

VA Office of Inspector General

OFFICE OF AUDITS AND EVALUATIONS



# Veterans Health Administration

*Review of  
Alleged Human Resources  
Delays at the Atlanta  
VA Medical Center*

January 30, 2017  
15-03401-76

# ACRONYMS

CARDS	Consult, Assist, Review, Develop, and Sustain
DFWP	Drug-Free Workplace Program
FY	Fiscal Year
NACI	National Agency Check with Written Inquiries
OIG	Office of Inspector General
OPM	Office of Personnel Management
PAID	Personnel and Accounting Integrated Data
PIPS	Personnel Investigations Processing System
TDP	Testing Designated Position
VA	Department of Veterans Affairs
VAMC	Veterans Affairs Medical Center
VHA	Veterans Health Administration

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**Website: [www.va.gov/oig/hotline](http://www.va.gov/oig/hotline)**

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# Highlights: Review of Alleged Human Resources Delays at the Atlanta VAMC

## Why We Did This Review

The VA OIG received allegations in March and April 2015 that the Atlanta VA Medical Center (VAMC) had a backlog of more than 300 unadjudicated background investigations and that mandatory drug testing of new hires did not occur over a 6-month period.

## What We Found

We substantiated both allegations. Multiple VA officials confirmed that the Atlanta VAMC had a backlog of unadjudicated background investigations by mid FY 2015. For example, the Director of VA Central Office's Personnel Security and Suitability Service told us that the Atlanta VAMC had a backlog of about 200 unadjudicated background investigations as of July 2015. An adjudication is considered backlogged after 90 days without a determination. In addition, Atlanta human resources personnel acknowledged a backlog dating as far back as 2012.

The lack of available records limited our ability to quantify the extent of the backlog. However, we substantiated that backlogs were occurring by determining that the average adjudication processing time at the VAMC was about 170 days from January 2015 through June 2015.

We also substantiated that the Drug-Free Workplace Program (DFWP) was not administered from November 2014 to May 2015.

These lapses occurred because records within the personnel security program were

inadequate, policies were not implemented as required, and human resources staff were not adequately trained. Finally, VAMC management did not ensure the continuity of the DFWP when the former coordinator left the position in September 2014.

Without proper controls over these human resources functions, the Atlanta VAMC cannot reliably attest to the suitability of its staff, exposing veterans and employees to individuals who have not been properly vetted. In addition, the facility lacks assurance that employees in Testing Designated Positions remain suitable for employment.

## What We Recommended

We recommended the Medical Center Director assess the human resources program and ensure staff receive appropriate background investigations, provide training on the requirements of the personnel security program, and monitor the DFWP.

## Agency Comments

The Atlanta VA Medical Center Director concurred with our recommendations. We consider the corrective action plans the facility submitted acceptable and will follow up on their implementation.

A handwritten signature in black ink that reads "Larry M. Reinkemeyer".

**LARRY M. REINKEMEYER**  
Assistant Inspector General  
for Audits and Evaluations

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## INTRODUCTION

### ***Allegations***

In March and April 2015, the VA OIG received allegations identifying delays in human resources activities at the Atlanta VA Medical Center (VAMC). Specifically, the complainant alleged that:

- The employee and labor relations division had a backlog of over 300 unadjudicated background investigations.
- Drug testing of new employees did not occur for a period of at least 6 months.

### ***Background Investigations***

All VA employees are evaluated and determined suitable for work through a background investigation process. VA determines the level of investigation by the sensitivity of the incumbent's position and rates the position as low, moderate or high-risk. At minimum, VA employees receive a National Agency Check with Written Inquiries (NACI) investigation to verify the individual is suitable for employment.

Positions that are determined to be in higher risk categories, such as human resources personnel, police officers, information technology specialists, and hospital administrators, require an additional review. Specifically, these positions require either a moderate-risk or high-risk background investigation. Employees are often allowed to begin work before background investigations are complete. Upon favorable determination, a certificate of investigation is included in the employee's personnel folder.

