

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

FEMA's Management of Corrective Actions and
Lessons Learned From National -Level Exercises





OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

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

SEP 11 2012

MEMORANDUM FOR: Timothy W. Manning
Deputy Administrator
National Preparedness Directorate
Federal Emergency Management Agency

FROM: Anne L. Richards *for* 
Deputy Assistant Inspector General for Audits

SUBJECT: *FEMA's Management of Corrective Actions and Lessons Learned From National-Level Exercises*

Attached for your action is our final report, *FEMA's Management of Corrective Actions and Lessons Learned From National-Level Exercises*. We incorporated the formal comments from the Office of Policy and Program Analysis, Federal Emergency Management Agency in the final report.

The report contains three recommendations aimed at improving the National Preparedness Directorate. Your office concurred with all recommendations. Based on information provided in your response to the draft report, we consider the recommendations resolved. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions and of the disposition of any monetary amounts.

Consistent with our responsibility under the *Inspector General Act*, we are providing 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.

Please call me with any questions, or your staff may contact Mark Bell, Deputy Assistant Inspector General for Audits, at (202) 254-4100.

Attachment



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Abbreviations

CAP	Corrective Action Program
DHS	Department of Homeland Security
EEP	Exercise and Evaluation Program
FEMA	Federal Emergency Management Agency
LLIS	Lessons Learned Information Sharing System
NED	National Exercise Division
NLE	National-Level Exercise
NPD	National Preparedness Directorate
OIG	Office of Inspector General
RAMP	Remedial Action Management Program
TOPOFF	Top Officials



Executive Summary

Every 2 years, the Federal Emergency Management Agency (FEMA) carries out a National-Level Exercise aimed at assessing U.S. capacity to prevent, prepare for, respond to, and recover from a large-scale disaster. FEMA is responsible for managing, tracking, and validating corrective actions stemming from this exercise, as well as other exercises and actual events, and widely disseminating lessons learned. Our objective was to determine whether FEMA is managing and tracking corrective actions and lessons learned from National-Level Exercises, as well as from other exercises and disasters.

FEMA did not consistently track and manage corrective actions assigned to it resulting from exercises carried out in 2007 and 2009, nor did it finalize and implement guidance for doing so. Furthermore, fewer than 40 percent of corrective actions resulting from these exercises, many of which FEMA was responsible for completing, were completed. FEMA also did not adequately validate corrective actions to improve planning and disaster response. Finally, FEMA did not sufficiently disseminate information on agency-specific lessons learned. As a result, FEMA missed opportunities to validate its actions in future exercises and actual events, learn from and apply the experiences of its personnel, and improve its incident management operations.

We are making three recommendations that, when implemented, should improve FEMA's efforts to track, manage, and validate corrective actions, as well as better disseminate lessons learned. FEMA concurred with our recommendations and is taking steps to implement them.



