became available and was disseminated in 2011, not all SSG officials were familiar with the training.

For example, in July 2014, one SSG official stated that she did not know the training was available and had to search the internet to find the training link. Other members knew the training existed but were unfamiliar with the training content. As a result, SSG officials determined they would have USD(P&R) representatives brief them on the training provided to DoD civilian personnel.

Similar to the results of the Fort Hood review board, in August 2012, the DSB Task Force concluded that DoD did not have a DoD-wide standardized process to report, analyze, train, and mitigate threats of targeted violence. The Task Force recommended that DoD take advantage of the significant overlap of related prevention and response efforts including suicide prevention, impulsive violence, sexual harassment, early warning signs of post-traumatic stress, and coping with medical or financial stress. The Task Force specified that those efforts could be integrated particularly with respect to the professional resources involved and associated training programs. The MA SSG[27] had oversight of the Task Force's recommendations and then delegated this oversight responsibility to its MA Fort Hood Working Group.

The Secretary of Defense agreed with the Task Force recommendation and directed the Under Secretary of Defense for Policy (USD[P]) to:

- establish Departmental policy, in collaboration with the USD(P&R), to require DoD Components to establish or maintain a threat management capability,
- issue policy to address the implementation of threat management capabilities no later than October 2013, and
- establish minimum policy requirements for threat management capabilities that DoD Components must implement.

On September 30, 2014, the USD(I)[28] issued DoDD 5205.16 to require DoD Components to establish or maintain a multi-disciplinary threat management capability. However, the Directive did not establish minimum policy requirements for DoD Components to implement threat management capabilities. As of July 2015, the MA Fort Hood Working Group has asked DoD Components to provide updates as they implement their individual threat management capabilities.

Therefore, the ASD(HD&GS) should review and analyze the DSB recommendations to verify existing policies and procedures and develop and execute an implementation plan to address gaps and deficiencies, address systemic issues, and identify opportunities for eliminating redundancies.

[27] The oversight responsibilities of the FP SSG were transferred to the MA SSG in 2013.

[28] On September 25, 2013, the Deputy Secretary of Defense appointed the USD(I) as the DoD Senior Official responsible to oversee insider threat efforts.

The Director, Defense Procurement and Acquisition Policy, should direct the Defense Acquisition Regulations Council to revise and incorporate language or clauses in the Defense Federal Acquisition Regulation Supplement to include contractor requirements for the prevention of workplace violence.

Levels of Preparedness Varied Across DoD

Military personnel, DoD civilian employees, and contractors were not equally prepared to prevent and respond to an act of workplace violence. The level of preparedness also varied among Services and tenants located on the same installation. For example, in the absence of readily available, installation-wide workplace violence programs, tenants at JBLM and Travis AFB inconsistently prepared their military, civilian, and contractor personnel to prevent and respond to workplace violence threats and incidents.

Joint Base Lewis-McChord

OPORD 12-296 required JBLM to create a workplace violence policy that included all tenants. However, since JBLM did not implement a workplace violence policy, tenants used different approaches and methods to prevent and respond to workplace violence. Three of four tenants visited provided some type of training on workplace violence; one of the three tenants conducted active shooter exercises on a routine basis. As a result, some tenants were better prepared to respond to concerning behaviors before they escalated into a potential active shooter incident. For example,

- According to a representative from the Marine Corps' Combat Logistics Battalion 23, a reserve unit, the unit completed the MCO-mandated online violence prevention training. The training was offered to military, civilian, and contractor personnel.
- According to the Army's Madigan Army Medical Center provost marshal, the Madigan Healthcare System[29] introduced all employees to the workplace violence program during new employee orientation and routinely conducted their own active shooter exercises.
- According to a representative from the Army's 17th Field Artillery Brigade, an active duty unit, the unit conducted training to prevent and respond to various types of violence such as sexual harassment. In addition, it used the U.S. Army Soldier Leader Risk Reduction Tool[30] to

[29] Madigan Healthcare System consists of the Madigan Army Medical Center and several other medical and health clinics on JBLM and surrounding areas.

[30] The U.S. Army Soldier Leader Risk Reduction Tool is a questionnaire that is used to guide conversations between Army leadership and soldiers and assists in connecting them to appropriate resources when necessary.

identify risk factors that needed to be addressed. However, Commanders could not use the U.S. Army Soldier Leader Risk Reduction Tool for civilian or contractor personnel assigned to their units.

- According to a representative from the Air Force's 627th Force Support Squadron, an active duty unit, squadron personnel are required to complete computer-based Human Relations Workplace Violence training annually. The training was offered to military and civilian personnel but not contractors.

Travis Air Force Base

We identified similar inconsistencies with the implementation of workplace violence prevention and response at Travis AFB. The 60th Air Mobility Wing, as the installation host, incorporated its workplace violence policy into its Integrated Defense Plan but only distributed the plan to a limited number of Travis AFB organizations. Tenants such as DTRA Travis and the Naval Computer and Telecommunications Strategic Communications Unit Detachment Fairfield were not a part of that distribution list. As a result, they used different approaches and methods to prevent and respond to workplace violence, as shown in the examples below.

- DTRA Travis required all personnel to take active shooter training annually in a classroom setting.
- Naval Computer and Telecommunications Strategic Communications Unit Detachment Fairfield, an active duty unit, conducted an active shooter drill in January 2015, to bring awareness to response processes and procedures. The officer in charge gave the drill a failed rating because the detachment did not properly execute basic response procedures.

Management Comments on the Finding and Our Response

The Acting Under Secretary of Defense for Personnel and Readiness and the Acting Assistant Secretary of Defense for Homeland Defense and Global Security provided comments on the finding. For the full text of the comments, see the Management Comments section of the report.

Acting Under Secretary of Defense for Personnel and Readiness Comments

The Acting Under Secretary noted a number of concerns with the report. He stated that the report used two definitions of workplace violence, 1) an "outdated" definition established by DCPAS and 2) the definition established by DoDI 1438.06. He also stated that the report asserted that DoD limited its guidance to DoD civilian employees and specifically excluded military personnel and contractors.

The Acting Under Secretary noted that the Fort Hood review was limited to military personnel and DoD civilian employees and specifically excluded contractors. He also noted that the Secretary of Defense tasked USD(P&R) with incorporating workplace violence prevention training into the Civilian Personnel Management Services' Managerial and Supervisory Training Framework, which limited the training to civilians.

The Acting Under Secretary stated that the delay in releasing a DoD workplace violence policies memorandum was to determine whether the Secretary of Defense would release any guidance in the wake of a workplace violence incident in April 2014. The Acting Under Secretary stated that, after coordination with senior leadership in the Department, it was determined that USD(P&R) would transfer responsibility for issuing guidance to USD(P). The Acting Under Secretary stated that the report failed to consider that the DoDI also mandates that supervisors are to immediately report threats of workplace violence "to their management and appropriate military or local civilian authorities as determined by local threat reporting protocol…" He added that commanders and leaders at all levels have "countless tools at their disposal" allowing them more sufficient capability to address workplace violence at the earliest opportunity.

