



NATIONAL VETERANS AFFAIRS COUNCIL

American Federation of Government Employees, Affiliated with the AFL-CIO

NATIONAL GRIEVANCE

NG-4/8/24

Date: April 8, 2024

To: Denise Biaggi-Ayer
Executive Director
Office of Labor-Management Relations
U.S. Department of Veterans Affairs
denise.biaggi-ayer@va.gov
sent via electronic mail only

From: Thomas Dargon, Jr., Deputy General Counsel, National Veterans Affairs Council (#53) (“NVAC”), American Federation of Government Employees, AFL-CIO (“AFGE”)

RE: National Grievance against the Department of Veterans Affairs for failing to satisfy bargaining obligations with NVAC prior to implementing VA Handbook 0325

STATEMENT OF CHARGES

Pursuant to the provisions of Article 43, Section 11 of the Master Agreement Between the Department of Veterans Affairs and the American Federation of Government Employees (2011) (“MCBA”), American Federation of Government Employees/National Veterans Affairs Council (“the Union”) is filing this National Grievance against you and all other associated officials and/or individuals acting as agents on behalf of the U.S. Department of Veterans Affairs (“Agency” or “VA”) for failing to satisfy bargaining obligations with NVAC prior to implementing VA Handbook 0325 (Personnel Accountability). To date, the Agency has failed to remedy this violation, and as such, continues to violate the MCBA and federal law.

Specifically, the VA violated Articles 2, 3, 47, and 49 of the MCBA, 5 U.S.C. §7116(a), and any other relevant articles, laws, regulations, and past practices not herein specified.

STATEMENT OF THE CASE

Background

On April 18, 2023, the Agency notified NVAC of its intent to implement a new policy, VA Handbook 0325 (Personnel Accountability). *See* Exhibit A. According to the notice from the VA Office of Labor-Management Relations, this new handbook would accompany VA Directive 0325 and would provide “additional information and implementation instructions for the Department-wide use of Veterans Affairs (VA) Emergency Alerting and Accountability System (VA EAAS).” *Id.* On April 27, 2023, NVAC submitted a demand to bargain this change in conditions of employment. *See* Exhibit B. Pursuant to the negotiated procedures in the Master Agreement, the

Agency was then required to schedule a briefing with the NVAC Mid-Term Bargaining Committee and negotiate in good faith prior to effecting any change in conditions of employment. On March 1, 2024, upon information and belief, the Agency published and implemented VA Handbook 0325 (Personnel Accountability) prior to satisfying its bargaining obligations with NVAC. *See* Exhibit C. VA Handbook 0325 imposes several new requirements on bargaining unit employees, including but not limited to, mandatory registration and self-reporting of safety status in VA-EAAS, mandatory training in the VA Talent Management System, and the provision of both work and personal contact information to be stored for use in the emergency alert system. *Id.* at 8. These new requirements constitute a change in conditions of employment.

By failing to comply with mid-term bargaining obligations, the Agency violated Article 47 and Article 49. Further, in refusing to properly notify and negotiate in good faith with the Union concerning changes in conditions of employment, the Agency committed an unfair labor practice under 5 U.S.C. §7116(a)(1) and (a)(5). Article 2 of the MCBA requires that the Agency comply with applicable federal statutes and regulations in the administration of matters covered by the MCBA. Therefore, in violating 5 U.S.C. §7116(a), as identified above, the Agency failed to comply with Article 2. Additionally, Article 3 encourages the Parties to maintain a cooperative labor-management relationship that is based on mutual respect, open communication, consideration of each other's views, and minimizing collective bargaining disputes. By failing to properly notify and negotiate with the Union, the Agency renounced its commitments under Article 3 of the MCBA and necessitated further collective bargaining disputes.

Violation

By failing to fulfill its obligations, the VA violated, and continues to violate, the following:

- Article 2 of the MCBA: requiring the Agency to comply with federal law;
- Article 3 of the MCBA: requiring the Agency to maintain an effective, cooperative labor-management relationship with the Union;
- Articles 47 and 49 of the MCBA: requiring the Agency to comply with agreed-upon procedures for mid-term bargaining at the national level;
- 5 U.S.C. §7116(a)(1) and (a)(5): requiring the Agency to negotiate in good faith with the Union;
- Any and all other relevant articles, laws, regulations, customs, and past practices not herein specified.