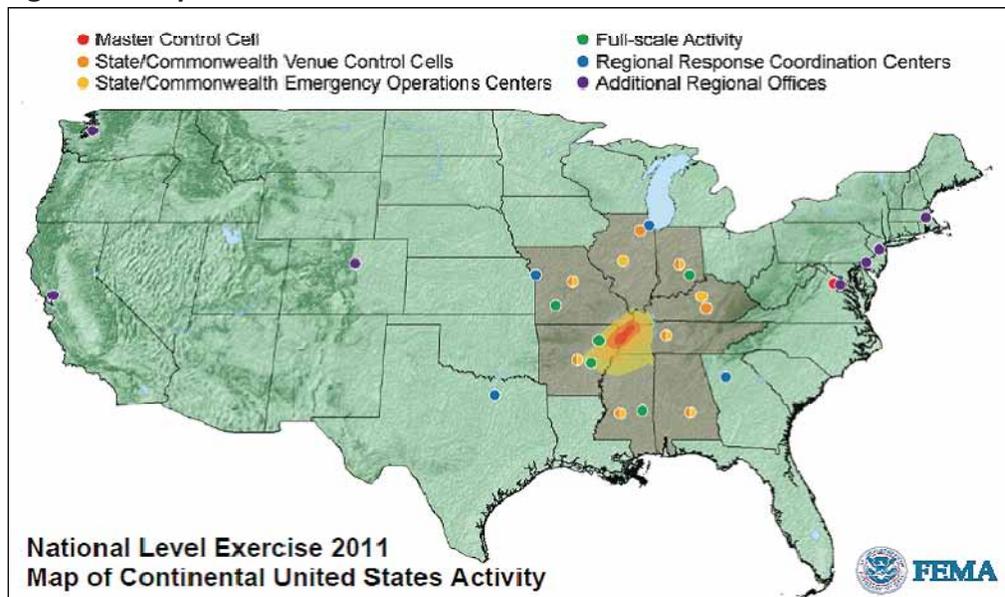
Background

National-Level Exercises

After the terrorist attacks of September 11, 2001, Congress passed the *Homeland Security Act of 2002* (Public Law 107-296), as amended, which formalized what is now known as the National-Level Exercise (NLE) program. An amendment to that act, found in United States Code Title 6, then established the requirement for a continuous exercise cycle, which culminates in a biennial national full-scale exercise involving Federal, State, and local partners. An NLE aims to assess U.S. capacity to prevent, prepare for, respond to, and recover from a large-scale disaster.

The NLE 2011 full-scale exercise, held from May 16 to 19, tested the response and recovery efforts for a simulated 7.7 magnitude earthquake in the New Madrid Seismic Zone and an additional 6.0 magnitude earthquake in the Wabash Valley Seismic Zone. The simulated catastrophic disaster affected four FEMA regions (IV, V, VI, and VII) and eight States (Alabama, Arkansas, Illinois, Indiana, Kentucky, Mississippi, Missouri, and Tennessee) (see figure 1). More than 10,000 Federal, State, local, international, nongovernmental, and private sector individuals participated in the exercise at about 135 sites. The purpose of the exercise was to prepare and coordinate a multijurisdictional integrated response to a catastrophic earthquake, with an emphasis on life-saving and life-sustaining missions in the initial 72 hours.

Figure 1. Map of New Madrid Seismic Zone



Source: FEMA.



FEMA's Roles and Responsibilities

FEMA coordinates the Federal Government's role in all domestic disaster-related activities. In April 2007, FEMA established the National Preparedness Directorate (NPD) to oversee the coordination and development of strategies to prepare for both manmade and natural disasters. The National Preparedness Assessment Division of NPD manages the Remedial Action Management Program (RAMP), Corrective Action Program (CAP), and the Lessons Learned Information Sharing System (LLIS), and develops and tracks performance measures for preparedness programs. RAMP and CAP provide a standard method for handling corrective actions and Improvement Plans. LLIS is a Web-based national network of lessons learned and best practices for emergency response providers and officials involved in homeland security. The National Exercise Division (NED) of NPD provides exercise guidance and planning support to Federal-, State-, and local-level emergency preparedness personnel.

NED established the National Exercise Program Base Plan to coordinate the efforts of other Federal, State, and local exercise programs. The base plan systematically evaluates exercises with a focus on developing corrective actions, which are steps that need to be taken to close gaps in preparedness and correct shortcomings found during exercises and actual events. The base plan is also aimed at rapidly identifying, developing, and disseminating lessons learned. It requires all Federal departments and agencies to actively participate in the corrective action process and maintain corrective action programs.

Under the base plan, NED ensures that, following exercises, After-Action Reports, Improvement Plans, and corrective actions are generated in a timely manner. After-Action Reports summarize exercise events, analyze performance, and evaluate achievement of exercise objectives. Improvement Plans include corrective actions to enhance performance, timelines for implementing corrective actions, and identification of the agencies responsible for completing the corrective actions. The base plan also requires NED to manage the CAP system and report on the status of corrective actions to the National Security Staff in the White House. NED also manages the Homeland Security Exercise and Evaluation Program to provide common policy and program guidance for a national standard for exercises, as well as tools for managers to plan, conduct, and evaluate exercises to improve overall preparedness.

Corrective Actions and Lessons Learned

Corrective actions are intended to close preparedness gaps and correct shortcomings experienced in exercises and actual disasters. A lesson learned is a positive finding or a validated corrective action implemented during an event or derived from analysis that improves performance or increases capabilities. A lesson learned can also be a negative



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finding that may need correction. Corrective actions and lessons learned can improve mission performance and future disaster management operations.

