

# Department of Homeland Security **Office of Inspector General**

## **FEMA's Initial Response to the Oklahoma Severe Storms and Tornadoes**





**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

MAR 19 2014

MEMORANDUM FOR: Joseph L. Nimmich  
Associate Administrator, Response and Recovery  
Federal Emergency Management Agency

FROM: John V. Kelly  
Assistant Inspector General  
Office of Emergency Management Oversight

SUBJECT: *FEMA's Initial Response to the Oklahoma Severe Storms  
and Tornadoes*  
FEMA Disaster Number 4117-DR-OK  
Audit Report Number OIG-14-50-D

Attached for your information is our final letter report, *FEMA's Initial Response to the Oklahoma Severe Storms and Tornadoes*. We audited the Federal Emergency Management Agency's (FEMA) initial response to the severe storms and tornadoes that occurred in Oklahoma from late May to early June 2013. We discussed the results of this audit with FEMA officials and provided a draft report to them on November 20, 2013. The report contains no recommendations.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to appropriate congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Major contributors to this report are Christopher Dodd, Acting Director; Moises Dugan, Supervisory Program Analyst; Patricia Epperly, Auditor-In-Charge; David Fox, Auditor; and Heather Hubbard, Auditor.

Please call me with any questions, or your staff may contact Christopher Dodd, Acting Director, Central Regional Office, Office of Emergency Management Oversight, at (214) 436-5200.

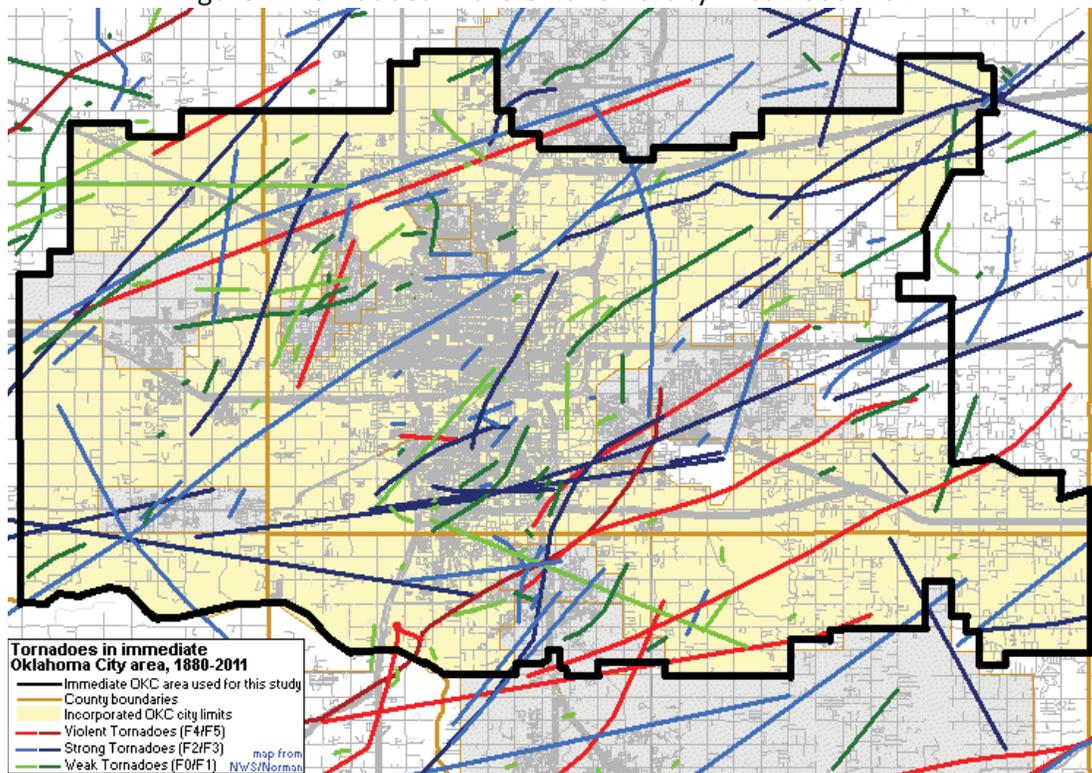
Attachment



## Background

The State of Oklahoma (State) lies within an area of the Great Plains known as Tornado Alley, a region that stretches from South Dakota to central Texas. The State experiences more tornadoes than any other state, and its capital, Oklahoma City, endures more tornadoes than any other city in the United States. Since May 2003, the President has declared 17 Federal disasters in Oklahoma related to tornadoes. Figure 1 demonstrates the history of tornado activity in the Oklahoma City area.

