



Memorandum from the Office of the Inspector General

June 25, 2015

Susan E. Collins, LP 3A-C

REQUEST FOR FINAL ACTION – AUDIT 2014-15234 – TVA’S TALENT ACQUISITION AND DEPLOYMENT PROCESS

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

Information contained in this report may be subject to public disclosure. Please advise us of any sensitive information in this report that you recommend be withheld.

If you have any questions or wish to discuss our findings, please contact Jessica L. Monroe, Auditor, at (865) 633-7338 or Lisa H. Hammer, Director, Operational Audits, at (865) 633-7342. We appreciate the courtesy and cooperation received from your staff during the audit.

Robert E. Martin

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OIG File No. 2014-15234



Office of the Inspector General

Audit Report

To the Vice President,
Human Resources

TVA'S TALENT ACQUISITION AND DEPLOYMENT PROCESS

Auditor
Jessica L. Monroe

Audit 2014-15234
June 25, 2015

ABBREVIATIONS

CDL	Commercial Driver License
CEE	Continuous Enterprise Excellence
CIP	Central In-Processing
D&S	Deployment and Support
EH	Employee Health
EIN	Employee Identification Number
FFD	Fitness for Duty
HR	Human Resources
HRG	Human Resource Generalist
IT	Information Technology
MVR	Motor Vehicle Record
NEE	New Employee Experience
NSAS	Nuclear Security Access Services
OGC	Office of the General Counsel
OIG	Office of the Inspector General
OPM	Office of Personnel Management
PEM	TVA Police and Emergency Management
PHQ	Personal History Questionnaire
PLUS	People Lifecycle Unified System
PS	Personnel Security
SBU	Strategic Business Unit
SPP	Standard Programs and Processes
TA	Talent Acquisition
TVA	Tennessee Valley Authority
VP	Vice President

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- A. OVERVIEW OF THE HIRING PROCESS
- B. RESPONSE DATED JUNE 16, 2015, FROM ERIN M. WASHINGTON TO ROBERT E. MARTIN
- C. MEMORANDUM DATED JUNE 15, 2015, FROM TODD M. PENEY TO ROBERT E. MARTIN
- D. MEMORANDUM DATED JUNE 19, 2015, FROM FRED E. MARCUSSEN TO ROBERT E. MARTIN
- E. RESPONSE DATED MAY 14, 2015, FROM TIMOTHY E. PONSETI TO ROBERT E. MARTIN



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EXECUTIVE SUMMARY

Why the OIG Did This Audit

At the request of the Vice President (VP) of Human Resources (HR), we evaluated the efficiency of the hiring process related to the time-to-fill for the Tennessee Valley Authority’s (TVA) annual employee positions. In addition, we assessed TVA’s reporting capabilities and functionality to identify gaps within the talent acquisition and deployment process. The scope of this audit was the process for hiring annual TVA employees as of August 2014—from the time a need to hire an employee is identified until a person is available to start work at TVA. Our audit scope covered the hiring process for internal and external candidates and direct-fill and competed positions.

What the OIG Found

We evaluated the efficiency of TVA’s hiring process related to the time-to-fill for TVA’s annual employee positions and determined the process was not efficient due to (1) process inefficiencies that can lengthen the hiring process timeline and (2) issues impacting the usefulness of the time-to-fill metric.ⁱ In addition, we identified areas where TVA’s HR Information System (i.e., People Lifecycle Unified System [PLUS]) could be improved to better support the hiring process and two areas where TVA does not comply with Office of Personnel Management (OPM) requirements related to Selective Service registration and internal requirements for psychological evaluations for system operators and dispatchers.

Three additional matters came to our attention during the audit related to completing psychological evaluations and motor vehicle checks for certain positions. These matters were not directly related to our audit objectives or within the scope of our planned audit but are included in this report for management’s consideration and action.

What the OIG Recommends

As evidenced in this report, the hiring process involves multiple organizations. As such, we make recommendations to several organizations impacting the process. Specifically, we recommend:

- The VP, HR:
 1. Address the process inefficiencies identified in this report by
 - (a) providing training on the hiring process and PLUS, as applicable, to all hiring managers and requiring periodic refresher training;

ⁱ We will refer to the time-to-fill metric as “Metric” throughout the report.



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(b) modifying the process to implement needed improvements; (c) updating procedures to reflect current practices or modifying practices to comply with applicable procedures; and (d) capturing customer feedback on the hiring process on a regular and timely basis. Needed improvements to address inefficiencies relate to identifying the need to hire; gaps in identifying position requirements; providing recruiting strategies to assist hiring managers; the timing of internal and external posting of vacancies, overlaps, and gaps in the approval process; providing hiring documents at the earliest point in the process; fingerprinting at the earliest point in the process; and fully utilizing PLUS capabilities.

2. Develop and/or modify the Metric input requirements and related definitions and work with other organizations in setting goals and determining accountabilities.
3. Work with Information Technology and other process owners, as applicable, to (a) require PLUS to accept the candidate application only after it is completed, (b) either grant the rights to appropriate HR personnel to develop and write reporting queries or define expectations for turnaround time for providing the requested information, (c) identify and develop reports needed by process owners, and (d) develop a process to prevent the creation of duplicate and multiple employee identification numbers (EIN) and streamline the process for correcting EIN errors.
 - The VP, HR, and the Director, TVA Police and Emergency Management (PEM), coordinate with TVA’s Office of the General Counsel to correct TVA’s process for verifying Selective Service registration and document a written, signed certification statement to comply with legal and OPM requirements.
 - The Director, PEM:
 1. Evaluate whether the fingerprint process can take place earlier in the hiring process and implement needed process improvements.
 2. Assess the risk of having armed guards at TVA sites without psychological evaluations to determine if psychological evaluation is needed, document the assessment and results, and implement needed improvements.
 3. Update TVA-SPP-14.7, Personnel Security, to reflect current requirements for inspectors.



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- The Director, PEM, and the Acting Director, Nuclear Security, jointly evaluate the use of a single application for nuclear candidates.
- The VP, Transmission Operations and Power Supply:
 1. Institute a process to request required psychological evaluations.
 2. Continue with plans to revise requirements related to psychological exam updates for system operators/dispatchers.

TVA Management’s Comments and Our Evaluation

TVA’s comments on the draft of this report are included in their entirety in the Appendices. TVA management generally agreed with our recommendations except for suggested actions to address assessment of the risk of having armed guards without psychological evaluations and use of a single application for nuclear candidates. The Office of the Inspector General concurs with the actions planned and taken to address our recommendations.

BACKGROUND

The Tennessee Valley Authority's (TVA) workforce is central to accomplishing the mission and strategic goals of TVA. As such, the hiring process is important to aid TVA in obtaining talented individuals to accomplish current and future business goals. Whether hiring in as a new employee or applying for an internal transfer or promotion, all TVA employees interact with the hiring process during their tenure at TVA.

The primary owner of TVA's hiring process is Human Resources (HR) within the HR and Communications strategic business unit (SBU). Specifically, HR Generalists (HRG) assist the hiring organizations in identifying the need to hire, Talent Acquisition (TA) personnel are responsible for the recruitment process, Deployment and Support (D&S) personnel are responsible for onboarding employees, and Employee Health (EH)¹ personnel are responsible for employee medical processing, including drug testing and psychological evaluations. Organizations in other SBUs are involved at various steps in the hiring process as well. TVA Police and Emergency Management's (PEM) Personnel Security (PS) staff is responsible for conducting preemployment background or suitability investigations. Nuclear Power Group's Nuclear Security Access Services (NSAS) and Central In-Processing (CIP) organizations are responsible for conducting nuclear-specific background investigations and required nuclear testing and training.

The hiring process begins with identifying a need to hire. This involves the hiring manager² working with their HRG to develop the vacancy posting information and providing that information to a TA recruiter to post the position to the People Lifecycle Unified System (PLUS) and external recruiting sites when appropriate. After a posting is closed, the recruiter reviews the list of candidates for minimum qualifications and provides a list of qualified candidates to the hiring manager. The hiring manager reviews the candidate applications and qualifications to select individuals for interview, conducts interviews, and selects the preferred candidate for the job offer. The recruiter communicates the job offer to the candidate. When a candidate accepts a job offer, the candidate enters the TVA onboarding process which includes completion of a preemployment background investigation, drug testing, and any position-specific medical testing or training. Nuclear employees complete an additional process that includes a nuclear background investigation, testing, and training. See the Appendix for more detailed information on the hiring process.

HR measures the 'time-to-fill' from the date a job opening is approved in PLUS through the hire date (the date an employee first reports for work at TVA). HR uses a time-to-fill metric³ as one barometer of the success of the hiring process,

¹ During our review, the EH organization was moved into the HR SBU from the Safety and Health SBU.

² Hiring organizations designate hiring managers who work with HR in the hiring process.

³ We will refer to the time-to-fill metric as "Metric" throughout the report.

with a shorter hiring timeline being more favorable. HR also uses various other inputs to identify potential delays in the hiring process, such as the medical exam requested date and the background initiated date, and measures several defined time frames in the hiring process. The Metric is calculated by a separate system, PeopleSoft Business Intelligence, which processes data from PLUS into reports.

In the fall of 2013, the former Continuous Enterprise Excellence⁴ (CEE) organization performed a preliminary review of TVA's hiring process at HR's request. CEE performed preliminary analyses of data, conducted process mapping sessions, and provided feedback to HR that included identification of issues related to incomplete data information and process standardization opportunities. CEE suspended its review due to TVA's transition to PLUS, which altered business processes and consequently affected the value of the review to HR. No changes to the hiring process resulted from the feedback CEE provided to HR.

