

**OFFICE OF INSPECTOR GENERAL**

# **DHS Pandemic Planning Needs Better Oversight, Training, and Execution**



Homeland  
Security

**October 12, 2016**  
**OIG-17-02**



# DHS OIG HIGHLIGHTS

## *DHS Pandemic Planning*

### *Needs Better Oversight, Training, and Execution*

**October 12, 2016**

## **Why We Did This Audit**

This review is the third in a series of audits on the Department of Homeland Security's pandemic preparedness and response. This audit focused on whether the Department had adequate preparedness plans to continue its essential missions during a pandemic.

## **What We Recommend**

We made seven recommendations to address the planning efforts made by DHS and its components to ensure continued operations during a pandemic. These recommendations, when implemented, should improve the efficiency and effectiveness of the program.

### **For Further Information:**

Contact our Office of Public Affairs at (202) 254-4100, or email us at [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov)

## **What We Found**

The Department has taken steps to develop a Departmental Pandemic Workforce Protection Plan intended to protect the workforce during a pandemic event. In addition, as a result of our previous audit recommendations, the Department has created an integrated logistics support plan for personal protective equipment.

However, DHS cannot be assured that its preparedness plans can be executed effectively during a pandemic event. The Department did not always provide clear guidance or sufficient oversight to ensure components:

- completed and finalized their pandemic plans;
- verified pandemic training requirements were included in their plans;
- identified the personal protective equipment needed for a pandemic response; and
- met exercise and reporting requirements.

Without such plan, the eight components may not be fully prepared to continue mission essential functions during a pandemic event.

## **DHS Response**

The Department concurred with all seven recommendations and has initiated corrective actions that should improve the planning process in order to protect its employees during a pandemic event. We consider all seven recommendations resolved and open.



## OFFICE OF INSPECTOR GENERAL

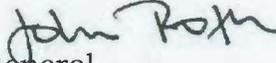
Department of Homeland Security

Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

October 12, 2016

MEMORANDUM FOR: The Honorable Alejandro N. Mayorkas  
Deputy Secretary  
Department of Homeland Security

Dr. Kathryn Brinsfield  
Assistant Secretary and Chief Medical Officer  
Office of Health Affairs

FROM: John Roth   
Inspector General

SUBJECT: *DHS Pandemic Planning Needs Better Oversight,  
Training, and Execution*

Attached for your information is our final report, *DHS Pandemic Planning Needs Better Oversight, Training, and Execution*. We have incorporated the formal comments from DHS components and offices.

The report contains seven recommendations aimed at improving planning for pandemic preparedness. Your office concurred with all seven recommendations. Based on information provided in your response to the draft report, we consider all seven recommendations resolved and open. 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.

Please send your response or closure request to [OIGAuditsFollowup@oig.dhs.gov](mailto:OIGAuditsFollowup@oig.dhs.gov).

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to 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 Maureen Duddy, Deputy Assistant Inspector General for Audits, at (617) 565-8723.

Attachment



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

**Table of Contents**

Background ..... 1

Results of Audit ..... 2

    Components’ Pandemic Plans Did Not Meet All Department Requirements ..... 2

    DHS Pandemic Personal Protective Equipment Planning Guidance and Oversight Needs Improvement..... 6

    DHS Pandemic Reporting and Exercising Requirements Needs Additional Oversight ..... 7

Recommendations..... 11

**Appendixes**

Appendix A: Objective, Scope, and Methodology ..... 16

Appendix B: DHS Comments to the Draft Report ..... 18

Appendix C: Office of Audits Major Contributors to This Report ..... 23

Appendix D: Report Distribution..... 24

**Abbreviations**

|       |  |
|-------|--|
| CBP   | U.S. Customs and Border Protection             |
| CY    | calendar year                                  |
| ICE   | U.S. Immigration and Customs Enforcement       |
| ILSP  | Integrated Logistics Support Plan              |
| NPPD  | National Protection and Programs Directorate   |
| OIG   | Office of Inspector General                    |
| OPS   | Office of Operations Coordination and Planning |
| POD   | points of dispensing                           |
| PPE   | personal protective equipment                  |
| PWPP  | Pandemic Workforce Protection Plan             |
| TSA   | Transportation Security Administration         |
| USCIS | U.S. Citizenship and Immigration Services      |



## OFFICE OF INSPECTOR GENERAL

### Department of Homeland Security

---

### Background

This audit is the third in a series related to the Department of Homeland Security's pandemic preparedness and response. We previously reported<sup>1</sup> on the Department's management of pandemic supplies as well as its implementation of enhanced screening measures in response to an Ebola outbreak. We conducted this audit to determine whether the Department has implemented adequate preparedness plans to continue mission essential functions during a pandemic.

In 2009, the Department began planning for pandemics in response to an influenza outbreak and issued a pandemic plan for the DHS workforce. In April 2013, the DHS Secretary directed the Department to update and expand its plan to include potential pandemic events and emerging infectious diseases.

The Department issued its *Pandemic Workforce Protection Plan* (PWPP) in November 2013 to better prepare components to maintain essential functions during a pandemic event or in the wake of an emerging infectious disease. The PWPP required components to develop or update their own pandemic plans to enable mission readiness and the protection of DHS personnel.

