

## SECURITY AND LAW ENFORCEMENT

**1. REASON FOR ISSUE:** This issue establishes mandatory procedures for protecting lives and property within Department of Veterans Affairs' (VA) jurisdiction, by adding Appendix F, "Active Threat Response." This new Appendix provides Department-wide requirements, goals and expectations for the development of Active Threat Response Plans at the facility level.

### **2. SUMMARY OF CONTENTS AND MAJOR CHANGES:**

**a. Summary.** This adds the newly developed Appendix F to VA Directive and Handbook 0730.

#### **b. Major Changes.**

- (1) Adds specific goals and expectations for Active Threat Response planning;
- (2) Provides definitions for key terms in Active Threat Response plans;
- (3) Adds a requirement for employee, affiliate training, and exercises for Active Threat Response.

**3. RELATED DIRECTIVES:** VA Directive 0730, December 12, 2012

**4. RESPONSIBLE OFFICE:** The Police Service (07B), Office of Security and Law Enforcement, Office of Operations, Security, and Preparedness is responsible for the material contained in this appendix.

**5. RESCISSION:** None.

**CERTIFIED BY:**

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

/s/  
**Stephen W. Warren**  
Executive in Charge and  
Chief Information Officer  
Office of Information and Technology

/s/  
**Kevin T. Hanretta**  
Assistant Secretary for  
Operations, Security, and Preparedness



### Active Threat Response Within Veterans Affairs

1. **Policy:** The policy of the Department of Veterans Affairs is to maintain safe and secure workplaces for the provision of care and services to our nation's Veterans. VA will provide individuals on VA facilities a safe, secure, and welcoming environment to meet our mission requirements while meeting community standards.

- a. An Active Threat/Active Shooter incident occurring in a VA facility may result in deaths or serious injuries to persons, as well as disrupting the Department's ability to provide care and services.
- b. This document provides definitions, assigns responsibilities and describes the goals and expected outcomes of Active Threat Response plans.

### 2. Goals and Objectives:

- a. As it relates to Active Threats, the Department's goal is to prevent or deter such incidents from occurring. VA accomplishes this goal by striving to provide excellent customer service in a respectful, professional environment. Pre-event planning at the facility level; compliance with physical security standards; and uniformed VA Police officers or security (as appropriate to the facility) are to be in place to assist in deterring and detecting potential threats.
- b. When an Active Shooter or Threat incident occurs, the goal of the Department is to minimize the risk to Veterans, visitors and staff by eliminating or neutralizing that threat as quickly as possible. The affected facility will be returned to normal operations as quickly and safely as possible.

### 3. Definitions:

- a. *Active Shooter:* An Active Shooter is an individual actively engaged in killing or attempting to kill people in a confined and populated area, typically through the use of firearms. (Interagency Security Committee, "Design Basis Threat Report" April 1, 2013). Active Shooter incidents can also occur without warning in open spaces, such as campus areas.
- b. *Active Threat:* VA extends the definition of Active Shooter to include the possible use of other weapons, including knives, explosives or blunt objects. The term used throughout this policy will be Active Threat.
- c. *VA Police:* VA employees who have appointed authority under statute to enforce Federal law within VA's jurisdiction. Such officers are armed with Department-approved weapons and are the primary initial response forces to Active Threat incidents on a VA-owned campus. VA Police officers complete substantial training in Active Threat Response.

d. *Office of Inspector General Special Agents* - VA employees in the Office of Inspector General (OIG) who are criminal investigators with full Federal law enforcement authority pursuant to the Inspector General Act. Pursuant to a Memorandum of Understanding (MOU) between OIG and the Office of Security and Law Enforcement, OIG special agents are available to assist VA Police, who are the primary initial responders in Active Shooter or Threat incidents, and will participate in planning and training for these incidents at VA facilities.

e. *Non-VA Law Enforcement*: VA organizations are required to maintain active memoranda of understanding or agreement (MOU) with local, state and Federal law enforcement agencies. Such MOUs are intended to define the roles and responsibilities of VA and the outside law enforcement agencies that provide support in the event of an emergency incident.

f. *Evacuate, Evade, Engage*: When confronted by an Active Threat incident, persons must choose a response appropriate to the incident and with concern for their safety and that of others. The incident may be very fluid and may require moving from one response to another as the situation unfolds.