Lastly, the Acting Under Secretary stated that the report implied USD(P&R) did not sufficiently inform stakeholders of dissemination of workplace violence prevention training. He added that once USD(P&R) announced the training launch on August 8, 2011, it became the responsibility of DoD-wide training officers to distribute information among their respective components.

Our Response

As stated by the Acting Under Secretary, we recognize that the Fort Hood report was limited to military personnel and DoD civilian employees and that the Secretary of Defense's tasking to USD(P&R) regarding workplace violence training was limited to the civilian workforce. We also recognize that USD(P&R) developed civilian workplace violence training in 2011 and disseminated the training to the DoD Components. However, our audit scope covered the entire DoD workforce, which includes military personnel, DoD civilian employees, and contractors. Until guidance is applicable to the entire DoD workforce, DoD's workplace violence program is not comprehensive or DoD-wide as we state in the Finding.

With respect to the workplace violence definition, at the time our audit began, the DCPAS definition of workplace violence was the DoD definition. In January 2014, the DoDI was issued, and contained a different definition of workplace violence. To eliminate any confusion, we removed the DCPAS definition from the report.

Furthermore, we agree that commanders possess a wide variety of means to address incidents of workplace violence. However, as we discuss in the report, DoD lacked a comprehensive DoD-wide workplace violence prevention and response program. As a result, personnel at different DoD installations (and even on the same installation) were not equally prepared to identify and respond to workplace violence threats and incidents.

Acting Assistant Secretary of Defense for Homeland Defense and Global Security Comments

The Acting Assistant Secretary of Defense for Homeland Defense and Global Security noted key areas of disagreement with the report. He stated that the SSGs have implemented 73 of 79 of the Fort Hood Review Board's recommendations and 8 of the 11 recommendations made by the Defense Science Board Task Force report on "Predicting Violent Behavior." He stated that the remaining nine recommendations were expected to be completed by the end of 2015.

He stated that the SSG exercised oversight and analysis through a collaborative and iterative process and that recommendations were closed after all members of the SSG agreed that the implementation met the intent of the Secretary of Defense's guidance provided in 2010. As part of the process, SSG members were responsible for providing their organizations authorized memorandums, instructions, and policies to the SSG that addressed each respective recommendation. Upon receipt of the information, the SSG catalogued the information, ensured full implementation through comprehensive review, and validated proper completion.

Our Response

The overall audit objective was to determine whether DoD effectively implemented programs to address workplace violence threats and incidents. In conducting the audit we reviewed the implementation and oversight of selected recommendations related to workplace violence from the Fort Hood report, DoD Component reviews, and the DSB Task Force report. For example, as we cite in the report, DoD should have developed a workplace violence prevention and response policy for military and civilian personnel under Finding 2.6 of the Fort Hood report. The Commandant of the Marine Corps issued a violence prevention policy for all Marine Corps personnel in December 2012, and USD(P&R) issued a DoD civilian workplace violence policy in January 2014. The Army, Navy, and Air Force have not yet issued workplace violence prevention policies. Accordingly, the SSG officials should not have validated Finding 2.6 as completed in 2011. We also cite that in response to a DSB recommendation, the Secretary of Defense directed the establishment of threat management capabilities. According to the Secretary of Defense, the

DoD Components need threat management capabilities to address and manage insider threats, including the risk of violence. After the USD(I) issued DoDD 5205.16 in September 2014, the SSG closed that DSB recommendation. However, as we discuss in the report, the Directive did not establish minimum policy requirements for DoD Components to establish threat management capabilities.

Recommendations, Management Comments, and Our Response

Renumbered, Added, and Revised Recommendations

As a result of management comments, we renumbered draft Recommendation 2 as Recommendation 2.a and added Recommendation 2.b to require the Under Secretary of Defense for Personnel and Readiness to develop interim, comprehensive DoD-wide policy for the prevention and response to workplace violence. In addition, we revised draft Recommendation 3 to require the Director, Defense Procurement and Acquisition Policy to develop both interim and final contractor workplace violence prevention requirements in coordination with the Under Secretary of Defense for Personnel and Readiness.

Recommendation 1

We recommend that the Assistant Secretary of Defense for Homeland Defense and Global Security review and analyze all of the Fort Hood and Defense Science Board recommendations and the concurrent internal reviews conducted by the Military Departments, Combatant Commands, and DoD Components to:

a. Verify existing policies and procedures have addressed identified gaps and deficiencies; identify systemic issues not addressed; and identify opportunities for streamlining processes and eliminating redundancies.

b. Develop and execute an implementation plan to close existing gaps and deficiencies through cross-functional coordination with DoD Components; employ corrective action to remedy systemic issues identified; streamline processes and eliminate redundancies; and provide completion dates for any outstanding recommendations.

Recommendation 2

We recommend that the Under Secretary of Defense for Personnel and Readiness:

a. **Based on the results of Recommendation 1, revise current policies and procedures and integrate existing programs to develop a comprehensive DoD-wide approach to address prevention and response to workplace violence.**

b. **Develop and issue interim, comprehensive DoD-wide policy for the prevention and response to workplace violence until the publication of final policies and procedures.**

Recommendation 3

We recommend that the Director, Defense Procurement and Acquisition Policy, Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics, in coordination with the Under Secretary of Defense for Personnel and Readiness, direct the Defense Acquisition Regulations Council to revise the Defense Federal Acquisition Regulation Supplement to address interim and final contractor requirements for the prevention of workplace violence.

Director, Defense Procurement and Acquisition Policy Comments

The Director, Defense Procurement and Acquisition Policy, agreed and proposed to delay revisions to the Defense Federal Acquisition Regulation Supplement until after the Under Secretary of Defense for Personnel and Readiness publishes a comprehensive DoD-wide workplace violence prevention and response policy.

Our Response

Comments from the Director partially addressed the recommendation. Although the Director agreed with the recommendation, he proposed delaying revisions to the Defense Federal Acquisition Regulation Supplement until after the Under Secretary of Defense for Personnel and Readiness issues a final, comprehensive DoD-wide policy. While a delay for final requirements is reasonable, DoD needs to establish interim contractor requirements for the prevention of workplace violence to ensure the health and safety of all DoD personnel. Accordingly, we request the Director provide comments on the revised recommendation for the implementation of interim and final contractor requirements for the prevention of workplace violence.

Management Comments Required

The Acting Under Secretary of Defense for Personnel and Readiness and the Acting Assistant Secretary of Defense for Homeland Defense and Global Security did not respond to the recommendations in the report. We request the Acting Under Secretary and the Acting Assistant Secretary provide comments on the report.

Appendix A

Scope and Methodology

We conducted this performance audit from December 2013 through July 2015 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 finding and conclusion based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our finding and conclusion based on our audit objective.

For purposes of our audit, we identified three main areas to assess DoD workplace violence programs:

- Planning—actions taken to develop policies and procedures, and govern an effective workplace violence program.
- Prevention—actions taken to implement preventative and responsive strategies for civilian, military, and contractor personnel that help reduce workplace violence threats and incidents.
- Response—actions taken to address and manage all workplace violence threats and incidents that have occurred.