OBJECTIVES, SCOPE, AND METHODOLOGY

At the request of the Vice President (VP) of HR, we evaluated the efficiency of the hiring process for TVA's annual employees related to the time-to-fill metric. In addition, we assessed TVA's reporting capabilities and functionality to identify gaps within the talent acquisition and deployment processes. The scope of the audit was the process for hiring annual TVA employees as of August 2014—from the time the need to hire an employee is identified until a person is available to start work at TVA. The audit scope covered the hiring process for internal and external candidates and direct-fill and competed positions. We obtained an understanding of internal controls related to our audit objectives but did not perform testing of internal controls.

To achieve our objectives, we performed the following:

- Reviewed relevant Standard Programs and Processes (SPP) owned by HR, Safety, and other organizations, and other policies and procedures to understand how the current process operates. Relevant SPPs and policies included:
 - TVA-SPP-11.2.0, Filling Vacant Positions, effective January 2013.
 - TVA-SPP-11.2.1, Recruitment Process, effective September 2012.
 - TVA-SPP-11.2.5, Onboarding, effective October 2011.
 - TVA-SPP-11.2.7, Selection of First Line Supervisors, effective January 2013.
 - TVA-SPP-11.2.9, Veterans' Preference, effective June 2011.
 - TVA-SPP-11.3.0, Using Assessment for Selection, effective December 2010.

⁴ During TVA's reorganizational efforts, CEE was disbanded in December 2014.

- TVA-SPP-11.510, Pre-Employment Drug Testing for Non-Nuclear Organizations, effective March 2014.
 - TVA-SPP-11.511, Fitness for Duty (FFD) Program for Non-Nuclear Organizations, effective June 2014.
 - TVA-SPP-11.512, TVA Department of Transportation Alcohol and Drug Testing Program, effective July 2013.
 - TVA-SPP-14.7, Personnel Security, effective November 2010.
 - November 1999 memorandum, “Integrity Evaluation/Random Alcohol and Drug Testing (Non-Nuclear) For System Dispatchers and Operators,” addressed to a former FFD Program Manager from the HR General Manager.
 - December 2009 Psychologist Manual: TVA Non-Nuclear Power Organizations, Non-Nuclear FFD Program, Health Services.
- Reviewed time-to-fill data provided in whole (including sources and calculation of data) and in segments (such as preemployment time) to validate the logic behind the calculations. We did not test the data inputs for the time-to-fill metric, and we relied on the metric data as provided by HR.
 - Reviewed process and system diagrams to understand the current process.
 - Reviewed reporting capabilities within PLUS to understand what reports were available in PLUS and compare end-user needs to PLUS capabilities to identify areas for improvement.
 - Reviewed the content of PLUS training available to hiring managers in December 2014 to identify potential gaps.
 - Reviewed documentation from the 2013 CEE review, including preliminary analyses of data, process mapping sessions, and feedback to HR, to understand process inefficiencies and opportunities for improvement previously discussed with HR.
 - Reviewed data TVA provided on industry benchmark groups and benchmarking results to evaluate usefulness as a comparison to TVA metrics.
 - Interviewed parties involved in the hiring process to obtain information on process steps and the Metric, understand reporting needs of end users, and identify any areas of noncompliance. Interviews included personnel in various HR organizations, such as HR Business Partnerships; Systems and Support Services as well as System Administration and Reporting and D&S; TA; and EH; as well as personnel in other organizations, including PS, CIP, and NSAS, and hiring managers. We used nonstatistical sampling methods to select 26 hiring managers (the internal customer for the hiring process) for interviews. The hiring manager population was based on a listing of 881 openings added from January 2014 through August 2014. We selected individuals from each SBU and from all business units within the Operations SBU⁵ included in our population. We also judgmentally selected

⁵ The selections were made prior to TVA organizational changes in November 2014.

21 individuals for interviews on the process based on review of SPPs and organizational charts and consultation with the VP of HR.

- Consulted with the Office of the Inspector General's (OIG) Legal Counsel and TVA's Office of the General Counsel (OGC) to clarify various requirements related to the hiring process.
- Created a current state process flow-mapping diagram using Lean⁶ based on interviews and documentation to visually depict the hiring process and identify areas for improvement or process gaps, including potential inefficiencies.

Fieldwork was conducted from August 2014 to December 2014. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

FINDINGS

We evaluated the efficiency of TVA's process for hiring annual employees related to TVA's time-to-fill and determined the process was not efficient due to (1) process inefficiencies that can lengthen the hiring process timeline and (2) issues with the Metric impacting its usefulness. In addition, we identified areas where PLUS could be improved to better support the hiring process and two areas where TVA is not in compliance with Office of Personnel Management (OPM) and internal requirements related to Selective Service registration and psychological evaluations for system operators and dispatchers.

PROCESS INEFFICIENCIES CAN LENGTHEN HIRING TIME

Through creation of a current state map detailing the organizations and steps in the hiring process and interviews with individuals from HR and other organizations, we identified several points within the process where inefficiencies can lengthen the hiring process timeline. In general, these inefficiencies related to a lack of training and guidance on the hiring process, timing issues and redundancies within the hiring process, the lack of a job requirements matrix, a lack of feedback within the hiring process, and issues with PLUS capabilities. Each of the process inefficiencies are described in more detail below.

Inefficiencies Compounded by a Lack of Training and Gaps in Procedures

Some of the identified process inefficiencies are compounded by a lack of understanding of the overall hiring process, including the use of PLUS in the

⁶ Lean focuses on maximizing customer value while minimizing waste. TVA offers Lean training and certifications.

process, and gaps in procedures and PLUS training, as described below. These inefficiencies may require process changes to become more efficient.

- PLUS has the capability for hiring managers to electronically identify a need to hire. Creating the request in PLUS makes the information available electronically to the recruiter to obtain approvals for posting the position. Prior to PLUS, hiring managers used TVA Form 20927, "Vacancy Posting/Direct Selection Form," to identify this need. However, according to interviews, the TVA form remains the predominant method for identifying a need to hire. The TVA form is circulated multiple times between the HRG, hiring manager, and recruiter, creating multiple handoffs. Ultimately, the recruiter must enter information from the TVA form into PLUS to generate the information needed for approvals and posting of the position. Some hiring managers did not understand how to use PLUS in the hiring process. One of the reasons for use of the form is hiring managers' lack of training and guidance on how to enter the information into PLUS. The PLUS training available to hiring managers in December 2014 did not describe how to initiate a vacancy in PLUS. Contributing to the confusion of hiring managers is that TVA-SPP-11.2.0, Filling Vacant Positions, and TVA-SPP-11.2.1, Recruitment Process, do not contain guidance on what TVA forms or systems are required to initiate a need to hire. Updating the procedures to reflect current practices, educating the hiring managers on this process, and having the hiring manager complete the need to hire in PLUS could help streamline the process and shorten this step in the hiring process.
- Recruiting strategies are important to fill some current positions and build relationships with recruiting resources for future hiring needs. Recruiting strategies may include development of places to post the position (e.g., Indeed, LinkedIn, and industry group websites) and identifying a strategy for utilizing existing recruiting resources (e.g., career fairs, employee and union referrals, and headhunters). The Recruitment Process SPP states a recruiting strategy is developed for each job requisition. However, according to HR, TVA used to develop a recruiting strategy for each posting but no longer completes this process step due to the high level of workload and limited number of recruiters on staff. Recruiting strategies are instead developed by recruiters when requested by the hiring manager. Due to inconsistencies between the SPP and current practices, hiring managers may not be aware that recruiting strategies are not routinely developed as part of the hiring process or that they must submit a request to start the process of developing a recruiting strategy for filling the needed position. The lack of recruiting strategies may limit the candidate pool TVA reaches for positions and increase the difficulty in filling positions, resulting in an elongated time-to-fill.
- In general, TVA posts a position internally before posting externally to allow current employees to apply and be considered. TVA also considers policies

- under union agreements and Veterans' Preferences⁷ in the job posting process. Approximately one-third (9 of 26) of the hiring managers interviewed had concerns with the requirement to post positions internally before posting externally. Specifically, four of those hiring managers felt it was unnecessary or a waste of time to require internal posting first when there is not an adequate hiring pool (due to required skill sets, specialty qualifications, or entry-level positions). However, HR informed us posting a position internally first is a preference, not a requirement, and concurrent posting is allowable with acceptable justification and approval. This discrepancy in understanding the posting policy represents another opportunity to educate hiring managers on the hiring process. Better understanding of the policy among HR staff and updated procedures could reduce inconsistencies in the process. In addition, allowing concurrent postings, when appropriate, could shorten time-to-fill.
- Workforce planning is an input within the business planning process. For example, a fiscal year 2014 business plan included an assessment of each department's current headcount, the potential effects of attrition on headcount, the current vacancies and direct transfers, and a projection of headcount for the next fiscal year. According to HR, various approvals from both HR and the hiring organization are required before the position can be posted, with the number of approvals varying based on the position level and hiring organization. Some hiring managers had concerns with the number of approvals required after an organization has approved a position through other internal processes, such as preparation of the organizational chart with position types and headcounts, budgeted headcounts and financial budget activities, and workforce planning. Multiple approvals required during the hiring process may be redundant and contribute to process inefficiencies. Delays in the process can also occur if an approver is unavailable, which then places the posting on hold. TVA's hiring process does not require assigning delegates for approvals, resulting in wait time in the process when an approver is unavailable. Hiring managers and HR staff could benefit from training and guidance on the approval process in terms of what is required by HR versus what is required by their line organization, the rationale behind these requirements, and assigning delegates. Requiring multiple approval levels and not having delegates assigned can lengthen the time-to-fill.