### ***Drug-Free Workplace Program***

The Drug-Free Workplace Program (DFWP) establishes mandatory guidelines for Federal drug testing. VA Handbook 5383 designates safety-sensitive occupational series, such as physicians, nurses, police officers, and all Senior Executive Service employees, as Testing Designated Positions (TDPs).<sup>1</sup> Components of DFWP include pre-employment applicant testing, random monthly testing of employees in TDPs, and reasonable suspicion testing of on-the-job drug use.

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<sup>1</sup> VA Handbook 5383/1, Part 1, Appendix A

## RESULTS AND RECOMMENDATIONS

### **Finding 1      The Atlanta VA Medical Center Experienced Delays in Adjudicating Background Investigations**

We substantiated that the Atlanta VAMC had a backlog of unadjudicated background investigations as of mid-FY 2015, but the lack of available records limited our ability to quantify the extent of the backlog. This occurred because (i) the Atlanta VAMC management did not maintain adequate internal controls, including adequate records, within its personnel security program; (ii) Office of Personnel Management (OPM) and VA policies were not implemented as required, including local standard operating procedures for the VAMC; and (iii) human resources staff were not adequately trained to perform required functions.

Without proper record keeping and timely processing of employee suitability, the Atlanta VAMC cannot reliably attest to the status and suitability of its staff. In addition, veterans and employees are at risk of exposure to individuals who have not been properly vetted.

#### **Background**

Individuals appointed to a position in VA must be determined suitable for Federal employment through a background investigation appropriate to the risk-level of the position.<sup>2</sup> New employees are permitted to work during the background investigation process. Designated human resources personnel adjudicate the results, consider any negative information, and validate suitability for employment. Adjudicative decisions are recorded in VA's Personnel and Accounting Integrated Data (PAID) system and OPM's Personnel Investigations Processing System (PIPS). Appendix A provides additional information on background investigations.

#### **Criteria**

VA Directive 0710 requires human resources staff to ensure appointees and employees in low-risk or non-sensitive positions have background investigations initiated and adjudicated at the local level within established time frames.<sup>3</sup> However, the directive does not specifically set a time frame for completion. Adjudications are considered backlogged after 90 days without an adjudicative determination, according to VA's Personnel Security and Suitability Service. VA Directive 0710 further states that only appropriately trained personnel are to make adjudicative determinations.<sup>4</sup> Adjudication includes reviewing the effect of any derogatory information resulting from the investigation on the individual's suitability for employment.

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<sup>2</sup> VA Directive 0710, Paragraph 2(h)(4)

<sup>3</sup> VA Directive 0710, Paragraph 3(g)(4)

<sup>4</sup> VA Directive 0710, Paragraph 3(g)(4)

**What We Did**

To determine the validity of the allegation, we obtained testimonial and documentary evidence from OPM, VA Central Office Personnel Security and Suitability Specialists, Veterans Health Administration (VHA) human resources consultants, and the Atlanta VAMC leadership and human resources staff. We reviewed available personnel and security files, investigation certifications, employee data, and applicable policies and procedures.

**What We Found**

Multiple VA officials and our review of recently completed adjudication records confirmed the VAMC had a backlog of unadjudicated background investigations during calendar year 2015, including carryover actions from 2014. The Director of VA Central Office's Personnel Security and Suitability Service told us that the Atlanta VAMC had a backlog of about 200 unadjudicated NACI background investigations as of July 2015. The office considered adjudications backlogged after 90 days without a determination.

In addition, VHA's internal Consult, Assist, Review, Develop, and Sustain (CARDS) review identified a backlog of NACI documents and Special Agreement Check adjudications in Atlanta as of February 2015. Finally, Atlanta VAMC human resources personnel acknowledged identifying a backlog of suitability adjudications dating as far back as 2012. For example, OPM completed an investigation on July 16, 2012, but the Atlanta VAMC human resources staff did not make a final determination until May 5, 2015, for a total processing time of 1,023 days, or 34 months.