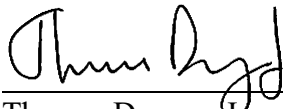
Remedy Requested

The Union asks that, to remedy the above situation, the VA agree to the following:

- Return to the *status quo ante*;
- Fully comply with its contractual obligations under Articles 2, 3, 47, and 49 of the MCBA and its statutory obligations under 5 U.S.C. §7116(a);
- Distribute an electronic notice posting to all AFGE bargaining unit employees concerning the Agency's failure to satisfy bargaining obligations with NVAC;
- Agree to any and all other remedies appropriate in this matter.

Time Frame and Contact

This is a National Grievance, and the time frame for resolution of this matter is not waived until the matter is resolved or settled. **If you have any questions, please contact Lynn Alexis, Staff Counsel (NVAC) at AFGE Office of the General Counsel at lynn.alexis@afge.org or 202-639-6424.** Lynn Alexis is designated to represent the Union in all matters related to the subject of this National Grievance.



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AFGE, AFL-CIO
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Washington, DC 20001
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thomas.dargon@afge.org

cc: Alma L. Lee, President, AFGE/NVAC
William Wetmore, Chairperson, Grievance and Arbitration Committee, AFGE/NVAC

Exhibit A

From: [Jackson, Letricia \(Trish\)](#)
To: owilliams@afgenvac.org; [Bill Wetmore](#); [Wille E. Haywood Jr. \(haywood.union@sbcglobal.net\)](mailto:Wille E. Haywood Jr. (haywood.union@sbcglobal.net)); [Cole, Tinita](#); PresidentLee@afgenvac.org; [NVAC Bargaining](#)
Cc: [Jackson, Letricia \(Trish\)](#)
Subject: AFGE/NVAC Union Notification: VA Handbook 0325 - Personnel Accountability
Date: Tuesday, April 18, 2023 11:45:52 AM
Attachments: [VA Handbook 0325 - Personnel Accountability as of 3 17 23.docx](#)

Dear AFGE/NVAC:

This notice is to inform the Union of VA Handbook 0325 - Personnel Accountability. This is a new handbook, accompanying VA Directive 0325, Personnel Accountability. This handbook provides additional information and implementation instructions for the Department-wide use of Veterans Affairs (VA) Emergency Alerting and Accountability System (VA EAAS).

Letricia (Trish) Jackson

Labor Relations Specialist
Office of Labor Management Relations (LMR)
(202) 754-1892: Mobile

New Schedule:

Week 1: Mon-Thurs 0700-1630, Fri 0700-1530

Week 2: Tues-Fri 0700-1630

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Exhibit B



**AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES
NATIONAL VETERANS AFFAIRS COUNCIL #53
Affiliated with the AFL - CIO
Mid-Term Bargaining Committee**

Oscar L. Williams Jr., Chair 2 nd Exec. V-President 29 Lake Street Danville, IL 61832-6101	Bill Wetmore, Member 3 rd Exec. V-President 2319 Alava Court Waldorf, MD 20603	Willie Haywood, Member 6 th Dist. Rep., NVAC 17705 Garden Blvd. Cleveland, OH 44128	Tinita Cole, Member NVAC Nat., Rep. VAMC Dayton Dayton, OH 45428	Nickloas Keogh, Member NVAC Nat., Rep VACO 811 Vermont Ave Washington, DC 20420
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April 27, 2023

Denise A. Biaggi-Ayer, Executive Director
Office of Labor Management Relations (LMR)
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

Subject: VA Handbook 0325 Personnel Accountability

Dear Ms. Biaggi-Ayer:

In accordance with Article 47, Section 2, C, of the Master Agreement, the National VA Council #53 is formally demanding to bargain on the VA Handbook 0325 Personnel Accountability as cited above within the Department. Please provide the NVAC's Mid-Term Bargaining Committee with any/all information/data concerning the cited subject above. The negotiations of this subject should normally begin no later than twenty (20) workdays after the Management's Chief Negotiator in this matter receives NVAC's demand to bargain.