Outside of the process inefficiencies described above, our interviews with hiring managers generally revealed a lack of understanding of the hiring process overall. Specifically, we found issues with understanding how to use hiring documents, how the screening process works, and the delineation of roles between the HRG and recruiter. Additionally, over one-half (15 of 26) of the hiring managers interviewed said they had concerns with the PLUS system or PLUS training, such as difficulty understanding the provided training or not receiving enough training. Specific hiring managers' concerns with PLUS included difficulty understanding

⁷ According to TVA-SPP-11.2.9, "Consistent with the Veterans' Preference Act of 1944, as amended, TVA applies veterans' preference in appointments and reductions in force, and to adverse actions affecting preference eligible veterans."

the PLUS process for hiring, full PLUS functionality was not being utilized, and expectations that items, such as a hiring matrix to identify job requirements, would be available in PLUS and were not. Enhanced training and additional guidance on the hiring process and PLUS could help hiring managers better understand the process and help alleviate some of the managers' concerns, leading to increased efficiency.

Timing Considerations within the Hiring Process

By mapping the hiring process, conducting interviews, and reviewing relevant SPPs, we identified two points where the timing could be improved to streamline hiring. Specifically, hiring documents were provided late in the process to hiring managers by recruiters and fingerprinting of candidates occurred late in the process for screening candidates. Providing documents earlier could shorten the time-to-hire and completing candidate fingerprints earlier could identify unqualified candidates before offers are made.

Hiring Documents Provided Late in Process

Hiring documents, specifically the hiring matrix⁸ and interview questions, are provided to hiring managers when recruiters provide a list of screened candidates who meet the minimum qualifications for the job. Hiring managers use the hiring matrix to develop criteria for reviewing candidate records and evaluating candidate interviews and to track and score results of candidate reviews. The interview questions are used as a resource for developing questions for interviews. According to HR, hiring managers have 10 days to review candidate information and select candidates for interviews. TVA-SPP-11.2.0, Filling Vacant Positions, and TVA-SPP-11.2.1, Recruitment Process, do not describe criteria for when documents should be provided in the process. Providing documents earlier in the process could help shorten the time-to-fill, as the hiring manager would be able to get familiar with the documentation, establish criteria for evaluating candidates, and develop interview questions concurrent with HR activities, rather than after the screening process. The hiring manager also would be better equipped to conduct the records review and make interview selections in a timelier manner.

Fingerprinting Occurs Late in Hiring Process

Fingerprinting takes place when an employee reports to CIP or on the first day of New Employee Experience (NEE). Fingerprint search results are loaded into TVA's Cogent system and PS reviews the results of fingerprint searches to determine if there is disqualifying information to prevent employment. Based on research by OIG's Legal Counsel, there appears to be no restriction on when fingerprinting takes place in the process. TVA has fingerprinting equipment located across the Valley, at corporate offices in Knoxville, Chattanooga, Nashville, and Muscle Shoals and at most plants. Fingerprinting earlier in the

⁸ The hiring matrix is an Excel spreadsheet used to score candidates based on the records review and interview performance. The hiring matrix is required for represented employees, but not for Management and Specialist employees. The hiring manager is responsible for selecting the criteria and determining the weighting (except where Veterans' Preference applies) for the hiring matrix.

process could identify those individuals who would not qualify for employment at TVA before an offer is made and the post-offer processes begin. For example, if the fingerprint results reveal that a candidate would not meet TVA suitability requirements, TVA would not move forward with the hiring process for that candidate. A shortened time-to-fill could result from fingerprinting earlier in the hiring process.

Lack of Defined Job Requirements

TVA does not have a job requirements matrix, typically used in the HR industry, or other method to readily identify the requirements for every job code (e.g., medical, clearance, suitability, psychological, training, license, certifications, respirator testing). The 2013 CEE review identified this issue, but no one was assigned responsibility for the issue and it was never resolved. Frequent changes in TVA job codes also create concerns that any ad hoc listing of requirements developed would not be complete and correct. Without a job requirements matrix or other standard method to identify requirements, HR spends time contacting various TVA personnel to identify the necessary requirements for each position being filled, which lengthens the time-to-fill. Additionally, the lack of a job requirements matrix could lead to inconsistencies in screening qualified candidates. Developing a matrix or other method, such as enhanced PLUS functionality, to quickly identify requirements for individual job codes could improve efficiency of the hiring process.

Redundancies in PS and NSAS Applications for Nuclear Candidates

As previously stated, when a candidate accepts a job offer, D&S contacts the candidate to request completion of a background application. This application is reviewed by PS as part of the preemployment background investigation. Nuclear candidate employment verification is performed by NSAS' contractor. PS performs a local law enforcement check for nuclear candidates and shares the results with NSAS. PS' goal is to conduct all background investigations in 10 to 12 days; data provided for January 2014 through July 2014 indicated PS took an average of 9.8 days to complete investigations.

In addition to the background application, nuclear candidates are asked to complete a Personal History Questionnaire (PHQ). NSAS conducts investigations in accordance with Nuclear Regulatory Commission requirements. NSAS stated background investigations are typically completed within 5 days after a candidate has left CIP. PS and NSAS share results of the investigations with each other. However, if PS follows up with candidates to complete information for the background application, such as for gaps in employment or education, before providing NSAS the results, the candidate may be contacted by both groups on the same gap in information. By reviewing the two applications, we determined the PHQ includes all information required on the background application and requires more information for nuclear candidates. The PHQ requests additional information: country of citizenship, personal description (eye color, hair color, height, weight), U.S. driver's license information, date of port of entry into U.S. (if not a U.S. citizen born in the U.S.),

personal data on foreign travel, personal references, credit history, Nuclear Regulatory Commission escalated enforcement actions, self-disclosure information, notification of legal actions, and signatures allowing TVA to conduct credit checks and nuclear industry checks and to review fingerprint information. In addition for nuclear candidates, there are timeframe requirements for residency and education history that are longer or more specific on the PHQ than the background application.

Having a nuclear candidate complete two applications for employment at TVA adds time to the hiring process, as a candidate completes similar information on both applications. Additionally, if PS and NSAS each review the respective applications for gaps or errors, the process is less efficient and time is added to the hiring process. Using a single application for nuclear candidates could streamline the process. According to Nuclear Security, changes to the application process for nuclear candidates should be made by PS because the information on the PHQ is required by Nuclear Regulatory Commission. In addition, better coordination between PS and NSAS could prevent both groups from following up with the same candidates for similar information.

No Formal Repository to Capture Feedback on Hiring Issues

Hiring managers inform HRGs or recruiters of hiring issues on an ad hoc basis. HR does not have a formal mechanism for capturing customer feedback, which could aid the hiring process by collecting feedback in a central repository or if HR staff cannot be reached. Capturing customer feedback could assist HR in identifying process and customer service issues and would allow for trending of data to see how the organization is performing over time. Empowering customers to provide feedback and having data to use to drive changes could help with process efficiencies as well.

PLUS Inefficiencies Need Improvement

During our audit, we determined PLUS could be improved to better support or shorten the hiring process. Applicants use PLUS to submit TVA background applications. TVA personnel use PLUS to complete hiring process functions, including submittal and review of background information, recording the date for completing medical examination, and tracking actions during the hiring process related to each candidate's offer, offer acceptance, hire date, and other actions. TVA personnel also use PLUS and related tools to run reports or queries on status of the hiring process.

Incomplete Applications Lengthen Hiring Process and Create Inefficiencies

When a candidate accepts an offer of employment with TVA, the candidate receives an e-mail link from D&S to access the TVA background application through PLUS. Background applications can be submitted with incomplete information. For example, a candidate may have a 6-month period where education or employment history is not included. Information for set periods of time (i.e., residency and locations of employment for 5 years) is required to complete a suitability investigation. As a result of receiving incomplete

background applications, PS spends time following up with candidates to obtain the needed information. According to PS, candidate information has to be corrected for every application reviewed which, depending on candidate responsiveness, can take from a few days to over a month to obtain a complete application. We were provided one example where the preemployment investigation took a total of 36 days; PS attributed this delay to incomplete background application information. During this time, the candidate was not moving forward in the hiring process. This lengthened the time-to-fill and created inefficiency where rework was necessary. Once all corrections are complete, the information sent to the contractor conducting the background investigation has to be amended for candidate corrections, which delays the investigation. Based on the results of the investigation, PS enters a decision of either suitability granted or suitability denied for each candidate. An aggravating factor is that once the background application is submitted by the candidate, PLUS locks the application from editing, which prevents the candidate from updating the application with corrections. According to HR, requests for revisions to PLUS are being evaluated.

PLUS Reporting Issues

TVA personnel who use PLUS identified concerns with reporting and duplicate or multiple employee identification numbers (EIN). The primary method of running reports in PLUS is query manager; however, query manager cannot run complex queries or query multiple systems. According to HR staff, HR and TVA agreed that requests to build queries outside of query manager must be completed by TVA's Information Technology (IT) group. In addition, making queries available for multiple users (such as for all recruiters or all HRGs) to run reports and view the results also requires IT action. For example, HRGs need to run and view a report showing the preoffer status of positions in the hiring process. HRGs do not have access to this report and recruiters use a spreadsheet to inform HRGs of the process status. Requiring IT to build all reports outside of query manager and to make reports available to additional users can add time to the process, as individuals wait for reports to be developed or to be provided information. Notwithstanding IT limits on access to certain portions of PLUS to preserve data reliability, limitations on PLUS reporting functions add inefficiencies to the hiring process.