The lack of records in regard to adjudicating the results of background investigations limited our ability to quantify the extent of the backlog. To assess whether adjudication processing delays increased significantly, we reviewed processing times for 100 individuals who began employment in calendar year 2014 and for whom the VAMC had adjudication responsibility. Processing times were measured from when OPM completed the individual's investigation until the VAMC made its suitability determination. From April to October 2014, it took an average of 27 days from the close of the background investigation to make an adjudicative determination. However, from January through June 2015, that average increased to about 170 days.<sup>5</sup> Specific examples include:

**Example 1**

OPM completed an investigation on August 11, 2014, but the Atlanta VAMC human resources staff did not make a final determination until May 5, 2015, for a total processing time of 267 days, or nearly 9 months.

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<sup>5</sup> The Atlanta VAMC did not complete an adjudication from October 2014 to January 2015.

**Example 2**

OPM completed an investigation on September 30, 2014, but the Atlanta VAMC human resources staff did not make a final determination until May 27, 2015, for a total processing time of 239 days, or nearly 8 months.

**Why This Occurred**

The backlog of unadjudicated background checks occurred because the Atlanta VAMC did not maintain adequate internal controls within its personnel security program. Specifically, management did not implement VA and VHA policies through local standard operating procedures nor did they use generally accepted tools available from OPM. Additionally, staff processing suitability determinations lacked the appropriate training and investigation level required to process cases.

**Internal Controls Were Not Implemented**

The Atlanta VAMC did not have a local suitability adjudication policy. VHA Handbook 0710.01 establishes requirements for facilities to set local policies and procedures to ensure that mandatory personnel screenings are accomplished and documented.<sup>6</sup> The handbook also provides a sample policy that outlines steps required and explains the roles and responsibilities of assigned individuals.<sup>7</sup> The Atlanta VAMC provided a draft policy for our review. However, according to Atlanta VAMC personnel, the draft policy was developed after the start of our review and, as of September 2016, remained in a draft status.

Human resources data at the Atlanta VAMC were inadequate for monitoring workload and performance due to long-standing weaknesses in how the facility collected and recorded the data. VAMC management and human resources staff could not account for the adjudicative status of personnel. We also found that VA's PAID system was not up to date in comparison with OPM data for that facility. Specifically, over 65 percent of PAID records for Atlanta VAMC personnel contained data that were erroneous or did not match the corresponding record in OPM's security and suitability investigations index.

In addition, the Atlanta VAMC did not conduct quarterly reviews of Personnel Suitability and Security Files prior to our review, as required by VHA guidance. Human resources personnel must review 10 percent of new appointments quarterly to determine if investigations were completed accurately, timely, and by the appropriate personnel.<sup>8</sup> This internal control is intended to identify issues in the adjudicative process. The responsible official stated that he was unfamiliar with the requirement and that quarterly reviews had not been conducted prior to the OIG's review. Subsequently,

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<sup>6</sup> VHA Handbook 0710.1, Paragraph 2(d)

<sup>7</sup> VHA Handbook 0710.1, Appendix C

<sup>8</sup> VHA Handbook 0710.1, Appendix C, Paragraph 3(f)

the Atlanta VAMC began conducting these reviews in the fourth quarter of FY 2015.

Finally, the Atlanta VAMC also did not have access to OPM's PIPS. We did not identify a requirement for facilities to use PIPS during personnel screenings. However, according to the Director of VA's Personnel Security and Suitability Service, PIPS is a generally accepted tool used across VA. Suitability personnel with access to PIPS can directly connect to OPM's database, which allows them to review and process background investigations more efficiently. In August 2015, the Atlanta VAMC reported that a security clerk had submitted an application for access to PIPS. As of July 2016, no Atlanta VAMC personnel had access.

*Suitability  
Adjudicators  
Lacked  
Appropriate  
Investigation  
and Training*

The Atlanta VAMC staff who were assigned adjudication responsibilities were not qualified to process suitability adjudications from January 2014 through September 2015. OPM guidance requires adjudicators to have high-risk background investigations.<sup>9</sup> During the scope of our review, all three Atlanta VAMC staff assigned adjudicative responsibilities lacked a high-risk background investigation required for their role. Further, personnel records indicate that none of those individuals had ever been investigated at that level. We identified two human resources staff members with high-risk background investigations. However, neither staff member was assigned adjudicative responsibilities.

