



THE SECRETARY OF VETERANS AFFAIRS
WASHINGTON

February 8, 2019

The Honorable Henry Kerner
Special Counsel
U.S. Office of Special Counsel
1730 M Street, NW, Suite 300
Washington, DC 20036

Re: OSC File No. DI-18-5270

Dear Mr. Kerner:

I am responding to your September 18, 2018, letter regarding allegations made by a whistleblower at the Department of Veterans Affairs (VA), Butler Healthcare Center (Butler HCC) in Butler, Pennsylvania, that local VA Police Service (VAPS) leadership may have engaged in conduct that put employees, police officers, Veterans, and the general public in danger. [REDACTED] a VA Police Officer at the Butler HCC alleged that the officer in charge of training at the facility ran active threat training in an unsafe manner by failing to provide police officers with advance notice and while the officers were carrying loaded service weapons. Further, the whistleblower alleged that the practice had been raised to the facility's ^{Employee 3} [REDACTED] but appropriate corrective actions had not been taken.

The Office of Inspector General's (OIG) Office of Investigations conducted an investigation and the results of the investigation are in the enclosed report. OIG substantiated the allegation that training exercises at the Butler HCC were conducted in an unsafe manner. Furthermore, OIG found that the Office of Security and Law Enforcement's guidance to VAPS on how to conduct rapid response drills is vague and has led to inconsistent approaches across VAPS.

Thank you for the opportunity to respond.

Sincerely,

Robert L. Wilkie

Enclosure



DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL
WASHINGTON, DC 20001



January 9, 2019

MEMORANDUM

TO: Office of Special Counsel

FROM: Office of Inspector General, Department of Veterans Affairs

SUBJECT: Report of Investigation re File No. DI-18-5270

Summary

On September 18, 2018, Henry J. Kerner, Special Counsel, reported a whistleblower disclosure concerning employees of the Department of Veterans Affairs (VA), Butler Healthcare Center (Butler HCC), Butler, Pennsylvania to VA Secretary Robert Wilkie. The whistleblower, a VA police officer, alleged that local VA Police Services (VAPS) leadership engaged in conduct that put employees, police officers, veterans, and the general public in danger. Specifically, the whistleblower alleged that:

- Employee 2, under the supervision of Employee 1, ran active threat training without providing police officers advanced notice and while responding officers were carrying loaded service weapons; and
- Employees have reported concerns about this practice to the facility's Employee 3 but appropriate corrective actions have not been taken.

Whistleblower reported to OSC that Employee 2 has conducted active threat training in an unsafe manner at least a dozen times in the past year. Whistleblower further reported that, in violation of VA policy, Employee 2 has run active threat training in which on-duty police officers have been called to respond to the alleged threat with loaded duty weapons with no notice that the threat is not real. Whistleblower further reported that, in one instance, a responding on-duty police officer drew his duty weapon during one of the spontaneous training exercises.

The Office of Inspector General (OIG) accepted the referral for investigation. On September 17, 2018, the OIG separately interviewed Whistleblower, Employee 1, Employee 2, and Employee 3 in person. Additional Butler HCC witnesses were subsequently interviewed in person. Two other witnesses who do not work at the Butler Healthcare Center were

subsequently interviewed by phone: VA Police Service Veterans Integrated Service Network (VISN) 4 regional chief with oversight of the Butler Healthcare Center (VISN Chief); and Deputy Director of the VA Law Enforcement Training Center (LETC) in Little Rock, Arkansas (LETC DD).

Our review substantiated Whistleblower's allegation that training exercises at the Butler HCC were conducted in an unsafe manner. The OIG found that VAPS supervisors conducted rapid response testing exercises in a manner that caused them to be live-action, scenario-based training, and not drills, but did not properly implement LETC firearms safety measures appropriate to such live-action training. Moreover, the OIG found that OS&LE's guidance to VAPS on how to conduct rapid response drills is vague and has led to inconsistent approaches to such training across VAPS. The OIG did not substantiate the allegation that an officer drew his duty weapon while responding to one of the training exercises.