In terms of the PLUS reporting capabilities, reports are developed on an ad hoc basis as reporting needs are identified. Once a user identifies the need for a report, there is a time delay while the report is developed and made available for use. Not having needed reports available can add time to the hiring process. For example, while D&S waited for a report to be built showing post-offer status, D&S had to manually enter each applicant's EIN to find the current status or wait for a reply on information requested. Developing reports as they are needed as opposed to developing reports based on business needs identified upfront also adds time and inefficiencies to the process.

Duplicate or Multiple EINs Compromise Data Integrity

Duplicate or multiple EINs are created in PLUS when interacting with other systems, such as the Cogent fingerprint system, IQ Navigator contractor system, Learning Management System for TVA training, and nuclear badging system. The PLUS unique identifier for each candidate, which is used to assign an EIN, is constructed from portions of the candidate's social security number and birthdate. If preexisting records are not found for the identifier, PLUS assigns a unique EIN to the candidate and links candidate information being added to the new EIN. If there is an error in data entry of the identifier (such as transposed numbers), multiple EINs can be assigned to the same individual. TVA personnel also identified an issue with PLUS because the candidate identifier is not unique for all individuals and some candidates have the same identifier. As a result, if a candidate inputs their information using their assigned identifier and a preexisting record is found for the same identifier, the new information (e.g., background information and training records) is added under the preexisting EIN for another person. Data integrity is compromised when PLUS assigns the same identifier to multiple candidates or links two distinct individuals' records into one record.

Duplicate and multiple EINs create unnecessary clean-up work in the system to correct multiple entries for an individual or employment records erroneously linked for two candidates to the same EIN. According to an HR IT Analyst, it takes a team of eight people to remove the duplicate or multiple EINs, because the team has to check all the systems involved, decide which EIN to keep, and move all the associated records to the correct EIN. Sometimes HR has to get help from TVA's IT group to move the records. The process takes from a day to a week without IT assistance or up to several weeks with IT involvement. Additionally, PS stated it has taken more than 30 days for PLUS records for two individuals to be unmerged, and this delay has impacted the time to complete investigations. While EIN errors are being corrected when they are found, data integrity and reliability are compromised when EINs are not unique to individuals and delays in the hiring process resulting from the data correction process can be reduced if these errors are prevented.

TIME-TO-FILL METRIC IS NOT EFFECTIVE

As stated in the Background of this report, HR measures time-to-fill from the date a job opening is approved in PLUS through the hire date (i.e., the date an employee first reports for work at TVA). The Metric is one barometer of success of the hiring process, with a shorter hiring timeline being more favorable. We identified issues with the Metric that could impact the reliability of the Metric and, therefore, its usefulness as a measure of success. In addition, we determined TVA may have difficulty with comparing the Metric with industry benchmarks due to differences in measurement definition and calculations.

Reliability of the Metric Impacts Usefulness

Reliability is necessary for the Metric data to provide useful information on the hiring process and how successful HR is at shortening the time-to-hire. How

accurate and complete the Metric data impacts that reliability and its usefulness in measuring success. In fact, due to concerns with the data, the Metric has only been reported once since January 2014. Issues with both accuracy and completeness of Metric data have impacted the Metric's usefulness.

Specifically, we found:

- The Metric data combines different types of hires (trades and labor, management excluded, and external) into a single Metric without considering the different requirements associated with each type of hire, such as the number of days a job opening must be posted. According to HR personnel, while HR breaks the Metric down into components, this information is not reported out to business units. As a result, the data could be misleading due to the proportion of types of selections.
- The Metric data uses calendar days, which skews the Metric to appear longer than the actual time-to-fill because TVA corporate employees typically work business days of Monday through Friday.
- Metric fields are reported based on the maximum date for each process step to be completed, resulting in batch processing jobs. For example, if a nuclear security officer position is posted with 12 positions needed, the job doesn't show as filled until the last position is filled. Having batch jobs can artificially lengthen the Metric⁹ by measuring time-to-fill for a group of positions instead of individual jobs.
- The Metric 'clock' continues if an organization puts a vacancy on hold. Additionally, if a candidate accepted a job offer and then failed out of the process, the candidate was still included in the pool being used for the Metric. Both items make the Metric appear longer than the actual time-to-fill. According to HR, TA attempts to move stalled postings forward through the process by contacting hiring managers or HR staff and is instituting a policy of cancelling inactive job postings after 45 days.
- Duplicates in the Metric data result from internal and external postings. For example, if a job is posted both internally and externally, PLUS creates a record for each posting. As a result, HR manually 'blends' the Metric in order to provide an overall time-to-fill for the position.
- The Metric data includes primarily manual inputs, as opposed to automatic date-stamped inputs. However, both manual and automatic date-stamped inputs are exposing the Metric to errors. Manual inputs depend on users not making date entry errors (e.g., incorrect or blank dates). Automatic date-stamped inputs are also creating inaccuracies in the Metric. For example, two entries for PS background dates showed the time to complete the background as 70 days and 102 days. PS personnel stated the preemployment investigation for each case took 6 days to process, but the

⁹ The CEE 2013 preliminary assessment previously identified this concern.

investigation was subsequently reopened for 1 day by HR IT, causing the number of days to complete to artificially recalculate using the last closure date instead of the actual completion date.

- NSAS, CIP, and EH do not enter data directly into PLUS, which can create issues with the Metric's accuracy and completeness. NSAS provides information to HR on the average number of days it takes to go through the process for granting clearance for unescorted access. Outside of PLUS, CIP tracks the amount of time new hires spend at CIP and provides sites a daily spreadsheet with a list of requisitioned new hires, the time each new hire spent at CIP, and the average CIP time per site. CIP creates a monthly rollup report that, according to the CIP manager, is provided to HR; however, no CIP data was included in the Metric data. EH does not track timeliness of hiring activities but would like to track timeliness information in a new safety application being expanded for industrial hygiene and medical clearances. D&S enters data into PLUS for nuclear investigations based on e-mail correspondence from NSAS and data from drug testing and medical systems.
- HR owns the Metric; however, HR is only responsible for part of the time-to-fill metric and there has been no buy-in from other TVA groups involved in the process for definition, measurement, and accountability for the Metric. Goals for completing hiring activities established by groups outside of HR are not included in the Metric. A lack of accountability to the Metric limits HR's ability to positively influence change in the Metric. This creates a question of the value of the Metric.
- Hiring managers may not see the Metric because it is not routinely reported. Seventeen of the 26 hiring managers interviewed had not seen or heard of the Metric. Several of these managers stated posting the Metric could be useful when planning for the hiring process. Making information on time-to-fill available to organizations and hiring managers helps set the expectation for how long the process should take and could create greater accountability for hiring managers to complete their part of the process on a timely basis or understand and accept the consequence of a longer hiring time.

Comparison to Benchmarks May Be Misleading

TVA provided 2013 benchmarking data to two industry groups. Each group measured the hiring process differently and compared TVA to different peer groups to provide benchmarking results. Although TVA measures and reports the Metric from the date the opening is approved to the date the employee starts work at TVA, other companies reviewed measure time-to-fill differently (such as days to fill the position or the overall average time to start work for all hires). These measures vary depending on which portions of the process are included; for example, whether background investigations, training, or new employee activities are included in the timeline. In addition, many of the peer groups do not have the same external requirements (e.g., OPM or Nuclear Regulatory Commission) for hiring after the offer is accepted by the candidate. As a result, external benchmarks may not be a fair comparison for the Metric due to the differences in measurement.

NONCOMPLIANCE WITH TVA AND EXTERNAL REQUIREMENTS

We identified two areas where TVA does not comply with requirements related to the hiring process. Specifically, psychological evaluations were not performed for seven system dispatchers/operators in TVA's Transmission group, as required by TVA policy. Additionally, TVA does not have standard processes for following up on covered individuals¹⁰ who are not registered with Selective Service; notifying OPM, as required, of unregistered personnel; or obtaining a written, signed certification to verify covered individuals have registered, as required by law.

Lack of Psychological Exams for Transmission System Operators/Dispatchers

A November 1999 memorandum issued in response to a corrective action from an accident investigation stated system dispatchers and system operators fall within the scope of safety-sensitive positions.¹¹ The memo established the requirement for system operators and dispatchers to have psychological evaluations with 3-year updates. Non-Nuclear FFD provided a list of 77 system operator/dispatcher employees in the Transmission business unit¹² as of July 2014. The data included the "FFD Clearance" date representing the date the employee was approved for the FFD clearance. An excerpt from the FFD psychologist's manual describes system operators/dispatchers as having highly specialized duties requiring them to be "held to even more stringent and specific criteria, since these duties involve unique demands and expectations."

According to the FFD data, psychological evaluations were not completed for seven personnel listed, as required. Although FFD informed the Transmission business unit of the issue in July 2014, as of January 2015, psychological evaluations had not been scheduled for these employees. Not scheduling the psychological evaluations may have resulted when TVA personnel moved from jobs that did not require psychological evaluations to jobs that did require the evaluations. Additionally, the lack of a TVA job requirements matrix may have contributed to this noncompliance because of limited information being available on the jobs requiring testing and how often, as discussed on page 8 of this report.

No Standard Written Statement or Process for Selective Service Follow-Up

Selective Service registration, commonly known as 'draft registration,' is required for most male U.S. citizens and immigrants ages 18 through 25. According to the

¹⁰ According to the Combined Federal Register Section 300.703, a covered individual is a male whose application is under consideration by an executive agency, who was born after December 31, 1959, is at least 18 years of age, and who is a U.S. citizen or alien residing in the U.S. or required to register.