In addition, adjudicators at the Atlanta VAMC did not receive appropriate training to adjudicate determinations. VA Directive 0710 requires that only appropriately trained personnel may make adjudicative determinations.<sup>10</sup> Furthermore, in July 2014, the interagency Suitability and Security Clearance Performance Accountability Council issued the National Training Standards requiring all adjudicators to receive training. Agencies had until October 1, 2015 to ensure that all final suitability determinations were processed by a trained adjudicator. As of December 2015, according to the Associate Medical Center Director, only one human resources staff member at the Atlanta VAMC had received that training and assumed adjudicative responsibilities. The Acting Human Resources Officer confirmed that this remained the case as of July 2016.

*What  
Resulted*

Without proper controls to accurately record adjudicative determinations and the timely processing of employee suitability, the Atlanta VAMC cannot reliably attest to the status and suitability of its staff. In addition, errors in suitability determinations occurred because human resources staff were not properly trained to process them. We also identified several positions at the Atlanta VAMC that did not have the proper background investigation

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<sup>9</sup> Title 5 Code of Federal Regulations §731.106 and OPM INV 15, Paragraph 2.0

<sup>10</sup> VA Directive 0710, Paragraph 3(g)(4)

completed for the designated risk category of the position. For example, 19 of 37 human resources specialists only had an NACI, even though a moderate-level investigation is required to maintain the position. Also, a nurse who began working in 1998 received only a fingerprint screening and never had an investigation.

Facilities are required to determine the sensitivity of a position and complete the adjudication process. If the facility cannot expeditiously and accurately ensure that employees are suitable for their positions, veterans and employees are at risk of exposure to individuals who have not been properly vetted.

## **Recommendations**

1. We recommended the Medical Center Director assess the human resources program at the Atlanta VA Medical Center to develop an action plan to ensure all medical center staff have appropriate background investigations and determinations are accurately recorded.
2. We recommended the Medical Center Director ensure all suitability adjudicators receive the mandatory training and background investigation required for the position.
3. We recommended the Medical Center Director provide training to all human resources staff on the requirements of the personnel suitability program to include generally accepted resources and tools to standardize the processing of background investigations.

### **Management Comments**

The Atlanta VAMC Director agreed with our findings and recommendations, stating that, effective August 23, 2016, the facilities Human Resources Management Service was organizationally realigned under her direct supervision. Additionally, the new Human Resources Management Officer started September 26, 2016, and recruitments have been posted for other critical staff who will oversee the Atlanta VA Personnel Security and Suitability program.

The VAMC Director stated that a workgroup will be chartered to review and streamline the background investigation and adjudication process. A database will be established to monitor and benchmark performance in comparison with practices across VA. Policy on the personnel security and suitability program will also be expedited. The VAMC Director anticipated implementation of the corrective actions by March 24, 2017.

The VAMC Director also stated that the facility will train a minimum of three human resources staff in the adjudication process as training becomes available. In the interim, the Veterans Integrated Service Network 7 Deputy Human Resources Office will assist in the adjudication process. The VAMC

Director anticipated implementation of the corrective actions by March 24, 2017.

Finally, the VAMC Director has tasked the Human Resources Management Officer to provide training to Atlanta human resources staff. Access to OPM's Personnel Investigations Processing System will be requested for all appropriate human resources staff. The Medical Center Director anticipates implementation of these corrective actions by November 25, 2016. Appendix C provides the full text of the VAMC Director's comments.

**OIG  
Response**

The Atlanta VAMC Director's comments and corrective action plans are responsive to the intent of the recommendations. We will monitor implementation of planned actions and will close the recommendations when we receive sufficient evidence demonstrating progress in addressing the issues identified.