Relevant Standards

VA Directive 0730, Security and Law Enforcement (Dec. 12, 2012):

¶ 3(c). Director, Law Enforcement Training Center. The Director, Law Enforcement Training Center, is responsible for ... [e]stablishing procedures to ensure that VA police officers receive appropriate in-service training.

VA Handbook 0730, Security and Law Enforcement (OS&LE) (Aug. 11, 2000):¹

¶ 5. i. Rapid Response. Procedures will be established and periodically tested to ensure the capability for rapid response of VA police officers on patrol to troubled areas and for handling other police emergencies as determined locally, e.g., bomb threats, demonstrations, hostage negotiations, and disaster plans.

Law Enforcement Training Center (LETC), Training Unit 18 (Dec. 2016):

I. Firearms Safety extends to multiple types of training where firearms may be present even when no live fire will take place. Whenever training involves the use of duty firearms, but no live fire is to take place, ammunition must be PROHIBITED in the training area.

The designated training area must be controlled by the Primary Instructor administering the training to other officers. Entry and exit of any personnel must be closely monitored so that no one enters the training area with any duty related weapons and/or ammunition. Examples of training involving actual duty weapons are: Weapon Handling Skills (draws, Speed and Tactical Reload Drills, Incapacitation Drills, etc.), and Dry Fire Marksmanship Training. Ammunition is

¹ VA Handbook 0730 was promulgated on August 11, 2000 to implement the policies contained in VA Directive 0730 also dated August 11, 2000. The August 2000 version of VA Directive 0730 was replaced by a new Directive 0730 dated December 12, 2012. LETC DD confirmed to the OIG that VA Handbook 0730 dated August 11, 2000 remains in effect.

PROHIBITED during this type of training. The Primary Instructor must ensure that every officer conduct[s] a safety clearance check by visually and physically checking the chamber of the weapon. All officers will conduct a visual check of magazines used for training to ensure no live ammunition is present. After every break in training the Instructor will ensure safety clearance checks are repeated before commencing training.

J. LETC has specific training briefings that are used before commencing any training where risk of injury can occur and mitigates the safety concerns discussed. The safety brief should be tailored for your location and training environment but will never deviate from the main safety best practices established. Safety will never be reduced or ignored for convenience or time.

Ideally, officers should be scheduled for training, so they can arrive ready to participate. If the officer must rotate from uniformed duty status, train and then go back on duty, the officer must go to the armory first. The officer must clear the firearm and lock up the firearm and all magazines with ammunition in his/her firearm locker. The officer must secure the baton and OC before reporting to the training location.

If breaks occur in the training and participants must leave and reenter the training area, a safety brief and check to make sure area is still sterile of any weapons will occur before starting training again.

Interviews Conducted

Whistleblower Whistleblower has been employed by the VAPS as a police officer for [REDACTED] and is assigned to the Butler HCC.

Employee 1 Employee 1 has been the VAPS, Employee 1, Butler HCC for five years.

Employee 2 Employee 2 has been a VAPS police officer assigned to the Butler HCC facility for 3 years. Employee 2 is the individual identified in the OSC complaint as organizing and running the alleged unsafe RRDs. Employee 2 is a Employee 2 for the Butler HCC, VAPS, and is an LETC certified classroom instructor and firearms instructor.

Lieutenant Lieutenant is a VAPS police officer who has been assigned to the Butler HCC for over 10 years. He/she was promoted to Lieutenant three years ago. Lieutenant is a training coordinator for the Butler HCC, VAPS, and is an LETC certified classroom instructor and firearms instructor.

Subsequent to the filing of the OSC complaint, Employee 2 was promoted to Lieutenant. However, consistent with the OSC complaint, this report refers to him/her as Employee 2.