The audit team reviewed the planning, prevention, and response aspects of the ISC and DCPAS guidance. Once identified, the audit team used this information as a baseline to compare against all documentation received throughout the audit related to how DoD addressed violence in the workplace.

The audit team held meetings and discussions with representatives for the:

- Under Secretary of Defense for Policy,
- Under Secretary of Defense for Personnel and Readiness,
    - Deputy Assistant Secretary of Defense for Civilian Personnel Policy,
    - Deputy Assistant Secretary of Defense for Military Personnel Policy,
- Under Secretary of Defense for Intelligence,
- Mission Assurance Senior Steering Group, and
    - Mission Assurance Fort Hood Working Group.

We reviewed the Fort Hood and DSB reports' findings and recommendations related to our audit objective. We determined roles and responsibilities at the Office of Secretary of Defense level to include development and implementation of policy and programs; coordination strategies; and oversight. We also reviewed the Services' and DTRA's responses to the Secretary of Defense's January 2010 direction. These responses identified the findings and implementation plans that the Services and DTRA proposed to address internal threats and force protection below the headquarters level.

We visited JBLM, Washington, and Travis AFB, California, and interviewed personnel responsible for the health and safety of their employees.

At JBLM we interviewed personnel from:

- IMCOM,
- Army I Corps, 7th Infantry Division, and 17th Field Artillery Brigade,
- Madigan Army Medical Center,
- 62nd Airlift Wing and 627th Air Base Group, and
- Marine Corps' Combat Logistics Battalion 23.

At Travis AFB, we interviewed personnel from:

- 60th Air Mobility Wing,
- Naval Computer and Telecommunications Strategic Communications Unit Detachment Fairfield, and
- DTRA Travis.

At each location, we identified and reviewed relevant criteria related to workplace violence, interviewed personnel, reviewed programs in place that address workplace violence threats and incidents, and assessed program implementation. We compared the installation and tenant programs, policies, procedures, and processes to determine whether all installation personnel were provided similar information and were at the same level of preparedness to prevent, report, and respond to workplace violence threats and incidents.

Use of Computer-Processed Data

We did not use computer-processed data to perform this audit.

Use of Technical Assistance

To understand how agencies established programs to prevent and respond to workplace violence incidents, we met with DoD Office of Inspector General representatives from the:

- Human Capital Advisory Services Directorate,
- Equal Employment Opportunity Directorate,
- Office of Security,
- Office of Professional Responsibility,
- Office of General Counsel, and
- Quantitative Methods Division.

Prior Coverage

During the last 5 years, the Army Audit Agency issued two reports discussing DoD workplace violence programs. Unrestricted Army Audit Agency reports can be accessed from .mil and gao.gov domains at https://www.aaa.army.mil/.

Army Audit Agency

Report No. A-2015-0026-MTP, "Army Installation-Level Actions to Address Fort Hood Report Recommendations," February 4, 2015

Report No. A-2013-0025-MTP, "Army Headquarters-Level Actions to Implement Fort Hood Recommendations," December 18, 2012

Appendix B

DoD DCPAS Guide Approaches to Address Workplace Violence Examples

The DoD DCPAS Guide provides approaches to address workplace violence incidents by severity level. The guide provides behavioral examples for each severity level and actions that should be taken by DoD civilian employees and supervisors in response to the behavior.

Table B. Steps to Address Workplace Violence Incidents

Categories/Levels	Examples	Intervention	Who To Call
LEVEL I: • Implied (covert) threats • Verbal/mental abuse • Harassment/ badgering • Inappropriate tones (threatening) or gestures (menacing)	• Screaming, yelling, disruptive behavior • "You'll pay for this." • "You'll be sorry." • Name calling, berating, sarcasm • Unfounded criticism – "You can't do anything right."	**Employees:** • Report to supervisor • Document **Supervisors:** • Report to your supervisor • Consult with Security, HR, and EAP as necessary • Define/address the problem • Document	• Supervisor • Security • HR • EAP
LEVEL II: • Threatening gestures • Specific (overt) written or verbal threats • Property abuse/ mishandling • Stalking	• Raising hand or object to strike someone • Any written or verbal threat to harm, avenge, or retaliate • Throwing objects, slamming doors, slamming fists on desk, hitting or kicking walls or objects • Monitoring a co-worker's activities to satisfy personal objectives (unwarranted attention) • Refusing to leave an area (office) when asked to do so • Intentionally crowding to intimidate • Blocking access to or exit from the area	**Employees:** • Report to supervisor • Document **Supervisors:** • Report to your supervisor • Consult with Security, HR, and EAP as necessary • Plan of action (disciplinary action, mandatory anger management referral, victim assistance) • Document	• Security • Supervisor • HR • EAP

Table B. Steps to Address Workplace Violence Incidents (cont'd)

Categories/Levels	Examples	Intervention	Who To Call
LEVEL III: • "Scuffles" (physical contact) • Destruction • Assault: physical, sexual, armed • A presently occurring loss-of-control event creating fear or imminent harm • Unauthorized possession of firearms or other weapons on government premises	• Shoving, grabbing, jabbing, poking, or prodding • Tripping or intentionally bumping or jostling • Breaking equipment • Breaking or putting holes in doors, walls, windows, etc. • Intentional use of objects for purpose of destruction: fire, bombs, chemicals, vehicles, etc. • Any intentional harmful physical contact • Unremitting rampage of loud, threatening, or incoherent speech • Bringing an unauthorized weapon on site	**Any/All Staff:** • Activate Emergency Response Procedures – Do NOT try to handle on your own • Report to a supervisor or manager • Assist in maintaining calm if possible • Assist in victim care if possible • Leave the area if necessary for your safety • Document **Supervisors:** • Arrange for debriefing after resolved (all persons impacted) • Coordinate plan of action (disciplinary action, mandatory anger management referral, victim assistance) with HR and EAP after crisis is resolved	• Security • Supervisor • HR • EAP

LEGEND

HR Human Resources
EAP Employee Assistance Program

Appendix C

DoD Workplace Violence Incidents

Over the last 20 years (1994-2014), DoD has experienced multiple active-shooter incidents on military installations. Of the 11 incidents listed below, 10 of the perpetrators were either serving or had previously served in the military at the time of the incident. This Table is not an all-inclusive listing of active-shooter incidents on military installations.

Table C. Active-Shooter Incidents on Military Installations

Date	Incident Location	Perpetrator Status	Number of Casualties
June 1994	Fairchild AFB, Washington	Former Military	23 wounded 6 dead (includes shooter and an unborn child)
October 1995	Fort Bragg, North Carolina	Military	18 wounded 1 dead
July 2009	Fort Lewis (now JBLM), Washington	Former Military	2 dead (includes shooter)
November 2009	Fort Hood, Texas	Military	43 wounded 13 dead
September 2010	Fort Bliss, Texas	Civilian, Former Military	1 wounded 2 dead (includes shooter)
June 2012	Fort Bragg, North Carolina	Military	1 wounded 2 dead (includes shooter)
March 2013	Marine Corps Base Quantico, Virginia	Military	3 dead (includes shooter)
September 2013	Washington Navy Yard, Washington, D.C.	Contractor, Former Military	4 wounded 13 dead (includes shooter)
October 2013	National Guard Recruiting Center, Millington, Tennessee	Military	3 wounded
March 2014	Naval Station Norfolk, Virginia	Civilian	2 dead (includes shooter)
April 2014	Fort Hood, Texas	Military	12 wounded 4 dead (includes shooter)

Appendix D

Fort Hood Review Board Findings and Recommendations

The following Fort Hood review board findings and recommendations were directly or indirectly related to the prevention and response to workplace violence threats and incidents.