Figure 1: Tornadoes in the Oklahoma City Area 1880–2011



Source: National Weather Channel. Map depicts the number of tornadoes in the Oklahoma City area.

The Oklahoma Department of Emergency Management serves as the State’s liaison with Federal and local emergency management agencies and maintains the State Emergency Operations Center located in Oklahoma City, Oklahoma. The State is within FEMA Region VI, located in Denton, Texas.



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On the afternoon of May 20, 2013, a category EF-5 tornado touched down in Moore, Oklahoma.<sup>1</sup> The tornado remained on the ground for over 40 minutes—its path more than a mile wide and 17 miles long. The tornado claimed 26 lives, including 7 children; injured more than 387 others; and destroyed 2 elementary schools.

Figure 2: Tornado Damage in Moore, Oklahoma, May 29, 2013



Source: OIG Emergency Management Oversight Team photograph. Moore, Oklahoma, May 29, 2013.

Within hours of the event, the Governor of Oklahoma declared a State of Emergency and, as the *Robert T. Stafford Disaster Relief and Emergency Assistance Act*, as amended, requires, requested a Presidential disaster declaration. FEMA Region VI processed the Governor’s request for a major disaster declaration by telephone, which resulted in a major disaster declaration (4117-DR-OK) within 24 hours of the incident. Typically, an average of 39 days passes between the date of the incident and the date of the declaration.<sup>2</sup> The incident period for this disaster began on May 18, 2013, to include a category EF-4 tornado that hit Steelman Estates Mobile Home Park in Shawnee, just 35 miles east of Oklahoma City, and continued through June 2, 2013, to include a

<sup>1</sup>Based on the Enhanced Fujita (EF) scale, an EF-5 tornado is the most severe with winds in excess of 200 miles per hour.

<sup>2</sup>Normally, damage assessments, conducted jointly by FEMA and the State, precede a State’s request for a major disaster declaration.



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second category EF-5 tornado that struck near the City of El Reno on May 31, 2013. In a period of 15 days, tornadoes and storms in the Oklahoma City area caused 48 fatalities and more than 508 reported injuries.

On May 28, 2013, our office deployed an Emergency Management Oversight Team (EMOT) to the Joint Field Office in Oklahoma City, Oklahoma.<sup>3</sup> The EMOT provides independent oversight of disaster response and recovery activities and provides FEMA an additional resource for proactive evaluation to prevent and detect systemic problems in disaster programs and helps ensure accountability over Federal funds.

Figure 3: Tornado Damage in Shawnee, Oklahoma, May 30, 2013



Source: OIG Emergency Management Oversight Team photograph. Steelman Estates, Shawnee, Oklahoma, May 30, 2013

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<sup>3</sup>FEMA establishes a Joint Field Office in or near the disaster area. Federal and State staff uses this office as the focal point of disaster recovery operations.



## Results of Audit

FEMA's initial response to the Oklahoma severe storms and tornadoes was effective. FEMA demonstrated its ability to fulfill its mission to serve and assist disaster survivors effectively by aggressively responding to the disaster both before and after the Presidential declaration, meeting recovery challenges, creatively overcoming resource shortfalls, implementing a variety of disaster sourcing methods, and effectively coordinating activities with the State.