VISN Chief VISN Chief is the VAPS Veterans Integrated Service Network (VISN) 4 regional police chief with oversight of the Butler HCC, VAPS.

Employee 3 Employee 3 is the Employee 3 at the Butler HCC and manages Employee 3. He/she has been employed by the VA for over 20 years.

Police Officer Police Officer has been a VAPS police officer assigned to the Butler HCC for Employee 3. Police Officer was working with Whistleblower during one of the rapid response drills that are the subject of Whistleblower's complaint.

LETC DD LETC DD is the Deputy Director of the VA Law Enforcement Training Center in Little Rock, Arkansas. LETC DD was promoted to Deputy Director in February 2014.

Additional Background³

Overview of VA Law Enforcement Offices

The Office of Operations, Security, and Preparedness (OSP) coordinates VA's emergency management activities, including police services and law enforcement. The Office of Security and Law Enforcement (OS&LE) reports to OSP. OS&LE "is responsible for developing policies, procedures and standards that govern VA's infrastructure protection, personal security and law enforcement programs." Office of Security and Law Enforcement, available at http://vawww.osp.va.gov/OSandLE_Overview.asp. Both VA Police Services and the VA Law Enforcement Training Center are within OS&LE. VAPS is under the leadership of the Director of Police Service. LETC is led by its Director and provides professional training for all VAPS officers.

VAPS Program Development and Guidance

OS&LE is responsible for ensuring that VA has an effective program in place for the protection of veterans, staff, and visitors who use VA medical facilities. The Director of OS&LE is responsible for promoting effective VAPS programs at VA medical facilities.

Police Program Inspections

To ensure the effectiveness of the OS&LE programs at VA medical facilities, VAPS provides a comprehensive program of on-site inspections. Field inspectors from OS&LE conduct a review at each facility at least once every two years. The inspectors spend several days at each site and review all elements of the OS&LE program. After the on-site inspection, the inspector prepares a comprehensive report of findings, which is provided to the facility management through the

³ The information in this section generally is derived from the website of VA's Office of Security and Preparedness. See generally <http://vawww.osp.va.gov>

Veterans Health Administration (VHA) Network Office for action. The Butler HCC, VAPS, was last inspected on November 2, 2017.

Law Enforcement Training Center

The Director of the LETC is responsible for the advancement of global VA training policies, practices, management, and oversight of all residence and field training programs. The LETC is organized into four divisions: the Academic Programs Division, Technical Programs Division, Advanced Programs Division, and the Training Standards Division.

OS&LE Rapid Response Testing⁴

As noted above, VA policy requires OS&LE to establish and periodically test procedures to ensure the capability for rapid response of VAPS officers on patrol to troubled areas and for handling other police emergencies as determined locally, e.g., bomb threats, demonstrations, hostage negotiations, armed robberies, and disaster plans. OS&LE does so through Rapid Response Drill (RRD) development training during the OS&LE Police Program Inspection training course. As currently implemented, these RRDs are designed to test an officer's response time as well as to ensure that VAPS officers are aware of tactics and procedures for the many types of incidents that may occur within the hospital setting. Currently, the Butler VAPS officers are subjected to RRDs while on-duty with no prior knowledge of the training drill and are not made aware of the training exercise until they arrive at the scene and are contacted by VAPS training instructors. The VAPS officers complete the drill while armed with their issued duty weapons, batons, and Oleoresin Capsicum (OC) spray.

Summaries of Interviews Conducted

Interview of Whistleblower

On September 27, 2018, OIG investigators interviewed Whistleblower. Whistleblower stated that **Employee 1** and **Employee 2** have violated LETC training policies that require on-duty officers to secure their loaded duty weapons and ammunition prior to participating in any training and prohibit the presence of any loaded weapons during training. He/she is aware of training being conducted with loaded weapons on multiple occasions.

