



Department of Homeland Security Office of Inspector General

**FEMA's Preparedness for
the Next Catastrophic Disaster -
An Update**





September 27, 2010

Homeland Security

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 presents the results of our assessment of FEMA's preparedness for the next catastrophic disaster. It is based on interviews with employees and officials, direct observations, and a review of applicable documents.

The recommendations herein have been developed to the best knowledge available to our office, and have 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 that reads "Richard L. Skinner".

Richard L. Skinner
Inspector General

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Abbreviations

ADD	Automated Deployment Database
COTR	Contracting Officer's Technical Representative
CSP	Cadre-Specific Plan
DHS	Department of Homeland Security
DMSWG	Distribution Management Strategy Working Group
DRWD	Disaster Reserve Workforce Division
eCAPS	Enterprise Coordination and Approvals Processing System
EMI	Emergency Management Institute
ESF	Emergency Support Function
FCC	Federal Communications Commission
FCO	Federal Coordinating Officer
FEMA	Federal Emergency Management Agency
FY	Fiscal Year
GAO	Government Accountability Office
GSA	General Services Administration
HSSAI	Homeland Security Studies and Analysis Institute
IT	Information Technology
LMD	Logistics Management Directorate
LSCMS	Logistics Supply Chain Management System
MA	Mission Assignment
MAWG	Mission Assignment Working Group
MERS	Mobile Emergency Response Support
NAPA	National Academy of Public Administration
NFIP	National Flood Insurance Program
NRF	National Response Framework
OCPO	Office of the Chief Procurement Officer
OIG	Office of Inspector General
OMB	Office of Management and Budget
PFO	Principal Federal Official
P.L.	Public Law
PNP	Protection and National Preparedness
TAV	Total Asset Visibility

OIG

*Department of Homeland Security
Office of Inspector General*

Executive Summary

In March 2008, we issued a report in response to a request from the House Committee on Oversight and Government Reform to perform a high-level assessment of the Federal Emergency Management Agency's preparedness to handle a future disaster. We reported that the agency had made progress in all of the key preparedness areas we reviewed, although in some areas the progress was modest or limited.

The primary objective of this assessment was to determine the progress the Federal Emergency Management Agency has made in the key preparedness areas. We reviewed pertinent reports, including those of our office and the Government Accountability Office, as well as congressional testimony. We interviewed agency officials and evaluated documents provided by them. Within each of the ten key preparedness areas, we collaborated with agency officials to confirm that the critical components identified in 2008 were still relevant or to update the critical components. We assessed the agency's progress in each of the areas against a four-tiered scale: substantial progress, moderate progress, modest progress, and limited or no progress.

Given the scope and limitations of our review, we did not perform an in-depth assessment of each of the ten key preparedness areas. We used the critical components within each area, as well as our broader knowledge of the key preparedness areas, to gauge the agency's overall progress. In response to our draft report, the agency provided information on specific activities underway. While we incorporated this information where appropriate, our assessment remains a high-level assessment. We recognize the importance of the many agency programs in various stages of development and implementation, and we will consider these programs as we plan future audits.

Overall, the Federal Emergency Management Agency has made substantial progress in one of the ten key areas, moderate progress in seven areas, and modest progress in two areas (see figure 1). It would benefit from increased oversight of key preparedness areas to ensure that implementation of initiatives is sustained.

Concerns that are common to our review of the critical components include: (1) the need for more effective coordination with state, local, and tribal governments; (2) the need for information technology systems that are updated and integrated agency-wide; (3) too few experienced staff to handle the increasing workload; and (4) funding that is not adequate to maintain initiatives, meet the costs of disasters, and recruit, train, and retain staff.

It should be noted that we and the Government Accountability Office have made many recommendations in our audits of agency operations that involve the key preparedness areas mentioned in this report. Many of these recommendations remain open. (See appendix C for a list of recent Office of Inspector General and Government Accountability Office reports.) We will continue to work with the Federal Emergency Management Agency to ensure that corrective action plans are submitted and that progress is made in fully implementing report recommendations. In addition, we plan to report the status of recommendations in our semiannual report.

In our 2008 report, we made recommendations in most of the critical areas discussed above. We recommended: (1) improving the agency's overall awareness of its readiness for a catastrophic disaster; (2) developing and sustaining systems to track the progress of major programs, initiatives, and other activities; and (3) regularly sharing reports on the status of such activities with key stakeholders. We reiterate those recommendations, which remain open, and will continue to work with the Federal Emergency Management Agency to ensure progress is made toward better preparedness for the next catastrophic disaster.

Figure 1. Scorecard for Select Federal Emergency Management Agency Preparedness Areas

Key Preparedness Areas			2008	2010
	Progress	Progress		
OVERALL PLANNING	Moderate Moderate Modest Moderate Moderate	Moderate Modest Moderate Modest Moderate		
COORDINATION AND SUPPORT	Moderate Modest Moderate Substantial	Moderate Modest Substantial Substantial		
EMERGENCY COMMUNICATIONS (New critical components in 2010)	Moderate	Substantial Substantial Substantial Moderate		
LOGISTICS (One new critical component in 2010)	Moderate Moderate	Moderate Moderate Moderate		
EVACUATIONS (New critical components in 2010)	Modest	Moderate Moderate Moderate		
HOUSING	Modest Modest Modest Modest	Moderate Moderate Moderate Moderate		
DISASTER WORKFORCE	Modest Moderate Modest	Modest Moderate Modest		
MISSION ASSIGNMENTS	Limited Modest	Modest Moderate Modest		
ACQUISITION MANAGEMENT	Moderate Moderate Moderate Modest	Moderate Substantial Moderate Modest		
MITIGATION (New preparedness area in 2010)		Moderate Modest Moderate Moderate		