The PWPP required components to submit their plans to the Department by January 2014. To assist components in meeting PWPP requirements, three departmental offices were responsible for reviewing component plans: the Office of Operations Coordination and Planning (OPS), the Management Directorate, and the Office of Health Affairs.

The Department provided guidance on:

- workplace protective measures;
- pandemic training and how to identify, maintain, and distribute pandemic supplies, such as personal protective equipment (PPE) and medication;
- points of dispensing (POD) for either antiviral medication in a pandemic response or antibiotic medication in an anthrax incident; and
- POD operations including exercises and reporting requirements.

To manage DHS' procurement and maintenance of PPE across its components, the Department issued supplemental guidance, the Integrated Logistics

---

<sup>1</sup> OIG-14-129 - *DHS Has Not Effectively Managed Pandemic Personal Protective Equipment and Antiviral Medical Countermeasures*, August 2014; and OIG-16-18 - *DHS' Ebola Response Needs Better Coordination, Training, and Execution*, January 2016.



## OFFICE OF INSPECTOR GENERAL

### Department of Homeland Security

---

Support Plan (ILSP), in July 2015. This guidance established instructions to support and manage PPE. The ILSP required components to use risk assessments for determining the type and quantities of protection needed during a pandemic. Components were to use all of the guidance provided to improve their pandemic preparedness.

### **Results of Audit**

The Department cannot be assured that its preparedness plans can be executed effectively during a pandemic event. The Department did not always provide clear guidance or sufficient oversight to ensure components:

- completed and finalized pandemic planning efforts;
- verified pandemic training requirements were included in all component plans;
- identified PPE supplies needed for pandemic response; and
- met POD exercise and reporting requirements.

### **Components' Pandemic Plans Did Not Meet All Department Requirements**

The Department's PWPP required components to update or develop their pandemic plans and evaluate workplace protective measures. However, DHS did not ensure that the eight components reviewed had final approved plans that met all requirements. Without such plans, the eight components may not be fully prepared to continue mission essential functions during a pandemic event.

The Department did not adequately oversee the planning process and fully review the eight components' pandemic plans to ensure the plans met all the PWPP requirements. Senior officials at two of the components did not approve their own pandemic plan. Further, we found the Department did not ensure the eight components that we reviewed had final, approved plans. DHS did not complete a final review and provide approval of the eight components' plans we tested (see table 1).



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

**Table 1: Component PWPP Review Status as of March 2016**

| Component   | Initial Review by OPS | Approved by Component Senior Official | Final Approval by OPS |
|---|-----------------------|---------------------------------------|-----------------------|
| <b>U.S. Customs and Border Protection</b>           | Yes                   | No                                    | No                    |
| <b>United States Coast Guard</b>                    | Yes                   | Yes                                   | No                    |
| <b>Federal Emergency Management Agency</b>          | Yes                   | Yes                                   | No                    |
| <b>U.S. Immigration and Customs Enforcement</b>     | Yes                   | Yes                                   | No                    |
| <b>National Protection and Programs Directorate</b> | Yes                   | Yes                                   | No                    |
| <b>United States Secret Service</b>                 | Yes                   | Yes                                   | No                    |
| <b>Transportation Security Administration</b>       | Yes                   | Yes                                   | No                    |
| <b>U.S. Citizenship and Immigration Services</b>    | Yes                   | No                                    | No                    |

Source: Office of Inspector General (OIG) analysis of data provided by the Department and each component.

The Department established OPS as the office responsible for reviewing component pandemic plans. After OPS’ initial review, components were to resubmit revised plans to OPS. However, the office responsible for reviewing pandemic plans changed, and the Department did not perform oversight continuously during this change. For about a year, it was unclear which office, if any, was responsible for conducting PWPP oversight.

Among the requirements in the PWPP, components had to consider three types of workplace protective measures:

- **Administrative controls** reduce employees exposure through training, telework, shift changes, and social distancing;
- **Engineering controls** include ventilation, mechanical, and structural changes used to place a barrier between a worker and a hazard; and
- **PPE** limits exposure by providing an immediate barrier between the employee and the hazard. PPE includes respirators, protective clothing, and gloves.

The Department has not ensured the eight components we reviewed evaluated and incorporated workplace controls needed to protect its personnel.



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

---

For example, we found:

- The United States Secret Service:
  - addressed engineering controls in its headquarters pandemic plan, but did not ensure similar controls were addressed at field office locations;
  - did not assess administrative controls, including the telework capabilities of its workforce, and did not know which employees have the technology to telework; and
  - did not determine the quantity of pandemic PPE needed for employees located within its field offices.
- U.S. Customs and Border Patrol addressed engineering controls in its draft headquarters pandemic plan; however, it has not ensured field office locations have addressed engineering controls.
- U.S. Immigration and Customs Enforcement (ICE) did not complete the required risk assessment to evaluate the need for PPE controls and their applicability for specific employees during a pandemic.
- The United States Coast Guard did not complete the required risk assessment to determine the quantity of pandemic PPE necessary for employees.

The Department considers PPE (see figure 1) as the least effective protective control. According to its guidance, engineering controls (see figure 2) and administrative controls (see figure 3) have the greatest impact on minimizing exposure to pandemic risks.





## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

**Figure 3: Example of Telework as an Administrative Control**



Source: Washington State Department of Transportation

### **Pandemic Readiness Training**

The Department did not develop clear requirements for pandemic readiness training. The DHS PWPP requires components to train and exercise staff and senior leadership on pandemic readiness at least annually. However, the Department did not provide details on applicable trainings or the frequency needed to meet this requirement. As a result, seven of the components we reviewed did not always include the necessary details in their plans on how pandemic training requirements would be met, such as applicable trainings, methods for providing training, and how often pandemic training was required.

### **DHS Pandemic Personal Protective Equipment Planning Guidance and Oversight Needs Improvement**

The Department did not establish sufficient oversight or provide clear instruction on the number of days for which components should maintain a supply of PPE for pandemic response. The PWPP required components to keep sufficient PPE on hand until the supplies can be received. It, along with the ILSP, required components to determine the time it takes to order and receive replenishment supplies. However, the Department did not establish a deadline for meeting these requirements.

We found three components — the Coast Guard, ICE, and the Secret Service — did not determine their pandemic PPE requirements. Additionally, ICE, U.S. Citizenship and Immigration Services (USCIS), and the Secret Service either could not identify their pandemic PPE stockpile or were unaware of whether local offices had pandemic PPE available on site.



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

---

The ILSP contained several requirements for maintaining pandemic PPE supplies; specifically:

- Components with a pandemic PPE requirement are encouraged not to store PPE, but rather use a just-in-time<sup>2</sup> approach.
- Components with operational requirements for PPE are encouraged to maintain a supply based upon lead times for replenishment.
- Delivery time for pandemic supplies is not to exceed 14 days.
- Components with both operational and pandemic<sup>3</sup> PPE requirements are encouraged to maintain enough pandemic supplies to provide protection for 5 operational days.

The ILSP recommendations for stockpiling may not have been clear to components that identified a pandemic PPE need. The Federal Emergency Management Agency and USCIS determined they would not maintain PPE for pandemic purposes and, if needed, will order them using a just-in-time method, as recommended by the ILSP. While the Transportation Security Administration (TSA) planned to maintain a 2-day supply, U.S. Customs and Border Protection (CBP) and the National Protection and Programs Directorate (NPPD) identified a pandemic PPE supply that significantly exceeded the maximum lead time of 14 days. Specifically, CBP maintained a 60-day stockpile, and NPPD had a 90-day stockpile requirement.

Without clear guidance and proper oversight, the Department cannot ensure components have the necessary amounts of PPE to protect their personnel during the initial stages of a pandemic response. The Department has initiated corrective actions to address these concerns. The Department reported it was revising its supplemental guidance and has drafted implementation instructions. These changes will clarify how PPE will be procured and managed.

### **DHS Pandemic Reporting and Exercising Requirements Need Additional Oversight**

The Department did not provide clear guidance or oversight on how components were to report required POD information and execute exercises.

---

<sup>2</sup> Just-in-time is an inventory strategy used to increase efficiency and decrease waste by receiving goods only as they are needed in the operations process, thereby reducing inventory costs.

<sup>3</sup> PPE is required by some DHS employees to perform everyday operational activities that support the DHS mission. PPE is also used to support and sustain the safety of DHS employees during a pandemic event.



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Consequently, the components did not always complete reporting requirements for POD locations or conduct exercises. Without sufficient guidance and oversight, the Department cannot ensure its employees are prepared to dispense medication, as needed, to protect its workforce during a pandemic.

### Reporting Requirements for Points of Dispensing

The Department required all component POD locations to exercise PODs (see figure 4) at least annually, preferably twice per year. To ensure components completed POD exercises, the Department requested components submit quarterly updates. These reports allow the Department to track personnel coverage, ensure components conducted required exercises, and identify areas for improvement. However, the Department did not provide clear instructions on how to report this information on a quarterly basis.

**Figure 4: POD Exercise**



Source: Federal Emergency Management Agency

We determined the Department did not ensure components completed and submitted these quarterly reports. Although the Department provided components with a reporting template, it was missing some required items. As a result, the Department could not accurately determine what percentage of its personnel had access to PODs or ensure components were adequately prepared to dispense medication during a pandemic.

We reviewed the POD quarterly reports of eight components for calendar years (CY) 2014 and 2015. We determined none of these components submitted



## OFFICE OF INSPECTOR GENERAL

### Department of Homeland Security

---

complete reports and two components, NPPD and USCIS, did not submit any reports in CY 2015. This occurred because the Department did not provide components with clear instructions on how to report POD information on a quarterly basis.

Most components submitted information on POD locations and reported whether exercises were conducted. However, components did not include information required for assessing the personnel covered by POD locations. Specifically, components using the department-provided template or component-developed report did not always include the following items:

- number of employees and those in its care and custody who are covered by component PODs;
- percentage of their workforce that has access to PODs;
- POD policy or procedure updates;
- after-action reports for POD exercises;
- number of component PODs exercised in the past 12 months; and
- identification of any PODs that have not been exercised in the past 12 months.