FEMA first used RAMP to track internal issues, lessons learned, and best practices identified during actual disasters. CAP was developed to track, manage, and disseminate corrective actions and Improvement Plans. The agency and its Federal partners used CAP to address preparedness deficiencies they identified during exercises, policy discussions, and actual disasters. In February 2009, FEMA began integrating the two programs, and in July 2010, the integrated program, now known as CAP, became operational.¹ As part of its responsibility to oversee CAP, the National Preparedness Assessment Division provides administrative and technical support for corrective action processes at other Federal departments and agencies.

In its “hotwash” process, FEMA identifies issues and lessons learned through facilitator-led discussion groups of key leaders and staff. The agency then uses LLIS to disseminate information and lessons learned from exercises and actual events internally and to the public. LLIS also serves as the national repository for After-Action Reports.

According to FEMA Exercise and Evaluation Program (EEP) Management Directive 123-15, issued in January 2009, all directorates, offices, and regional offices involved in exercises must provide senior-level leadership to the FEMA EEP Steering Committee. The EEP Steering Committee coordinates FEMA activities related to exercises, including corrective action recommendations, and manages and tracks FEMA-specific corrective actions.

Results of Review

FEMA did not adequately manage and track corrective actions assigned to it resulting from disaster management exercises carried out in 2007 and 2009, and fewer than 40 percent of all these corrective actions are completed. Furthermore, FEMA did not validate corrective actions to ensure that they could be used to improve future mission performance. Finally, FEMA did not effectively use its mechanism for disseminating agency-specific lessons learned to personnel. These weaknesses resulted in missed opportunities to validate its actions and apply lessons learned to improve future exercises, as well as improve planning and responses to actual disasters.

¹ In January 2011, OIG released the report *FEMA’s Implementation of the Remedial Action Management Program* (OIG-11-32), outlining several issues with the program.



Tracking, Managing, and Completing Corrective Actions

FEMA did not consistently track, manage, and complete the corrective actions assigned to it resulting from exercises carried out in 2007 and 2009. Insufficient oversight by the EEP Steering Committee made it more difficult to manage, track, and prioritize completion of corrective actions. The agency's failure to complete corrective actions may also be attributed to the extended period allowed for completion.

The National Exercise Program Base Plan requires the development of a corrective action process to ensure that lessons learned from exercises are either continued or improved upon as appropriate. The base plan also requires all departments and agencies to maintain a corrective action program that can generate data for, and track assignments from, the CAP system. At FEMA, immediately following exercises, NED and other exercise participants are to develop After-Action Reports that summarize exercise events, analyze performance, and evaluate achievement of objectives. Improvement Plans are also to be developed and should include corrective actions, timelines for implementing them, and the agencies responsible for their completion. Improvement Plans are entered into the CAP system, where FEMA's National Preparedness Assessment Division is to ensure that they are tracked until completion.

The EEP Steering Committee, which was established in January 2009 through Management Directive 123-15, did not meet to coordinate exercise activities and make corrective action recommendations. The Steering Committee is responsible for managing and tracking FEMA's corrective actions within CAP, RAMP, and LLIS. It is to include senior leadership from all FEMA directorates and offices involved in disaster exercises, and be chaired by the National Integration Center. When Management Directive 123-15 was issued, NED was part of the National Integration Center, which is no longer the case. However, the directive was not updated, and there was not a clear understanding of which office was responsible for chairing the committee. According to our interviews, no one in FEMA called a meeting in several months. The lack of oversight by the EEP Steering Committee made managing and tracking corrective actions more difficult and completing them less of a priority. If the committee met regularly, it would be better able to recommend which offices should resolve issues related to corrective actions and prioritize completion of these actions.

Fewer than 40 percent of the corrective actions identified from the Top Officials (TOPOFF) 4 exercise in 2007 and the NLE 2009 had been completed as of October 25, 2011. At the time of our review, 57 percent of corrective actions to



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be completed by DHS (including FEMA) from these two exercises had not met their targeted completion dates. FEMA was not primarily responsible for completing all corrective actions included in the Improvement Plans from these exercises, but many for which the agency was responsible were not completed. For example, of the 11 FEMA-specific corrective actions from the 2007 TOPOFF 4 exercise, 8 were open and overdue. These corrective actions were to be completed by January 2011—more than 3 years after the exercise. One of the TOPOFF 4 actions yet to be completed by FEMA states that more government-wide planning is needed to develop a process to determine where to send resources and supplies in case there are multiple disaster sites. FEMA is also responsible for two corrective actions from the NLE 2009, both of which were to be completed in May 2011 and are now overdue. One of these corrective actions states that pre-exercise seminars are needed to discuss the roles and responsibilities of executive branch organizations dealing with crisis situations to improve the decisionmaking process. According to FEMA, the time allotted to complete the FEMA-specific corrective actions is determined by each designated office and depends on the complexity of the improvement plan; there is no centralized office that determines the timeframe for completing corrective actions.