Please cease and desist any implementation until the bargaining obligation has been met. The above named NVAC's Mid-Term Bargaining Committee may request a briefing over the cited subject above, before sending any proposals. If you have any questions, please call me at (217) 554-4979.

Sincerely,

Oscar L. Williams, Jr.
Chairperson, Mid-Term Bargaining Committee
2nd Executive Vice President
National VA Council #53

cc: Alma L. Lee, President National VA Council #53
NVAC Executive Committee

AFGE: Good Government We Are Ready

Exhibit C

PERSONNEL ACCOUNTABILITY

1. **REASON FOR ISSUE.** To provide additional information and implementation instructions for the Department-wide use of Veterans Affairs (VA) Emergency Alerting and Accountability System (EAAS).
2. **SUMMARY OF CONTENTS/MAJOR CHANGES.** This handbook provides the Department procedures and responsibilities for personnel accountability. This is the first release of Handbook 0325 for VA EAAS.
 - a. VA EAAS is the primary emergency notification system of record to send safety alerts to VA employees, contractors, subcontractors and affiliates, to gain cognizance of personnel safety status and to provide actionable intelligence to leadership through data analysis and compilation. Timely information is valuable for generating decisions during an emergency;
 - b. The system can send mass alerts and personnel accountability messages simultaneously, regardless of location or assigned organization, to VA staff members during an emergency through multiple devices (e.g., email, phone, text messages, desktop pop-up and mobile app).
3. **RESPONSIBLE OFFICE.** Office of Human Resources and Administration/ Operations, Security and Preparedness (HRA/OSP) (006), Office of the Chief Human Capital Officer (OCHCO) (05); Human Capital Services Center (HCSC) (006H).
4. **RELATED DIRECTIVE.** VA Directive 0325, Personnel Accountability, dated October 8, 2020.
5. **RESCISSION.** Not applicable.

CERTIFIED BY:

**BY DIRECTION OF THE SECRETARY
OF VETERANS AFFAIRS:**

/s/
Guy T. Kiyokawa
Assistant Secretary for
Enterprise Integration

/s/
Cassandra M. Law
Assistant Secretary for
Human Resources and Administration /
Operations, Security and Preparedness

DISTRIBUTION: Electronic Only

PERSONNEL ACCOUNTABILITY

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PERSONNEL ACCOUNTABILITY

1. **PURPOSE.** The purpose of this handbook is to provide standard guidance and procedures for implementing and operating VA's primary system for emergency alerting and personnel accountability as outlined in VA Directive 0325, Personnel Accountability. This handbook applies to all levels of Department management and addresses emergency situations such as:
 - a. National emergencies involving any threat to the continuity of the Federal Government;
 - b. Natural and technological disasters such as radiological accidents or emergencies, hazardous material, accidents and environmental disasters;
 - c. Events declared by the President of the United States to be major disasters or emergencies under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 93-288, as amended, 42 U.S.C. § 5121 et seq.; or
 - d. Violent events such as: civil disorders, terrorism, or active shooter situations.
2. **SCOPE.** The VA EAAS is the standard and only authorized system to alert and account for VA staff members during emergencies. For the purposes of this handbook, VA staff members are defined in paragraph 3j.
3. **TERMS AND DEFINITIONS.** The following definitions and acronyms apply for purposes of VA Directive 0325 and this handbook:
 - a. **Alert:** An alert is a notification or message that is sent to an individual(s) or group(s) for the purpose of providing critical information during or about an emergency situation. Alert is interchangeable with the term notification.
 - b. **Alert Summary:** An Alert Summary is a report obtained from the VA EAAS application by a VA EAAS administrator showing the sent alert, the number of personnel assigned to receive the alert, the number and percent of personnel successfully contacted and the number of personnel reported as safe, not safe, impacted, or who have not responded.
 - c. **Desktop Pop-up Notification:** One of the VA EAAS methods used to receive alerts. When used by the VA Emergency Coordinators or VA EAAS administrator, an alert will display on every VA staff member's monitor.
 - d. **Emergency Manager/Coordinators (EM/C):** VA employee(s) who prepares for and implements programs, policies and procedures for emergency situation.
 - e. **Geographic Area of Interest (GAOI):** The physical region or locale impacted by an emergency situation. Identifying the area of interest helps to limit the scope of alerting and personnel accountability to the affected personnel.