Without receiving complete quarterly reports, the Department and components cannot fully assess their preparedness and response capabilities. In addition, the Department cannot identify areas for improvement without reviewing after-action reports of POD exercises. During the audit, a Program Manager stated the Department was aware that the reporting requirements were not being met and indicated these requirements would be revised.

### **POD Exercise Requirement**

Components did not always complete annual exercises for POD locations as required by the Department's plan. Although most components reported the locations that completed POD exercises for CYs 2014 and 2015, the Department did not verify the accuracy of this information. As a result, the Department may not be able to accurately assess its POD capabilities. Based on the component reports, two of the eight components reviewed met the annual POD exercise requirement, while four substantially met the requirement, and two did not meet the requirement. See table 2 for the reported number of required POD exercises completed for CYs 2014 and 2015.



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

**Table 2: POD Exercises Completed and Reviewed for CY 2014-2015**

| Component                           | Exercises Required | Exercises Reported Complete | Reported Completion Rate | Exercises Reviewed by OIG | Exercises Supported with Documentation | Exercise Accuracy Rate Based on Supporting Documentation |
|-------------------------------------|--------------------|-----------------------------|--------------------------|---------------------------|--|--|
| CBP                                 | 135                | 132                         | 98%                      | 20                        | 4                                      | 20%  |
| Coast Guard                         | 80                 | 77                          | 96%                      | 20                        | 19                                     | 95%  |
| Federal Emergency Management Agency | 34                 | 32                          | 94%                      | 20                        | 15                                     | 75%  |
| ICE                                 | 51                 | 51                          | 100%                     | 20                        | 14                                     | 70%  |
| NPPD                                | 75                 | 8                           | 11%                      | 8                         | 8                                      | 100%   |
| TSA                                 | 906                | 896                         | 99%                      | 90                        | 46                                     | 51%  |
| USCIS                               | 6                  | 6                           | 100%                     | 6                         | 6                                      | 100%   |
| Secret Service                      | 22                 | 1                           | 5%                       | 1                         | 1                                      | 100%   |

Source: OIG analysis of data provided by each component

As illustrated in table 2, five of the eight components did not maintain supporting documentation, including after-action reports, to demonstrate exercises were completed. In addition, CBP did not complete all exercises as reported, and TSA missed completing one.

Additional concerns identified during the audit included: one of the eight components we reviewed did not have an adequate number of POD locations to ensure sufficient personnel coverage, and another completed exercises just for its field locations. Specifically, USCIS' 4 POD locations were inadequate to cover its personnel at its more than 100 nationwide offices. In CY 2015, NPPD did not conduct exercises for all of its 42 POD locations; rather, it conducted just 4 regional exercises.

The Department and components cannot fully assess their preparedness and response capabilities or identify areas for improvement without completing POD exercises and reviewing after-action reports to determine whether future improvements are needed.

**Conclusion**

The Department left components to develop pandemic plans without continued guidance and oversight to ensure those plans were fully developed and approved. Specifically, the Department was responsible for providing oversight to ensure components developed plans, assessed and implemented protective



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

---

measures, conducted pandemic readiness training, and properly exercised and reported on PODs. However, the Department did not verify components met all of these requirements. Maintaining oversight to ensure components have adequately planned and prepared for pandemics is critical to allowing components to maintain their mission essential functions when a pandemic occurs. As a result, the department cannot be assured that its preparedness plans can be effectively executed during a pandemic event.

### Recommendations

We recommend that the Deputy Secretary of DHS:

**Recommendation 1:** Designate an office responsible for conducting oversight of component pandemic plans, including review and approval of those plans.

**Recommendation 2:** Update the Department's *Pandemic Workforce Protection Plan* to clarify pandemic readiness training requirements.

**Recommendation 3:** Issue implementation guidance, including deadlines, for components to execute the *Integrated Logistics Support Plan*.

**Recommendation 4:** Establish oversight to ensure component compliance with the *Integrated Logistics Support Plan*.

**Recommendation 5:** Establish clear and consistent guidance on timeframes for which components should maintain pandemic personal protection equipment.

**Recommendation 6:** Ensure the Department develops an oversight plan to ensure components are completing points of dispensing exercises and submitting complete points of dispensing reports.

**Recommendation 7:** Provide guidance on submitting required points of dispensing reports and update the quarterly reporting template to include all required items.

### Management Comments and OIG Analysis

In its response to our draft report, the Department concurred with all seven of our recommendations. The Department indicated that our report identified many of the same issues the Department is already addressing as part of its ongoing efforts to improve pandemic preparedness.



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

---

**Recommendation 1:** Designate an office responsible for conducting oversight of component pandemic plans, including review and approval of those plans.

**DHS Response:** Concur. The *DHS Pandemic Workforce Protection Plan* (PWPP) is currently undergoing significant revisions and will be republished as the “DHS Pandemic and Emerging Infectious Disease (PEID) Plan.” The PEID Steering Committee (PEID-SC), co-chaired by executives from the Management Directorate (MGMT) and Office of Health Affairs (OHA), is overseeing this effort. The co-chairs of the PEID-SC will establish a team to review and approve component PEID plans. The team will comprise participants in the current Core Planning Team (CPT) that developed the basic changes to the PEID. Team members will represent the major PEID Plan areas of expertise (OHA, Occupational Safety and Health, Chief Readiness Support Officer (CRSO), etc.) and will review the areas they are responsible for, as determined beforehand by the PEID-SC. The PEID-SC co-chairs will be the executive authority for plan reviews and will oversee the team's actions. This process will be repeated each time the components’ pandemic plans or the PEID Plan is formally updated. Estimated Completion Date (ECD): December 31, 2016.