## **Finding 2      The Atlanta VAMC Drug-Free Workplace Program Lapsed for a Period of 6 Months**

We substantiated that the Atlanta VAMC did not administer the DFWP for a period of 6 months. Specifically, from November 2014 through May 2015, no drug screenings were completed or documented by medical center personnel. According to the Acting Human Resources Officer, drug screening resumed in June 2015. The lapse in the program occurred because the former DFWP Coordinator left the position in September 2014 and the alternate coordinator did not assume the collateral duties required of this position. In addition, other human resources staff were unaware of their responsibilities under DFWP. As a result, the Atlanta VAMC was not in compliance with the DFWP Program and lacked assurance that employees in Testing Designated Positions (TDPs) remained suitable for employment.

### **Background**

A previous OIG report, the *Audit of the Drug-Free Workplace Program*,<sup>11</sup> identified weaknesses in VA's controls of pre-employment applicant drug testing and random employee drug-testing requirements. We recommended the Deputy Assistant Secretary for Human Resources Management implement processes to adequately monitor local compliance with VA's Drug-Free Workplace Program requirements.

Local facilities conduct random monthly drug testing of TDPs and are required to issue an individual notice to all employees in TDPs explaining that their position will be subject to random testing. Samples are sent to VA's Forensic Toxicology Drug Testing Laboratory in Minneapolis, MN, and reported to local-level Medical Review Officers, who are required to review all tests.

### **Criteria**

VA Handbook 5383 requires the facility human resources officer to assure, through consultation with the medical review officer, that a drug test has been conducted on individuals selected for screening and determine whether the test result is a verified positive result.<sup>12</sup> In addition, all drug-testing information must be maintained in a secure location for 3 years.<sup>13</sup> Custody and Control forms are sequentially numbered and must be used in that order.<sup>14</sup>

### **What We Did**

To determine the validity of the allegation, we obtained testimonial and documentary evidence from the Atlanta VAMC. In addition, we requested evidence of random drug testing from May 2014 through May 2015. We

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<sup>11</sup> Report No. 14-02383-175, March 30, 2015

<sup>12</sup> VA Handbook 5383, Paragraph 11(f)

<sup>13</sup> VA Handbook 5383, Paragraph 14(e)

<sup>14</sup> VA Handbook 5383/5, Part II, Appendix B, Records

also interviewed human resources staff and the medical review officer responsible for administering the DFWP.

**What We Found**

The Atlanta VAMC did not conduct drug screenings for a period of 6 months. Specifically, we requested evidence of drug testing for the period of May 2014 through May 2015. However, the Atlanta VAMC could only provide Custody and Control forms<sup>15</sup> from May through November 2014. Furthermore, human resources personnel acknowledged that the DFWP was not administered or tracked between November 2014 and May 2015. Finally, the medical review officer stated that no requests were received from the Atlanta VAMC Human Resources Department during this period despite receiving screening requests from outlying clinics. According to the Acting Human Resources Officer, drug screenings resumed in June 2015 during our review.

**Why This Occurred**

Atlanta VAMC leadership did not properly manage or provide oversight for the DFWP. According to the Associate Medical Center Director, VAMC leadership was not aware of how personnel changes affected the program or that drug screenings did not occur. Specifically, when the former DFWP Coordinator left the position in September 2014, VAMC leadership did not ensure the alternate DFWP Coordinator assumed the collateral duties. In addition, according to the Associate Medical Center Director, the DFWP was not discussed during regular management meetings and the human resources staff did not report the lapse in the program.

**What Resulted**

As a result, the Atlanta VAMC was not in compliance with DFWP and lacked assurance that employees in TDPs remained suitable for employment. In addition, veterans and patients at the VAMC were put at potential risk to exposure to employees who were not properly vetted and deemed suitable for providing services at the facility.