In approximately 1 month from the disaster declaration, FEMA:

- processed 12,461 Individual Assistance registrations,
- completed 96 percent of home inspections,
- disbursed \$9,437,387 in individual household assistance,
- completed 36 Public Assistance Kickoff meetings and approved 48 requests for Public Assistance grant funds,<sup>4</sup>
- issued 34 Mission Assignments (31 Federal Operations Support and 3 Direct Federal Assistance) totaling more than \$2 million, and
- awarded \$1 million in disaster response contracts, including \$818,473 to local businesses.

In evaluating FEMA's initial response to this disaster, we focused on answering the following questions:

1. What activities did FEMA perform before the major disaster declaration?
2. What were the most pressing challenges FEMA faced in this disaster?
3. What were the most significant resource shortfalls?
4. How did FEMA make disaster-sourcing decisions?
5. How well did FEMA coordinate its activities?

### **FEMA's Activities Before the Disaster Declaration**

FEMA officials effectively responded to the disaster before the Presidential declaration. Beginning immediately after the incident, FEMA Region VI activated an Incident Management Assistance Team, three Urban Search and Rescue Teams, two Disaster Medical Assistance Teams, two Disaster Mortuary Operational Response Teams, and the National FEMA Incident Management Assistance Team. Although FEMA Region VI

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<sup>4</sup>FEMA's Public Assistance grants are available to supplement State, Tribal, and local governments and certain types of private nonprofit organizations to cope effectively with the direct results of the disaster.



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activated these disaster response teams and mobilized resources before the declaration, the short time between the incident and the declaration prevented some elements of FEMA's Incident Management Assistance Team from deploying until after the declaration.

FEMA Region VI officials expedited the declaration process by accepting the Governor's request by telephone rather than in writing. This expedited process resulted in a major disaster declaration within 24 hours of the incident, as opposed to the nationwide average of 39 days.<sup>5</sup> This process made Federal resources available faster to the citizens of Oklahoma.

FEMA Region VI also activated the Regional Response Coordination Center in Denton, Texas before the Presidential disaster declaration. The center acts as the focal point of FEMA's response until FEMA's incident management team takes operational control of the disaster at the Joint Field Office. During this event, FEMA Region VI implemented, for the first time, concepts of FEMA's recently published *Regional Incident Support Manual*. However, this caused some confusion because FEMA Region VI had not completed its training on the manual's concepts before the disaster.<sup>6</sup> The manual implements changes to the organizational structure of FEMA's Regional Response Coordination Center to enhance FEMA's ability to support its incident management teams. Illustrating the enhanced support role, the new organizational structure centralizes resource ordering into one section (Resources Support), unlike the Joint Field Office structure where resource ordering remains split among three sections (Operations, Logistics, and Administrative/Finance).<sup>7</sup> However, because of FEMA's quick response to the tornadoes, FEMA transitioned operational control of the event from the Regional Response Coordination Center to the Joint Field Office quickly. Therefore, implementing this new concept did not significantly impact FEMA's response. FEMA officials said they expect problems with implementing the *Regional Incident Support Manual* concepts to diminish once FEMA completes its training.

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<sup>5</sup>Normally, damage assessments that FEMA and the State conduct jointly precede a State's request for a major disaster declaration.

<sup>6</sup>FEMA issued the *Regional Incident Support Manual* on January 24, 2013.

<sup>7</sup>The Joint Field Office follows an Incident Command System organizational structure. The Incident Command System is a standardized, on-scene, all-hazards management approach that integrates facilities, equipment, personnel, procedures, and communications within a common organization structure and enables a coordinated response and common processes for planning and managing resources.



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### **FEMA's Most Pressing Challenges**

FEMA effectively resolved pressing challenges by facilitating a rapid and safe response to the disaster. For example, FEMA implemented programs to assist survivors through its Disaster Survivor Assistance initiative, expedited debris removal through a pilot program, and reassigned staff deployed to the Joint Field Office to the most appropriate positions based on skills and experience.