**OIG Analysis:** The Department’s response addresses the intent of the recommendation. This recommendation is resolved and will remain open until the Department provides the document that outlines responsibilities and specifies the process for reviewing and approving component PEID plans to include a feedback loop for changes made in response to the Department’s review.

**Recommendation 2:** Update the Department’s *Pandemic Workforce Protection Plan* to clarify pandemic readiness training requirements.

**DHS Response:** Concur. The current departmental update and revision to the PEID Plan includes specific training requirements (personal protective equipment, POD, etc.) and a new concept of operations that requires training and exercises as a major activity during each phase of a PEID response, including steady state readiness activities. Subsequent to publication of this new plan, the PEID-SC will request component PEID Plans and ancillary documents, including a pandemic training plan for review by a team of subject matter experts. The team will evaluate submittals on matters regarding the quality and completeness of the training plans. If component training plans are deficient, components will be tasked with improving them to meet common quality standards for effective instructional design. This process will be repeated each time the pandemic plan or PEID Plan is formally updated. ECD: March 31, 2017.



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

---

**OIG Analysis:** The Department's response addresses the intent of the recommendation. This recommendation is resolved and will remain open until the Department provides the updated PEID Plan and provides a copy of the results review of component training plans.

**Recommendation 3:** Issue implementation guidance, including deadlines, for components to execute the *Integrated Logistics Support Plan*.

**DHS Response:** Concur. The "Pandemic Integrated Logistics Support Plan" (ILSP) was approved by the DHS CRSO in July 2015. The implementation direction and guidance on its application will be in the updated PEID Plan, which is in final review. The ILSP identifies and describes specific logistics guidance, practices, and methodologies to standardize the general process for all DHS components to follow when supporting the operational personal protective equipment and pandemic personal protective equipment needs, to include planning, procurement, acquisition, managing, and maintaining personal protective equipment. This guidance was distributed to all components logistics points of contact involved in its development. They will adapt their processes to adhere to this plan no later than December 31, 2016. Quarterly reports, which are generated from the Department's Sunflower Asset Management System (SAMS) through the Consolidated Asset Portfolio & Sustainability Information System, will demonstrate component compliance. ECD: December 31, 2016.

**OIG Analysis:** The Department's response addresses the intent of the recommendation. This recommendation is resolved and will remain open until the Department provides the updated PEID Plan along with documentation that the December 31, 2016, deadline was communicated to all components.

**Recommendation 4:** Establish oversight to ensure component compliance with the *Integrated Logistics Support Plan*.

**DHS Response:** Concur. Program supportability and sustainment is managed through the DHS strategic sourced contracts by the DHS MGMT Office of Procurement, Strategic Sourcing, and MGMT CRSO's Office of Assets and Logistics. CRSO has direct oversight of pandemic personal protective equipment inventory and is responsible for reviewing quarterly reports to monitor procurement activities under the mandatory DHS personal protective equipment strategic sourcing contracts and ensuring that components use these mandatory sources. ECD: December 31, 2016.

**OIG Analysis:** The Department's response addresses the intent of the recommendation. This recommendation is resolved and will remain open until



## OFFICE OF INSPECTOR GENERAL

### Department of Homeland Security

---

the Department provides documentation of the responsibility for oversight of component compliance with the *Integrated Logistics Support Plan* along with a copy of the most recent quarterly report.

**Recommendation 5:** Establish clear and consistent guidance for timeframes that components should maintain pandemic personal protection equipment.

**DHS Response:** Concur. The timeframes that components should maintain pandemic personal protection equipment are guided by the ILSP, see Appendix 4, “DHS PPE Rotational Stock Guidance.” Components are responsible for ensuring that the level of on-hand inventory maintained aligns with the demand and can be rotated in such a way that there is minimal waste in place. Furthermore, components must ensure any personal protective equipment designated for the purposes of pandemic protection is transferred to operational inventory within one year prior to the manufacturer's expiration date. Should a component not have an operational need for the equipment, that equipment stock must be offered to other components at least 180 days prior to the manufacturer's expiration date. The ILSP guidance also references existing guidance on the management of personal protective equipment, as personal property assets, under Management Directive 119-03, “Personal Property Management Program.” The updated PCID Plan, which is in final review, will direct implementation of the ILSP guidance. ECD: December 31, 2016.

**OIG Analysis:** The Department’s response addresses the intent of the recommendation. This recommendation is resolved and will remain open until the Department provides the updated PEID Plan directing implementation of the ILSP guidance.

**Recommendation 6:** Ensure the Department develops an oversight plan to ensure components are completing points of dispensing exercises and submitting complete points of dispensing reports.