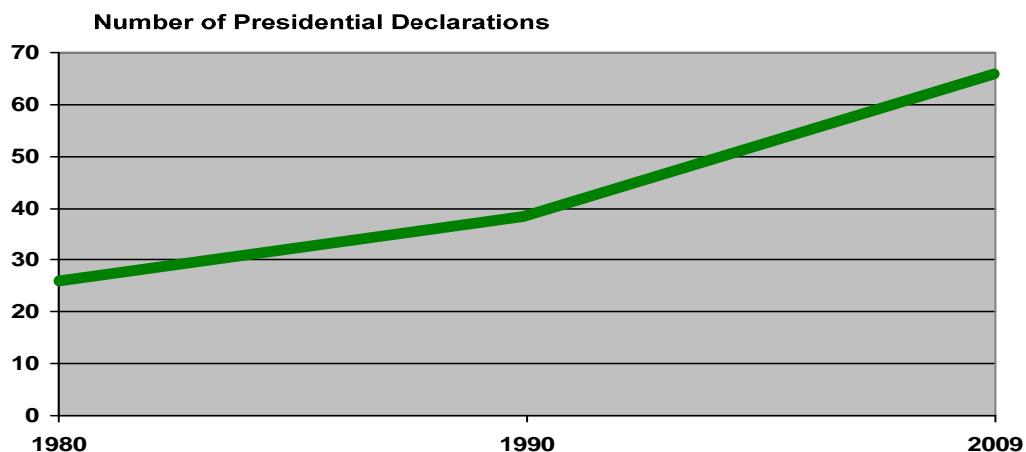
Background

In responding to natural or manmade emergency situations, current doctrine dictates that the government agencies and organizations most local to the situation act as first responders. When state and local governments become overwhelmed by the size or scope of the disaster, state officials may request assistance from the federal government, so federal agencies must always be prepared to provide support when needed. In 1979, President Carter issued an Executive Order that created the Federal Emergency Management Agency (FEMA) and merged many of the separate disaster-related federal functions. Following the terrorist attacks of September 11, 2001, the *Homeland Security Act of 2002* (Public Law [P.L.] 107-296) (Homeland Security Act) realigned FEMA and made it part of the newly formed Department of Homeland Security (DHS).

FEMA's statutory authority comes from the *Robert T. Stafford Disaster Relief and Emergency Assistance Act*, as amended (P.L. 100-707) (Stafford Act), which was signed into law in 1988 and amended the *Disaster Relief Act of 1974* (P.L. 93-288). To access federal assistance under the Stafford Act, generally, states must make an emergency or major disaster declaration request that is reviewed by FEMA for presidential approval. The Stafford Act also permits FEMA to anticipate declarations and prestage federal personnel and resources when a disaster threatening human health and safety is imminent, but not yet declared.

Between January and May 2010, FEMA responded to more than 40 presidentially declared emergencies and disasters. Since 1980, the average number of events to which FEMA responds each year has risen from 25 to about 70. Figure 2 shows the number of presidentially declared emergencies and disasters from January 1980 through December 2009.

Figure 2. Presidentially Declared Emergencies and Disasters, 1980 Through 2009

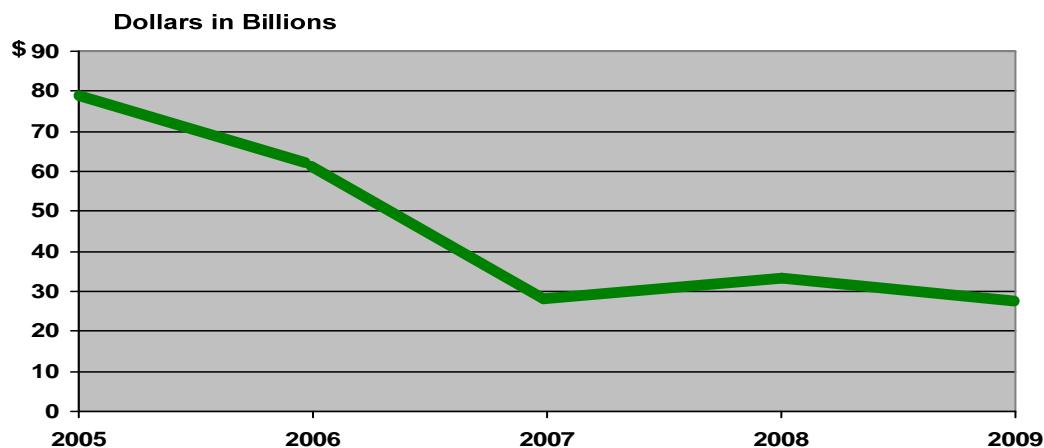


Source: FEMA.

FEMA spends an average of \$4.3 billion each year on responding to disasters.¹ Most of the money is spent on direct disaster assistance programs such as Individual Assistance (e.g., temporary housing), Public Assistance (e.g., debris removal and repair of damaged public property), and the Hazard Mitigation Grant Program (e.g., retrofitting buildings to make them resistant to earthquakes or strong winds). These programs are intended to address the short-, medium-, and long-term impacts of a disaster on individuals and communities. Figure 3 reflects FEMA's budgetary resources, including the Disaster Relief Fund, from FY 2005 through FY 2009.

¹ The fiscal year (FY) 2011 budget request includes a \$5.1 billion supplemental appropriation for costs associated with previous catastrophic disasters.