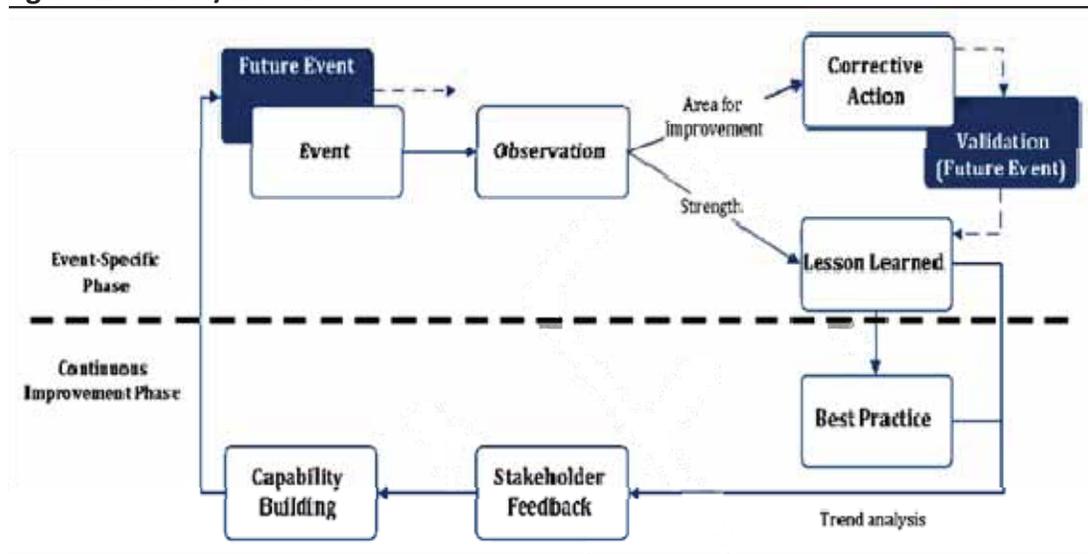
Validating Corrective Actions

FEMA did not consistently and adequately validate all completed corrective actions for which it was responsible. Validation was hampered by the need for finalized guidance for the corrective action process.

Guidance for the Homeland Security Exercise and Evaluation Program includes an improvement planning process to identify and resolve corrective actions from After-Action Reports. Furthermore, according to the guidance, once resolved and completed, corrective actions should be implemented, tested, and validated by incorporating them into subsequent exercises or responses to actual events. Once a corrective action has been completed and validated, it becomes a lesson learned, which should be disseminated throughout FEMA. (See figure 2.)



Figure 2. RAMP/CAP Work Flow



Source: FEMA.

The draft *FEMA RAMP/CAP Manual*, dated September 2011, provides guidance to standardize and develop a process to evaluate operational performance in actual and simulated events, track agency-wide corrective actions, and, with FEMA's partners, address lessons learned. According to the draft manual, a completed corrective action is considered to be validated when it improves mission performance. Validation confirms that improvements are being put into practice, which is critical to FEMA's ability to learn and innovate. However, FEMA personnel who design internal training exercises said that they had not received any requests to validate corrective actions during future exercises. Because the *RAMP/CAP Manual* has not been finalized, FEMA offices and divisions do not have updated, official guidance and are unaware of roles and responsibilities in the corrective action process. This need for of guidance has hindered validation of corrective actions.

Managing Lessons Learned

FEMA did not sufficiently disseminate information on agency-specific lessons learned. Without a final *RAMP/CAP Manual*, FEMA needs a standardized process for managing and sharing lessons learned. In January 2011, OIG reported in *FEMA's Implementation of the Remedial Action Management Program* (OIG-11-32) that FEMA had discontinued its use of the RAMP, and, in the process, lost the ability to read historical data on lessons learned. Since then, FEMA has located some reports and posted them to LLIS, but all the posted reports were from December 2009 and earlier. There are no reports from the



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past 2 years in LLIS. For these reasons, lessons learned were not consistently disseminated throughout the agency. As a result, FEMA was missing opportunities to learn from the experiences of its personnel and improve its disaster management operations.