Finding 2.1

DoD programs, policies, processes, and procedures that address identification of indicators for violence are outdated, incomplete, and fail to include key indicators of potentially violent behaviors.

Recommendations

- **2.1(a)** Update training and education programs to help DoD personnel identify contributing factors and behavioral indicators of potentially violent actors.
- **2.1(c)** Develop a risk assessment tool for commanders, supervisors, and professional support service providers to determine whether and when DoD personnel present risks for various types of violent behavior.
- **2.1(d)** Develop programs to educate DoD personnel about indicators that signal when individuals may commit violent acts or become radicalized.

Finding 2.6

The Services have programs and policies to address prevention and intervention for suicide, sexual assault, and family violence, but guidance concerning workplace violence and the potential for self-radicalization is insufficient.

Recommendations

- **2.6(a)** Revise current policies and procedures to address preventing violence toward others in the workplace.
- **2.6(b)** Integrate existing programs such as suicide, sexual assault, and family violence prevention with information on violence and self-radicalization to provide a comprehensive prevention and response program.

Finding 2.16

Authorities governing civilian personnel are insufficient to support commanders and supervisors as they attempt to identify indicators of violence or take actions to prevent violence.

Recommendation

2.16 Review civilian personnel policies to determine whether additional authorities or policies would enhance visibility on indicators of possible violence and provide greater flexibility to address behaviors of concern.

Finding 3.1

The DoD has not issued an integrating force protection policy. Senior DoD officials have issued DoD policy in several force protection-related subject areas such as antiterrorism but these policies are not well integrated.

Recommendation

3.1(a) Assign a senior DoD official responsibility for integrating force protection policy throughout the Department.

Finding 3.2

DoD force protection programs and policies are not focused on internal threats.

Recommendations

- **3.2(a)** Develop policy and procedures to integrate the currently disparate efforts to defend DoD resources and people against internal threats.
- **3.2(b)** Commission a multidisciplinary group to examine and evaluate existing threat assessment programs; examine other branches of government for successful programs and best practices to establish standards, training, reporting requirements/mechanisms, and procedures for assessing predictive indicators relating to pending violence.
- **3.2(c)** Provide commanders with a multidisciplinary capability, based on best practices such as the Navy's TMU, the Postal Service's "Going Postal Program," and Stanford University's workplace violence program, focused on predicting and preventing insider attacks.

Finding 4.3

DoD policy does not currently take advantage of successful models for active shooter response for civilian and military law enforcement on DoD installations and facilities.

Recommendations

- **4.3(a)** Identify and incorporate civilian law enforcement best practices, to include response to the active shooter threat, into training certifications for civilian police and security guards.
- **4.3(b)** Include military law enforcement in the development of minimum training standards to ensure standard law enforcement practices throughout the DoD.
- **4.3(c)** Incorporate the Department of Homeland Security best practices regarding workplace violence and active shooter awareness training into existing personal security awareness training contained in current Level I Antiterrorism Awareness training.
- **4.3(d)** Develop a case study based on the Fort Hood incident to be used in installation commander development and on-scene commander response programs.

Appendix E

Defense Science Board Task Force Recommendations

The following DSB task force recommendations were directly or indirectly related to the prevention and response to workplace violence threats and incidents.

Recommendations

- The Secretary of Defense direct a Department-wide requirement for the Military Departments and DoD Agencies to establish a multidisciplinary TMU that identifies, assesses, and responds/manages threats of targeted violence.
    - Designate an Executive Agent responsible for overseeing and managing the Department's TMUs. The Executive Agent would be responsible for management, oversight, identifying resources and training requirements, and serve as DoD's central point for threat management – with Under Secretary of Defense for Policy oversight.
- The designated Executive Agent should establish effective information sharing and communications among DoD TMUs and with appropriate non-DoD organizations.
    - Establish an information sharing system that would facilitate the review and assessment of communications or behaviors of concern for immediate use by the TMUs and for analytical purposes.
    - Develop and implement a communication strategy to establish a higher level of awareness regarding the risk of targeted violence throughout DoD.
    - Efforts dealing with targeted violence should take advantage of the significant overlap and be integrated as appropriate with related efforts including suicide prevention, impulsive violence, sexual harassment, early warning signs of Post-Traumatic Stress Disorder, and coping with medical or financial stress, particularly with respect to the professional resources involved and associated training programs.

Appendix F

Component Guidance Related to Workplace Violence Prevention and Response

The Department of the Army, Department of the Navy, Department of the Air Force, Marine Corps, and Defense Threat Reduction Agency guidance listed below relate to preventing or responding to violent threats or incidents that may occur in the workplace.

Department of the Army

1. All Army Activities 025/2010, "HQDA [Headquarters, Department of the Army] EXORD [Execute Order] 087-10 ISO Annual Military Police Law Enforcement," February 8, 2010. This order discusses the importance of military police to keep up with training requirements because law enforcement skills are critical in assisting Army leadership with providing increased monitoring and intervention in reducing soldier indiscipline, high-risk behaviors, suicides, and domestic violence.
2. All Army Activities 122/2011, "Interim Guidance – Training and Reporting Requirements," April 2, 2011. This guidance was sent to inform Commanders of Army Commands, Army Service Components, the Army National Guard and Direct Reporting Units that DoD conducted a complete review of existing policies, programs, processes, systems and procedures in place. The guidance addresses and documents behaviors detrimental to good order and discipline, including violent behavior and prohibited activities. Pending further guidance from the DoD on personnel records, Commanders are required to review and update local policies and procedures used to report and address behaviors that may be precursors to acts of violence.
3. All Army Activities 285/2013, "Enhancing Protection of Army Installations, Facilities and Workplaces," October 25, 2013. This guidance reinforces actions and activities that have the potential to assist in averting an incident of workplace violence or mitigating its effects. This guidance expired on May 1, 2014.
4. Army Directive 2011-04, "Army Protection Program," January 31, 2011. This Directive established the integrated Army Protection Program to better manage risks relative to the safety and security of soldiers, families, civilians, infrastructure and information in today's highly dynamic threat environment. This Directive was superseded on December 8, 2014 with the issuance of Army Regulation 525-2, "Army Protection Program."

