



Memorandum from the Office of the Inspector General

December 16, 2020

David L. Bowling, Jr.
Cynthia L. Herron

REQUEST FOR FINAL ACTION – EVALUATION 2020-15757 – TVA'S RESPONSE TO COVID-19

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

If you have any questions or wish to discuss our findings, please contact Lindsay J. Denny, Evaluations Manager, at (865) 633-7349 or E. David Willis, Director, Evaluations, at (865) 633-7376. We appreciate the courtesy and cooperation received from your staff during the evaluation.

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

LJD:FAJ

Attachment

cc (Attachment):

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OIG File No. 2020-15757



Office of the Inspector General

Evaluation Report

To the Vice President, River and
Resource Stewardship and the Vice
President, EnergyRight®Solutions

TVA'S RESPONSE TO COVID-19

Evaluation Team
Lindsay J. Denny
Lucas W. Cotter

Evaluation 2020-15757
December 16, 2020

ABBREVIATIONS

CDC	Centers for Disease Control and Prevention
COOP	Continuity of Operations
COVID-19	Coronavirus
MEF	Mission-Essential Function
SPP	Standard Programs and Processes
TVA	Tennessee Valley Authority
UVGI	Ultraviolet Germicidal Irradiation
VP	Vice President

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- A. MEMORANDUM DATED DECEMBER 1, 2020, FROM CYNTHIA L. HERRON TO DAVID P. WHEELER

- B. MEMORANDUM DATED DECEMBER 16, 2020, FROM DAVID L. BOWLING, JR., TO DAVID P. WHEELER



Evaluation 2020-15757 – TVA’s Response to COVID-19

EXECUTIVE SUMMARY

Why the OIG Did This Evaluation

In March 2020, the World Health Organization declared the coronavirus (COVID-19) outbreak a global pandemic. The Tennessee Valley Authority (TVA) began taking steps to keep employees and their families’ safe, while also ensuring the agency could continue to fulfill its mission of service.

Due to the ongoing pandemic and its impact on TVA’s workforce related to mandatory telework and staffing, we initiated an evaluation to assess TVA’s response to COVID-19.

What the OIG Found

We determined most actions taken by TVA in response to COVID-19 related to staffing, employee safety, and telework were reasonable. Specifically, (1) TVA’s policies align with Centers for Disease Control and Prevention and federal guidelines, (2) TVA took actions to document and communicate lessons learned, and (3) feedback from employees and management was positive regarding changes made in response to COVID-19 on employees and their work. However, we identified potentially misleading marketing language used to promote unproven technology to combat COVID-19. In addition, we identified some opportunities for improvement related to extended telework, mask usage at TVA facilities, and information management practices. Additionally, we identified some required elements were not present in the continuity of operations plan for TVA’s River Forecast Center.

What the OIG Recommends

We recommend TVA management address issues related to (1) marketing language used to promote unproven technology related to COVID-19, (2) extended telework, (3) mask usage at TVA facilities, and (4) information management practices. Our detailed recommendations are listed in the body of this report.



Evaluation 2020-15757 – TVA’s Response to COVID-19

EXECUTIVE SUMMARY

TVA Management’s Comments

In response to our draft report, TVA management stated that actions have, or will be, taken to address the recommendations. See the Appendices for TVA’s complete response.

Auditor’s Response

We concur with TVA management’s planned or completed actions for the recommendations.

BACKGROUND

In March 2020, the World Health Organization declared the coronavirus (COVID-19) outbreak a global pandemic. The Tennessee Valley Authority (TVA) began taking steps to keep employees and their families' safe, while also ensuring the agency could continue to fulfill its mission of service.

Effective March 18, 2020, based on guidance from the Office of Management and Budget,¹ TVA recommended that all employees who could telework do so, limiting the number of employees coming in to the physical office locations. On March 25, 2020, mandatory telework began for all employees not physically required to be at their site. At that time, TVA made the decision to move the start dates of two nuclear plant refueling outages, as well as limiting crews to essential minimal staffing at several gas plants and one coal plant, due to local area COVID-19 conditions.

The Centers for Disease Control and Prevention (CDC) issued interim guidance in May 2020 for businesses and employers to help prevent workplace exposures to COVID-19. The guidance included activities to (1) prevent and reduce transmission among employees, (2) maintain healthy business operations, and (3) maintain a healthy work environment. TVA issued a COVID-19 Guide that aligns with the most current recommendations from the CDC to ensure the safety of the TVA workforce and the continuity of operations (COOP).