## **Recommendations**

4. We recommended the Medical Center Director ensure the Atlanta VA Medical Center human resources staff, to include the Drug-Free Workplace Program Coordinators and Medical Review Officers, are properly trained on the requirements of the Drug-Free Workplace Program and the responsibilities of their positions.
5. We recommended the Medical Center Director review the Drug-Free Workplace Program on a regular basis to ensure compliance with

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<sup>15</sup> Federal Drug Testing Custody and Control forms are documents used to establish a paper trail and track seizure, custody, control, transfer, analysis, and disposition of physical and electronic evidence of human urine specimens.

regulations and that employees hired during screening gaps are subject to corrective testing.

**Management  
Comments**

The Atlanta VAMC Director agreed with our findings and recommendations, stating that the facility appointed a DFWP Coordinator and alternate coordinator to oversee the program. The coordinators have participated in DFWP awareness training provided by VA Central Office, to include duties and responsibilities of the position, and are involved in all communication related to DFWP. In addition, human resources staff will be trained to ensure the maintenance of a safe and drug-free workplace for all Federal workers.

The VAMC Director also stated that DFWP Coordinators will certify 100 percent of TDPs are in compliance with DFWP objectives. The coordinators will provide monthly reports to VA Central Office, the Veterans Integrated Service Network 7 Office, and the Atlanta VAMC Director on findings and test results to guarantee VA's duty to achieve a drug-free workforce. Appendix C provides the full text of the Atlanta VAMC Director's comments.

**OIG  
Response**

The Atlanta VAMC Director's comments and corrective action plans are responsive to the intent of the recommendations. We will monitor implementation of planned actions and will close recommendations when we receive sufficient evidence demonstrating progress in addressing the issues identified.

## Appendix A Background

### Suitability Determinations

OPM requires applicants to covered positions to undergo a background investigation to determine their suitability for Federal employment.<sup>16</sup> Depending on the responsibilities of the position, the level of investigation varies. All individuals selected for employment receive a pre-screening Special Agreement Check, which is a limited investigation including law enforcement checks. Once appointed, the facility begins a background investigation appropriate to the risk level of the position. The table identifies the position risk categories and the investigation types associated with each category.

**Table. Investigation Type and Position Risk Categories**

Investigation Type	Risk Category	Occupations
Special Agreement Check	N/A	All
National Agency Check with Written Inquiries	Low	Most Employees
Moderate Risk Background Investigation	Moderate	Human Resources, Information Technology, Police, Program Managers
Background Investigation	High	Management, Adjudicators, Security Officers, Fiscal and Finance

*Source: VA Handbook 0710, Appendix A, Paragraph 11(c) and VHA Handbook 0710.01*

Local VA facilities adjudicate Special Agreement Check and NACI investigations. VA’s Security and Investigations Center in North Little Rock, AR, adjudicates moderate- and high-risk level investigations.

### Adjudicative Process

After the facility receives the results of the background investigation from OPM, the adjudicative process begins. Designated human resources personnel review NACI investigation results to validate suitability for employment. If the result of the investigation yields derogatory information, adjudicators consider the sensitivity level of the position, length of time since the offense, as well as the effect on the agency decision. Suitability decisions are recorded in VA’s PAID system and OPM’s PIPS.

<sup>16</sup> Title 5 Code of Federal Regulations § 731.104

**Previous  
Inspector General  
Report**

In March 2015, the OIG issued the *Audit of the Drug-Free Workplace Program* (Report No. 14-02383-175), which identified weaknesses in VA's controls of pre-employment applicant testing and random employee drug-testing requirements. We recommended the Deputy Assistant Secretary for Human Resources Management implement processes to adequately monitor local compliance with VA's Drug-Free Workplace Program requirements.

## Appendix B Scope and Methodology

### Scope

We conducted this review from May 2015 through September 2016. Our work focused on human resources activities at Atlanta VAMC for the period of January 2014 through December 2015.

### Methodology

We obtained testimonial and documentary evidence from OPM, VA Central Office Personnel Security and Suitability Specialists, VHA HR Consultants, and the Atlanta VAMC leadership and HR staff. We reviewed personnel and security files, investigation certifications, employee data, and applicable policies and procedures.

We compared available employee data in the PAID system with OPM's Security and Investigations Index report. We also analyzed Certificates of Investigation from electronic Official Personnel Folders to compare the investigation close dates with signatures from Atlanta VAMC human resources staff.