Once corrective actions have been completed and validated, they become lessons learned, which should then be disseminated throughout FEMA. The National Preparedness Assessment Division of NPD is responsible for ensuring that FEMA-specific observations and lessons learned from all training, exercises, and actual events are promptly submitted to LLIS. Prompt submission to LLIS ensures that lessons learned are widely and easily accessible to FEMA personnel and eliminates the need for multiple searches to find reports and documents. However, 9 of the 10 FEMA regions posted a combined total of only 10 lessons learned to the FEMA channel within LLIS, while Region VII posted 47. Every exercise and actual disaster can potentially generate multiple lessons learned. For example, seven lessons learned were generated from the NLE 2011 alone, and once the corrective actions from the exercise have been completed and validated, they too will become lessons learned. Given this, we would expect to see more than 57 lessons learned posted in LLIS.

Conclusion

FEMA did not provide proper oversight or clear guidance to track and manage its corrective actions or prioritize their completion, nor did it sufficiently disseminate its agency-specific lessons learned from exercises and disasters. Convening regular meetings of the EEP Steering Committee would help to better track and manage corrective actions and ensure that their completion was made a priority and done in a timely manner. Moreover, if FEMA finalized and implemented the *RAMP/CAP Manual*, the agency could more effectively track and manage, and thus, complete and validate corrective actions as well as better disseminate lessons learned. By not completing and validating corrective actions and not disseminating all its agency-specific lessons learned, FEMA missed opportunities to gain knowledge from the experiences of its personnel and improve its disaster management operations. Unless FEMA takes steps to resolve issues that arise from exercises and disasters and improve its processes, its disaster management operations may be adversely affected.



Recommendations

We recommend that the Deputy Administrator, National Preparedness Directorate:

Recommendation #1:

Revise Federal Emergency Management Agency Exercise and Evaluation Program Management Directive 123-15 to reflect the current organizational structure and ensure that the Exercise and Evaluation Program Steering Committee meets regularly.

Recommendation #2:

Finalize, issue, and implement a *Remedial Action Management Program/Corrective Action Program Manual* that standardizes the corrective actions and lessons learned processes and provides a clear delineation of all participants' roles and responsibilities.

Recommendation #3:

Validate completed corrective actions through exercises or actual events and, once validated, submit them in a timely manner to the Lessons Learned Information Sharing website.

Management Comments and OIG Analysis

We obtained and reviewed written comments on the draft report from the Director of FEMA's Office of Policy and Program Analysis. Where appropriate, we made changes to the report. FEMA concurred with all three recommendations. Appendix B includes a copy of the management comments in their entirety. Our evaluation of FEMA's response to the draft report follows.

Management Response to Recommendation #1

FEMA concurs with this recommendation. FEMA acknowledges that the Management Directive needs to be revised and will determine an appropriate steering committee organization to provide internal FEMA oversight of corrective actions and lessons learned and update all associated directives as appropriate. FEMA points out that the EEP Steering Committee is not expected to be the solution for corrective action tracking and that it addresses internal FEMA issues, but not interagency issues.



OIG Analysis

We consider this recommendation resolved because steps are being taken to implement it. However, it will remain open until FEMA revises the Management Directive and ensures that the Exercise and Evaluation Program Steering Committee meets regularly.

Management Response to Recommendation #2

FEMA concurs with this recommendation and is developing new doctrine/policy that should be completed by August 2012.

OIG Analysis

We consider this recommendation resolved because steps are being taken to implement it. However, it will remain open until the new doctrine/policy that standardizes the corrective actions and lessons learned processes is finalized.

Management Response to Recommendation #3

FEMA concurs with this recommendation. Validation of completed corrective actions and timely sharing of lessons learned will be addressed in the new doctrine/policy in development, which should be completed by August 2012.

OIG Analysis

We consider this recommendation resolved because steps are being taken to implement it. However, it will remain open until the new doctrine/policy is finalized.



Appendix A

Objectives, Scope, and Methodology

The Department of Homeland Security (DHS) Office of Inspector General (OIG) 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 our review was to determine whether FEMA is managing and tracking corrective actions and lessons learned identified during the National-Level Exercises, as well as other exercises and disasters. The scope of our review included exercises from October 2007 (TOPOFF 4) to May 2011 (NLE 2011).