Figure 3. FEMA's Budgetary Resources, FY 2005 Through 2009

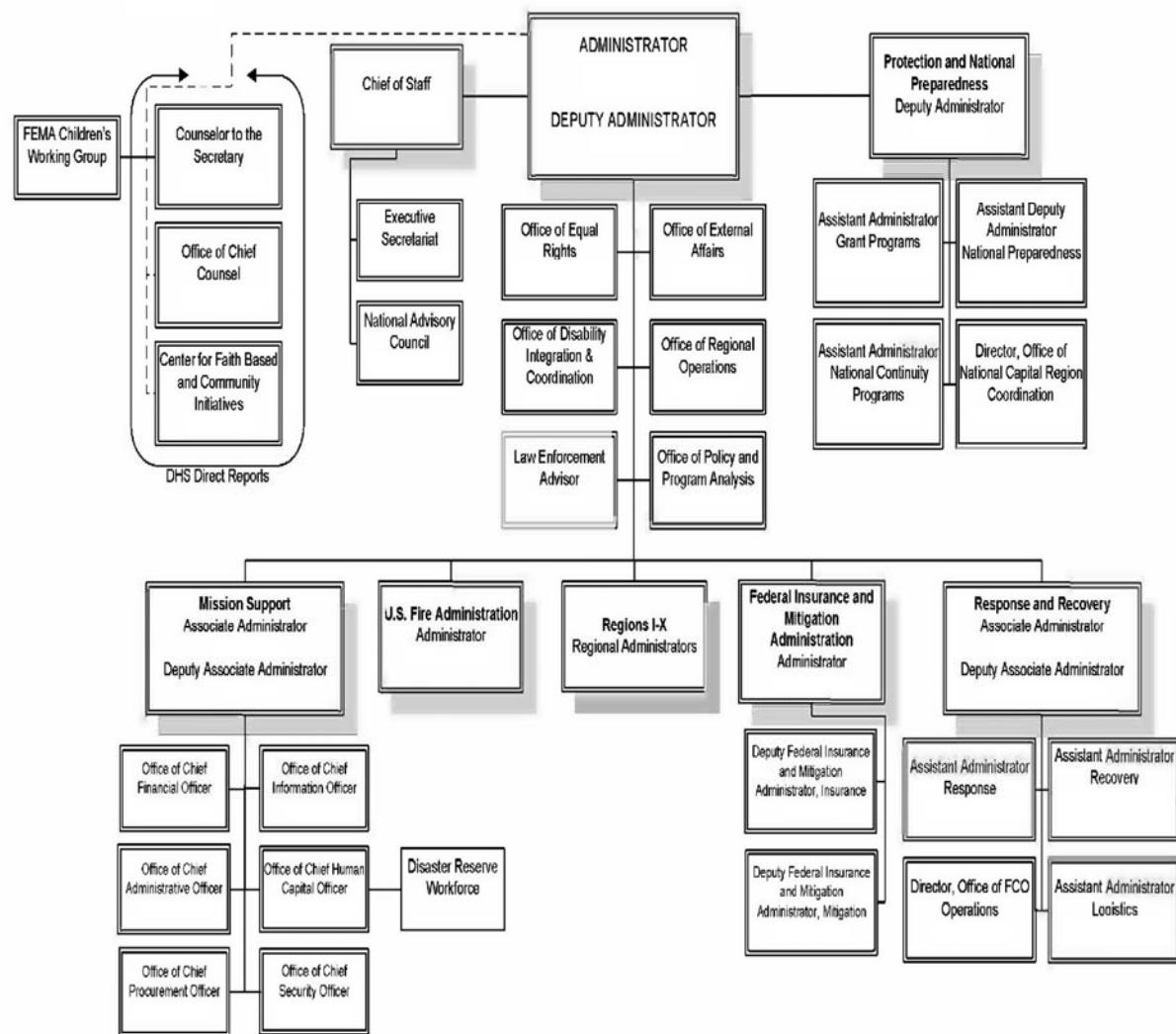


Source: DHS Annual Financial Report Data. Budgetary resources include unobligated balances carried forward; recoveries of prior year obligations; current year budget authority; and nonexpenditure transfers.

In December 2009, FEMA implemented a new organizational structure designed to help it achieve its emergency management mandate more effectively. The new structure is intended to help strengthen key functions that had been previously fragmented across multiple organizational divisions and enable FEMA to better support the disaster management efforts of citizens and first responders. Figure 4 shows the new organizational structure.

Since 1993, FEMA has been called upon to help support many routine natural disasters that historically would have been handled entirely by state and local governments. At the same time, some state and local governments cut funding to their own emergency management programs, thereby rendering themselves less prepared to handle routine disasters like floods, fires, or storms. As a relatively small federal agency, many of FEMA's staff are "dual-hatted." During nondisaster times, their primary roles may be to support planning and preparedness efforts. When a disaster hits, however, they may be working in the field on response and recovery. As more disasters are declared and disasters stay open for longer periods of time, more FEMA staff resources are diverted from planning and preparedness efforts.

Figure 4. FEMA Organization as of February 2010



Source: FEMA.

In March 2008, we performed a high-level assessment of FEMA's preparedness for the next catastrophic disaster. We reported that FEMA had made moderate progress in five of nine key preparedness areas, modest progress in three areas, and limited progress in one area.² From November 2009 to May 2010, we conducted fieldwork to assess FEMA's current state of preparedness in these areas. We also included an assessment of Mitigation in this current review.

² FEMA's Preparedness for the Next Catastrophic Disaster (OIG-08-34), March 2008.

Results of Review

We assessed FEMA's progress to improve preparedness in the following key areas:

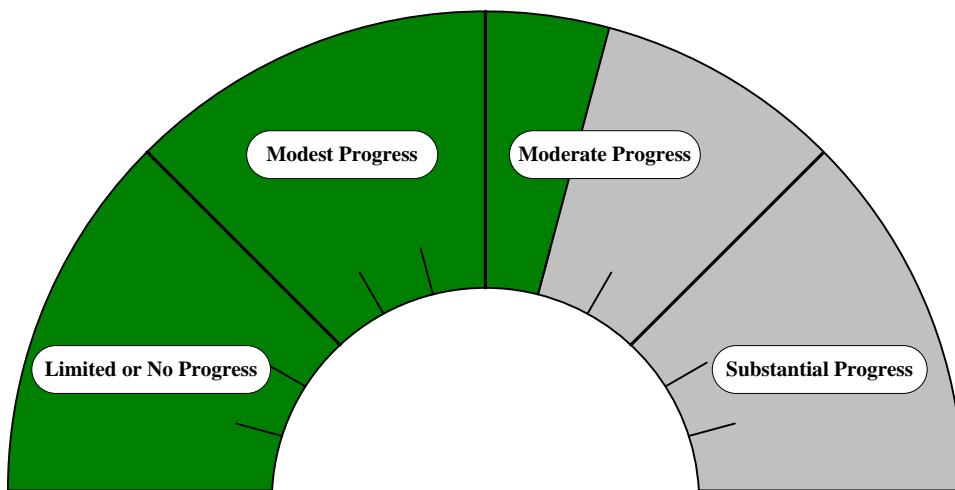
- Overall Planning
- Coordination and Support
- Emergency Communications
- Logistics
- Evacuations
- Housing
- Disaster Workforce
- Mission Assignments
- Acquisition Management
- Mitigation