- f. **Mission-Essential Personnel:** VA staff members who are critical to the continuation of key operations and services during an emergency situation.
- g. **Personnel Accountability:** The Department's method of determining staff members' safety or other statuses during emergency situation.
- h. **Personnel Accountability Roster:** A list or directory of VA staff members used for secondary accountability methods only. It contains, at a minimum, the effective or updated date, organization(s) name, roster monitor's name and contact information and each VA staff members' name, contact information, physical address (city, state and zip code).
- i. **Safety Status:** The state of a VA staff member during an emergency; the safety statuses are safe, not safe, impacted, or no response. Some safety status messages will have a question to employees asking if they are impacted by an emergency. Impacted could mean if they are evacuating or staying in place during an emergency.
- j. **VA Staff Members:** VA employees, contractors, subcontractors and affiliates with issued Personal Identity Verification (PIV) cards and/or access to Government furnished equipment, who require access to VA information systems or physical access to VA facilities to perform their jobs.
- k. **Test:** A procedure intended to establish the quality, performance, or reliability of VA EAAS before the system is needed during a situation. The quarterly tests establish and confirm system capability and continuity.
- l. **VA Affiliate:** Individuals who require logical access (i.e., access that requires authentication/authorization) to VA information systems and/or physical access to VA facilities to perform their duties and who are not employees or contractors. Examples include but are not limited to: volunteers, Veteran Service Organizations representatives, Joint Commission reviewers, childcare staff, union officials and union support staff.
- m. **VA Employee:** An individual employed by VA, who meets the requirements of 5 U.S.C. § 2105(a).
- n. **VA EAAS Administrator (VA EAAS Admin):** A representative of an organization who manages the alerting and personnel accountability program and VA EAAS. VA EAAS Admins may share responsibilities or assume some of the responsibilities of an EM/C, as described in the Administration or Staff Office's (A/SO) personnel accountability procedures.

4. **RESPONSIBILITIES.** VA has implemented a program for alerting and accounting for VA staff members affected by an emergency situation. The Office of Human Resources and Administration/Operations, Security and Preparedness (HRA/OSP) collects and reports this information to VA leadership. VA Directive 0325 describes the general responsibilities related to implementing this policy; the below provides a brief summary and additional procedural detail where appropriate and should be read in conjunction with the Directive responsibilities.

a. **Assistant Secretary for Human Resources and Administration/Operations, Security and Preparedness (ASHRA/OSP)** shall:

- (1) Ensure that the development, dissemination and implementation of the Department's personnel accountability system aligns with VA's Comprehensive Emergency Management Program and the National Incident Management System;
- (2) Direct the personnel accountability program management and operational activities;
- (3) Serve as the VA Crisis Response Team personnel accountability Principal;
- (4) Designate a Director and Program Manager for VA EAAS to ensure VA Department-wide standardized usage;
- (5) Advise the Secretary on human resource issues arising from an emergency; and
- (6) Report the safety statuses of VA staff members to the Office of the Secretary, as needed.

b. **Principal Deputy Assistant Secretary for Human Resource and Administration/Operations, Security and Preparedness (PDAS HRA/OSP)** shall:

- (1) Serve as VA official with overall responsibility for personnel accountability;
- (2) Report safety statuses of VA staff members to the ASHRA/OSP.

c. **Under Secretaries, Assistant Secretaries and Other Key Officials** shall:

- (1) Establish procedures related to VA Directive 0325 and this handbook within each A/SO to issue alerts and establish personnel accountability during an emergency and provide those procedures to personnel under their authority. These procedures should include a description of any EM/C responsibilities assigned as a VA EAAS Admin;
- (2) Ensure safety statuses are reported to each respective A/SO Watch Desk as directed in paragraph 5c of this handbook;