As of November 2020, TVA is in Phase One of reintegration. During Phase One, TVA has focused on managing the return of essential on-site and selected remote positions, as needed, in support of mission-essential functions (MEF) and business-essential functions. Phase One requires mandatory telework for all other employees and places restrictions on in-person meetings, travel, and visitors.

TVA Standard Programs and Processes (SPP) 35.400, *TVA Continuity of Operations (COOP) Program*, provides planning and program guidance for implementing the COOP program to ensure TVA remains capable of conducting its MEFs under all threats and conditions. TVA-SPP-35.420, *TVA Business Continuity Program*, enables TVA to perform business-essential functions in advance of or in response to any disruption or emergency.

Due to the ongoing pandemic and its impact on TVA's workforce related to mandatory telework and staffing, we initiated an evaluation to assess TVA's response to COVID-19.

¹ The Office of Management and Budget's mission is to assist the President of the United States in meeting his policy, budget, management and regulatory objectives, and to fulfill the agency's statutory responsibilities.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of our evaluation was to assess TVA's response to COVID-19. Our scope included actions taken by TVA related to staffing, employee safety, telework, and lessons learned. To achieve our objective, we:

- Compared TVA's COVID-19 safety measures/protocols and policies in place to current CDC and federal recommendations to determine if TVA's protocols were consistent with federal guidelines.
- Reviewed condition reports² to identify any COVID-19 concerns and issues related to employee safety or to capture lessons learned.
- Selected a judgmental sample of 11 of 47 members of senior management³ and a random selection of 200 of 9,703 employees below the vice president (VP) level (excluding the 47 members of management), as of September 12, 2020. We interviewed TVA personnel regarding changes made in response to the pandemic, including (1) the impact on operations, including staffing changes, (2) employee safety measures, and (3) the impact of telework, including communication and productivity.
- Reviewed COOP plans for all TVA MEFs to determine if plans were in alignment with TVA's COOP program.
- Reviewed business-continuity plans for all non-MEFs and business units to determine if (1) all business units were covered under business-continuity plans, (2) all plans defined essential functions, and (3) steps were documented in each plan to initiate activation of the plan.

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

FINDINGS

We determined most actions taken by TVA in response to COVID-19 related to staffing, employee safety, and telework were reasonable. Specifically, (1) TVA's policies align with CDC and federal guidelines, (2) TVA took actions to document and communicate lessons learned, and (3) feedback from employees and management was positive regarding changes made in response to COVID-19 on employees and their work. However, we identified potentially misleading marketing language used to promote unproven technology to combat COVID-19. In addition, we identified some opportunities for improvement related to extended telework, mask usage at TVA facilities, and information management practices. Additionally, we identified some required elements were not present in the COOP plan for TVA's River Forecast Center.

² A condition report is a mechanism used to document an issue (undesired condition, problem, or concern raised by personnel).

³ The judgmental selection was made to get a cross section of mission-critical and support business units as well as some whose teams are primarily teleworking and some whose teams are primarily working on site.

MOST ACTIONS TAKEN BY TVA IN RESPONSE TO COVID-19 WERE REASONABLE

We determined most actions taken by TVA in response to COVID-19 were reasonable in regard to staffing, employee safety, and telework. Specifically, we found the TVA COVID-19 Guide and TVA Reintegration and Recovery Plan align with CDC and federal guidelines. We also found TVA took actions to formally document and communicate lessons learned across the agency. Additionally, we received positive feedback from employees and management regarding changes made in response to COVID-19 and the impact those changes had on employees and their ability to accomplish their work. However, we identified marketing language related to COVID-19 that could be misleading.

Marketing Language Related to COVID-19 Could Be Misleading

During the course of our evaluation, we identified language used by TVA's EnergyRight® Solutions program to promote technology to customers to combat COVID-19. The EnergyRight® Solutions program has offered incentives to businesses throughout the Tennessee Valley for installing duct-mounted ultraviolet germicidal irradiation (UVGI) systems. UVGI is an established means of disinfection and has been used to prevent the spread of certain infectious diseases. In advertising this technology, TVA used language which suggests UVGI technology will kill the COVID-19 virus. As a result, customers could make decisions based on this information. However, we spoke with TVA management and determined that while the technology had been tested on similar viruses in the past, it had not been tested and proven effective on COVID-19. We discussed the marketing language used with TVA management, who agreed that the language posed a risk. TVA has paused the program in order to work with its legal staff to determine an appropriate path forward.