5. Army Directive 2013-18, "Army Insider Threat Program," July 31, 2013. This Directive establishes the Army Insider Threat Program, which is an integrated departmental effort to deter, detect and mitigate risk by employees or military personnel who may represent a threat to national security.
6. Army Regulation (AR) 190-30, "Military Police Investigations," November 1, 2005. This Regulation establishes Department of the Army policy for the conduct of military police investigations.
7. AR 190-56, "The Army Civilian Police and Security Guard Program," March 15, 2013. This Regulation prescribes policies and procedures for the Department of the Army Civilian Police and Security Guard Program. It contains provisions for the selection, management, employment, training, and certification of Department of the Army civilian police officers and security guards.
8. AR 381-12, "Threat Awareness and Reporting Program," October 4, 2010. This Regulation provides policy and responsibilities for threat awareness and education and establishes a requirement for Department of the Army personnel to report any incident of known or suspected espionage, international terrorism, sabotage, subversion, theft or diversion of military technology, information systems intrusions, and unauthorized disclosure of classified information, among others.
9. AR 525-2, "Army Protection Program," December 8, 2014. This Regulation establishes the Army Protection Program to better manage risks relative to the safety and security of soldiers, civilians, family members, facilities, contractors, infrastructure, and information.
10. AR 525-13, "Antiterrorism," September 11, 2008. This Regulation prescribes policy and procedures and assigns responsibilities for the Army Antiterrorism Program.
11. AR 525-27, "Army Emergency Management Program," March 13, 2009. This Regulation implements the Army Emergency Management Program in an all-hazard approach to planning, preparation, response, and recovery. It also prescribes policy and assigns responsibility for Army installation protection and related activities.
12. AR 600-20, "Army Command Policy," March 18, 2008. This Regulation prescribes the policy and responsibility of command, which includes well-being of the force, military and personal discipline and conduct, the Army Equal Opportunity Program, Prevention of Sexual Harassment, and the Army Sexual Assault Prevention and Response Program.
13. Department of the Army Pamphlet 525-27, "Army Emergency Management Program," September 20, 2012. This publication provides the policies and procedures required for the establishment of a single, comprehensive, and integrated emergency management program on Army installations, facilities, and activities.

14. Department of the Army Pamphlet 600-15, "Extremist Activities," June 1, 2000. This publication provides guidance and procedures for handling extremist activities in the U.S. Army.
15. Operation Order 12-296, "U.S. Army Installation Management Command (IMCOM) Prevention of Workplace Violence Program (U)," September 21, 2012. This Operation Order directs IMCOM regional directors to implement the Prevention of Workplace Violence Program by October 15, 2012.
16. Operation Order 14-091, "U.S. Army Installation Management Command (IMCOM) Installation Emergency Management (IEM) Program Installation Full Operational Capability (FOC) and Status Reporting (U)," July 2, 2014. This Operation Order directs garrisons to continue implementing emergency management program requirements in order to achieve full operational capability.

Department of the Navy

1. Secretary of the Navy Instruction 5510.37, "Department of the Navy Insider Threat Program," August 8, 2013. This Instruction establishes the Department of the Navy Insider Threat Program, implements policy, assigns responsibilities, and institutes the Department of the Navy Insider Threat Program Senior Executive Board.
2. Secretary of the Navy Instruction 1752.4B, "Sexual Assault Prevention and Response," August 8, 2013. This Instruction updates policy and procedural guidance for the Department of the Navy Sexual Assault Prevention and Response Program, implements DoD Instruction 6495.02, "Sexual Assault Prevention and Response (SAPR) Program Procedures," March 28, 2013, and DoD Directive 6495.01, "Sexual Assault Prevention and Response (SAPR) Program," January 23, 2012.
3. Chief of Naval Operations Instruction 1720.4A, "Suicide Prevention Program," August 4, 2009. This Instruction provides policy and procedures, and assigns responsibilities for the Navy's Suicide Prevention Program.
4. Chief of Naval Operations Instruction 1752.2B, "Family Advocacy Program," April 25, 2008. This Instruction prescribes procedures, and assigns responsibility for the implementation of the Family Advocacy Program within the Navy.
5. Chief of Naval Operations Instruction 6100.2A, "Health and Wellness Promotion Program," March 15, 2007. This Instruction outlines the programs and initiatives that the Navy has established to improve and sustain military readiness by focusing on health, fitness, and quality of life for sailors, Department of Defense personnel, and other beneficiaries.

Department of the Air Force

1. Air Force Instruction (AFI) 10-206, "Operational Reporting," June 11, 2014. This Instruction establishes and describes the Air Force Operational Reporting System. It also explains the purpose and gives instructions for preparing and submitting these reports.
2. AFI 10-245, "Antiterrorism," September 21, 2012. This Instruction establishes responsibilities and guidance for the Air Force Antiterrorism Program.
3. AFI 16-1402, "Insider Threat Program Management," August 5, 2014. This Instruction implements the DoD Insider Threat Program and assigns responsibilities for the oversight and management of the Air Force Insider Threat Program.
4. AFI 36-703, "Civilian Conduct and Responsibility," February 18, 2014. This Instruction provides guidance and procedures on civilian employee standards of conduct and individual responsibility throughout the Air Force.
5. AFI 44-153, "Traumatic Stress Response," March 31, 2006. This Instruction establishes the requirements for Traumatic Stress Response teams at all active duty Air Force installations and encourages an integration of resources and efforts of the Air Force Reserve Command and Air National Guard.
6. AFI 51-1201, "Alternative Dispute Resolution Processes in Workplace Disputes," May 21, 2009. This Instruction prescribes the Air Force Alternative Dispute Resolution programs and procedures to resolve disputes in the Air Force workplace. It also specifies minimum qualifications for Air Force mediators and standards of conduct for Air Force mediators and other neutral parties.
7. AFI 90-501, "Community Action Information Board (CAIB) and Integrated Delivery System (IDS)," August 14, 2014. This Instruction establishes Air Force, Major Command and installation Community Action Information Boards that promote cross-organizational collaboration to address individual, family, and community concerns. It also outlines requirements for the Integrated Delivery System at each level of the organization.
8. Air Force Manual 31-201, Volume 4, "High Risk Response," November 17, 2011. This manual provides guidance on Security Forces standards and procedures for Air Force civilian and military personnel who serve in Security Force roles.

Marine Corps

1. Marine Corps Order (MCO) 1754.11, "Marine Corps Family Advocacy and General Counseling Program," March 26, 2012. This order provides policy and procedures for the effective execution and use of the Family Advocacy and General Counseling Program. In addition, the order supports the commander's responsibility to prevent and respond to child abuse, domestic abuse, and support and treat eligible beneficiaries with counseling services.
2. MCO 5580.3, "Violence Prevention Program," December 1, 2012. This order defines warning signs and indicators of potential violence, outlines reporting requirements, and provides guidance for command response to reported warning signs and indicators of potential violence.
3. MCO 5300.17, "Marine Corps Substance Abuse Program," April 11, 2011. This order provides policy and procedural guidance to commanders, substance abuse personnel, and Marines to effectively utilize and execute the Marine Corps Substance Abuse Program. In addition, the order provides policy and guidance to commanders so they can improve their capability to treat and prevent alcohol and drug abuse problems that detract from unit performance and mission readiness.
4. MCO 1752.5A, "Sexual Assault Prevention and Response Program," February 5, 2008. At a minimum, this order addresses the specific needs of military personnel victims of sexual assault; defines sexual assault and required reporting procedures; implements reporting options in the form of unrestricted and restricted reporting and a database to track sexual assault trends throughout the Marine Corps; and directs mandatory training for sexual assault responders.