¹¹ TVA-SPP-11.511 defines safety-sensitive as "those positions in which the incumbent, as part of his or her normal, regular duties, has the potential to cause immediate serious physical injury or harm to himself or herself or to the health and safety of other TVA employees, contractors, visitors, property, or the general public."

¹² We did not independently verify the accuracy or completeness of the list provided.

Selective Service website,¹³ registration is “a way our government keeps a list of names of men from which to draw in case of a national emergency requiring rapid expansion of our Armed Forces.” Based on a concern related to Selective Service registration identified during an interview, we obtained clarification from TVA’s OGC about Selective Service requirements at TVA, and specifically, what actions TVA must take as part of the hiring process related to Selective Service. TVA is required by law¹⁴ to confirm that a covered individual who is being appointed to a TVA position has registered for the Selective Service. Further, if a covered individual does not register, the individual is not eligible for appointment as a federal employee. The regulations also require TVA to obtain a written and signed statement at some point in the hiring process to certify the covered individual has appropriately registered.

If TVA receives notice from a candidate or the Selective Service Web site that a covered individual has failed to register, TVA must notify the Selective Service group at OPM. According to D&S, a system administrator checks the Selective Service Web site to verify that candidates in the hiring process are registered before the applicant attends NEE. The administrator adds a verification letter from the Selective Service Web site to the employee record. If the candidate is not registered, D&S asks the candidate to provide a reason for not registering and advises the applicant to register. However, D&S does not follow-up with Selective Service to verify the candidate registered or notify Selective Service of an unregistered candidate. TVA does not use a standard written form to certify Selective Service registration by employees and does not follow a standard process if a covered individual is not registered for Selective Service. As a result, TVA does not comply with Selective Service requirements.

OTHER MATTERS NEEDING MANAGEMENT ATTENTION

Three other matters described below came to our attention during the audit. During interviews, we became aware of two risks related to PEM and one risk related to Transmission Operations and Power Supply processes. Specifically, these risks involve (1) the lack of psychological evaluations for armed contract guard personnel, (2) motor vehicle and commercial driver checks not being updated timely, and (3) psychological evaluations not being updated for designated Transmission personnel. Although these matters did not relate directly to our audit objectives and were not within the scope of our planned audit, we included the concerns in this report for management’s consideration and action.

Lack of Psychological Evaluations for Armed Guard Contractors

In 2012, TVA transitioned from a TVA police force to using TVA inspectors (many were former TVA police officers) and Murray Guard, Inc., to provide non-

¹³ The Selective Service, an independent federal agency, hosts a Web site at <http://www.sss.gov/default.htm>.

¹⁴ The applicable laws are found at U.S. Code Chapter 5, Section 3328 and Code of Federal Regulations Chapter 5, Parts 300.701 through 300.707.

nuclear security services at TVA facilities. Although TVA inspectors are required to successfully complete psychological and fitness evaluations as part of employment, there is no requirement in the contract between TVA and Murray for armed contract guards to complete psychological evaluations. Having armed guards without psychological evaluations to test mental stability could put TVA at higher risk for workplace violence events and could create a TVA liability should such an event occur.

Motor Vehicle and Commercial Drivers Updates Not Completed Timely

During interviews, we were provided information related to Motor Vehicle Records (MVR) and Commercial Driver License (CDL) checks performed by PS. MVR/CDL checks are requested by business units or HRGs based on policies dictating update frequency for positions requiring special licensing or when a primary portion of the job involves driving. MVRs contain information about driving history, including traffic accidents; driving record points; traffic law violations, convictions, and fines; driving under the influence public records; and whether a driver's license is valid, suspended, or cancelled. As of November 13, 2014, PS identified 33 employees in safety-sensitive positions, including linemen, foremen (i.e., linemen or electrician), truck drivers, and gas and diesel mechanics, with a requested MVR/CDL check or update that had not been conducted since approximately May 2014. PS previously conducted MVR/CDL checks and updates; however, with personnel changes, the required access to request this information was disabled. In the absence of PS directly performing the work, the background contractor could perform this work. Although we were told MVR/CDL checks were not included in the contract services performed by the vendor, PS requested this capability be added to the vendor service package in August 2014. After discussing these issues with Shared Services in November 2014, a November 30, 2014, contract amendment with the PS vendor added the MVR services. PS provided evidence on February 25, 2015, showing all delinquent MVR/CDL checks had been performed.

Prior to the transition from TVA police officers to inspectors, TVA police officers were required under TVA-SPP-14.7, Section 3.2.3, to have MVR checks at the time of hiring and updates conducted every 3 years. Although the language in TVA-SPP-14.7 had not been updated to address TVA inspectors instead of TVA police officers, the PEM Manager of Field Operations confirmed the requirements in this section of the SPP also apply to the inspectors. Other safety-sensitive driving positions at TVA (such as truck drivers, linemen, and construction electricians) are also required to have MVR/CDL checks and updates conducted. While we did not find instances where MVR checks had been requested but not conducted for inspectors, we did not perform testing of current inspector qualifications to validate whether MVR updates had been completed in the last 3 years. MVR/CDL checks and updates are an important check on the driving history of employees responsible for operating TVA vehicles on work time. Timely MVR/CDL updates are necessary to ensure driver qualifications are kept current and driving violations are detected.

Transmission Operations and Power Supply Psychological Evaluations Not Updated

Three-year psychological evaluation updates are not conducted for system operators and system dispatchers. As described on page 14 of this report, the 1999 memo stated system dispatchers and system operators are safety-sensitive positions and require psychological evaluations with updates every 3 years. From the list of active system operators and dispatchers FFD provided, we identified over 76 percent (59 out of 77) of these employees as being delinquent on the 3-year psychological evaluation updates. Despite the requirement established in 1999, FFD stated they had not received requests for updated psychological evaluations as of January 2015. The VP of Transmission Operations and Power Supply stated the intent was not to require routine evaluation updates and a revised policy would be issued to replace the 3-year requirement with individual requests for additional psychological evaluations based on management and peer oversight. The revised policy will include language that passing a psychological evaluation is a condition of employment for the system dispatcher/operator positions.

CONCLUSION

As noted in this report, we concluded TVA's hiring process related to the time-to-fill annual employee positions is not efficient. Educating hiring managers on steps within the hiring process and addressing process inefficiencies, timing issues, and redundancies can make a positive impact in reducing time-to-fill. Further improvements to the hiring process can be made through creation of a job requirements matrix, providing a feedback process, and additional PLUS improvements. Most of these improvements can be made by HR to address process inefficiencies. However, HR is limited in how much improvement they can make without collaboration with all TVA organizations.

The Metric is an example where collaboration is required. Although HR owns the Metric, other organizations are responsible for various parts of the hiring process reflected in the Metric. There has been little buy-in from other parties involved in the process for Metric definition, measurement, and accountability. About two-thirds (17 of 26) of the hiring managers interviewed had not seen or heard of the Metric. Providing information on time-to-fill to organizations and hiring managers helps set expectations for how long the process should take and could create greater accountability for hiring managers to complete their part of the process on a timely basis or understand and accept the consequence of a longer hiring time. The lack of accountability to the Metric by organizations outside of HR limits HR's ability to positively influence change in the Metric. This raises a question of the general value of having the Metric.

Collaboration is one of TVA's values and is defined as a commitment to fostering teamwork, developing effective partnerships, and valuing diversity as TVA works together to achieve results. Having multiple organizations involved in the hiring process increases the need for collaboration in order to more effectively and

efficiently obtain talented individuals to accomplish the TVA mission and strategic goals.

RECOMMENDATIONS, MANagements' RESPONSES, AND OUR EVALUATION

As evidenced in this report, the hiring process involves multiple organizations. As such, we make recommendations to several organizations impacting the process. Specifically, we recommend:

- The VP, HR:
 1. Address the process inefficiencies identified in this report by
 - (a) providing training on the hiring process and PLUS, as applicable, to all hiring managers and requiring refresher training on a periodic basis;
 - (b) modifying the process to implement needed improvements;
 - (c) updating procedures to reflect current practices or modifying practices to comply with applicable procedures; and (d) capturing customer feedback on the hiring process on a regular and timely basis. Needed improvements to address inefficiencies relate to identifying the need to hire; gaps in identifying position requirements; providing recruiting strategies to assist hiring managers; the timing of internal and external posting of vacancies, overlaps and gaps in the approval process; providing hiring documents at the earliest point in the process; fingerprinting at the earliest point in the process; and fully utilizing PLUS capabilities.

TVA Management's Comments – HR management agreed with our recommendation and has taken or is taking actions to address process inefficiencies identified in this report. Details of their specific actions can be found in Appendix B. These actions include, but are not limited to, providing general training on the process and use of PLUS, developing of a process map and central depository for recruitment tools and templates, developing a talent acquisition alignment team to identify and recommend changes to management, updating and retiring of SPPs, and implementing a regular customer survey.

Auditor's Response – The OIG concurs with management's completed and planned actions.

2. Develop and/or modify Metric input requirements and related definitions and work with other organizations in setting goals and determining accountabilities.

TVA Management's Comments – HR management agreed with our recommendation and has implemented a TVA People dashboard, evaluated the Metric, and made changes around dashboard definitions.

HR plans to continue to evaluate the Metric in the future and make updates for improvement.

Auditor's Response – The OIG concurs with management's completed and planned actions.