Whistleblower stated that at some time during the winter of 2017–2018 he/she and Police Officer were on-duty when they were dispatched to a theft call.⁵ Whistleblower and Police Officer were not aware that this was a training exercise and believed it to be an actual call for service. Upon arriving at the scene, they found a person fitting the description of the subject and recognized him as **Employee 2** who was role-playing as the subject. Whistleblower and Police Officer then realized it was a training RRD and proceeded with the scenario.

⁴ Background information concerning the OS&LE Rapid Response Drills was obtained from review of OS&LE training documents and interviews with OS&LE training staff.

⁵ A Daily Event Record provided by **Employee 1** indicates the RRD was conducted on December 1, 2017.

At the end of the scenario, during the debriefing, Whistleblower said that the instructors told him/her that another group of trainees, who had completed the same training scenario, drew their loaded duty weapons and pointed them at Employee 2

Whistleblower did not understand why the RRDs were being conducted in an unsafe manner. The VAPS has a training facility, protective clothing, and less than lethal weapons that are used on a regular basis for other reality-based scenario training. During these training events, LETC and firearms safety policies are strictly followed.

Whistleblower stated he/she had expressed his/her concerns over the safety of the RRDs to Lieutenant and Employee 3 but to Whistleblower's knowledge no corrective action has been taken. Whistleblower stated that he/she has not witnessed any unsafe RRDs since the December 2017 event.

Interview of Employee 1

Employee 1 recalled the incident in question and referred to it as an RRD. Employee 1 described the RRDs as an inspection item that is required by OS&LE. Employee 1 stated that he/she was aware of the firearms training policy that requires on-duty officers to report to the armory and secure their duty weapon before participating in any training, but Employee 1 stated that he/she believed that the policy did not apply to RRDs. Employee 1 stated that the RRDs are reviewed as part of the OS&LE inspection program and he/she provided OIG investigators with a copy of the most recent OS&LE inspection report dated November 2, 2017.

Employee 1 stated that there were no RRD safety guidelines like those mandated for Active Threat Training because the RRDs are drills that measure the officers' response time and do not involve any use of force. The RRD participants are critiqued, and the comments are recorded on the Rapid Response and Alarm Responses Record and Critique form.

Employee 1 stated that he/she and Employee 2 were the instructors for the subject RRD. Employee 2 was the role player/subject and Employee 1 was the observer and critiqued the responding officers' actions. The scenario took place in an isolated penthouse on the Butler HCC campus. The participating officers were on-duty and armed and were dispatched to the penthouse to contact a suspect in a minor theft. Employee 1 met the participating officers on the third floor when they exited the elevator. Employee 1 stated that, upon seeing Employee 1 and Employee 2, the participating officers should have realized that this was a training RRD. At the end of the scenario, Employee 1 and Employee 2 critiqued the participating officers' performance. At no time did Chief of Police or Employee 2 refer to a previous scenario where the participating officers drew their duty weapons and pointed them at the role player.

Employee 1 stated that he/she was aware of the complaint described in the allegation and that VISN Chief had investigated the complaint.

Interview of Employee 3

Employee 3 stated that he/she was aware of two complaints about unsafe training practices within VAPS. The complaints were unofficial and were raised along with other issues

such as scheduling, leadership, and officer advancement. [Employee 3] scheduled a meeting at the Butler HCC with the complaining officers, a union representative, and the acting director of the facility to hear the officers' complaints. [Employee 3] could not recall the date of the meeting, but provided a copy of meeting notes dated "3/28" and "3/29" that included comments about reviewing training protocols.

To address the issues raised at the meeting, [Employee 3] enlisted the assistance of VISN Chief to investigate the officers' complaints and provide viable solutions to the management issues.

Interview of VISN Chief

VISN Chief stated that in March 2018, the Butler HCC acting director and [Employee 3] sought his/her assistance in resolving the VAPS complaints at the Butler HCC. VISN Chief interviewed several of the Butler HCC VAPS officers and management. VISN Chief stated that the complaints were the result of the opening of the new Butler HCC complex and the lack of preparation for the increased VAPS responsibilities to secure the new campus. VISN Chief could not recall receiving any complaints about the VAPS training or any unsafe training practices at the Butler HCC and did not review an allegation of improper RRD training with live ammunition.