**DHS Response:** Concur. OHA has adopted SAMS as its solution to catalog, manage, and track MCM data. The system also provides the capability to capture and report POD exercise status and information for each POD location. OHA is providing each component, directorate, and office MCM POD locations with tailored instruction on how to input the required information into the SAMS POD exercise module. In-person SAMS POD exercise module training for component MCM points of contact (POC) is underway and expected to be complete by early calendar year 2017. Exercise status reports, by POD location and component, are available to OHA and MGMT POCs on a continuous basis. Quarterly POD exercise status reports will be submitted by the DHS MCM



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

---

Program to MGMT's EP, which is responsible for oversight and management of POD training and exercise compliance, in accordance with DHS Directive 010-02, section VI.B.5.e, VI.C. 1, and VI.C.3. OHA is responsible for MCM policy, procedures, and training guidance and MGMT's EP is responsible for ensuring and reporting on training and exercise compliance. This information has been shared across the Department via monthly DHS MCM Working Group meetings hosted by OHA. ECD: February 28, 2017.

**OIG Analysis:** The Department's response addresses the intent of the recommendation. This recommendation is resolved and will remain open until the Department provides documentation that MGMT's EP is reporting on training and exercise compliance.

**Recommendation 7:** Provide guidance on submitting required points of dispensing reports and update the quarterly reporting template to include all required items.

**DHS Response:** Concur. OHA has provided MCM Program POCs in all DHS components, directorates, and offices with guidance for implementing and updating POD logistics and exercise information in the SAMS MCM materials module. This module includes fields for each required MCM POD data point. Component MCM POCs are responsible for updating their organization's POD information in the SAMS MCM materials module, to include exercise information and after-action reports. Local users will be able to query this information and the status of their PODs at any time. OHA (and soon, MGMT) MCM POCs will be able to query POD information, including the number of component PODs exercised in the past 12 months, and will be able to identify any PODs that have not been exercised in the past 12 months, at the local, component, and Department levels, any time, to assess POD readiness. OHA will provide a quarterly SAMS generated POD status report to MGMT EP. This information has been shared across the Department via monthly DHS MCM Working Group meetings hosted by OHA. ECD: February 28, 2017.

**OIG Analysis:** The Department's response addresses the intent of the recommendation. This recommendation is resolved and will remain open until the Department provides documentation that implementation guidance was provided to all responsible POCs, including a copy of the implementation guidance, and documentation of the component requirements to update their organization's POD information.



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

---

### **Appendix A**

#### **Objective, Scope, and Methodology**

The DHS 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 our review was to determine whether DHS had implemented adequate preparedness plans to continue mission essential functions during a pandemic. To achieve our objective, we reviewed applicable Federal laws, regulations, and guidance. In addition, we reviewed applicable departmental policies and procedures for pandemic planning and identified the specific requirements.

We interviewed officials within OPS, the Management Directorate, and the Office of Health Affairs to determine the Department's pandemic planning efforts and oversight of components' development and implementation of their pandemic plans. To determine the adequacy of pandemic plans, we reviewed plans for 8 of DHS' 24 components that were judgmentally selected based on size of component. Those components were: CBP, the Coast Guard, the Federal Emergency Management Agency, ICE, NPPD, the Secret Service, TSA, and USCIS. We interviewed officials at these components and conducted site visits to local offices at CBP, the Coast Guard, and TSA.

This audit was done concurrently with the *OIG-16-18 DHS' Ebola Response Needs Better Coordination, Training, and Execution* audit. Site visits were selected to ensure coverage for both audits. Specifically, we met with CBP and TSA at the following domestic airport locations:

- John F. Kennedy International Airport, Jamaica, NY;
- Washington-Dulles International Airport, Dulles, VA;
- Newark Liberty International Airport, Newark, NJ;
- Chicago O'Hare International Airport, Chicago, IL;
- Hartsfield-Jackson Atlanta International Airport, Atlanta, GA;
- Miami International Airport, Miami, FL;
- Los Angeles International Airport, Los Angeles, CA; and
- San Francisco International Airport, San Francisco, CA.



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

---

We met with CBP and the Coast Guard at the following seaport locations:

- New Orleans, LA;
- Houston, TX; and
- Corpus Christi, TX.

In addition, we met with CBP at the following locations:

- Champlain, NY Area Port;
- Montreal Trudeau International Airport, Dorval, Quebec, Canada; and
- Toronto Pearson International Airport, Toronto, Ontario, Canada.

We also selected a sample of component field locations to determine whether those locations completed POD exercises, as required. From our universe of 1,309 exercises for the 8 components reviewed, we randomly selected a sample of 10 POD locations for each component, or in the cases of larger components, we reviewed 10 percent of their POD locations, whichever was larger. For components with fewer than 10 POD locations, 100 percent were selected. For each site selected we reviewed supporting documentation to determine whether reported information was accurate. We determined significant discrepancies between what was reported as completed and what was supported. This testing was performed to assess and validate the reliability of the data provided on POD exercises. We determined that this data was inaccurate for five of the eight components we reviewed as we have detailed in this report.

We conducted this performance audit between November 2014 and April 2016 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.