3. Work with IT and other process owners, as applicable, to (a) require PLUS to accept the candidate application only after it is completed, (b) either grant the rights to appropriate HR personnel to develop and write reporting queries or define expectations for turnaround time for providing the requested information, (c) identify and develop reports needed by process owners, and (d) develop a process to prevent the creation of duplicate and multiple EINs and streamline the process for correcting EIN errors.

TVA Management's Comments – HR management agreed with our recommendation and (a) submitted system enhancements for the candidate application, (b) granted higher level access to HRG/HR assistant populations so they can see real-time status of candidates, (c) standardized reports regarding job openings and shared reports on the HR share drive, and (d) continues to work with IT Security and the OGC to implement ways to mitigate the duplication of applicant EINs.

Auditor's Response – The OIG concurs with management's completed and planned actions.

- The VP, HR, and the Director, PEM coordinate with TVA's OGC to correct TVA's process for verifying Selective Service registration and document a written, signed certification statement to comply with legal and OPM requirements.

TVA Management's Comments – Management agreed with this recommendation. PEM, PS recognized the need to require the Selective Service question to be designated as a "required field." PS collaborated with IT and OGC to update the application in PLUS. The revised application was deployed in June 2015.

Auditor's Response – The OIG concurs with management's planned and completed actions.

- The Director, PEM:
 1. Evaluate whether the fingerprint process can take place earlier in the hiring process and implement needed process improvements.

TVA Management's Comments – PEM neither agreed nor disagreed with our recommendation. PEM management stated they are capable of fingerprinting at any time during the hiring process but HR determines at what stage of the process fingerprints should be taken.

Auditor's Response – The OIG suggests collaboration between PEM and HR to further evaluate whether the fingerprint process should take place earlier in the hiring process and implement needed improvements.

2. Assess the risk of having armed guards at TVA sites without psychological evaluations to determine if psychological evaluation is needed, document the assessment and results, and implement needed improvements.

TVA Management's Comments – PEM management stated they have assessed this risk and disagreed with our recommendation. The assessment was completed through means of benchmarking and review of applicable federal guidelines, the Code of Federal Regulations, and best practices. PEM found that other federal agencies do not require psychological evaluations of their armed security officers. PEM was unable to identify any Code of Federal Regulations which requires a psychological evaluation. Murray Guard, Inc., currently contracted by PEM, provided a cost estimate of \$80,000 to perform psychological evaluations for current TVA guards. PEM is unable to justify such expenditure at this time.

Auditor's Response – The OIG concurs with management's completed actions.

3. Update TVA-SPP-14.7, Personnel Security, to reflect current requirements for inspectors.

TVA Management's Comments – PEM agreed with our recommendation and updated the appropriate SPPs.

Auditor's Response – The OIG concurs with management's completed actions.

- The Director, PEM, and the Acting Director, Nuclear Security, jointly evaluate the use of a single application for nuclear candidates.

TVA Management's Comments – PEM disagreed with our recommendation; however, Nuclear Security management agreed with the recommendation and stated they would evaluate the use of a single application for nuclear candidates with PEM.

Auditor's Response – The OIG suggests PEM and Nuclear Security collaborate and jointly evaluate the use of a single application for nuclear candidates.

- The VP, Transmission Operations and Power Supply:

1. Institute a process to request required psychological evaluations.

TVA Management's Comments – Management agreed with our recommendation and all required psychological evaluations were completed as of April 2, 2015.

Auditor's Response – The OIG concurs with management's completed actions.

2. Continue with plans to revise requirements related to psychological exam updates for system operators/dispatchers.

TVA Management's Comments – Management agreed with our recommendation. A new procedure "Transmission Operations & Power Supply System Operations Non-Nuclear Fitness for Duty Integrity Clearance Procedure" was developed, finalized, and signed April 28, 2015. Appendix A of the new procedure lists positions requiring a psychological evaluation. Further, in development of the procedure, management agreed to eliminate the 3-year update requirement contained in the 1999 memo and, going forward, follow-up psychological examination will occur as needed, based on supervisor observation of employee behavior.

Auditor's Response – The OIG concurs with management's completed actions.

OVERVIEW OF THE HIRING PROCESS

The Tennessee Valley Authority's (TVA) hiring process is comprised of four main steps: (1) identifying the need to hire; (2) obtaining eligible candidates for the position through internal posting, external posting, recruiting, or other appropriate means; (3) evaluating candidates, making the selection decision, and notifying candidates; and (4) onboarding or transitioning the new employee. We developed a detailed flowchart of the hiring process and provided it to Human Resources (HR) in December 2014 for its use. Below is a more detailed explanation of each of these steps including the processes that comprise them and the organizations involved in completing each process.

IDENTIFYING THE NEED TO HIRE

The hiring manager initiates the hiring process by identifying a need to hire and verifying budget availability to fill the vacancy. The hiring manager communicates the vacancy information to their assigned HR Generalist¹ (HRG) who verifies the headcount is available to fill the position and completes TVA Form 20927, "Vacancy Posting/Direct Select Form." Information entered includes the type of posting (i.e., internal, external, simultaneous, or direct select), job code, job title, number of available openings, official station, and hiring manager. When a hiring manager is posting multiple jobs at the same time, an Excel spreadsheet may be used instead of the form. Next, the HRG sends TVA Form 20927 to the hiring manager who reviews the vacancy form for accuracy and sends it back to the HRG. The HRG verifies the method for filling the position (i.e., direct select, internal posting, or external posting) is allowable and e-mails the form to the recruiter in HR's Talent Acquisition business unit.

OBTAINING ELIGIBLE CANDIDATES

Using the information on TVA Form 20927, the recruiter creates the posting in the People Lifecycle Unified System (PLUS). Various approvals from both HR and the hiring organization are required before the position can post; the number of approvals varies based on the position level and hiring organization. If requested by the hiring manager, the recruiter assists the hiring manager in developing a recruiting strategy. Generally, positions are posted internally first and Veterans' Preference and union agreements specify certain posting standards.² Hiring managers can post externally first or simultaneously with internal posting, if additional required approvals are obtained. After the position is posted, the recruiter sends a hiring timeline e-mail to the hiring manager indicating timeline dates for individual steps within the process.

¹ HRGs were formerly known as Employee Relations Consultants. Each SBU (External Relations, HR and Communications, Financial Services, and Office of the General Counsel) and each business unit within the Operations and Shared Services SBUs are assigned an HRG to assist with human resource functions.

² TVA has union agreements with the Engineering Association, Inc.; Office and Professional Employees International Union, American Federation of Labor and Congress of Industrial Organizations; International Brotherhood of Teamsters; and Trades and Labor Council for Annual Employees of the TVA. These agreements only apply to represented positions.

EVALUATING AND SELECTING A CANDIDATE

After a job is posted for the predetermined number of days, PLUS automatically closes the posting. When the posting closes, the recruiter reviews each candidate's résumé to determine if the candidate meets the minimum qualifications for the position outlined in the job description. The recruiter then provides the hiring manager a list of candidates meeting the minimum qualifications along with a hiring matrix and interview guidelines. If requested by the hiring manager, the recruiter will also provide a list of interview questions to consider. The hiring manager performs a records review of the candidate's résumé and additional information provided and decides which candidates to interview. The hiring manager sends the hiring matrix or other documentation justifying selection to the recruiter with a list of candidates to interview. According to HR, hiring managers have 10 days to review the candidate information and provide a list of interviewees. The recruiter reviews this information for reasonableness and schedules the interviews. The hiring manager conducts the interviews and, using the hiring matrix or other documentation, selects a candidate and provides a justification for the candidate selected to receive a job offer. The recruiter reviews the information for reasonableness. If no suitable candidates are found for an internal posting, the hiring manager may decide to post the position externally. In this case, the process would return to the posting step.

The recruiter prepares the offer package with required approvals for the selected candidate. The recruiter makes a verbal offer to the candidate and then extends the formal offer in PLUS. The candidate typically has 3 days to respond to a job offer. TVA policy is that job offers are made within 45 days of closing the posting and acceptance is required within 60 days of closing the posting. For internal candidates, the current manager can request the employee remain in their current role for up to 45 days before moving to the new position. The offer package would include any relocation expenses and is conditional on the candidate passing employment requirements such as background and drug screening, as well as any position-specific requirements such as a physical or other testing.

ONBOARDING OR TRANSITIONING A NEW EMPLOYEE³

Once the candidate accepts the offer, the candidate starts TVA's onboarding process. Deployment and Support (D&S) personnel send an e-mail to the candidate requesting the candidate fill out a background application in PLUS. D&S personnel also coordinate requirements for drug testing and additional medical testing or psychological evaluations, as required for the position. If the candidate is hiring for a nuclear position, D&S personnel schedule the candidate for Central In-Processing (CIP) and send an e-mail with the nuclear application to the candidate. Nuclear specific process steps are described later in this section.

³ Depending on what group a new employee is transitioning to and the timing of previous hiring process items for existing TVA employees, requirements for background processes, drug testing, and/or medical testing will vary.

Drug testing is required for all TVA employees as part of the preemployment process. Drug tests are valid for 30 days and drug test results are typically available within 2 days of testing. Employee Health personnel maintain the contracts for drug testing and psychological evaluations. D&S staff is responsible for scheduling drug screening and checking the web-based system for the results of candidates' drug tests and entering this information into PLUS. Fitness for Duty schedules psychological evaluations typically within a week of being requested. Additional testing of skills or abilities is conducted at the discretion and timing preference of the hiring manager, except for trades and labor positions, which require Edison Electric Institute testing as part of the hiring process and adds several weeks to the timeline.