- (3) Designate a primary and alternate VA EAAS Admin or EM/C, to serve as the A/SO subject matter expert on personnel accountability as required in Directive 0325 paragraph 3c(1), 3c(3) and 3c(6); where needed, assign a VA EAAS Admin at the region and Veterans Integrated Service Network (VISN) level;
- (4) Ensure the designated VA EAAS Admins or EM/C completes the appropriate training as referenced in VA Directive 0325 paragraph 3d(1) within 30 days of being designated or assigned;
- (5) Ensure personnel are provided the necessary information and guidance to receive and respond to VA EAAS alerts in the event of an emergency situation;
- (6) Establish procedures for the creation and maintenance of a Personnel Accountability Roster for each respective A/SO. The Personnel Accountability Roster should be updated on a quarterly basis or as needed; and
- (7) Ensure that each Administration has adopted VA EAAS as its sole emergency alerting system and that all contracts for alternate existing emergency solutions are cancelled at the end of their current performance period.

d. Emergency Manager/Coordinators (EM/C) shall:

- (1) Report personnel accountability (i.e., safety statuses of VA staff members) to the VA Integrated Operations Center and leadership such as the Under Secretaries, Assistant Secretaries and Other Key Officials; and
- (2) Fulfill any other responsibilities described in VA Directive 0325 3d., including initiation of alerts and personnel accountability procedures, unless assigned to a VA EAAS Admin in the A/SO personnel accountability procedures.

e. VA EAAS Admins may, in accordance with the procedures of their A/SO, fulfill the following EM/C responsibilities:

- (1) Initiate VA EAAS emergency alerts as needed and personnel accountability messages as directed by Under Secretaries, Assistant Secretaries, other Key Officials, or by A/SO leadership in accordance with the A/SO procedures.
- (2) Represent the organization regarding all personnel accountability responsibilities and provide their contact information to VA EAAS Program Office at VAEAASHelpDesk@va.gov;

- (3) Notify VA staff members of possible threats that may occur and inform them of how they will receive alerts (i.e., desktop pop-up, text messages, email alerts and telephone calls to VA or personal cell phones);
 - (4) Comply with provisions of the Privacy Act of 1974 (5 U.S.C. § 552a) to prevent unauthorized disclosure and use of Personal Identifiable Information (PII);
 - (5) Maintain a roster of all EM/Cs and/or VA EAAS Admins within their respective organizations; and
 - (6) Ensure VA EAAS is exercised at least twice a year. VA EAAS Admins will also conduct quarterly tests to ensure viability of communication systems in accordance with the National Emergency Communications Plan (Reference Title XVIII of the Homeland Security Act of 2002, VA Handbook 0324 and VA Directive 0325).
- f. **Human Resources Representative/Liaisons (HR Rep)** shall:
- (1) Ensure that VA EAAS registration is included in the Departmental onboarding process for all new VA staff members.
 - (2) Ensure VA staff members update contact information for personnel accountability in VA EAAS as changes occur; and
 - (3) Contact staff within the GAOI with the safety status of not safe, impacted, or no response. HR Reps will coordinate with managers and supervisors as needed to reach such VA staff members.
- g. **Managers and Supervisors** shall:
- (1) Comply with provisions of the Privacy Act of 1974 (5 U.S.C. § 552a) to prevent unauthorized use of PII;
 - (2) Account for all assigned VA staff members by utilizing VA EAAS or secondary methods listed in paragraph 5b of this handbook, including assisting HR Reps with reaching VA staff members whose safety statuses are unknown or not safe as needed; and
 - (3) Ensure VA staff members meet personnel accountability requirements including but not limited to:
 - (a) Ensure all assigned employees under their supervision update their VA EAAS profiles.
 - (b) Ensure all VA staff members under their supervision complete the Computer Based Training (CBT) on Personnel Accountability Procedures assigned in the Talent Management System (TMS).

h. **VA staff members** shall:

- (1) Receive alerts and self-account.
 - (a) VA staff members shall complete registration in VA EAAS. Before, during, or after an emergency situation, the Department will deliver important updates to affected VA staff members through phone calls, text messages, emails, mobile application and desktop pop-up notifications.
 - (b) When directed through VA EAAS alerts, VA staff members shall self-account with their safety status by responding to VA EAAS alerts or personnel accountability notifications and identifying requested status while on duty or after hours, including weekends and holidays, for accountability in impacted areas.
- (2) Complete the CBT on Personnel Accountability Procedures assigned in TMS; and
- (3) Provide, at a minimum, the following information for personnel accountability:
 - (a) Work location address;
 - (b) Work telephone number;
 - (c) Government-issued cellular telephone number (if available);
 - (d) Government email;
 - (e) Personal off-duty contact number (home or cell phone number—this is critical for non-work hour contact and coordination); and
 - (f) Permanent home address.

5. **PERSONNEL ACCOUNTABILITY PROCEDURES.** The Department will maintain a personnel accountability system providing the capability to collect and report on personnel safety and security in response to an emergency situation. Each A/SO will develop their personnel accountability procedures based on their organization and/or location, which should specify the responsibilities to be fulfilled by EM/Cs and/or VA EAAS Admins. The EM/Cs or the assigned VA EAAS Admins will utilize VA EAAS for personnel accountability. Personnel Accountability Process flow is provided in Appendix A.

a. Personnel Accountability Methods.

- (1) The primary method to account for personnel is VA EAAS.

- (2) The secondary method to account for personnel will be accomplished manually using Personnel Accountability Rosters when the VA EAAS system is unavailable. The rosters shall adhere to the following:
 - (a) Identify mission-essential personnel. List by name, work email, work number, home and cell phone number, as applicable.
 - (b) Be subject to the Privacy Act of 1974, 5 U.S.C. § 552a. Personal Privacy Information of Government employees is protected per VA Directive 6600. Information collected is to allow for personnel accountability and is for official use only.
 - (c) The Personnel Accountability Roster should be updated on a quarterly basis or as needed.
 - (d) Be disposed of in a manner as to prevent the unauthorized release of personal information.

b. Personnel Accountability Procedures.

- (1) Primary method –VA EAAS.
 - (a) The EM/Cs or the assigned VA EAAS Admins, in accordance with the A/SO's personnel accountability procedures, will initiate a personnel accountability alert to VA staff members affected by an emergency situation.
 - (b) VA staff members shall respond to the personnel accountability alerts to report their safety status using at least one of the listed devices or options below:
 - i Desktop Pop-up notification on the computer (Government furnished equipment (GFE));
 - ii Mobile Application via GFE work cell phone or personal cell phone;
 - iii Text messages;
 - iv Email alerts via Outlook inbox or personal email inbox;
 - v Phone calls via work phone, GFE work cell phone, personal cell phone, or home number; or
 - vi Reporting directly to your supervisor who will then report the status to leadership.

- (c) HR Reps will contact staff within the GAOI with the safety status of not safe, impacted, or no response.
 - (d) HR Reps will report all safety status updates to the EM/Cs and appropriate leadership such as the Under Secretaries, Assistant Secretaries and Other Key Officials to reach 100% personnel accountability, which means that all VA staff members have reported their status.
- (2) Secondary method –The secondary method is a cascade process using a Personnel Accountability Roster or office directory. The cascade process is accomplished by contacting VA staff members manually by phone.
- (a) The most senior level Director or official will initiate the secondary method by contacting the next person listed on the roster to relay the personnel accountability message.
 - (b) The next person will receive the message and safety status of the previous individual, then pass the collected information to the next person on the roster. If an individual cannot be contacted, the process will continue to the next person notating the missed individual's safety status as unknown. The cascade of calls will continue until the last person on the roster is contacted.
 - (c) The last person on the roster will report the personnel accountability statuses to the assigned HR Reps.
 - (d) HR Reps will contact staff within the affected area with no response or have responded as not safe until all VA staff members have reported.
 - (e) HR Reps will report all safety status updates to the EM/Cs and Department leadership as they become available.
- c. Reporting Procedures.

- (1) Personnel accountability can be conducted either geographically or organizationally, depending on the type of an emergency situation. The A/SO procedures implementing this process must identify who will make this determination. The determinations should be made considering the following factors: the nature of the incident/emergency; who is likely to be impacted; whether the emergency impacts a geographic area or is limited to a single organization.