Overall, FEMA has made substantial progress in one of the ten key areas, moderate progress in seven areas, and modest progress in two areas. FEMA would benefit from increased oversight of key preparedness areas to ensure that initiatives are being implemented.

Concerns that are common to our review of the critical components include: (1) the need for more effective coordination with state, local, and tribal governments; (2) the need for information technology (IT) systems that are updated and integrated agency-wide; (3) too few experienced staff to handle the increasing workload; and (4) funding that is not adequate to maintain initiatives, meet the costs of disasters, and recruit, train, and retain staff.

FEMA continues to make progress in leading the federal effort in responding to catastrophic disasters. FEMA can build on this progress by maintaining its momentum in continuing to develop and implement the critical components of the ten key preparedness areas discussed in this report.

Overall Planning



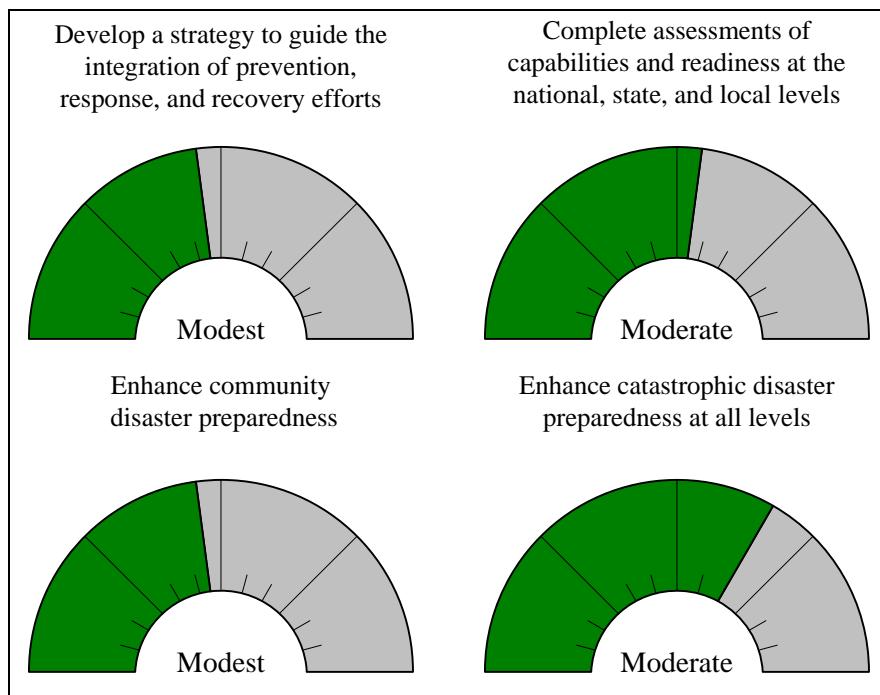
Background

FEMA's Protection and National Preparedness (PNP) is responsible for leading America's efforts to enhance preparedness to prevent, protect from, respond to, and recover from natural and manmade disasters. It strives to ensure that the Nation is prepared through a comprehensive cycle of planning, organizing, equipping, training, and exercising.

In our 2008 report, we assessed five critical areas of Overall Planning. For this update, we combined two of the previously assessed critical areas because of their similarities. We combined the "Enhance preparedness at all levels" and "Enhance preparedness for the management and resolution of catastrophic events" areas into the critical area "Enhance catastrophic disaster preparedness at all levels." In 2008, we assessed FEMA's progress in both of these areas as moderate.

This assessment of Overall Planning focuses on FEMA's efforts to:

- Develop a strategy to guide the integration of prevention, response, and recovery efforts;
- Complete assessments of capabilities and readiness at the national, state, and local levels;
- Enhance community disaster preparedness; and
- Enhance catastrophic disaster preparedness at all levels.



Critical Components

Develop a strategy to guide the integration of prevention, response, and recovery efforts (Modest) – Our 2008 report rated FEMA’s progress in this critical area as moderate, given that the strategy and guidance for integration of prevention, response, and recovery efforts was under development and would soon be implemented.

The *Post-Katrina Emergency Management Reform Act of 2006* (Post-Katrina Act) directed FEMA to integrate its emergency preparedness, protection, response, recovery, and mitigation responsibilities and to develop and coordinate the implementation of a risk-based, all-hazards strategy for preparedness. However, FEMA’s PNP has yet to complete the development and implementation of a strategy and guidance for the integration of prevention, response, and recovery efforts.³ In April and October 2009, the Government Accountability Office (GAO) reported that the PNP had not developed a strategic plan.⁴ In the interim, PNP used its annual operating plan, which aligns with FEMA’s strategic plan, to

³ *The Post-Katrina Emergency Management Reform Act of 2006*, Section 503 (2) (D), directed the FEMA Administrator to integrate the agency’s emergency preparedness, protection, response, recovery, and mitigation responsibilities to confront effectively the challenges of a natural disaster, act of terrorism, or other manmade disaster.

⁴ *National Preparedness, FEMA Has Made Progress, but Needs to Complete and Integrate Planning, Exercise, and Assessment Effort* (GAO-09-369), April 2009. *Emergency Management, Preliminary Observations on FEMA’s Community Preparedness Programs Related to the National Preparedness System* (GAO-10-105T), October 2009. At the time of these reports, PNP was known as the National Preparedness Directorate.

guide its integration strategy. However, the GAO report noted that the annual operating plan does not have key elements of an effective national strategy, such as how to gauge progress.