VISN Chief provided the Butler HCC management with options for increasing the manpower and restructuring the staff to resolve the issues. VISN Chief did not provide a written report of the review but did provide an oral briefing to the Butler HCC acting director and [Employee 3].

Interview of [Employee 2]

[Employee 2] stated that he/she conducts scenario-based RRDs as required by OS&LE policy and that he/she conducts the RRDs with on-duty VAPS officers who are armed with their duty weapons. [Employee 2] stated that the mandatory LETC safety precautions required by firearms policy and utilized in other reality-based scenario training do not apply to the RRDs because the objective of these drills is to time the officers' response and observe the officers' approach. The RRD scenarios are designed to be a spoken interaction where no use of force would be needed; therefore, no additional safety precautions are provided. [Employee 2] was not aware of any complaints relating to unsafe practices during RRDs, but did recall the RRD in question.

[Employee 2] stated he/she was the role player for the scenario that involved an employee who was suspected of stealing items from the canteen. [Employee 1] was present at the RRD as an observer. The participating on-duty officers were dispatched to the theft call not knowing it was a RRD. When the officers arrived at the penthouse third floor they were met by [Employee 1] and they should have realized that this was an RRD. The participating officers completed the scenario without incident. [Employee 2] stated he/she had done several iterations of this scenario and none of the participating officers drew a duty weapon or pointed a duty weapon at him/her.

Interview of Lieutenant

Lieutenant stated that he/she is familiar with RRDs, which include a variety of scenarios, such as a bomb threat, active shooter, natural disasters (e.g., tornadoes), a pandemic, and panic alarms.

Lieutenant stated that the RRDs are mandated by OS&LE and LETC is not involved with the RRDs. The RRDs are conducted while the VAPS officers are on-duty and armed with loaded duty weapons. The officers are not made aware the RRD is a training exercise in order to illicit a real-world reaction that is appropriate to the event.

Lieutenant is familiar with the safety protocols for reality-based scenario training. According to Lieutenant, those safety measures do not apply to RRDs because the RRDs are controlled and designed to evaluate the officers' communication, tactics, and approach to the problem. Lieutenant stated that RRD objectives are to test the officers' dialogue and no duty weapons should be drawn for any reason. Lieutenant stated that he/she views the force-on-force training and RRDs as two separate entities and the RRDs do not require the additional safety measures.

Lieutenant was not aware of any complaints of unsafe training practices that were identified to him/her. Lieutenant later reviewed his/her past e-mail messages and did not find any messages reporting unsafe training practices.

Interview of Police Officer

Police Officer was involved in the subject RRD with Whistleblower. Police Officer stated he/she and Whistleblower were on duty and armed with their loaded duty weapons. They were dispatched to a theft call and directed to contact an employee/suspect at the penthouse. Upon arrival, Police Officer saw Training Sergeant dressed as the suspect. At that point Police Officer realized that this was not an actual service call, but a training scenario. The officers completed the scenario and they were critiqued by Employee 1 and Employee 2. Police Officer stated that during the RRD critique, Employee 2 commented that during a previous iteration of the same scenario, one of the participating officers drew their duty weapon and pointed it at Employee 2, who was acting as a role player.

Interview of LETC DD

On November 14, 2018, OIG investigators interviewed LETC DD by telephone. LETC DD is familiar with the safety standards for scenario-based training that are outlined in LETC Directive Training Unit 18. LETC DD is also familiar with OS&LE Handbook 0730, which mandates the VAPS conduct RRDs.

According to LETC DD, RRDs are timed events that are conducted to measure an officer's response time to events like a panic alarm. Because every VA facility is unique, the local VAPS supervisors establish RRD training procedures that apply to their facility's specific needs.