To accomplish our objective, we reviewed and analyzed the *Homeland Security Act of 2002* (Public Law 107-296), as amended, and the *Post-Katrina Emergency Management Reform Act of 2006* (Public Law 109-295), as amended, prior DHS OIG and Government Accountability Office reports relevant to our review, and documents provided by FEMA, as well as other applicable documents.

We interviewed officials from DHS and FEMA. We conducted these interviews by phone and in person at FEMA headquarters in Washington, DC. We observed the functional component of NLE 2011 in Washington, DC, and Herndon, VA. We attended both the After-Action Conference and the Lessons Learned Conference for NLE 2011.

We conducted this review under the authority of the *Inspector General Act of 1978*, as amended, and according to the Quality Standards for Inspections issued by the Council of the Inspectors General on Integrity and Efficiency.



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Appendix B
Management Comments to the Draft Report

U.S. Department of Homeland Security
Washington, DC 20472



FEMA

JUL 11 2012

MEMORANDUM FOR: Anne L. Richards
Assistant Inspector General for Audits
Office of the Inspector General

FROM: David J. Kaufman 
Director
Office of Policy and Program Analysis

SUBJECT: FEMA's Management of Corrective Actions and Lessons Learned
From National Level Exercises – For Official Use Only
(OIG Project No. 11-139-EMO-FEMA)

Thank you for the opportunity to review and comment on the draft report: *FEMA's Management of Corrective Actions and Lessons Learned from National Level Exercises – For Official Use Only*. This memo addresses our responses to specific findings and recommendations in the report.

In general, the draft report accurately attributes several deficiencies in the FEMA and interagency corrective action processes to programs managed by FEMA, specifically the National Exercise Program (NEP) and the Lessons Learned Program. Some of the discussion and findings require clarification to avoid possible misinterpretation of FEMA's authorities and responsibilities. FEMA does not have the authority to force the implementation of corrective actions identified by or assigned to other Federal departments and agencies. In addition, neither existing exercise guidance nor the anticipated Lessons Learned and Continuous Improvement Program (LL/CIP) assign validation responsibility to FEMA's National Preparedness Assessment Division (NPAD) or National Exercise Division (NED). Each issue identified during a National Level Exercise (NLE) that requires resolution is assigned to a department, agency, or directorate with the appropriate expertise to develop, complete, and validate the corrective action.

Overall Comments

FEMA notes that the OIG included discussion on three results of the review. FEMA has several comments, provided below:

- **Tracking, Managing, and Completing Corrective Actions**
 - The report states "A lack of oversight by the EEP Steering Committee made it more difficult to manage, track, and prioritize completion of corrective actions." The FEMA Exercise and Evaluation Program Steering Committee was established as an internal FEMA coordinating body with no responsibility or authority outside FEMA and cannot "coordinate recommendations for all Federal agencies corrective actions."



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- The last sentence of this finding states “It is possible that the extensive amount of time FEMA allows to complete corrective actions resulted in a diminished sense of urgency to complete them.” The time allotted is determined by the responsible department or agency and depends on the complexity of the improvement plan.
- Update on corrective action completion rate: 97% of DHS issues and 91% of FEMA issues from TOPOFF 4 are complete. 100% of DHS and FEMA issues from NLE 08 are complete. 95% of DHS and 100% of FEMA issues from NLE 09 are complete.
- **Validating Corrective Actions**
 - The report states “Guidance for the Homeland Security Exercise and Evaluation Program includes an improvement planning process to identify and resolve corrective actions from After-Action Reports. Furthermore, according to the guidance, once resolved and completed, corrective actions should be implemented, tested, and validated by incorporating them into subsequent exercises or responses to actual events. Once a corrective action has been completed and validated, it becomes a lesson learned, which should be disseminated throughout FEMA.” FEMA acknowledges that more specific direction is required for validating completed corrective actions and will provide this direction in its LL/CIP documentation and revised HSEEP documentation.
 - Each issue identified during an NLE is assigned to a department, agency, or directorate with the appropriate expertise to develop the corrective action and submit to the CAP. It is each department’s, agency’s, or directorate’s responsibility to validate the completed corrective action. Under the NEP, NPAD reports the completion and validation of the FEMA and interagency corrective actions that are submitted to, maintained, and updated in CAP. NLE participants can nominate appropriate exercise objectives to facilitate the validation of completed corrective actions. However, corrective actions also can be validated through real-world events.
- **Managing Lessons Learned**
 - The following statement is misleading: “Without a final RAMP/CAP Manual, FEMA lacks a standardized process for sharing lessons learned.” The existing FEMA manual describes a process for sharing lessons learned within FEMA based on the defunct RAMP software -- and is being updated. FEMA shares lessons learned with external partners via *LLIS.gov*. *LLIS.gov* has served as the national lessons learned management system since 2004. After-Action Reports/Improvement Plans (AAR/IPs) and other lessons learned information are disseminated through *LLIS.gov*. Participation is voluntary. FEMA recognizes the current limitations of *LLIS.gov* and the lessons learned program and is currently working to improve the *LLIS.gov* user interface and update the methodology to enhance participation and information sharing to meet both FEMA internal and national requirements.
 - The report states “The National Preparedness Assessment Division of NPD is responsible for ensuring that observations and lessons learned from all training, exercises, and actual events are promptly submitted to LLIS.” NPAD manages the lessons learned program and *LLIS.gov* system, ensuring that *LLIS.gov* is available to those that have a need to access, that the configuration of *LLIS.gov* supports the stakeholders, and that information provided by stakeholders is displayed appropriately. The decision to submit any documents to *LLIS.gov* remains with the individual, department, agency, or other organization that originated the document.