Defense Threat Reduction Agency

1. Defense Threat Reduction Agency, "Enhanced Security Program," January 25, 2010. This memorandum explains that the Enhanced Security Program focuses on both processes and procedures for information technology threat, workplace violence, and emergency evacuation procedures.
2. Defense Threat Reduction Agency and U.S. Strategic Command Center for Combating Weapons of Mass Destruction Directive 5240.07, "Insider Threat Program," April 15, 2014. This directive establishes the minimum requirements and guidance for insider threat detection and prevention programs to deter employees with authorized access from becoming insider threats.

Management Comments

Acting Under Secretary of Defense for Personnel and Readiness Comments

Final Report Reference

UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000

AUG 31 2015

MEMORANDUM FOR DEPARTMENT OF DEFENSE INSPECTOR GENERAL

SUBJECT: Personnel and Readiness Response to Draft Inspector General Workplace Violence Report

Thank you for giving Personnel and Readiness (P&R) the opportunity to review the draft Inspector General (IG) Report, "DoD [Department of Defense] Needs a Comprehensive Approach to Address Workplace Violence." Unfortunately, while my team notes that several positive changes were made to the Report based on our initial feedback, a number of concerns about the content of the Report still remain:

- The Report uses the correct definition of workplace violence in a footnote on page five, but uses the outdated definition on page one.

Deleted, Page 1

- There are several instances in which the Report asserts that DoD limited its guidance and policy to DoD civilians, and specifically excluded military members and contractors. While perhaps technically accurate, the IG Report failed to note, as we requested specifically, that two important factors inform this decision:
  - First, Chapter Two of the January 2010 "Protecting the Force: Lessons from Fort Hood" report states that the review was limited to military personnel and civilian employees, and explicitly excludes contractors.
  - Second, an August 2010 memo released by the Secretary of Defense tasked P&R with incorporating workplace violence prevention training into the Civilian Personnel Management Services' Managerial and Supervisory Training Framework, de facto limiting the training to civilians. DoD implemented the Secretary of Defense's guidance as tasked, rather than the Review Board's recommendations, in effecting subsequent workplace violence-related programs and procedures.
  - It is also noteworthy, as we and others have pointed out repeatedly, that military commanders have a full array of authorities—punitive and non-punitive—at their disposal relative to military personnel.
- P&R did initially delay the release of a DoD workplace violence policies memorandum. While the Report does mention the cause behind the delay on page six, it does so only in cursory fashion and fails to explain the reason said memorandum was ultimately not released by P&R. Following the second workplace violence incident in April 2014, P&R decided to hold the memorandum to determine whether the Secretary of Defense would release any guidance and, if said guidance was not forthcoming, to coordinate the P&R guidance fully with the senior leadership of the Department. Ultimately, after such coordination, it was determined that P&R would transfer responsibility for issuance of the guidance to the Office of the Under Secretary of Defense for Policy.

Acting Under Secretary of Defense for Personnel and Readiness Comments (Cont'd)

Final Report Reference

- The Report on page six argues that DoD Instruction (DoDI) 1438.06, "DoD Workplace Violence Prevention and Response Policy," "will still not apply to all DoD personnel because the DoDI referenced and incorporated the use of the Interagency Security Committee (ISC) publication…" because said guide applies to facilities meant for non-military activities. While this is true at face value, the Report fails to take into account that the DoDI also mandates that "all supervisors must immediately report threats of workplace violence to their management and appropriate military or civilian authorities as determined by local threat reporting protocol…" The DoDI therefore does not discount military protocols such as those that would be found on military installations.

- As noted above, military commanders exercise plenary authority over troops in their commands. While the Report does acknowledge the existence of the Uniform Code of Military Justice, it largely – if not completely – ignores the many other authorities inherent in military command. Military commanders have, for time and memorial, possessed the full panoply of jurisdiction and authority over their troops; these authorities fall into many categories, including administrative, health and welfare, non-judicial, judicial, and others. Thus, commanders and leaders at all levels have countless tools at their disposal allowing them more sufficient capability for the prevention, early identification, support and treatment, and discipline of Service members who may show "concerning behaviors," and seek to intervene at the earliest opportunity using these multiple prevention-oriented response mechanisms.

- While the Report notes correctly at page 14 that P&R training on workplace violence prevention was disseminated in 2011, it also implies that P&R did not sufficiently inform relevant stakeholders of the dissemination of the training. To the contrary, P&R announced the training launch on August 8, 2011, providing it to Employee Relations, who, according to their policies and responsibilities, in turn shared it with their training officers. It then became the responsibility of DoD-wide training officers to distribute information among their respective components.

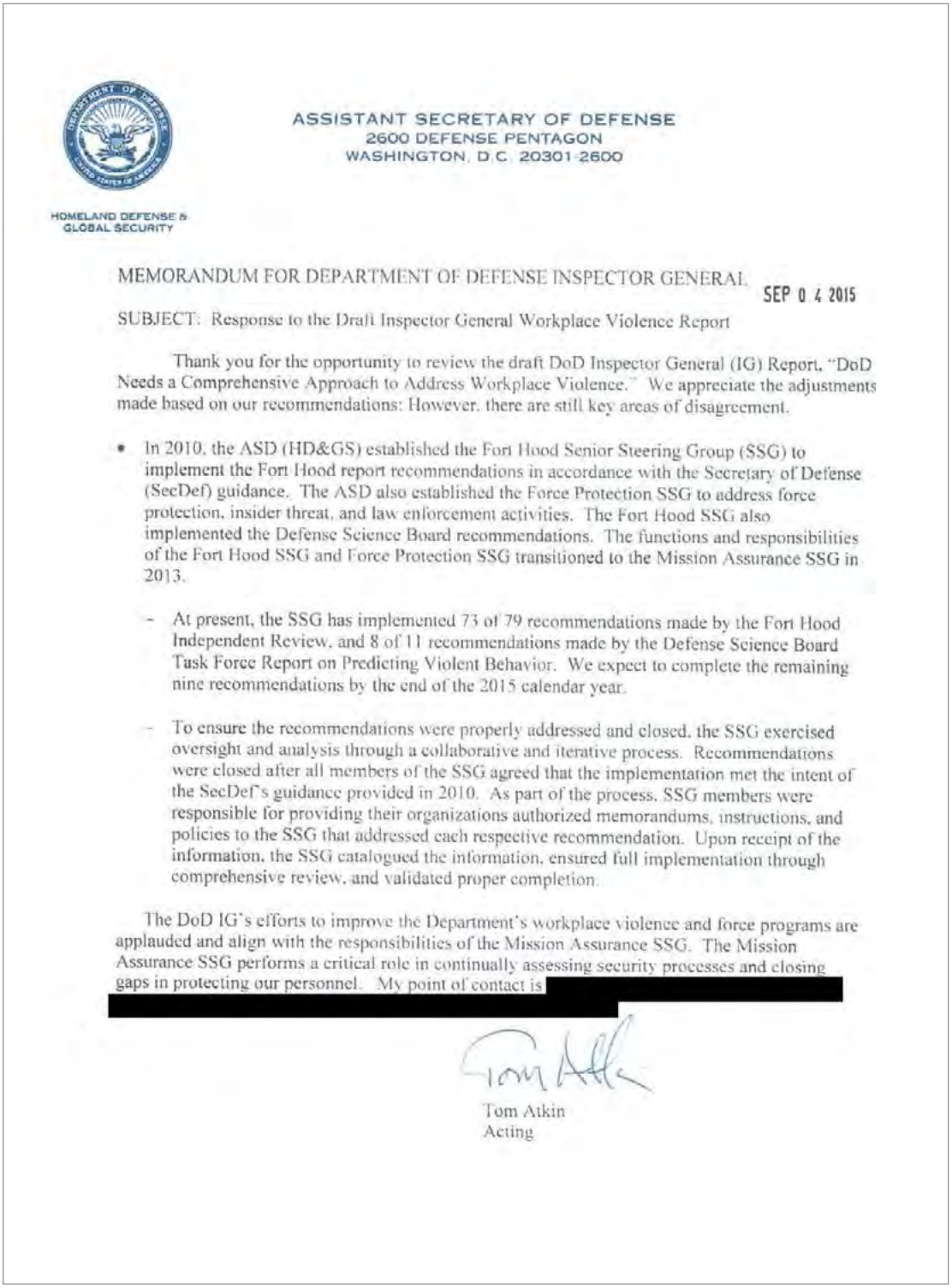
- The anecdote illustrated within the text bubble on page 15 illustrates our argument well. This anecdote seems to reflect the viewpoint of but one Working Group member – whose level of participation and knowledge of the project is unknown – and surely cannot be allowed to inform the narrative that the training regimen employed was somehow unsatisfactory. To the contrary, the August 8, 2011, email from the Defense Civilian Personnel Advisory Service (DCPAS) to Employee Relations ensured that the training was announced to a large number of employees, as DCPAS has successfully released previous guidance/information through the same channel.