1. *Evacuate*: As defined by this policy, evacuate means to rapidly and safely leave an area directly impacted by an Active Threat incident. Unlike a traditional fire response, evacuation from the area of an Active Threat may not always be the best option available. Evacuation is best suited in a setting where there is clear access to an escape route or for people in the immediate area of an attack that is underway.

2. *Evade*: In this context, “evade” equates to “shelter in place.” Pre-identified shelter in place locations are used to provide protection by use of walls, lockable doors and furniture/movable fixtures. Where there is no pre-identified shelter in place location, or when the shelter in place location is not immediately available, staff will improvise to the extent possible.

3. *Engage*: Staff should only take physical action against a suspect as an absolute last resort when their life is in immediate danger. VA understands that in some circumstances, attempts by an employee to evacuate or evade may not be successful or safe, and, if confronted by an attacker, the employee may have to take action to protect their life.

#### **4. Nature of the Active Threat:**

a. Persons engaged in carrying out an Active Threat may be armed with firearms, edged weapons, blunt objects, explosives or a combination of these.

b. The eruption of this level of violence is generally unpredictable and difficult to prevent. Once initiated, the suspect’s actions are also unpredictable. The suspect may have a specific target person in mind (a predatory attack); may choose to act out of a political or other reason, or may choose to attack for reasons that are suicidal in nature.

c. The motive of an active attacker will most likely not be known until well after the attack is over. It will not be clear what the attacker is attempting to accomplish when an incident first occurs. Due to this nature, any active attack by a sole person or group should be considered an Active Threat until it is resolved or the motive of the attack is clarified.

#### **5. Risk of the Active Threat:**

a. Whether providing direct healthcare, processing benefits claims or memorial affairs, VA facilities are workplaces where Veterans, staff and visitors reasonably expect to carry out their functions in a safe environment.

b. An Active Threat may result in injuries or death to persons within the VA facility. Care or service delivery will be disrupted, often for an extended period of time.

c. Active Threats are difficult to predict or prevent. Persons who carry out an Active Threat generally give little or no pre-warning, and could include VA patients, staff, and visitors. Persons who have no direct personal VA or Federal government involvement, but do have a political or other motive can also be possible attackers. VA facilities will use available resources; Disruptive Behavior Committees; Employee Threat Assessment Teams; and regular multi-disciplinary committees to share information and help with planning.

#### **6. Response Planning for Active Threat.**

a. Security planning in VA is based on three primary concepts: Deter, Detect, Respond.

##### **(1) Deter-**

(a) The first step in an Active Threat response plan is deterring or preventing the incident from occurring. Deterrence includes:

Active uniformed police or security patrol and stationary posts (as appropriate for the facility). VA facilities that are not serviced by a VA Police unit will coordinate with outside law enforcement for regular patrol coverage.

Staff and associates who provide excellent customer service as well as treat each other and customers with courtesy and respect.

Installing and using physical security systems (cameras, locks, doors, alarm systems) that are well designed, properly managed, maintained and tested regularly.

(b) In the Veterans Health Administration (VHA), active membership and support of safety planning organizations and Disruptive Behavior Committees/Employee Threat Assessment Teams allows for some measure of pre-warning and planning. This helps to ensure that troubled staff or Veterans are identified early, are provided support, and will assist in deterring some potential threat incidents.

(c) VA Police Service engagement in local Joint Terrorism Task Forces (JTTF) and similar criminal intelligence sharing organizations assists in pre-identifying threats and determining best practice countermeasures.

(d) Facility managers and engineering staff are key members of Active threat response teams. Facility management and engineering staff coordinate appropriate compartmentalization of VA space. Consideration should always be given to controlling access to high threat areas. As an example, while lobbies and public space may have minimal entry controls, office, clinic and ward areas should be secured with heavy doors and access control systems to be able to deny movement to an Active Threat suspect and provide shelter in place locations.

## **(2) Detect**

(a) Staff training is critical to ensure recognition when a Veteran or other person is escalating to violence. The earlier such escalation is identified, the more likely an appropriate response can be established to minimize or eliminate the threat of injury or death.

(b) Technical aids to security, including Closed Circuit Television, communication systems, duress systems and other alarms are critical to ensure that response forces are rapidly mobilized.