### Data Reliability

We relied on personnel information from OPM's PIPS, which we received via the Security and Investigations Index report. To test for reliability, we compared data elements, such as investigation completion dates, level of investigation, and position classification, with certificate of investigation documents extracted from the electronic Official Personnel Folder. We concluded that the data were reliable and appropriate for this review.

We also compared information extracted from PIPS with the information from VA's PAID system. Based on the information in the certificate of investigation documents previously corroborated by PIPS, we determined that PAID was unreliable to accurately account for the adjudicative status of Atlanta VAMC personnel. Our report used PAID data without independent verification to access administrative information, such as duty station, date of birth, name, and title.

We documented data limitations with respect to any errors and omissions in the data significant to our findings. Except for the limitations discussed in this appendix and the body of the report, we concluded that the data used were sufficiently reliable to reach the assessments of each allegation, conclusion, and recommendation made in this report.

### Government Standards

We conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

## Appendix C Management Comments

### Department of Veterans Affairs Memorandum

Date: October 12, 2016

From: Director, Atlanta VA Medical Center (508/00)

Subj: DRAFT REPORT – Office of Audits and Evaluations – Review of Alleged Human Resources Delay at the Atlanta VA Medical Center

To: Assistant Inspector General for Audits and Evaluations

1. I have reviewed the Veterans Affairs (VA) Office of Inspector General Office of Audits and Evaluations draft report the Review of Alleged Human Resources Delays at the Atlanta VA Medical Center, Decatur, Georgia.

2. I concur with the draft report and recommendations. Attached are responses to each recommendation.

*(original signed by:)*

Annette P. Walker

Attachment

**Comments to OIG's Report**

The following comments are submitted in response to the recommendations in the OIG report:

**OIG Recommendations:**

**Recommendation 1.** We recommended the Medical Center Director assess the human resources program at the Atlanta VA Medical Center to develop an action plan to ensure all medical center staff have appropriate background investigations and determinations are accurately recorded.

Facility response: Concur

Target Completion Date: March 24, 2017

Effective August 23, 2016, Human Resources Management Service (HRMS) was organizationally realigned under the direct supervision of the Medical Center Director. In addition, the new Human Resource Management Officer (HRMO) arrived on station September 26, 2016. Recruitment for a new Assistant HRMO has been posted as well as a Supervisory Employee Relations/Labor Relations Specialist who will have oversight of the Atlanta VA Personnel Security and Suitability (PSS) program.

A Rapid Process Improvement Workgroup is being chartered to review the background investigation and adjudication process. The purpose of this workgroup will be to streamline the background investigation and adjudication process from selection to on-boarding to ensure that all new employees receive the appropriate background investigations within the established timeframe.

A database will be established to facilitate real time monitoring with benchmarking against identified best practices across the VA for continuous improvement with ongoing compliance reporting to leadership. The draft local policy on the personnel security and suitability program will be expedited through the Medical Center Memorandum approval process with designation for required training and documentation of understanding by all Human Resources personnel upon approval.

**Recommendation 2.** We recommended the Medical Center Director ensure all suitability adjudicators receive the mandatory training and background investigation required for the position.

Facility Response: Concur

Target Completion Date: March 24, 2017

Human Resources Management Service previously completed the background investigation and mandatory training of one assigned staff member that has since separated from the Atlanta VA. In the interim, the VISN7 Deputy Human Resources Officer is currently assisting in the adjudication process until staff training is available this fall. The medical center will train a minimum of three Human Resources staff in the adjudication process as training becomes available.

**Recommendation 3.** We recommended the Medical Center Director provide training to all human resources staff on the requirements of the personnel suitability program to include generally accepted resources and tools to standardize the processing of background investigations.

Facility Response: Concur

Target Completion Date: November 25, 2016

The Medical Center Director has tasked the Human Resources Officer to provide training to the Atlanta Human Resources staff and Medical Review Officers within the next 30 days. In addition, access to OPM's Personnel Investigations Processing System will be requested for all appropriate Human Resources staff.