When the candidate completes the background application, the candidate's PLUS status is moved to preemployment and PS completes a preemployment or suitability investigation. The status is coded based on the type of preemployment being requested (e.g., nuclear or non-nuclear) and automatically creates a case in PLUS assigned to a PS investigator. A suitability investigation consists of a fingerprint check through the Federal Bureau of Investigation, local law enforcement checks in locations of employment and residence for the last 5 years, verification of employment history for the last 3 years, including periods of unemployment and self-employment, verification of the highest education degree and other educational requirements deemed necessary, and verification of military service in the last 3 years. The PS investigator reviews the background application for completeness. If the application is incomplete, PS follows up with the candidate until complete information is provided, which, depending on the responsiveness of the candidate, can take from a few days to over a month. When complete information is obtained, PS sends the information to a contractor to conduct the investigation including education and employment verifications. Based on the results of the investigation, PS enters a decision of either suitability granted or suitability denied for each candidate. PS targets completing the preemployment process in 10 to 12 days and data provided by PS for 173 cases closed from January 2014 to July 2014 indicated PS was completing the process in an average of 9.8 days.

When a candidate has been granted suitability, D&S contacts the candidate to set up a date for reporting to the New Employee Experience (NEE). The date depends on NEE space availability and candidate schedules. Currently, NEE begins on each Monday of a new pay period. On the first day of NEE, non-nuclear candidates are fingerprinted. Fingerprint search results are loaded into TVA's Cogent system and PS reviews these results to determine if there is disqualifying information to prevent employment. If no disqualifying information is found, the employee completes NEE and reports to their assigned station. The fingerprint results become part of the employee's PLUS record. PS may conduct special investigations and clearance reviews after the hiring process is complete as part of employment if the position is designated or meets other requirements for review.

NUCLEAR SPECIFIC

Nuclear candidates are required to attend the CIP facility that is scheduled for the candidate by D&S. The hiring manager sends a CIP training request to the CIP scheduler mailbox. CIP uses this and other information to build a schedule for each candidate to receive upon arrival at CIP. The schedule lists all activities a candidate needs to complete while at CIP. Prior to CIP, candidates can complete some preprocessing activities, which include the nuclear Personal History Questionnaire (PHQ), Minnesota Multiphasic Personality Inventory psychological exam, computer-based training modules, and sometimes, medical screening. A portion of CIP is conducted prior to NEE for premedical processing (i.e., physical and psychological) and background processing including fingerprinting. Fingerprint searches are processed in the Cogent system and provided to PS to review for any disqualifying information. As described above, the fingerprint results become part of the employee's PLUS record. The candidate also attends CIP after NEE for nuclear specific training. Data provided by CIP indicated candidates are typically at the facility for a total of about 3 days.

For nuclear personnel, PS conducts local law enforcement checks and sends information to the contractor to conduct a suitability investigation without verifying employment. PS shares information and results with Nuclear Security Access Services (NSAS). Nuclear candidates obtaining unescorted access to nuclear sites undergo an additional investigation conducted by NSAS. When a candidate completes the PHQ, NSAS receives a copy of this questionnaire and the background form completed for PS. If there is a gap in employment history, NSAS follows up with the candidate to get complete information while the candidate is at the CIP facility. Once the questionnaire is completed, NSAS sends the information to another contractor to conduct the investigation. As part of the process, NSAS also pulls information from the Personal Access Data System, a nuclear industry database with information on candidate's prior nuclear access and drug screening. NSAS reviews the results of the investigation along with the results of the fingerprint search, psychological evaluation, and drug screening. At this point, NSAS makes a decision to either grant or deny the candidate unescorted access to TVA nuclear facilities. NSAS shares information with PS because it could affect the PS suitability decision. According to NSAS, the timeline for granting nuclear access is typically 5 days after the candidate leaves CIP. Once NSAS grants unescorted access and required training is complete, the employee can report to the assigned nuclear site.

Talent Acquisition and Deployment Process

Audit – 2014-15234

HR RECOMMENDATIONS RESPONSE

June 16, 2015

[1]



1. Address process inefficiencies identified

OIG Recommendation: Provide Training on the hiring process and PLUS, as applicable, to all hiring managers and requiring refresher training on a periodic basis. Modify the process to implement needed improvement. – **AGREED**

Comments, Facts and Recommendations:

- General training on how to use the PLUS recruiting module is available online through LMS (course #00084764). This is available for employees and hiring managers anytime. In addition to this training being available upon going live with PLUS, there will be reminders sent regarding this online training.
- Talent Acquisition will provide a process map for the Staffing process from end to end. This map will identify the activities included at each stage of the staffing process. The process map will define the roles and responsibilities for the hiring manager involved in the staffing process. Estimated due date: 10/1/15
- An output of the process map will be a checklist to standardize the flow of the recruitment cycle.
- There will be a central depository for applicable recruitment tools and templates accessible anytime to the hiring managers. Estimated due date: 10/1/15
- Provide ad hoc training as needed.
- Include an online training tool with a blend of the Process training into the current PLUS recruiting module. Estimated due date: 11/1/15

[2]



1. Address process inefficiencies identified

OIG Recommendation: Modify the process to implement needed improvement. – AGREED

Comments, Facts and Recommendations:

- Developed a Talent Acquisition alignment team. Through this team inefficiencies were identified, changes were recommended to management and implemented as appropriate. Some of the outcomes include:
 - Granted higher level access to HR Generalist/ HR Assistant population
 - Identified system enhancements and placed these items on the prioritization list for implementation in PLUS
 - Streamline the job opening process
 - HR Generalist/HR Assistant initiates job opening in PLUS
 - Elimination of the 20927 form “Vacancy Posting/Direct Selection Form”, resulting in a reduction in handoffs.
 - Training provided to the Human Resource community.
 - Training material, tools and templates placed on HR share drive for reference

3



1. Address process inefficiencies identified

OIG Recommendation: Updating procedures to reflect current practices or modifying practices to comply with applicable procedures. Capturing customer feedback on the hiring process on a regular timely basis. - AGREED

Comments, Facts and Recommendations:

- Development of the recruitment process checklist. Estimated due date: 10/1/15.
- Update TVA-SPP-11.2.0, Filling Vacant Positions to reflect current process. TVA-SPP-11.2.1 Recruitment Process will be retired and the pertinent information from this SPP will be located and available through the Employee Handbook and the Leadership Handbook. Estimated due date: 10/1/15
- Implementing a regular customer survey capturing the voice of the customer. This is will include input from a variety of hiring managers. Estimated due date: 10/1/15

4



1. Address process inefficiencies identified

OIG Recommendation: Improvements in: Identifying the need to hire, Gaps in identifying position requirements, Overlaps and gaps in the approval process. - **AGREED**

Comments, Facts and Recommendations:

- The HR Generalist is the first point of contact with the hiring manager upon identifying the need to hire and exploring other alternatives.
- Removed unnecessary approvals in the recruitment process. Two levels of management approvals are required to post and fill a position. Some organizations may add additional layers of approval based on the business need.
- Actively working on process improvements to assist in identifying position requirements. This plan includes collection of the position requirements to be tied to the job code in the system.

{ 5 }



1. Address process inefficiencies identified

OIG Recommendation: Improvements in: Providing recruitment strategies to assist hiring managers, Timing of internal and external posting of vacancies, Providing hiring documents at the earliest point possible in the process. - **AGREED**

Comments, Facts and Recommendations:

- Decision to simultaneous post is at manager's discretion (abiding by all applicable labor agreements). The HRG consults on this at the front end of the process, in addition to the recruiter confirmation at posting.
- Recruitment strategies will be consistently utilized on External vacancies. The strategy is a standard template that is utilized upon consultation from the recruiter with the hiring manager..
- Talent Acquisition will provide a process map for the Staffing process from end to end. This map will identify the activities included at each stage of the staffing process. The process map will define the roles and responsibilities for the hiring manager involved in the staffing process.
- An output of the process map will be a checklist to standardize the flow of the recruitment cycle.
- There will be a central depository for applicable recruitment tools and templates accessible anytime to the hiring managers. For example the Selection Matrix and the Interview questions will be stored here for hiring managers to utilize in preparation for the recruiting process. Estimated due date: 10/1/15.

{ 6 }



2. Develop and/or modify Metric input requirements and related definitions and work with other organizations in setting goals and determining accountabilities.

OIG Recommendation: Noted above. - AGREED

Comments, Facts and Recommendations:

- Implemented TVA People dashboards. Included are detailed breakouts for organizations, goals and consistent definitions. See example below for the overall TVA level:



[7]

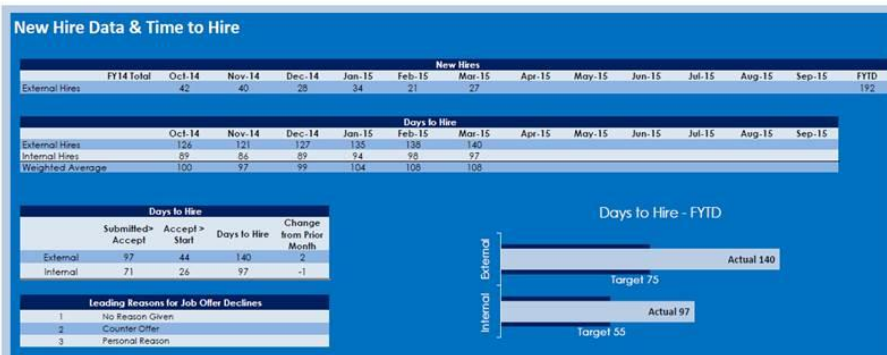


2. Develop and/or modify Metric input requirements and related definitions and work with other organizations in setting goals and determining accountabilities.