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

**Appendix B**  
**DHS Comments to the Draft Report**

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

September 16, 2016

MEMORANDUM FOR: John Roth  
Inspector General

FROM: Jim H. Crumpacker, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office 

SUBJECT: Management's Response to OIG Draft Report: "DHS's  
Pandemic Planning Needs Better Oversight, Training, and  
Execution" (Project No. 14-111-AUD-DHS)

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the Office of Inspector General's (OIG) work in planning and conducting its review and issuing this report.

We were pleased to see that the OIG's report identified many of the same issues the Department considers important and is already addressing as part of its ongoing efforts to improve pandemic preparedness. For example, in September 2015 the Under Secretary for Management issued a DHS-wide Directive 010-02, "Emergency Preparedness," establishing a new Emergency Preparedness (EP) Program to coordinate with Component heads – including the Chief Medical Officer for medical and public health activities – to assess EP capabilities, evaluate overall EP efforts, and report assessment results to the Secretary. In addition, a new "Pandemic and Emerging Infectious Disease Plan," to supersede the "2011 DHS Component Anthrax Operation Plan and Guidance Statement" and "2104 DHS Pandemic Workforce Protection Plan," which will clarify roles and responsibilities for oversight of Component pandemic plans and pandemic readiness training, are nearing completion. The DHS Medical Countermeasures (MCM) Program is also establishing a new process to collect point of dispensing (POD) exercise information through the Department's automated asset management system, and provide an exercise reporting mechanism to assess the readiness status of each POD location.

The Department will continue to take, concrete, substantive steps forward in the way it prepares for and responds to a pandemic, emerging infectious disease, or large-scale biological attack. The OIG's reports in these areas represent valuable resources for informing these efforts. Refining the guidance and oversight of DHS pandemic planning and preparedness will help ensure the Department is postured to maintain its mission essential functions when a biological incident occurs.



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

---

The draft report contained seven recommendations with which the Department concurs. Attached find our detailed response to each recommendation.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Attachment



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

**Attachment: DHS Management Response to Recommendations Contained in  
OIG Draft Report for Project Number 14-111-AUD-DHS**

The OIG recommended that the Deputy Secretary of DHS:

**Recommendation 1:** Designate an office responsible for conducting oversight of component pandemic plans, including review and approval of those plans.

**Response:** Concur. The “DHS Pandemic Workforce Protection Plan” (PWPP) is currently undergoing significant revisions and will be republished as the “DHS Pandemic and Emerging Infectious Disease (PEID) Plan.” The PEID Steering Committee (PEID-SC), co-chaired by executives from the Management Directorate (MGMT) and Office of Health Affairs (OHA), is overseeing this effort. The co-chairs of the PEID-SC will establish a team to review and approve component PEID plans. The team will be comprised of participants in the current Core Planning Team (CPT) that developed the basic changes to the PEID. Team members will represent the major PEID Plan areas of expertise (OHA, Occupational Safety and Health, Chief Readiness Support Officer (CRSO), etc.) and will review the areas they are responsible for, as determined beforehand by the PEID-SC. The PEID-SC co-chairs will be the executive authority for plan reviews and will oversee the team’s actions. This process will be repeated each time the Components’ pandemic plans or the PEID Plan is formally updated. Estimated Completion Date (ECD): December 31, 2016.

**Recommendation 2:** Update the Department’s *Pandemic Workforce Protection Plan* to clarify pandemic readiness training requirements.

**Response:** Concur. The current departmental update and revision to the PEID Plan includes specific training requirements (personal protective equipment (PPE), POD, etc.) and a new concept of operations that requires training and exercises as a major activity during each phase of a PEID response, including steady state readiness activities. Subsequent to publication of this new plan, the PEID-SC will request component PEID Plans and ancillary documents, including a pandemic training plan for review by a team of Subject Matter Experts. The team will evaluate submittals on matters regarding the quality and completeness of the training plans. If component training plans are deficient, components will be tasked to improve them to meet common quality standards for effective instructional design. This process will be repeated each time the pandemic plan or PEID Plan is formally updated. ECD: March 31, 2017.

**Recommendation 3:** Issue implementation guidance, including deadlines, for components to execute the *Integrated Logistics Support Plan*.



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

**Response:** Concur. The “Pandemic Integrated Logistics Support Plan” (ILSP) was approved by the DHS CRSO on July 15, 2015. The implementation direction and guidance on its application will be in the updated Pandemic and Infectious Disease Plan which is in final review. The ILSP identifies and describes specific logistics guidance, practices, and methodologies to standardize the general process for all DHS Components to follow when supporting the operational PPE and pandemic PPE needs, to include planning, procurement, acquisition, managing, and maintaining of PPE. This guidance was distributed to all Components logistics points of contact involved in its development. They will adapt their processes to adhere to this Plan no later than December 31, 2016. Quarterly reports, which are generated from the Department’s Sunflower Asset Management System (SAMS) through the Consolidated Asset Portfolio & Sustainability Information System (CAPSIS) will demonstrate Component compliance. ECD: December 31, 2016.

**Recommendation 4:** Establish oversight to ensure component compliance with the *Integrated Logistics Support Plan*.

**Response:** Concur. Program supportability and sustainment is managed through the DHS strategic sourced contracts by the DHS MGMT Office of Procurement, Strategic Sourcing, and MGMT CRSO’s Office of Assets and Logistics. CRSO has direct oversight over pandemic PPE inventory and is responsible for reviewing quarterly reports to monitor procurement activities under the mandatory DHS PPE strategic sourcing contracts and ensuring that Components use these mandatory sources. ECD: December 31, 2016.