FEMA Region VI met the challenge of assisting disaster survivors by implementing its Disaster Survivor Assistance initiative.<sup>8</sup> This initiative supports the needs of survivors by having FEMA Disaster Survivor Assistance teams establish ad-hoc registration sites to provide virtual disaster assistance functions in tandem with fixed Disaster Recovery Centers.<sup>9</sup> This approach allowed FEMA to provide important disaster assistance services to residents who could not leave their homes or who had transportation limitations. The Disaster Survivor Assistance teams enhanced operational and programmatic coordination by combining situational awareness efforts with program services in the critical first hours, days, and weeks following the disaster.

To expedite debris removal, FEMA Region VI offered subgrantees the opportunity to participate in the Public Assistance Alternative Procedures Pilot Program for Debris Removal. This program encourages subgrantees to expedite removal of eligible debris by providing an increased Federal cost share of up to 85 percent for debris removed within the first 30 days.<sup>10</sup> Participation in this program also allows the subgrantee to retain any debris recycling revenues and receive reimbursement for its employees' regular wages instead of only overtime wages.<sup>11</sup>

Finally, to ensure the best qualified staff filled each position at the Joint Field Office, FEMA officials reassigned personnel based on the individual's skills and experience, rather than release the staff and wait for replacements to deploy. FEMA's reliance on the FEMA Qualification System to obtain enough appropriately skilled staff continues to be an ongoing and pressing challenge. We have identified staffing as a major challenge in all four disasters we have reviewed, including this one.<sup>12</sup> Therefore, because the

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<sup>8</sup>This disaster was only the second time FEMA Region VI implemented Disaster Survivor Assistance. The first time followed the West, Texas, explosion that occurred on April 17, 2013 (EM-3363-TX).

<sup>9</sup>A Disaster Recovery Center is a readily accessible facility or mobile office where applicants may go for information about FEMA or other disaster assistance programs, such as housing or rental assistance.

<sup>10</sup>The Federal cost share established for this disaster declaration is 75 percent.

<sup>11</sup>FEMA Policy 9525.7, Labor Costs – Emergency Work, allows only overtime labor eligibility for debris removal and emergency protective measures.

<sup>12</sup>Audit Report Number OIG-13-84, *FEMA's Initial Response to Hurricane Isaac in Louisiana Was Effective and Efficient*, April 30, 2013; Audit Report Number OIG-13-117, *FEMA's Initial Response in New Jersey to*



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problem appears to be systemic, rather than specific to a single disaster, we will issue a separate report to address the challenges FEMA responders have had with FEMA's Qualification System.

#### **Resource Shortfalls**

FEMA creatively overcame State and FEMA resource staffing shortfalls, as well as shortfalls in local mitigation plans. For example, the State had a shortage of personnel and resources to address its initial management activities for donated goods. In response, FEMA provided staff to collect, sort, and store donated goods until State staff was able to assume responsibilities.

In addition, FEMA Region VI addressed State and local jurisdictions mitigation planning shortfalls by presenting the State with several options to accelerate the review and approval of local mitigation plans and updates.<sup>13</sup> As a result, FEMA expedited funding of mitigation projects. It is important that FEMA, the State, and grant applicants address mitigation planning shortfalls to ensure disaster survivors and communities statewide have access to FEMA's hazard mitigation funds. We will also address this hazard mitigation planning shortfall in a separate report.

#### **FEMA's Disaster Sourcing Decisions**

FEMA provided goods and services necessary for the response and recovery through a variety of disaster sourcing mechanisms. FEMA tasked other Federal agencies to support FEMA and State efforts using Mission Assignments (as explained in the next section); used its Logistics Section to requisition supplies, equipment and services, such as water and blankets; and used its Administrative and Finance Section to outsource other services, such as providing security guards to FEMA offices and distribution centers using local contractors.

As discussed previously, FEMA operated its Regional Response Coordination Center based on the new *Regional Incident Support Manual* concept. Under this concept, the Resources Support Section makes all resource ordering decisions. FEMA's Regional Response Coordination Center maintained control over disaster sourcing decisions until the Joint Field Office incident management team took over this activity in Oklahoma City.

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*Hurricane Sandy*, September 6, 2013; and Audit Report Number OIG-13-124, *FEMA's Initial Response in New York to Hurricane Sandy*, September 26, 2013.

