



# Department of Homeland Security Office of Inspector General

## FEMA's Implementation of Recommendations from Top Officials 4





**Homeland  
Security**

September 28, 2010

Preface

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.

This report addresses the extent to which the Federal Emergency Management Agency incorporated corrective actions from Top Officials 4 into National Level Exercise 2009. It is based on interviews with employees and officials of relevant agencies and institutions, direct observations, and a review of applicable documents.

The recommendation herein has been developed to the best knowledge available to our office, and has been discussed in draft with those responsible for implementation. We trust this report will result in more effective, efficient, and economical operations. We express our appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in black ink, appearing to read "C. I. Mann".

Carlton I. Mann

Assistant Inspector General for Inspections











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During the planning and conduct of NLE 2009, interagency planners were also engaged in planning NLE 2010, NLE 2011, and multiple Tier I and Tier II exercises. With these multiple events and associated planning meetings, concerns were expressed regarding the viability planning, evaluating, and incorporating lessons learned in the annual national level exercise.

FEMA officials stated that for NLE 2009, planners recognized that TOPOFF 4 and previous national level exercises focused almost exclusively on response operations and law enforcement, with insufficient emphasis placed on prevention and intelligence activities. Therefore, incorporating corrective actions into subsequent exercises may not be relevant in most cases since they do not want to test the same capabilities each year. FEMA officials concluded that it would be more beneficial to alternate the type of threat each year to incorporate pre- and post-incident exercises. As a result, this would better ensure that each of the homeland security mission areas was tested over time.

In preparation for NLE 2009, exercise planners agreed that a primary area of concern should be securing the southwest border and preventing terrorists from entering and attacking the United States. Because of these priorities, NLE 2009 focused exclusively on terrorism prevention and protection, as opposed to incident response and recovery, which resulted in different issues and objectives between TOPOFF 4 and NLE 2009. Exercise planners concluded that NLE 2009, as a prevention-focused exercise, would continue to accomplish national preparedness goals and objectives because of the emphasis placed on intelligence and information sharing that occurs in all national level exercises.

NLE 2009 was the first major exercise exclusively dedicated to terrorism prevention and protection. Specifically, this exercise focused on preventing an adversary's entry into the country through air, border, and maritime security and protecting various infrastructures and information through various alert and notification systems. Unlike past national level exercises, NLE 2009 did not have an incident response and recovery component, but highlighted intelligence and information sharing.

During the planning process for NLE 2009, FEMA officials reviewed past exercise improvement plans to determine (1) specific deficiencies requiring further examination, and (2) compatibility with the overall terrorism prevention focus for NLE 2009. TOPOFF 4 exercise simulated a bomb explosion that involved responding to radiological dispersal device attacks. The TOPOFF 4 Improvement Plan identified 54 corrective actions, of which 12 pertained to radiological events, 19 pertained to



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recovery, 12 pertained to response, one was considered outside of TOPOFF 4's scope, and ten pertained to terrorism and prevention protection.

The TOPOFF 4 corrective actions incorporated into NLE 2009 were identified during the exercise planning phase as actions to be validated during the functional prevention exercise. The corrective actions include Emergency Operations Center management, on-site incident management, and public information and warning. The TOPOFF 4 corrective actions incorporated into NLE 2009 are listed below.

1. Incorporate national scenario-based guidance into regional planning, training, and exercise programs such as the Regional Interagency Steering Committee (RISC) or the Regional Assistance Committee (RAC).
2. Consider the use of virtual tools (such as web conferencing and chat rooms) to supplement National Incident Communications Conference Line (NICCL) calls.
3. Evaluate smart practices and suggestions on information management identified in the After Action Report (AAR).
4. Investigate information technology solutions that support e-mail distribution lists that can be easily modified.
5. Consider mechanisms to promote cross-jurisdictional coordination by public affairs officials.
6. Develop and promulgate written Strategic Communication Planning guidance; establish and exercise interagency strategic communication team to address national themes, effects, tasks, international engagement strategy, and processes and procedures.
7. Review and align meeting and reporting schedules.
8. Consider scope, attendance, and classification level of senior leadership meetings, as well as procedures for capturing and disseminating discussions, decisions, and taskings.
9. Review and update policy documents to clarify the purpose, roles, and responsibilities for various private sector nongovernmental organizations (NGO).

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10. Articulate and institutionalize a process for private sector and NGO engagement in national-level exercises, including authority for planning, programming, and budgeting for national and venue working groups.

FEMA officials provided the following rationale for TOPOFF 4 corrective actions that were incorporated in NLE 2009:

Corrective Action 1

This corrective action relates to the On-Site Incident Management capability. This capability provides the means to accomplish a mission and achieve desired outcomes by performing critical tasks, under specified conditions, to target levels of performance.

Corrective Actions 2, 3, 4, 5 and 6

Although the focus of NLE 2009 was intelligence and information sharing, the exercise provided an opportunity to validate TOPOFF 4 corrective actions related to Public Information and Warning. Specifically, the exercise included interagency communication protocols to ensure that accurate and credible law enforcement and intelligence information was provided to the public. Electronic message transmissions and scheduled teleconferences among national, state, local and private sector participants facilitated information exchange. In addition, virtual tools, such as web conferencing and chat rooms, were a primary source of communication throughout the exercise.

Corrective Actions 7 and 8

These corrective actions relate to the Emergency Operations Center Management capability, and were incorporated in both the planning and conduct of NLE 2009. The DHS Secretary, White House staff, and other senior federal leaders participated in the exercise and related discussions.

Corrective Actions 9 and 10

These corrective actions relate to the Emergency Operations Center Management capability. Non-government agencies, as well as critical infrastructure facilities, participated in NLE 2009, with the National Joint Information Center serving as a focal point for coordinated and timely release of incident-related information to the public and media.

All TOPOFF 4 corrective actions were not incorporated into NLE 2009 since FEMA officials concluded that it is beneficial to alternate the type of















**Appendix C**  
**Major Contributors**

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