**Recommendation 5:** Establish clear and consistent guidance for timeframes that components should maintain pandemic personal protection equipment.

**Response:** Concur. The timeframes that components should maintain pandemic personal protection equipment are guided by the ILSP, see Appendix 4, “DHS PPE Rotational Stock Guidance.” Components are responsible for ensuring that the level of inventory maintained on hand aligns with the demand and can be rotated in such a way that there is minimal waste in place. Furthermore, Components must ensure any PPE designated for the purposes of pandemic protection is transferred to operational inventory within one year prior to the manufacturer’s expiration date. Should a component not have an operational need for PPE, then that PPE stock must be offered to other Components at least 180 days prior to the manufacturer’s expiration date. The ILSP guidance also references existing guidance on the management of PPE, as personal property assets, under Management Directive 119-03, “Personal Property Management Program.” The update Pandemic and Infectious Disease Plan, which is in final review, will direct implementation of the ILSP guidance. ECD: December 31, 2016.



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

**Recommendation 6:** Ensure the Department develops an oversight plan to ensure components are completing points of dispensing exercises and submitting complete points of dispensing reports.

**Response:** Concur. OHA has adopted SAMS as its solution to catalog, manage, and track MCM data. The system also provides the capability to capture and report POD exercise status and information for each POD location. OHA is providing each Component, Directorate, and Office MCM POD locations with tailored instruction on how to input the required information into the SAMS POD exercise module. In-person SAMS POD exercise module training for Component MCM points of contact (POCs) is underway and expected to be complete by early calendar year 2017. Exercise status reports, by POD location and Component, are available to OHA and MGMT POCs on a continuous basis. Quarterly POD exercise status reports will be submitted by the DHS MCM Program to MGMT's EP, which is responsible for oversight and management of POD training and exercise compliance, in accordance with DHS Directive 010-02, section VI.B.5.e, VI.C.1, and VI.C.3. OHA is responsible for MCM policy, procedures, and training guidance and MGMT's EP is responsible for ensuring and reporting on training and exercise compliance. This information has been shared across the Department via monthly DHS MCM Working Group meetings hosted by OHA. ECD: February 28, 2017.

**Recommendation 7:** Provide guidance on submitting required points of dispensing reports and update the quarterly reporting template to include all required items.

**Response:** Concur. OHA has provided MCM Program POCs in all DHS Components, Directorates and Offices with guidance for implementing and updating POD logistics and exercise information in the SAMS MCM materials module. This module includes fields for each required MCM POD data point. Component MCM POCs are responsible for updating their organization's POD information in the SAMS MCM materials module, to include exercise information and after action reports. Local users will be able to query this information and the status of their PODs at any time. OHA (and soon, MGMT) MCM POCs will be able to query POD information, including the number of component PODs exercised in the past 12 months, and will be able to identify any PODs that have not been exercised in the past 12 months, at the local, Component, and Department levels, any time, to assess POD readiness. OHA will provide a quarterly SAMS-generated POD status report to MGMT EP. This information has been shared across the Department via monthly DHS MCM Working Group meetings hosted by OHA. ECD: February 28, 2017.



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

---

**Appendix C**  
**Office of Audits Major Contributors to This Report**

Brooke Bebow, Director  
Stephanie Christian, Audit Manager  
Ruth Gonzalez, Auditor-in-Charge  
Gary Crownover, Program Analyst  
Megan McNulty, Program Analyst  
Matthew Noll, Program Analyst  
Sabrina Paul, Program Analyst  
Melissa Woolson Prunchak, Program Analyst  
Kevin Dolloson, Communications Analyst  
Andrew Herman, Referencer



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

---

**Appendix D**  
**Report Distribution**

**Department of Homeland Security**

Secretary  
Deputy Secretary  
Chief of Staff  
General Counsel  
Executive Secretary  
Director, GAO/OIG Liaison Office  
Assistant Secretary for Office of Policy  
Assistant Secretary for Office of Public Affairs  
Assistant Secretary for Office of Legislative Affairs

**Office of Management and Budget**

Chief, Homeland Security Branch  
DHS OIG Budget Examiner

**Congress**

Congressional Oversight and Appropriations Committees

## ADDITIONAL INFORMATION AND COPIES

To view this and any of our other reports, please visit our website at: [www.oig.dhs.gov](http://www.oig.dhs.gov).

For further information or questions, please contact Office of Inspector General Public Affairs at: [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov). Follow us on Twitter at: @dhsoig.



## OIG HOTLINE

To report fraud, waste, or abuse, visit our website at [www.oig.dhs.gov](http://www.oig.dhs.gov) and click on the red "Hotline" tab. If you cannot access our website, call our hotline at (800) 323-8603, fax our hotline at (202) 254-4297, or write to us at:

Department of Homeland Security  
Office of Inspector General, Mail Stop 0305  
Attention: Hotline  
245 Murray Drive, SW  
Washington, DC 20528-0305