During interviews, an employee questioned whether UVGI systems would be installed in TVA facilities because of the marketing language used by TVA. The individual felt if TVA installed the UVGI systems, it could enable employees to return from teleworking. Management informed us that TVA's preferred mitigation strategy was personal hygiene decisions and telework, and there were no plans to install UVGI systems in office complexes. However, a plant manager informed us of plans to install ultraviolet lights into the ductwork at their plant.

A lack of understanding among employees concerning statements in the UVGI marketing materials versus TVA's currently planned actions at its own facilities could pose a reputational risk.

OPPORTUNITIES FOR IMPROVEMENT

We identified opportunities for improvement related to extended telework, mask usage, and information management practices. Additionally, we identified some required elements were not present in the COOP plan for TVA's River Forecast Center.

Potential Extended Telework Concerns

Our 200 interviews consisted of 129 employees whose job duties required either mandatory full time or part time telework. Employees in those roles responded largely positively in regard to their experience with telework. However, employees provided the following feedback, should TVA utilize extended telework going forward:

- Home office and computer equipment would be needed.
- A balance between working in the office or field, and working remotely, would be helpful.
- Office and/or administrative processes would need to be changed or reevaluated to accommodate long-term telework.
- Telework could result in a lack of social interaction.
- A remote workforce raises cybersecurity concerns and creates additional need for information technology support.

As of October 2020, TVA had developed a draft project charter for an enterprise workplace flexibility initiative. The objective of the initiative is to develop a strategy that supports a permanent hybrid model of on-site, telework, and remote employees.

Mask Usage Is Inconsistent

According to TVA's COVID-19 Guide, in office locations, wearing a mask is mandatory whenever you are not alone in your personal workspace. For plant sites, field work, or control rooms, wearing a mask is required when in a common area or working within 6 feet of another individual. However, interviews with employees throughout the agency indicated that mask usage was inconsistent. Our 200 interviews consisted of 117 employees whose job duties required them to be onsite full time or part time. Of the 117 individuals, 15 mentioned concerns with mask usage, representing 10 separate TVA locations. Those 10 locations included TVA office complexes, generating plants, and service centers.

If employees are not complying with mask policies at TVA facilities, they could put themselves and others at risk of spreading COVID-19.

Potential Violations of Information Management Practices

TVA-SPP-12.002, *TVA Information Management Policy*, states TVA sensitive, restricted, and confidential information must not be sent to, or from, personal non-TVA email accounts due to the unknown security status of those services. However, some employees informed us during interviews that they were unable to print while

teleworking because they either could not connect their TVA-provided computers to TVA-provided printers or did not have a TVA-provided printer. As a result, many of these employees had emailed TVA documents to their personal email accounts in order to print.

While we do not know the content of documents sent to personal email accounts, there is the potential they contain sensitive, restricted, or confidential information. Emailing nonpublic TVA documents to a personal email account creates a cybersecurity risk to TVA due to the unknown security status of those services.

Required Elements Were Not Present in the COOP Plan for TVA's River Forecast Center

TVA's COOP program is applicable to TVA organizations and personnel that ensure the continuity of TVA's MEFs when normal operations are disrupted or threatened with disruption. We reviewed the COOP plan for each MEF and identified five elements related to reconstitution⁴ that were not present in the COOP plan for the River Forecast Center. We communicated this information to the COOP planner who agreed and is in the process of updating the plan accordingly.

RECOMMENDATIONS

We recommend the VP, EnergyRight® Solutions:

- Finalize the path forward for the UVGI technology program in conjunction with TVA legal counsel.

TVA Management's Comments – EnergyRight® Solutions' staff worked with TVA's Office of the General Counsel to revise the language around COVID-19 on our program material. Marketing material was updated and now includes the revised language.

Auditor's Response – We concur with actions taken.

We recommend the VP, River and Resource Stewardship:

- Communicate extended telework concerns identified in this report to Human Resources for consideration in TVA's enterprise workplace flexibility initiative.