When directed through VA EAAS alerts or secondary personnel accountability methods, VA staff members shall respond with their safety status. EM/Cs will notify their respective A/SO Watch Desk regarding

personnel accountability. The report shall contain the following, at a minimum:

- (a) Participating A/SO organization.
- (b) Alert Summary:
 - i Number of personnel assigned.
 - ii Number and percent of personnel contacted. Including the number and percent of personnel reported as safe, not safe, or impacted.
 - iii Number and percent of personnel with no response.

6. **ALERTING.** The Department will maintain a system capable of sending alerts to VA staff members to ensure personnel safety and security in response emergency situations. Alerts are used to provide information to VA staff members. Each A/SO will develop their alerting procedures based on their organization and/or location, which should specify the responsibilities to be fulfilled by EM/Cs and/or VA EAAS Admins. The EM/C or the assigned VA EAAS Admin will utilize VA EAAS to send alerts to the affected VA staff members in accordance with the A/SO's personnel accountability procedures.

a. Alerting Methods.

- (1) VA EAAS is the primary method to send critical alerts to VA staff members.
- (2) The secondary method to contact VA staff members is manually using Personnel Accountability Rosters or office directories when the VA EAAS system is unavailable. The rosters shall adhere to the guidelines listed in paragraph 5a(2).
- (3) Emergency alerts should be conducted without public announcement (news media) unless otherwise directed by the Secretary. If a public announcement is needed, the Office of Public and Intergovernmental Affairs should be consulted and approve the proposed message.

b. Alerting Procedures.

- (1) Primary method – using VA EAAS.
 - (a) The EM/Cs or the assigned VA EAAS Admins will initiate a VA EAAS alert to affected VA staff members and will continue to provide updates until the emergency situation is no longer a safety.
 - (b) VA staff members shall receive VA EAAS alerts, through one of the listed devices or options below:

- i Desktop pop-up notification;
 - ii Mobile application via GFE cell phone or personal cell phone;
 - iii Text messages;
 - iv Email alerts via Outlook inbox or personal email inbox;
 - v Phone calls via work phone, GFE cell phone, personal cell phone or home number;
- (2) Secondary method – The secondary method is a cascade process using a Personnel Accountability Roster or office directory. The cascade process is accomplished by contacting VA staff members manually by phone.
 - (a) The most Senior Level Director or Official will initiate the secondary method by contacting the next person listed on the roster to relay the alert message.
 - (b) The next person will receive the alert message, then pass the information to the next person on the roster. If an individual cannot be contacted, the process will continue to the next person noting the missed individual's name. The cascade of calls will continue until the last person on the roster is contacted.
 - (c) The last person on the roster will report to the assigned HR Rep that the manual notification process is completed with the names of any missed VA staff members.
 - (d) The HR Rep will report updates to the EM/Cs and leadership such as the Under Secretaries, Assistant Secretaries and Other Key Officials.

7. **TESTS AND EXERCISES.** Each organization must test and exercise the system to prepare and validate the ability to perform personnel accountability and emergency alert functions during any change in normal operating conditions. Tests and exercises will be scheduled using a fiscal year calendar. Test and exercise messages should be identified as such in each message to avoid any confusion. VA staff members will participate in their assigned tests and exercises.

- a. **Test:** A test will demonstrate the system functionality and ensure the procedures meet the Department's ability to send alerts to VA staff members. The tests will confirm that messages can be sent and are received on all devices chosen for each message. EM/Cs or VA EAAS Admins shall conduct a VA EAAS test on a quarterly basis with a test rate reaching at least 90%.
- b. **Exercise:** An exercise is a simulation of a real-world emergency designed to validate continuity plans and personnel accountability procedures. An exercise allows for training, assessment, practice and improvement of continuity

capabilities. EM/Cs or VA EAAS Admins shall conduct a VA EAAS exercise at least twice a year. Exercises can be conducted to perform personnel accountability procedures in areas to prepare for seasonal events such as hurricanes or severe winter weather. A response is required from each recipient during an exercise as described in paragraph 5b(1)(b) of this handbook. At a minimum, the exercise must include one alert during duty hours and one alert after duty hours with a required minimum response rate of 90%. Exercises can be conducted on any organizational level as determined within the A/SO's personnel accountability procedures or as needed.