Deleted, Page 14

My points of contact on this effort, [redacted] or [redacted] and [redacted] are available to discuss the Report with your office and are happy to provide suggestions and edits as needed.

Brad Carson
Acting

Acting Assistant Secretary of Defense for Homeland Defense and Global Security Comments



ASSISTANT SECRETARY OF DEFENSE
2600 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-2600

HOMELAND DEFENSE & GLOBAL SECURITY

MEMORANDUM FOR DEPARTMENT OF DEFENSE INSPECTOR GENERAL

SEP 0 4 2015

SUBJECT: Response to the Draft Inspector General Workplace Violence Report

Thank you for the opportunity to review the draft DoD Inspector General (IG) Report, "DoD Needs a Comprehensive Approach to Address Workplace Violence." We appreciate the adjustments made based on our recommendations: However, there are still key areas of disagreement.

- In 2010, the ASD (HD&GS) established the Fort Hood Senior Steering Group (SSG) to implement the Fort Hood report recommendations in accordance with the Secretary of Defense (SecDef) guidance. The ASD also established the Force Protection SSG to address force protection, insider threat, and law enforcement activities. The Fort Hood SSG also implemented the Defense Science Board recommendations. The functions and responsibilities of the Fort Hood SSG and Force Protection SSG transitioned to the Mission Assurance SSG in 2013.

  - At present, the SSG has implemented 73 of 79 recommendations made by the Fort Hood Independent Review, and 8 of 11 recommendations made by the Defense Science Board Task Force Report on Predicting Violent Behavior. We expect to complete the remaining nine recommendations by the end of the 2015 calendar year.

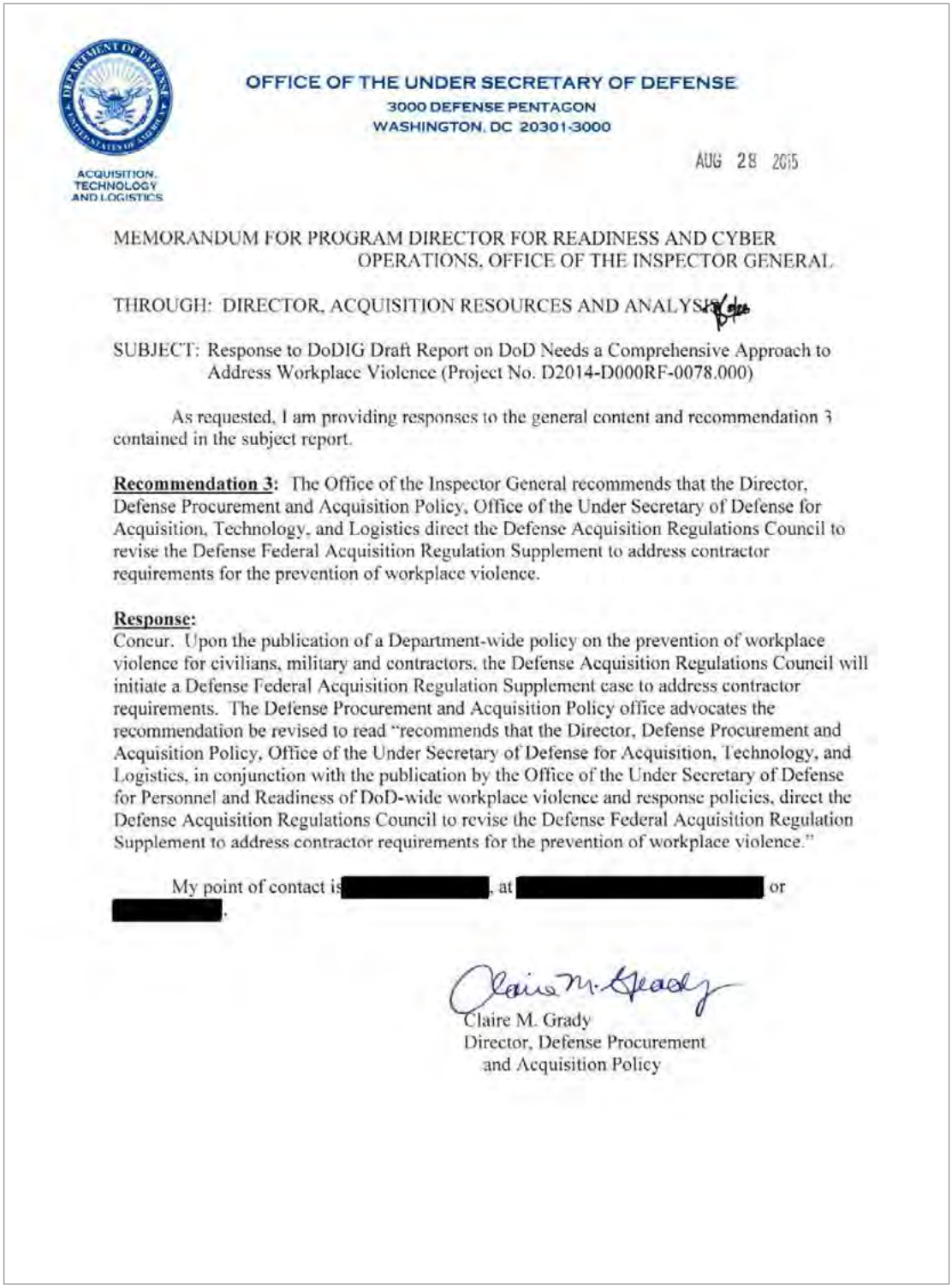
  - To ensure the recommendations were properly addressed and closed, the SSG exercised oversight and analysis through a collaborative and iterative process. Recommendations were closed after all members of the SSG agreed that the implementation met the intent of the SecDef's guidance provided in 2010. As part of the process, SSG members were responsible for providing their organizations authorized memorandums, instructions, and policies to the SSG that addressed each respective recommendation. Upon receipt of the information, the SSG catalogued the information, ensured full implementation through comprehensive review, and validated proper completion.