FEMA officials indicated that PNP is in the process of developing a strategic plan that will strengthen the integration of each of the directorate's divisions and include specific goals, timelines, milestones, and measurements of progress. PNP plans to develop a new version of its strategic plan and begin implementation by the end of December 2010. However, the timeline for completing the strategic plan will hinge primarily on the completion of the new Presidential Policy Directive on National Preparedness, which is currently in draft, and the recommendations of the National Preparedness Task Force. Specifically, PNP has taken the following actions on its strategic plan:

- Creating a community of division-level leadership to help guide and execute the new strategy being developed;
- Performing inventories and analyses to lay the foundation for the strategy that aligns PNP-wide activities to the strategic focus; and
- Identifying a three-phased approach to strategic planning. (Currently, the first round of review for Phase I: "Creating Strategic Focus" is underway.)

FEMA officials emphasized that the Quadrennial Homeland Security Review, the Bottom-Up-Review, the Presidential Policy Directive on National Preparedness, and recommendations of the National Preparedness Task Force will have significant implications for the agency and the national preparedness system.

Complete assessments of capabilities and readiness at the national, state, and local levels (Moderate) – FEMA used the Cost to Capabilities initiative and the Gap Analysis Program to conduct capabilities and readiness assessments.⁵ The Cost to Capabilities initiative was intended to optimize the impact of homeland security grant dollars on preparedness efforts, and the Gap Analysis Program was designed to improve operational readiness by reducing response and recovery capability shortfalls throughout all levels of government.

FEMA conducted gap analyses in 2008 and 2009 for FEMA Regions I, II, III, IV, and VI. Once the gaps were identified, FEMA worked closely with the states to mitigate the shortfalls. For example, in May 2009, a state in FEMA Region I reported that it would be unable to meet transportation and evacuation needs if a Category 3 hurricane made landfall. FEMA is working with the state to provide technical assistance in developing and refining its evacuation plans.

⁵ The Post-Katrina Act requires the FEMA Administrator to establish a comprehensive assessment to assess, on an ongoing basis, the Nation's prevention capabilities and overall preparedness, including operational readiness.

In July 2009, the FEMA Administrator issued a moratorium on new information requests from state, tribal, and local governments. This suspension of data collection applies to the Cost to Capabilities initiative and the Gap Analysis Program. The FEMA Administrator directed PNP to gather all the reporting information required by directorates and develop a consolidated process that eliminates duplication and minimizes the burden on state, local, and tribal partners. The Reporting Requirements Working Group was formed in August 2009, composed of FEMA representatives and officials from state, local, tribal, and territorial governments. The working group meets regularly, and a proposal to streamline reporting requirements is due to the FEMA Administrator this fiscal year.

PNP is also leading an effort to update the status of catastrophic planning in all 50 states and 75 of the Nation's largest urban areas. This update was undertaken at the direction of Congress and was due in April 2010.⁶ As of May 2010, FEMA was finalizing the report.

Enhance community disaster preparedness (Modest) – Although FEMA emphasizes the importance of individual and community preparedness, significant challenges remain. Our 2008 report rated FEMA's progress in this critical area as moderate, as efforts were underway to coordinate and integrate community disaster preparedness through the Citizen Corps Program and the Ready Campaign. However, in January 2010, GAO reported that FEMA has been unable to measure performance effectively for these programs.⁷ FEMA is in the process of developing a corrective action plan to address GAO's concerns.

The Citizen Corps Program is intended to make communities safer, stronger, and better prepared to respond to disasters of all kinds through education, training, and volunteer service. The program uses the number of local volunteer organizations registered nationwide as its principal performance measure, but the GAO report said that FEMA does not verify that registration data are accurate. FEMA officials said that a survey tool to assess the activities of Citizen Corps Councils nationwide has been developed and is awaiting approval from the Office of Management and Budget (OMB).

The Ready Campaign is a national public service advertising campaign designed to educate citizens to prepare for and respond to terrorist attacks and other emergencies. GAO determined that FEMA has been unable to control the distribution of the Ready Campaign messages or measure whether the messages are changing individuals' behavior.

⁶ Conference Report (111-298) accompanying the *Department of Homeland Security Appropriations Act, 2010*.

⁷ *Emergency Preparedness, FEMA Faces Challenges Integrating Community Preparedness Programs into Its Strategic Approach* (GAO-10-193), January 2010.

In 2008, we noted that various offices within DHS are responsible for elements of community preparedness, which was a challenge. However, since 2008, several programs, such as the Ready Campaign and faith-based community initiatives, have been transferred to FEMA.

In January 2009, FEMA hosted a summit to generate ideas for creating a culture of preparedness. Government and nongovernment experts in emergency management, sociology, psychology, mass communications, and commercial marketing attended the summit. FEMA used the results from the summit and findings from a FEMA report titled *Personal Preparedness in America: Findings from the 2009 Citizen Corps National Survey* to draft a Community Preparedness Strategic Approach to promote a culture of preparedness.⁸

In October 2009, the National Academy of Public Administration (NAPA) reported that FEMA has taken significant steps to integrate preparedness and develop more robust regional offices.⁹ However, the report concluded that while progress has been made: (1) preparedness is not fully integrated across FEMA; (2) FEMA's regional offices do not yet have the capacity required to ensure that the Nation is fully prepared; and (3) stakeholders are not yet full partners with FEMA in national preparedness.

Enhance catastrophic disaster preparedness at all levels (Moderate) – FEMA has made progress enhancing catastrophic preparedness, particularly at the regional level. FEMA officials told us that several regional planning initiatives have been undertaken since 2008, including the Hawaii Hurricane Plan, the San Francisco Bay Area Earthquake Plan, the Northwest Nevada Earthquake Plan, and the Florida Hurricane Plan. Planning initiatives currently underway include the Southern California Earthquake Planning Initiative, the Guam Typhoon Planning Initiative, the Gulf Coast Hurricane Planning Initiative, and the New Madrid Seismic Zone Catastrophic Earthquake Planning Initiative.