- c. **Reports:** The EM/Cs or the VA EAAS Admins will report tests and exercise results of the VA EAAS message within 5 business days to the VA EAAS Program Office at VAEAASHelpDesk@va.gov. Test and Exercise Reporting Table example is provided in Appendix B. The report shall contain the following as a minimum:

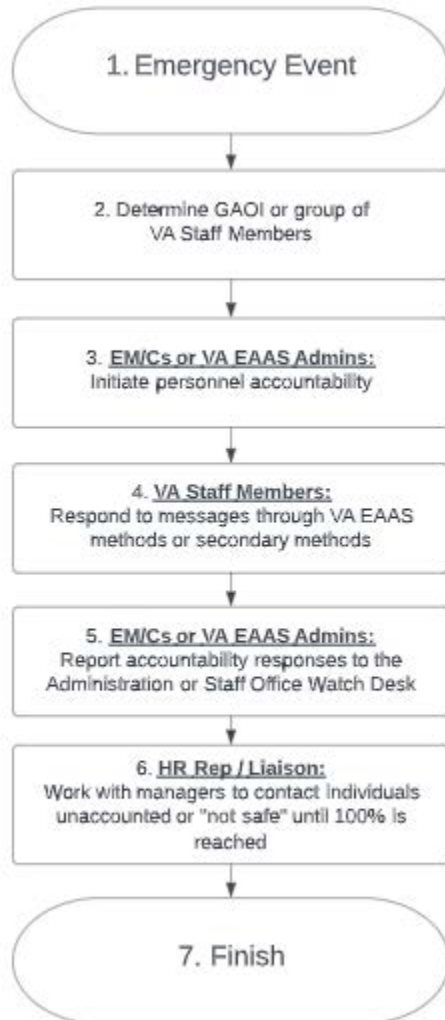
- (1) Participating A/SO organization.
- (2) Alert Summary:
 - (a) Number of personnel assigned.
 - (b) Number and percent of personnel contacted.
 - i Number and percent of personnel reported as safe.
 - ii Number and percent of personnel reported as not safe/impacted.
 - (c) Number and percent of personnel with no response.
- (3) Any problems or issues experienced.
- (4) Lessons learned after each emergency situation.

8. REFERENCES.

- a. [Federal Continuity Directive 1](#) (FCD-1), January 17, 2017.
- b. [National Incident Management System](#), October 10, 2017.
- c. [National Response Framework](#), October 28, 2019.
- d. [National Security Presidential Directive \(NSPD-51\)](#), May 9, 2007.
- e. [Presidential Policy Directive 8 \(PPD-8\), National Preparedness](#), March 30, 2011.

- f. [VA Directive 0320, Comprehensive Emergency Management Program](#), August 13, 2012.
- g. [Federal Information Security Modernization Act of 2014, P.L. 113-283](#), December 18, 2014.
- h. [Disclosure of Confidential Information, 18 U.S.C. § 1905](#), January 3, 2012.
- i. [The Privacy Act of 1974, 5 U.S.C. § 552a](#), December 31, 1974.
- j. [VA Directive 0324, Test, Training, Exercise and Evaluation Program](#), October 9, 2012.
- k. [VA Directive 0325, Personnel Accountability](#), October 8, 2020.
- l. [Homeland Security Exercise and Evaluation Program](#), January 2020.
- m. [VA Handbook 0735, Homeland Security Presidential Directive 12 Program](#), March 24, 2014.
- n. [National Emergency Communications Plan](#), September 2019.

APPENDIX A. Personnel Accountability Process



APPENDIX B. Test and Exercise Reporting Table (example template only)

Date/time of the alert and Duration of the alert:				
Participating organization or facility:				
Name of alert:				
Alert Summary:				
Assigned	Contacted	Responded (Safe or Not Safe/Affected)	No-Response	% Responded
Any issues or problems experienced:				
Lessons Learned:				
Best Practices:				