The DoD IG's efforts to improve the Department's workplace violence and force programs are applauded and align with the responsibilities of the Mission Assurance SSG. The Mission Assurance SSG performs a critical role in continually assessing security processes and closing gaps in protecting our personnel. My point of contact is [redacted]

Tom Atkin
Acting

Director, Defense Procurement and Acquisition Policy Comments

Final Report Reference



OFFICE OF THE UNDER SECRETARY OF DEFENSE
3000 DEFENSE PENTAGON
WASHINGTON, DC 20301-3000

ACQUISITION, TECHNOLOGY AND LOGISTICS

AUG 28 2015

MEMORANDUM FOR PROGRAM DIRECTOR FOR READINESS AND CYBER OPERATIONS, OFFICE OF THE INSPECTOR GENERAL

THROUGH: DIRECTOR, ACQUISITION RESOURCES AND ANALYSIS

SUBJECT: Response to DoDIG Draft Report on DoD Needs a Comprehensive Approach to Address Workplace Violence (Project No. D2014-D000RF-0078.000)

As requested, I am providing responses to the general content and recommendation 3 contained in the subject report.

Recommendation 3: The Office of the Inspector General recommends that the Director, Defense Procurement and Acquisition Policy, Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics direct the Defense Acquisition Regulations Council to revise the Defense Federal Acquisition Regulation Supplement to address contractor requirements for the prevention of workplace violence.

Response:
Concur. Upon the publication of a Department-wide policy on the prevention of workplace violence for civilians, military and contractors, the Defense Acquisition Regulations Council will initiate a Defense Federal Acquisition Regulation Supplement case to address contractor requirements. The Defense Procurement and Acquisition Policy office advocates the recommendation be revised to read "recommends that the Director, Defense Procurement and Acquisition Policy, Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics, in conjunction with the publication by the Office of the Under Secretary of Defense for Personnel and Readiness of DoD-wide workplace violence and response policies, direct the Defense Acquisition Regulations Council to revise the Defense Federal Acquisition Regulation Supplement to address contractor requirements for the prevention of workplace violence."

My point of contact is [redacted], at [redacted] or [redacted].

Claire M. Grady
Director, Defense Procurement and Acquisition Policy

Renumbered Recommendation 2 as Recommendation 2.a

Added Recommendation 2.b

Revised Recommendation 3

Acronyms and Abbreviations

AFB	Air Force Base
AFI	Air Force Instruction
AR	Army Regulation
ASD(HD&GS)	Assistant Secretary of Defense for Homeland Defense and Global Security
DCPAS	Defense Civilian Personnel Advisory Service
DSB	Defense Science Board
DTRA	Defense Threat Reduction Agency
FP	Force Protection
IMCOM	U.S. Army Installation Management Command
ISC	Interagency Security Committee
JBLM	Joint Base Lewis–McChord
MA	Mission Assurance
MCO	Marine Corps Order
OPORD	Operation Order
SECNAVINST	Secretary of the Navy Instruction
SSG	Senior Steering Group
TMU	Threat Management Unit
UCMJ	Uniform Code of Military Justice
USD(AT&L)	Under Secretary of Defense for Acquisition, Technology, and Logistics
USD(I)	Under Secretary of Defense for Intelligence
USD(P)	Under Secretary of Defense for Policy
USD(P&R)	Under Secretary of Defense for Personnel and Readiness

Glossary

Army Protection Program. An overarching program that brings together Antiterrorism, Computer Network Defense, Continuity of Operations, Critical Infrastructure Risk Management, Emergency Management, Fire & Emergency Services, Health Protection, High Risk Personnel, Information Assurance, Law Enforcement, Operations Security, and Physical Security programs.

Eagle Eyes Program. Launched in 2004, is a hotline for anyone in the military community to report and raise awareness of suspicious activity.

Insider Threat (Navy definition). A person with authorized access, who uses that access, wittingly or unwittingly, to harm national security interests or national security through unauthorized disclosure, data modification, espionage, terrorism, or kinetic actions resulting in loss or degradation of resources or capabilities. The term kinetic can include, but is not limited to, the threat of harm from sabotage or workplace violence.

Planning. Actions taken to develop policies and procedures, and govern an effective workplace violence program.

Prevention. Actions taken to implement preventative and responsive strategies for civilian, military, and contractor personnel that help reduce workplace violence threats and incidents.

Response. Actions taken to address and manage all workplace violence threats and incidents that have occurred.

Tenant (Army definition). A unit, agency, or activity of one command that occupies facilities on an installation of another command and receives support services from that garrison.

Threat Management Units. A cross-functional, multi-disciplinary team approach to assist in the assessment of threatening situations and development of plans that minimize the potential risk of violence. Team members should have professional competence in law enforcement; risk assessment; clinical, medical, and psychological expertise; and social and behavioral training.

Workplace Violence (DoD definition). Any act of violent behavior, threats of physical violence, harassment, intimidation, bullying, verbal or non-verbal threat, or other threatening, disruptive behavior that occurs at or outside the work site.

Workplace Violence (Occupational Safety and Health Administration definition). Any physical assault, threatening behavior, or verbal abuse occurring in the work setting.

Whistleblower Protection
U.S. Department of Defense

The Whistleblower Protection Enhancement Act of 2012 requires the Inspector General to designate a Whistleblower Protection Ombudsman to educate agency employees about prohibitions on retaliation, and rights and remedies against retaliation for protected disclosures. The designated ombudsman is the DoD Hotline Director. For more information on your rights and remedies against retaliation, visit www.dodig.mil/programs/whistleblower.

For more information about DoD IG reports or activities, please contact us:

Congressional Liaison
congressional@dodig.mil; 703.604.8324

Media Contact
public.affairs@dodig.mil; 703.604.8324

For Report Notifications
http://www.dodig.mil/pubs/email_update.cfm

Twitter
twitter.com/DoD_IG

DoD Hotline
dodig.mil/hotline

DEPARTMENT OF DEFENSE | INSPECTOR GENERAL

4800 Mark Center Drive
Alexandria, VA 22350-1500
www.dodig.mil
Defense Hotline 1.800.424.9098