**Recommendation 4.** We recommended the Medical Center Director ensure the Atlanta VA Medical center human resource staff, to include the Drug-Free Workplace Coordinators and Medical Review Officers, are properly trained on the requirements of the Drug-Free Workplace Program and the responsibilities of their positions.

Facility Response: Concur

Target Completion Date: November 1, 2016

The Atlanta VA Medical Center has appointed a Drug-Free Workplace coordinator and alternate coordinator to oversee the program. The coordinators have participated in the Drug-Free Workplace (DFWP) awareness training provided by VA Central Office (VACO) and are involved in all communication related to DFWP. They have been trained on the duties and responsibilities for Testing Designated Positions (TDP), Random Testing, Reasonable Suspicion, Injury, illness, unsafe or unhealthful practice, voluntary testing, and testing as a part of or as a follow-up to counseling or rehabilitation.

Human Resources staff will be trained to ensure the maintenance of a safe and drug free workplace for all federal workers. Appropriate staff were provided a list of Testing Designated Positions (TDP) and have been educated to ensure that all applicants selected for a TDP are tested and issued a copy of the Acknowledgement Notice.

**Recommendation 5.** We recommend the Medical Center Director review the Drug-Free Workplace Program on a regular basis to ensure compliance with regulations and that employees hired during screening gaps are subject to corrective testing.

Facility Response: Concur

Target Completion Date: Completed

The Drug-Free Workplace (DFWP) Coordinator(s) will certify 100% Testing Designated Positions (TDP) are in compliance with the Drug Free Workplace Program objectives. Additionally, the DFWP Coordinators will ensure internal employees transferring to a TDP are tested prior to transfer and will certify the completion of all required monthly random drug testing. The Coordinator(s) will provide monthly reports to VA Central Office (VACO), the VISN 7 Network Office and the Atlanta VA Medical Center Director on findings and test results to guarantee VA's duty to achieve a drug free workforce.

**Additional Information.** In addition, an update on the status of the unadjudicated background investigations backlog was requested. The Atlanta VA Medical Center did conduct initial onboarding requirements such as fingerprinting and preliminary Special Agreement Check requirements before any employee started on duty at this Medical Center. The facility is in the process of gaining access to OPM's Personnel Investigations Processing System and will implement an action plan to audit all facility employee background levels to validate complete background investigation compliance. Once the full review has been conducted, any employees found to have an insufficient background investigation will be provided assistance to complete all requirements in an expedient manner.

*For accessibility, the format of the original documents in this appendix has been modified to fit in this document.*

## Appendix D **OIG Contact and Staff Acknowledgments**

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Contact	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
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Acknowledgments	Steven Wise, Director Dustin Clark Michael Derick Shawn Steele
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## Appendix E Report Distribution

### VA Distribution

Office of the Secretary  
Veterans Health Administration  
Veterans Benefits Administration  
National Cemetery Administration  
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Office of Acquisition, Logistics, and Construction  
Board of Veterans Appeals  
Director, VISN 7: VA Southeast Network  
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### Non-VA Distribution

House Committee on Veterans' Affairs  
House Appropriations Subcommittee on Military Construction,  
Veterans Affairs, and Related Agencies  
House Committee on Oversight and Government Reform  
Senate Committee on Veterans' Affairs  
Senate Appropriations Subcommittee on Military Construction,  
Veterans Affairs, and Related Agencies  
Senate Committee on Homeland Security and Governmental Affairs  
National Veterans Service Organizations  
Government Accountability Office  
Office of Management and Budget  
U.S. Senate: Johnny Isakson, David Perdue  
U.S. House of Representatives: Rick Allen; Sandford D. Bishop, Jr.;  
Buddy Carter; Doug Collins; Tom Graves; Jody Hice;  
Henry C. "Hank" Johnson, Jr.; John Lewis; Barry Loudermilk;  
Tom Price; Austin Scott; David Scott; Lynn A. Westmoreland;  
Robert Woodall

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