OIG Recommendation: Noted above. - AGREED

Comments, Facts and Recommendations:

- Evaluated metrics on recommendations and made changes. See people dashboard definitions. Continue to evaluate in the future and make updates for improvements.
- Hiring metrics located on the workforce planning dashboards:



[8]



3. Work with IT and other process owners to:

OIG Recommendation: Require PLUS to accept the candidate application only after it is completed. Either grant the rights to appropriate HR Personnel to develop and write reporting queried or define expectations for turnaround time for providing the requested information. - **AGREED**

Comments, Facts and Recommendations:

- System enhancements have been submitted to the prioritization for deployment to address candidate confusion associated with the application process.
- The HR Generalist/HR Assistant population has been granted higher level access to the system so they can see real time the status of candidates.



3. Work with IT and other process owners to:

OIG Recommendation: Identify and develop reports needed by process owners. Develop a process to prevent the creation of duplicate and multiple EINs and streamline the process for correcting EIN errors - **AGREED**

Comments, Facts and Recommendations:

- Standardize reports regarding job openings has been developed. These reports are shared regularly as well as located on the HR share drive for easy accessibility.
- Continue to work with Information Technology Security and Office of General Counsel to implement ways to mitigate the duplication of applicant EINs.



3. VP, HR and Director, TVA Police and Emergency Management

OIG Recommendation: Coordinate with OGC to correct TVA's process for verifying Selective Service registration and document a written, signed certification statement to comply with legal and OPM regulations. - **Agree**

Comments, Facts and Recommendations:

- The governance for verification of Selective Service registration and documentation to comply with OPM regulations resides with TVA Police and Emergency Management as an element of suitability.

June 15, 2015

Robert E. Martin, ET 3C-K

DRAFT AUDIT 2014-15234 - TVA'S TALENT ACQUISITION AND
DEPLOYMENT PROCESS

This memo is in response to your request for comments regarding the findings of the subject draft report. Our responses to the recommendations are listed below:

Recommendation

The VP, HR, and the Director, TVA Police and Emergency Management (PEM), coordinate with TVA's Office of the General Counsel to correct TVA's process for verifying Selective Service registration and document a written, signed certification statement to comply with legal and OPM requirements.

Response

TVA Police & Emergency Management (TVAP&EM) Personnel Security recognizes the need to require the Selective Service question to be designated as a "required field." Personnel Security collaborated with IT and OGC to update the application in PLUS. The revised application is scheduled to be deployed by June 16, 2015.

Recommendation

Evaluate whether the fingerprint process can take place earlier in the hiring process and implement needed process improvements.

Response

TVAP&EM is capable of fingerprinting at anytime during the hiring process. TVA Human Resources Department determines at what stage of the hiring process fingerprints should be taken, not TVAP&EM.

Matter Needing Management Attention

Assess the risk of having armed guards at TVA sites without psychological evaluations to determine if psychological evaluation is needed, document the assessment and results, and implement needed improvements.

Response

TVAP&EM has assessed the risk. The assessment was completed through means of benchmarking and review of applicable Federal Guidelines, Code, and Best Practices.

Robert E. Martin
Page 2
June 15, 2015

TVAP&EM has found that federal agencies such as the Federal Protective Service (FPS), Transportation Security Administration (TSA), and the Department of Homeland Security (DHS) do not require psychological evaluations of their armed security officers.

TVAP&EM was unable to identify any Code of Federal Regulation (CFR) which requires a psychological evaluation. The security company (Murray Guard) currently contracted by TVAP&EM provided a cost estimate of \$80,000 to perform psychological evaluations of current TVA guards. The results of our benchmarking and lack of federal regulation leaves TVAP&EM with the inability to justify such an expenditure at this time.

Recommendation

Update TVA-SPP-14.7, Personnel Security, to reflect current requirements for inspectors.

Response

TVAP&EM will update the appropriate SPPs to reflect the above recommendation.

Recommendation

The Director, TVAP&EM, and the Acting Director, Nuclear Security, jointly evaluate the use of a single application for nuclear candidates.

Response

Nuclear Security's clearance request is focused on unescorted access and not a part of the hiring process. In addition, (1) Personnel Security's application contains Restricted Protected Identifiable Information (RPII), (2) the criteria used to grant an unescorted nuclear access clearance cannot be considered in the hiring decision, and (3) Nuclear Security's unescorted access clearance requests are regulated by the NRC whereas Personnel Security's application is regulated by OPM.

Please let us know if your staff has any concerns with TVA's comments. In closing, we would like to thank Jessica Monroe and her audit team for their

Robert E. Martin
Page 3
June 15, 2015

professionalism and cooperation in conducting this audit. If you have any questions, please contact Kristi Foxx at (865) 632-2186.



Todd M. Peney
Director, TVA Police & Emergency Management
WT 2D-K

cc: Katherine J. Black, LP 6A-C
Christopher E. Glover, EB 10B-C
Dwain K. Lanier, MR 3K-C
R. Windle Morgan, WT 4D-K
Charles G. Pardee, WT 7B-K
Ricardo G. Perez, MR 3A-C
Timothy E. Ponseti, MR 1B-C
Sherry A. Quirk, WT 6-K
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Scott W. Tiemeyer, LP 3A-C
Van M. Wardlaw, BR 5D-C
OIG File No. 2014-15234



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

June 19, 2015

Robert E Martin, ET 3C-K

COMMENTS FOR 2015-15234 - TVA'S TALENT ACQUISITION AND DEPLOYMENT PROCESS

I have reviewed the draft report and agree with the facts and conclusions contained in the report for areas impacting Nuclear Security Access Services.

For the recommendation: The Director, PEM, and the Acting Director, Nuclear Security, jointly evaluate the use of a single applications for nuclear candidates. I agree with the recommendation and will evaluate a single application for nuclear candidates with the Director, PEM, noting the permanent Director, Nuclear Security has been appointed and is signing this comment letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred", followed by a horizontal line extending to the right.

Fred Marcussen
Director, Nuclear Security

Monroe, Jessica L.

From: Ponseti, Timothy E <teponset@tva.gov>
Sent: Thursday, May 14, 2015 9:07 PM
To: Martin, Robert E; Hammer, Lisa H.; Monroe, Jessica L.
Cc: Woodward, Jacinda B; Goza, Stuart L; Scott, Howell D; Rodriguez, Armando M; Hensley, Dianne Duke; Reed, Nicole Leigh; Ross, Henry Duncan; Wright, Andrew R; Clepper, Candace L; Johnson, Deanna D; Barnes, Edna M
Subject: Request for Comments - Draft Audit 2014-15234 - TVA's Talent Acquisition and Deployment Process
Attachments: 2014-15234 TVA's Talent Acquisition and Deployment Process.pdf; Non-Nuclear Fitness for Duty Integrity Clearance Procedure - TOPS.pdf; RE DRAFT SPP; PSYCATS_Load Dispatcher report 4-20-15.xlsx
Sensitivity: Private

DATE: May 14, 2015

TO: Robert E. Martin, Assistant Inspector General
Lisa H. Hammer, Director, Operational Audits
Jessica L. Monroe, Auditor

FROM: Timothy E. Ponseti, Vice-President, Transmission Operations & Power Supply (TOPS)

RE: Requests for Comments - Draft Audit 2014-15234 - TVA's Talent Acquisition and Deployment Process

Many thanks for the opportunity to review and comment on this draft audit report.

My comments are in regard to the section "Lack of Psychological Exams for Transmission System Operators/Dispatchers" on page 14, and also regarding the recommended action items contained in the Executive Summary on page iii.

Both recommended action items on page iii have been completed, along with the items mentioned on page 14:

- A new procedure "Transmission Reliability & Operations Non-Nuclear Fitness for Duty Specialized Clearance Procedure" was developed, finalized, and signed 4-28-2015. The Appendix A list of positions requiring an FFD Integrity Clearance was coordinated with Nikki Reed, HR Generalist. This new procedure is attached.
- Per Candace Clepper, the Senior Program Manager for Non-nuclear Fitness for Duty, all required psychological exams for Transmission System Operators/Dispatchers were completed as of April 2, 2015. See the attached email and spreadsheet listing, with dates. Please note that these tests were taken between Jan 15, 2015 and March 31, 2015.

- In development of this new procedure, TOPS management and Non-Nuclear Fitness for Duty agreed to eliminate the 3-year update requirement that was contained in the 1999 memo mentioned on page 14. Going forward, follow-up psychological exams will occur as needed, based on supervisor observation of employee behavior. This approach is consistent with the Non-nuclear Fitness for Duty process currently in place. The process established by the attached procedure will ensure future compliance.

Please let me know if you have any questions.

Sincerely,

-Tim

Tim Ponseti
VP, Transmission Operations & Power Supply (TOPS)

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From: Martin, Robert E [<mailto:remartin@tvaog.gov>]
Sent: Wednesday, April 15, 2015 3:03 PM
To: Collins, Susan Elizabeth
Cc: Black, Katherine J; Glover, Christopher Edmund; Lanier, Dwain Kendrick; Morgan, Robert Windle; Pardee, Charles Graham; Peney, Todd M; Perez, Ricardo German; Ponseti, Timothy E; Quirk, Sherry Ann; Thomas, John Madison III; Tiemeyer, Scott W; Wardlaw, Van M
Subject: Request for Comments - Draft Audit 2014-15234 - TVA's Talent Acquisition and Deployment Process
Importance: High
Sensitivity: Private

TVA External Message. Please use caution when opening.

Please find attached the subject draft report for your review and comment. Recipients of this report are responsible for safeguarding it to prevent publication or other improper disclosure.

Robert E. Martin
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