LETC DD stated that there should not be any scenario training, role playing, or use of force applications during the RRDs. These additional objectives should only be applied to scenario-based training in a controlled environment that does not allow any live weapons in the training

area. LETC DD added that the OS&LE RRD policy does not require the use of on-duty officers or that the officers should not be advised prior to an RRD.

Discussion

Currently, there is a conflict between LETC training protocols and VA policy that is causing the Butler VAPS to conduct RRDs in an inappropriate and unsafe manner. VA Handbook 0730 describes Rapid Response training as testing to ensure both (i) "the capability for rapid response of VA police officers on patrol to troubled areas" and (ii) that VA police can "handl[e] other police emergencies as determined locally, e.g. bomb threats, demonstrations, hostage negotiations, and disaster plans." This policy conflates rapid response drills, which may be conducted by armed officers on patrol under LETC guidance, and scenario-based training, which must be subject to appropriate firearms safety protocols and conducted in a training environment under LETC policy.

This understanding, which was expressed by LETC DD, is supported by OS&LE's inspection report of the Butler HCC VAPS training. OIG investigators reviewed a copy of the OS&LE November 2, 2017, "Inspection Report of Police Service, Butler, VA HCC." The report notes in Part A – Personnel and Training:

**9. Firearms Safety extends to multiple types of training where firearms may be present even when no live fire will take place. Whenever training involves the use of duty firearms, but no live fire is to take place, ammunition must be PROHIBITED in the training area. The designated training area must be controlled by the Primary Instructor administering the training to other officers. H-0730, Para. 4. D. & g; Training Unit 18 Para. H. (Training).

**9.1. All training weapons are visually altered to significantly distinguish them from duty weapons.

The report notes in Part C - Operations, 6.3:

*6.3. Procedures are established and tested several times quarterly to assure the capability for rapid response of police officers to an emergency or urgent situation. Results of these tests are documented in memorandum form and filled in RCS 29.32 and recorded as training in the Continuing In-service Training Schedule as situational emergency training. H-0730, Para. 5.i.

6.3. (Critical Area) Comment Only. The Police Service is doing an excellent job conducting and documenting rapid response drills.

Although the OS&LE report identifies the distinction between RRDs and scenario-based training, the report fails to recognize that Butler's RRDs were, in fact, being conducted as scenario-based training exercises. Thus, the report reflects a lack of understanding by the OS&LE inspectors of how the Butler VAPS was conducting RRDs. The report (Part A, ¶ 9.3) notes that Firearms Safety prohibits the presence of live ammunition in the training area during training exercises, but then finds (Part C, ¶ 6.3) that the Butler VAPS was appropriately conducting RRDs. In fact, the OS&LE inspectors should have recognized that the RRDs were

being conducted in a manner that made them training exercises. Thus, while the inspection properly found that RRDs were regularly conducted and documented, the inspection failed to determine that the RRDs were being conducted in violation of LETC firearms safety protocols.

Butler HCC RRD protocols utilize on-duty Butler HCC VAPS officers armed with loaded duty weapons responding to what they believe to be a real duty call. That is scenario-based training and directly violates the safety standards promulgated in LETC Directive Training Unit 18 regarding firearms and training, which states:

Ideally, officers should be scheduled for training, so they can arrive ready to participate. If the officer must rotate from uniformed duty status, train and then go back on duty, the officer must go to the armory first. The officer must clear the firearm and lock up the firearm and all magazines with ammunition in his/her firearm locker. The officer must secure the baton and OC before reporting to the training location.

That the RRDs being conducted at Butler HCC, as described by Employee 2 and Employee are in fact scenario-based training is further evidenced by the results of RRDs being documented in the Continuing In-service Training Schedule as "situational emergency training" and not as drills.