<sup>13</sup>FEMA requires an approved local hazard mitigation plan to receive FEMA hazard mitigation grant funds for a project such as safe rooms.



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However, at the Joint Field Office, FEMA made resource-ordering decisions using its traditional linear, stove-piped, approach, involving three different sections within the Joint Field Office’s organizational structure—the Operations Section, the Logistics Section, and the Administrative/Finance Section. Under this traditional approach, FEMA’s Operations Section receives and tracks all resource requests. FEMA used action request forms to document Federal and State requirements for commodities, equipment, teams, and services. FEMA can address Federal and State requirements in four ways:

- Mission Assignments,
- Internal requisitions,
- Local contracts or interagency agreements, or
- Public Assistance program referral

### **Operations Section Tasked Other Federal Agencies Using Mission Assignments**

As of June 21, 2013, FEMA’s Operations Section obligated more than \$2 million in Mission Assignments to Federal agencies to support the disaster recovery efforts of FEMA and the State. These Mission Assignments provided resources such as emergency medical personnel, air quality monitoring services, and donations management support services. FEMA used the following two types of Mission Assignments during this disaster.

1. **Federal Operations Support:** Federal-to-Federal request allowing FEMA to execute its mission without requesting a cost share from the State. For example, FEMA tasked several Federal agencies to provide agency representatives to support FEMA’s response and disaster planning efforts at the National and Regional Response Coordination Centers. FEMA also tasked the Corporation for National and Community Services to provide warehouse management support for a FEMA warehouse.
2. **Direct Federal Assistance:** Federal-to-Federal request FEMA makes to other Federal Agencies to directly provide goods and services not available through the State. FEMA and the State share the cost of this type of mission assignment. For example, at the State’s request, FEMA tasked the Environmental Protection Agency to perform air monitoring in areas where debris removal operations and other recovery efforts were underway.



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### **Logistics Section Requisitioned Supplies, Equipment, and Services**

FEMA's Logistics Section processed requests for supplies, equipment, and services that FEMA's Operations Section had not addressed. If the Logistics Section could not fill the request, Logistics personnel forwarded it to the Administrative and Finance Section for sourcing consideration using either a contract or interagency agreement.

### **Administrative and Finance Section Outsourced Services Using Local Contracting**

During this disaster, FEMA's Administrative and Finance Section used local contracting before using any advanced contracts. As of June 4, 2013, the Administrative and Finance Section awarded eight local contracts totaling \$818,473.

### **Public Assistance Program Referral**

FEMA can return requests to the State and recommend that the State address the matter with its own resources, or through the Emergency Management Assistance Compact; and request Federal reimbursement for the activity under FEMA's Public Assistance program.<sup>14</sup>

### **FEMA's Coordination with State and Local Officials**

FEMA effectively coordinated its efforts in this disaster. Effective disaster response and recovery relies on a strong partnership between the impacted community, the State, and FEMA. According to the Federal Coordinating Officer, FEMA addressed all requests in a timely manner, processed all Mission Assignments quickly, and began Preliminary Disaster Assessments the same day requested. FEMA coordinated its response and recovery activities and moved quickly to address State and applicant deficiencies and shortfalls.

During our deployment to this disaster, we observed instances where FEMA personnel provided incomplete and, at times, inaccurate information to Public Assistance applicants regarding Federal procurement standards. Based on our previous audit reports and personal observations, similar instances have been occurring for several years. Therefore, we are issuing a separate report on this problem.

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<sup>14</sup>The Emergency Management Assistance Compact is the nation's state-to-state mutual aid system offering assistance during governor-declared states of emergency.



## **Conclusion**

State officials were satisfied with FEMA's response to this disaster. FEMA remained focused on its mission to provide effective emergency response and disaster assistance to Oklahoma communities and residents. We plan to issue separate reports addressing issues with (1) FEMA's Qualification System and its deployment policies, (2) hazard mitigation planning that delayed funding of mitigation measures, and (3) procurement guidance that FEMA personnel provide early in disasters.