In April 2010, Secretary Napolitano announced the creation of a National Preparedness Task Force charged with making recommendations for all levels of government regarding: (1) disaster and emergency guidance and policy; (2) federal grants; and (3) federal requirements, including measuring efforts. The task force includes federal, state, tribal, territorial, and local government officials, nongovernmental organization officials, and private sector officials. The task force will conduct regular meetings and expects to deliver recommendations in September 2010.

PNP is also working to complete FEMA's first National Preparedness Report, which will describe federal, state, and local preparedness levels and identify nationwide trends that can inform decisionmakers on what actions are needed to

⁸ *Personal Preparedness in America: Findings from the 2009 Citizen Corps National Survey*, December 2009.

⁹ NAPA, *FEMA's Integration of Preparedness and Development of Robust Regional Offices*, October 2009.

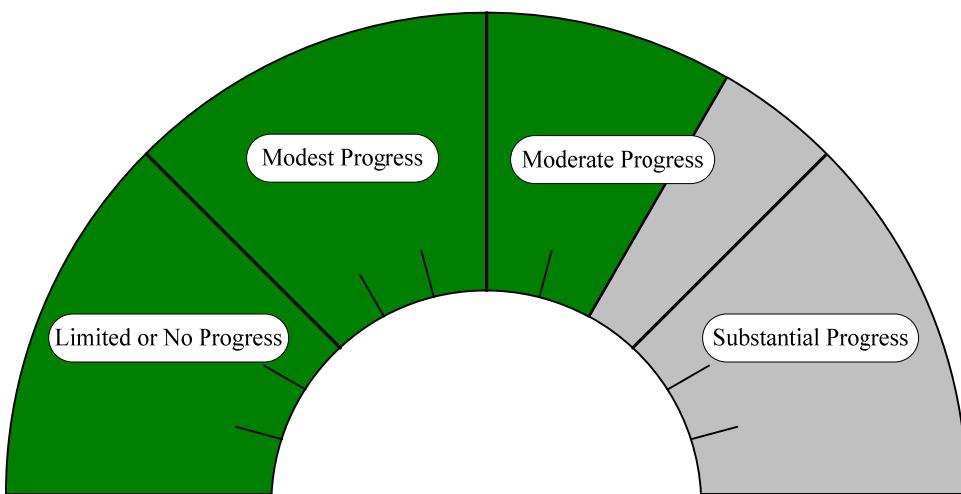
further enhance our Nation's preparedness for 4 of the 15 National Planning Scenarios: Improvised Explosive Device, Improvised Nuclear Device, Pandemic Influenza, and Hurricane. The draft National Preparedness Report is in the clearance phase with OMB. In May 2010, PNP conducted the 2010 National Level Exercise to test its catastrophic planning efforts. The exercise tested the response capabilities to an improvised nuclear device detonation.

FEMA officials stated that FEMA regional offices encourage constant dialogue with state and local governments and reap the benefits of a better awareness of what is happening in the states. FEMA officials also credited the collaboration between the federal government and state and local governments through various working groups and task forces with helping to bring together different perspectives. An example of collaboration is the emergency planning guide *Comprehensive Preparedness Guide 101*, which PNP developed in coordination with state and local governments. The guide, finalized in March 2009, provides response and recovery planning guidance to state, territorial, tribal, and local governments.

Continuing Concerns

The Post-Katrina Act reaffirmed FEMA's mission and set forth requirements that remain to be completed, including the development of a strategy to integrate prevention, response, and recovery efforts. Despite the important role of individuals and communities in preparing for a disaster, FEMA faces numerous challenges in measuring the effectiveness of its efforts to enhance individual and community preparedness.

Coordination and Support



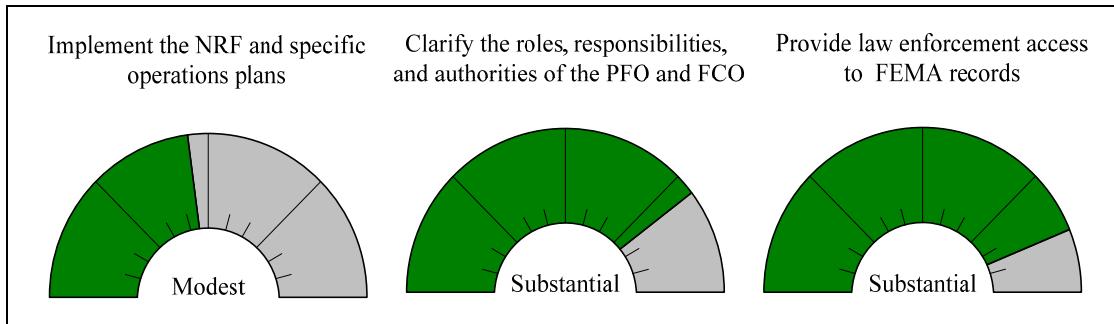
Background

Following the terrorist attacks of September 11, 2001, efforts were undertaken to develop a national planning framework for emergency management. The result was the creation of the National Response Plan. The National Response Plan was used in response to Hurricane Katrina, but it fell far short of the seamless, coordinated effort that had been envisioned. Problems ranging from poor coordination of federal support to confusion about the roles and authorities of incident managers to inadequate information sharing among responders plagued the response to this catastrophic disaster.

DHS issued the National Response Framework (NRF) in January 2008 to replace the National Response Plan. The NRF is intended to guide how the Nation conducts all-hazards response and describes key lessons learned from hurricanes Katrina and Rita, focusing particularly on how the federal government is organized to support communities and states in catastrophic incidents.