TVA Management's Comments – River and Resources Stewardship stated they will share the report with Human Resources for consideration in TVA's enterprise workplace flexibility initiative.

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

- Address concerns related to mask usage and implementation throughout the agency.

TVA Management's Comments – TVA management stated they reinforced mask usage as part of TVA's COVID-19 policy update. The message was also

⁴ Reconstitution is the process by which surviving and/or replacement personnel resume normal operations.

reinforced to the enterprise's COVID-19 Leadership Team. TVA Emergency Management will continue to work with Safety, the Emergency Management Peer Team, and individual sites to reinforce masks and social distancing protocols. See Appendix B for TVA's complete response.

Auditor Response - We concur with the actions taken.

- Reinforce the policy that personnel must not send nonpublic TVA documents to, or from, personal email accounts.

TVA Management's Comments – River and Resources Stewardship will advise Information Technology of the requirement to reinforce information management/security policies.

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

- Update the River Forecast Center's COOP Plan to include missing elements related to reconstitution.

TVA Management's Comments – TVA management stated they will complete the revision to the COOP plan.

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



Tennessee Valley Authority, 26 Century Boulevard, Nashville, Tennessee 37214

December 1, 2020

David Wheeler

REQUEST FOR COMMENTS – DRAFT EVALUATION 2020-15757- TVA'S RESPONSE TO COVID-19

We appreciate the opportunity to review the Draft Evaluation 2020-15757 – TVA's Response to COVID-19 – and to provide management's response to the recommendation as provided below.

Recommendation: Finalize the path forward for the UVGI technology program in conjunction with TVA legal counsel.

Management's Response:

EnergyRight Solutions' staff worked with TVA's Office of General Counsel to revise the language around COVID-19 on our program material. Marketing material was updated as of November 13 and now includes the revised language.

We appreciate the courtesy and professionalism displayed by your staff in conducting this evaluation and appreciate them bringing this item to our attention. Please let us know if you have any questions or need additional information.

A handwritten signature in cursive script that reads "Cynthia L. Herron".

Cynthia L. Herron
Vice President
Energy Services & Programs

cc: (Attachment):

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OIG File No. 2020-15757



Tennessee Valley Authority, 400 West Summit Hill Drive Knoxville, Tennessee 37902

December 16, 2020

David P. Wheeler

**MANAGEMENT'S RESPONSE – DRAFT EVALUATION 2020-15757 - TVA'S
RESPONSE TO COVID-19**

We appreciate the opportunity to review the Draft Evaluation 2020-15757 – TVA's Response to COVID-19 and to provide management's response to the recommendations as provided below:

Recommendation: Communicate extended telework concerns identified in this report to Human Resources for consideration in TVA's enterprise workplace flexibility initiative.

Management's Response: River & Resources Stewardship (R&RS) will share the above subject report with Human Resources for consideration in TVA's enterprise workplace flexibility initiative. This action will be completed by February 1, 2021.

Recommendation: Address concerns related to mask usage and implementation throughout the agency.

Management's Response: Mask usage is a central aspect of TVA's COVID-19 Policy Update, which is the master guidance describing how TVA expects all business units to respond to COVID-19. This guidance is available on the TVA COVID-19 Resource Center and is posted at the top of that website. This message was reinforced to the enterprise's COVID-19 Leadership Team on a weekly coordination call on December 9, 2020. TVA Emergency Management will continue to work with Safety, the Emergency Management Peer Team and individual sites to reinforce masks and social distancing protocols.

Recommendation: Reinforce the policy that personnel may not send nonpublic TVA documents to, or from, personal email accounts.

Management's Response: R&RS will advise Information Technology (IT) of the requirement to reinforce IT information management/security policies. This action will be completed by February 1, 2021.

David Wheeler
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Recommendation: Update the River Forecast Center COOP Plan to include missing elements related to reconstitution.

Management's Response: Emergency Management and River Management have jointly committed to a revision deadline for the River Management COOP Plan of February 1, 2021.

We appreciate the courtesy and professionalism displayed by your staff in conducting this evaluation and appreciate the opportunity to resolve the identified gaps. Please let us know if you have any questions or need additional information.

Sincerely,



David L. Bowling, Jr.
Vice President
River & Resources Stewardship

cc: James R. Dalrymple, MR 3H-C
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OIG File No. 2020-15757