## **Recommendations**

We are not making any recommendations.

## **Management Comments and OIG Analysis**

FEMA concurred with the report and its conclusion.



## **Appendix A**

### **Objectives, Scope, and Methodology**

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the Department.

The objective of this audit was to determine whether FEMA's response to Oklahoma's severe storms and tornadoes was effective and to evaluate FEMA's actions, resources, and authorities according to Federal regulations and FEMA guidelines in effect at the time of our fieldwork. To accomplish our objective, we focused on answering the following questions:

1. What activities did FEMA perform before the major disaster declaration?
2. What were the most pressing challenges FEMA faced in this disaster?
3. What were the most significant resource shortfalls?
4. How did FEMA make disaster-sourcing decisions?
5. How well did FEMA coordinate its activities?

We conducted this performance audit between May 2013 and November 2013, pursuant to the *Inspector General Act of 1978*, as amended, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

We performed the following procedures to evaluate FEMA's initial response to this disaster (4117-DR-OK):

- Deployed staff to the Joint Field Office within a week of the declaration.
- Interviewed officials with FEMA Region VI and the Oklahoma Office of Emergency Management at the Joint Field Office.
- Reviewed all disaster-specific initiatives, plans, and reports.
- Attended Joint Field Office briefings and task force meetings.
- Observed daily operations at the Joint Field Office.
- Distributed EMOT brochures to FEMA and State officials.



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- Tracked local and national media reports on the disaster and on FEMA’s response to the disaster.
- Visited a Disaster Recovery Center at Westmoore High School in southern Oklahoma City.
- Accompanied FEMA and U.S. Army Corps of Engineers officials conducting debris estimates and preliminary damage assessments in Moore, Oklahoma.
- Met with the Oklahoma State Auditor and Inspector at the State Capitol in Oklahoma City.
- Attended FEMA Kickoff meetings with the cities of Shawnee, Moore, and Norman; the counties of Cleveland and Pottawatomie; and the public school districts of Moore and Oklahoma City. At these meetings, we—
  - instructed applicants to review and comply with the FEMA Public Assistance Applicant Handbook and Public Assistance Guidelines,
  - stressed mandatory compliance with the Code of Federal Regulations for Federal procurement and contract requirements in 44 CFR 13.36 and 2 CFR 215,
  - discussed common audit findings that jeopardize Federal funds, and
  - distributed copies of our fiscal year 2012 capping report of public assistance and hazard mitigation audits and our audit tips handout.
- Made a presentation at the Public Assistance Inspectors Briefing.
- Met with FEMA Office of Chief Counsel staff to discuss contracts and procurement requirements identified in 44 CFR 13.36 and 2 CFR 215.

We also performed other procedures considered necessary to accomplish our objective. We did not assess the adequacy of FEMA’s internal controls applicable to disaster response because it was not necessary to accomplish our audit objective.



## **Appendix B**

### **Report Distribution**

#### **Department of Homeland Security**

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#### **Federal Emergency Management Agency**

Administrator  
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Director, Risk Management and Compliance  
Federal Coordinating Officer, FEMA Disaster Number 4117-DR-OK  
Regional Administrator, FEMA Region VI  
Audit Liaison, FEMA (Job Code 13-152-EMO)  
Audit Liaison, FEMA Region VI

#### **Recovery Accountability and Transparency Board**

Director, Investigations, Recovery Accountability and Transparency Board

#### **Office of Management and Budget**

Chief, Homeland Security Branch  
DHS OIG Budget Examiner

#### **Congress**

Senate Committee on Appropriations, Subcommittee on Homeland Security  
Senate Committee on Homeland Security and Governmental Affairs  
House Committee on Appropriations, Subcommittee on Homeland Security  
House Committee on Homeland Security  
House Committee on Oversight and Government Reform

#### **State**

Director, State of Oklahoma Emergency Management  
Oklahoma Office of State Auditor and Inspector

## ADDITIONAL INFORMATION

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