Reality-based scenario training is a standard method used by federal, state, and local law enforcement to create realistic training environments. However, tragic and fatal training accidents have occurred when loaded duty weapons were introduced into the training environment.⁹ Law enforcement training institutions such as the Federal Law Enforcement Training Center, the Secret Service, and local law enforcement academies have developed strict safety management procedures, similar to the protocols contained in the LETC firearms directive, that prevent the presence of a loaded weapon or ammunition in a scenario-based training environment.

Our review was limited to the complaint at the Butler HCC, but the evidence we developed indicates that the RRDs have been an integral part of the OS&LE inspection process throughout the country since 2000. OS&LE's failure to provide clear guidance regarding how to conduct RRDs has caused a lack of standardization across the VAPS. This allows VAPS supervisors to conduct RRDs based on their interpretation of how the RRDs should be completed. This caused the RRDs at the Butler HCC to go beyond a response time drill and became training that did not align with LETC safety protocols. RRDs as conducted at Butler HCC create an unsafe environment for the VAPS officers, VA staff, and veterans. Armed, on-duty VAPS officers respond to the call for service without knowing the call is an RRD. Each responding VAPS officer reacts to the call as a real event and this creates an unsafe atmosphere where errors and injuries may occur.

⁹ See, e.g., <http://www.baltimore-on.com/news/marylan/1-time-in-10-i-baltimore-pol-get-injuring-accident-photo-20130213-story.html>

Conclusion

The investigation substantiated Whistleblower's allegations that the Butler HCC VAPS supervisors have conducted training exercises in an unsafe manner. The OIG found discrepancies in the way Butler HCC VAPS supervisors conducted RRDs and the application of the mandated LETC firearms training safety requirements. These discrepancies were illustrated by **Employee 1** failure to understand that OS&LE and LETC policy prohibits the use of live ammunition during training exercises. While it is appropriate to conduct *drills* measuring response times by on-duty, armed officers, it violates LETC firearms safety protocols to do so in a manner simulating an actual duty call.

Based on our review, the OIG believes that OS&LE management should consider suspending all live-action drills and training until proper safety precautions are reviewed and updated guidance is issued to all VAPS offices on the proper safety protocols for implementing RRDs and live-action, scenario-based training in their facilities. OS&LE should also consider revising VA Handbook 0730 to clarify the distinction between RRDs and scenario-based training.

The Butler HCC VAPS, as with all VAPS offices, falls under the governance of the director and associate director in each facility. In this case, **Employee 3** received complaints regarding unsafe training, but lacked the law enforcement experience, training, or institutional knowledge necessary to recognize the nuances and dangers associated with conducting reality-based scenario training with armed officers.

To address the challenge faced by **Employee 3** in handling complaints regarding VAPS procedures, we refer the Director of OS&LE to OIG report, "Inadequate Governance of the VA Police Program at Medical Facilities," Rep. No. 17-01007-01 (Dec. 13, 2018).⁷ In that report, the OIG recommended that the VA Deputy Secretary "[c]larify program responsibilities between the Veterans Health Administration and [OSP], and evaluate the need for a centralized management entity for the security and law enforcement program across all medical facilities."

⁷ The report may be accessed at <https://www.va.gov/oig/apps/info/OversightReports.aspx>.



DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL
WASHINGTON, DC 20001



January 9, 2019

MEMORANDUM

TO: Office of Special Counsel

FROM: Office of Inspector General, Department of Veterans Affairs

SUBJECT: Addendum to Report of Investigation re File No. DI-18-5270

Key to Individual Identities in OIG Report of Investigation

Whistleblower	[REDACTED], VA Police Officer, Butler HCC
Employee 1	Employee 1 [REDACTED], Butler HCC
Employee 2	Employee 2 [REDACTED], VA Police Services, Butler HCC
Lieutenant	[REDACTED], Lieutenant, VA Police Services, Butler HCC
VISN Chief	[REDACTED], Chief of Police, VISN 4
Employee 3	Employee 3 [REDACTED], Butler HCC
Police Officer	[REDACTED], VA Police Officer, Butler HCC
LETC DD	[REDACTED], Deputy Director, LETC