To determine FEMA's readiness to support communities and states in response to a future catastrophic disaster, we reassessed the critical components evaluated in our 2008 report:

- Implement the NRF and specific operations plans;
- Clarify the roles, responsibilities, and authorities of the Principal Federal Official (PFO) and Federal Coordinating Officer (FCO); and
- Provide law enforcement access to FEMA records in support of Emergency Support Function-13 (ESF-13), *Public Safety and Security*.



Critical Components

Implement the NRF and specific operations plans (Modest) – The NRF was implemented in March 2008, but federal operations plans that describe detailed resource, personnel, and asset allocations necessary to respond to incidents representing the gravest dangers facing the United States have not yet been completed.

Since superseding the National Response Plan, the NRF has been used in more than 160 presidentially declared disasters and emergencies. FEMA includes the NRF Resource Center on its website to help stakeholders across the Nation understand domestic incident response roles, responsibilities, and relationships in order to respond more effectively to any type of incident. The Resource Center includes documents and guides pertaining to the National Incident Management System, the support annexes, briefings, and job aids. According to FEMA officials, the NRF will undergo a scheduled review this year and be updated in 2011 to include lessons learned and best practices.

The NRF describes planning as the cornerstone of national preparedness and a critical element to respond to a disaster or emergency. It also lists 15 National Planning Scenarios that represent a minimum number of credible scenarios depicting the range of potential terrorist attacks and natural disasters and related impacts facing our Nation. Operations plans for these scenarios are particularly important because they identify detailed resources, personnel, assets and specific roles, responsibilities, and actions for each federal department and agency responding to an incident or emergency. Our recent audit of federal incident management planning efforts determined that although planning has progressed for certain scenarios, much work remains to complete operations plans for all 15 scenarios.¹⁰ Moreover, a senior DHS official said that planning was put on hold in July 2009 owing to the review of *Homeland Security Presidential Directive–8* by the Domestic Readiness Group and National Security Council.

Clarify the roles, responsibilities, and authorities of the PFO and FCO (Substantial) – FEMA has made progress in clarifying the roles of key senior

¹⁰ DHS Progress in Federal Incident Management Planning (OIG-10-58), March 2009.

federal officials who typically may be deployed with a federal incident management team. The NRF describes the roles of both the PFO and FCO and their responsibilities and authorities during an incident. It underscores that the PFO does not have directive authority over an FCO or any other federal or state official. Rather, “the PFO promotes collaboration and, as possible, resolves any Federal interagency conflict that may arise.” It also underscores that the FCO is specifically appointed by the President to coordinate federal support in the response to and recovery from emergencies and major disasters by executing Stafford Act authorities, including commitment of FEMA resources and the mission assignment of other federal departments or agencies. To further clarify that the FCO is the primary federal representative with whom the state, tribal, and local response officials interface, Congress included in the *DHS Appropriations Act of 2010* (P.L. 111-83) prohibitions on the use of funds for any position designated as a PFO for Stafford Act-declared disasters or emergencies. It is important to note, however, that the DHS Secretary retains the authority to appoint a representative who functionally reports through the FCO; however, the NRF has not yet been updated to reflect this clarification. Additionally, FEMA Administrator Fugate, in testimony on May 6, 2010, declared that DHS will follow existing federal law and no longer appoint PFOs in disasters and emergencies that fall under the Stafford Act. Further, the department will not object to keeping the prohibition against such appointments in law.¹¹ In August 2010, FEMA reported that it is no longer referring to incident commanders or team leaders as PFOs.

Provide law enforcement access to FEMA records (Substantial) – Since our last assessment, FEMA has made progress in improving law enforcement access to its disaster recovery assistance files by updating its system-of-records notice relating to FEMA disaster recovery assistance files. However, the protocols, procedures, and processes for facilitating law enforcement access to these records are not fully in place.

To remedy information-sharing problems encountered following Hurricane Katrina and to facilitate law enforcement access to FEMA disaster recovery assistance files for investigating fraud, locating missing children, and identifying the whereabouts of sex offenders and fugitive felons, FEMA executed agreements with the Department of Justice, including the Federal Bureau of Investigation and U.S. Marshals Service.¹² Additionally, in November 2007 FEMA appointed a

¹¹ Testimony of W. Craig Fugate, FEMA Administrator, at the hearing, “Priorities For Disasters and Economic Disruption: The Proposed FY 2011 Budgets for FEMA and the Economic Development Administration” before the Subcommittee on Economic Development, Public Buildings, and Emergency Management, Committee on Transportation and Infrastructure, United States House of Representatives. Washington, DC, May 6, 2010.

¹² These agreements remain in effect, and in September 2009, FEMA updated its system-of-records notice for its disaster recovery assistance files to expand access to “appropriate federal, state, territorial, tribal, local, international, or foreign law enforcement authority or other appropriate agency charged with investigating or prosecuting such a violation or enforcing or implementing a law, rule, regulation, or order, so long as such disclosure is proper and consistent with the official duties of the person receiving the information.”

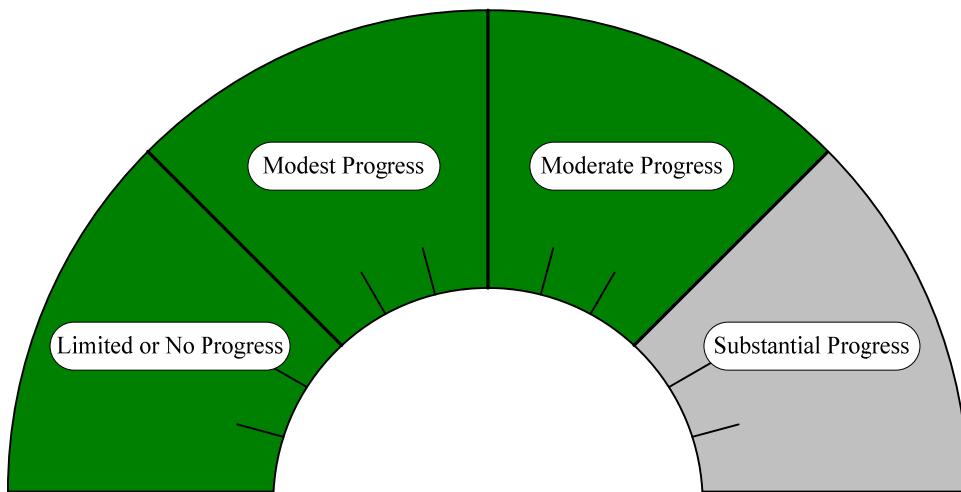
law enforcement advisor to the administrator to fill a position created by the Post-Katrina Act. The advisor is to provide FEMA with a law enforcement perspective on agency plans and policies and support FEMA's growing interaction with law enforcement associations. Although FEMA's law enforcement advisor was aware of the agreements executed in 2006 and 2007 with the Department of Justice, he said he would not be involved in any future policy review unless specifically asked by FEMA's Office of Chief Counsel.