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NPAD posts lessons learned, practice notes, and best practices gathered through its own research and other open-source information.

- The data point that 9 out of 10 Regions submitted a total of 10 lessons learned, and that the 10th Region submitted 47 lessons learned, indicates the importance of culture on the development and sharing of lessons learned, and how the cultural difference among FEMA components affects the number of respective lessons learned shared.
- FEMA lost the ability to read some, not all, historical data when RAMP was discontinued. FEMA was able to recover 86% of the data, including 99% of the lessons learned data that was part of the defunct RAMP, and post related reports to *LLIS.gov*.

Response to Recommendations

OIG Recommendation #1: Revise Federal Emergency Management Agency Exercise and Evaluation Program Management Directive 123-15 to reflect the current organizational structure and ensure that the Exercise and Evaluation Program Steering Committee meets regularly.

FEMA Response to Recommendation #1: FEMA concurs with this recommendation. FEMA acknowledges that the Management Directive needs to be revised. However, the Exercise and Evaluation Program Steering Committee is not expected to be the solution for corrective action tracking. Also, the Committee addresses internal FEMA issues, not interagency issues. Moreover, FEMA will determine appropriate steering committee organization to provide internal FEMA oversight of corrective actions and lessons learned and update all associated Directives as appropriate.

OIG Recommendation #2: Finalize, issue, and implement a Remedial Action Management Program/Corrective Action Program (RAMP/CAP) Manual that standardizes the corrective actions and lessons learned processes and provides a clear delineation of all participants' roles and responsibilities.

FEMA Response to Recommendation #2: FEMA concurs with this recommendation. FEMA requests discretion to determine the optimal content and format of the document, e.g., broad lessons learned and corrective action doctrine versus a RAMP/CAP manual. This new doctrine/policy is in development, and should be completed by August 2012.

OIG Recommendation #3: Ensure that completed corrective actions are validated through exercises or actual events and, once validated, are submitted in a timely manner to the Lessons Learned Information Sharing website.

FEMA Response to Recommendation #3: FEMA concurs with this recommendation. Validation of completed corrective actions and timely sharing of lessons learned will be addressed in the new doctrine/policy in development, and should be completed by August 2012.

Once again, thank you for the opportunity to comment on the findings and recommendations of the OIG Draft Report on *FEMA's Management of Corrective Actions and Lessons Learned From National Level Exercises* prior to its publication.



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We look forward to working with you on future homeland security emergency management engagements to improve FEMA programs and initiatives. Please feel free to provide any comments/concerns to Ms. Gina Norton of our GAO/OIG Audit Liaison Office, 202-646-4287.



Appendix C

Major Contributors to This Report

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Appendix D

Report Distribution

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Should you be unable to access our website, you may submit your complaint in writing to: DHS Office of Inspector General, Attention: Office of Investigations Hotline, 245 Murray Drive, SW, Building 410/Mail Stop 2600, Washington, DC, 20528; or you may call 1 (800) 323-8603; or fax it directly to us at (202) 254-4297.

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