(c) Stationing of VA Police officers or security personnel, as appropriate to the VA facility, is very important in high traffic locations at facility entrances. The visibility of police or security forces can deter an attack from happening, detect and provide instant response in the event deterrence efforts are not successful.

(d) The use of behavior management committees or facility security committees allows for multi-disciplinary information sharing. This assists in early detection and intervention in potential incidents from persons known to the facility (patients, employees, etc.)

## **(3) Response**

(a) Every VA facility will develop response plans to an Active Threat event. Consideration needs to be given to local policies; communication plans; physical design of the facility; response plans for staff and visitors; exercise and testing to ensure the effectiveness of the planning and to reinforce appropriate responses.

**1.** Each VA facility will develop a response plan specific to Active Threat Response

**2.** The response plan will include communication plans. The intent is to ensure that all persons at the facility are aware of an active incident and able to take appropriate precautions.

“Clear language” will be used to describe an incident during internal communications (“Active Threat Underway on Ward\_\_\_\_, “for instance). The use of color or other codes is discouraged because of the potential for confusion. The use of emails, twitter or other social media will be required and a key component of local response plans.

3. The response plan will clearly spell out the initial emergency contact number, and whether that is facility VA Police Service or non-VA law enforcement. Facility directors will coordinate non-VA law enforcement response plans and exercises as appropriate to the measures in place at that facility.

4. The communication plan will include ensuring that notification is made to the VAIOC according to the requirements of VA Directive 0321, “Serious Incident Reporting.”

5. Each VA facility will pre-identify shelter in place locations for protecting Veterans, visitors, patients and staff. Areas that can be secured will be identified in advance and the ability to rapidly lock down those areas will be tested.

6. Active Threat Response teams will include membership from facility management and/or engineering, and potential facility command post locations will be pre-identified. Facility management team members have the knowledge of facility utilities, HVAC, and access to floor plans. It may become critical during an incident to control such building systems in support of law enforcement special response teams.

7. Employee accountability measures will be in place and tested on a regular basis.

8. Response plans will include that Veteran care and service is the primary responsibility of this Department. All reasonable attempts to shelter patients and other customers will be made, but it is understood that in some scenarios a staff member may have to evacuate rapidly in the face of an immediate threat to their safety

9. Active Threat Response Training, developed jointly by the VA Law Enforcement Training Center and VHA, will be required for all VA employees. The primary concepts presented in that training (Evacuate, Evade, Engage) will be tested in regular exercises.

## 7. References:

Title 38, United States Code 901 and 902, “Security and Law Enforcement” Available at: <http://www.gpo.gov/fdsys/pkg/USCODE-2010-title38/pdf/USCODE-2010-title38-partI-chap9-sec901.pdf>

Title 38, Code of Federal Regulations 1.218, “Security and Law Enforcement.” Available at: <http://www.gpo.gov/fdsys/pkg/CFR-2011-title38-vol1/pdf/CFR-2011-title38-vol1-sec1-218.pdf>

VA Directive 0730, “Security and Law Enforcement” December 12, 2012

Interagency Security Committee: “Violence in the Federal Workplace, A Guide to Prevention and Response”, April 2013

<http://www.dhs.gov/sites/default/files/publications/ISC%20Violence%20in%20the%20Federal%20Workplace%20Guide%20April%202013.pdf> Accessed on February 19, 2014.

Interagency Security Committee: “Design-Basis Threat Report”, April 2013 (security sensitive document, not publicly available)

US Department of Labor, Occupational Safety and Health Administration. Workplace Violence. OSHA Fact Sheet. 2002. Available at:

[http://www.osha.gov/OshDoc/data\\_General\\_Facts/factsheet-workplace-violence.pdf](http://www.osha.gov/OshDoc/data_General_Facts/factsheet-workplace-violence.pdf). Accessed May 13, 2013.

Gelen, G.D.; Catlett, C.L; Kubit, J.G., Hsieh, Y-H. Hospital-Based Shootings in the United States: 2000-2011. Annals of Emergency Medicine. Volume 60, No. 6: December 2012.

Available at: [http://www.annemergmed.com/article/S0196-0644\(12\)01408-4/abstract](http://www.annemergmed.com/article/S0196-0644(12)01408-4/abstract) Last accessed on May 14, 2013.