FEMA officials told us that they are 90% complete with establishing the protocols, procedures, and processes for providing appropriate law enforcement access to FEMA disaster recovery assistance records, to include Interagency Security Agreements with the Department of Justice and others needing access. FEMA anticipates that standard operating procedures will be in place by the end of this fiscal year.

Continuing Concerns

Federal operations plans for all 15 National Planning Scenarios are still needed because they guide other preparedness activities and contribute to the unity of effort by providing a common blueprint for activity in an emergency. We consider completion of these plans, particularly by agencies designated in the NRF as coordinators or primary agencies, as a foundational element for both preparedness and response. Additionally, FEMA should update the NRF to remedy confusion about the role, authority, and responsibilities of the PFO and to ensure that all NRF stakeholders are aware of the intent of Congress. Finally, it is important that the FEMA law enforcement advisor and his staff be kept aware of and regularly consulted on the execution of future law enforcement agreements and FEMA's implementation of protocols, procedures, and processes to provide access to appropriate law enforcement entities.

Emergency Communications



Background

Disaster emergency communication is the means of transmitting and receiving voice, data, and video messages; information; and images critical to the management of an incident in which communications infrastructure has been abnormally impacted or lost. The ability of the disaster response community to communicate during an incident is essential to successful response and recovery efforts. It is generally recognized that the inability to communicate effectively was a major impediment to operations following the September 11, 2001 attacks and Hurricane Katrina. Critical emergency communications areas include the ability to maintain communications in the disruptive environment of catastrophic disasters (continuity), the ability to communicate across different organizations (interoperability), and the system's ability to handle the increased demand that often accompanies disasters (capacity).

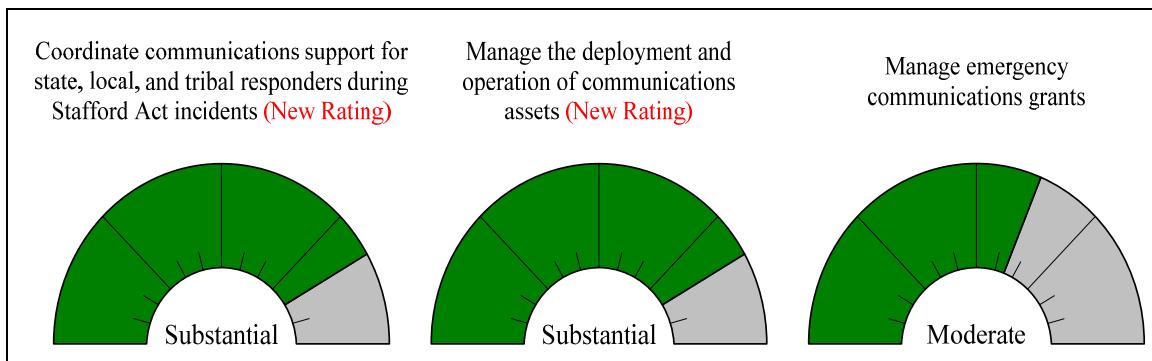
Many agencies have a role in emergency communications. The NRF's Emergency Support Function for Communications (ESF-2) identifies eight federal agencies with primary or supporting roles. DHS and other federal agencies have recently developed strategic guidance and pursued significant efforts, such as the National Emergency Communications Plan and the Emergency Communications Preparedness Center. The Federal Communications Commission (FCC), in conjunction with DHS, has been working to establish a nationwide interoperable network to increase emergency responders' communications capacity.

Three organizational components within DHS are responsible for emergency communications: (1) the National Protection and Programs Directorate's Office of Emergency Communications; (2) the Science & Technology Directorate; and (3) FEMA's Response Directorate's Disaster Emergency Communications Division. In the past, there was confusion over which of these three elements led

DHS' efforts in this area. In July 2009, Secretary Napolitano designated the Office of Emergency Communications to lead DHS' efforts to advance interoperable emergency communications. Notwithstanding the recent designation, FEMA has important responsibilities in this area.

This report focuses on FEMA's areas of responsibility. Title 6 of the U.S. Code directs FEMA to provide funding, training, exercises, technical assistance, planning, and other assistance to build tribal, local, state, regional, and national communications capabilities to respond to a natural disaster, act of terrorism, or other manmade disaster.¹³ FEMA's Office of National Preparedness and Protection, Grants Program Directorate is responsible for administering the Interoperable Emergency Communications Grant Program. Consequently, we updated our criteria from the 2008 report to assess FEMA's progress in the following critical areas:

- Coordinate communications support for state, local, and tribal responders during Stafford Act incidents;
- Manage the deployment and operation of communications assets; and
- Manage emergency communications grants.



Critical Components

Coordinate communications support for state, local, and tribal emergency responders during Stafford Act incidents (Substantial) – FEMA's Disaster Emergency Communications Division of the Response Directorate has been actively coordinating federal communications support for state, tribal, and local responders. The Disaster Emergency Communications Division is working with the National Communications System to revise the overarching ESF-2 standard operating procedures. Once the revision has been finalized, the division will revise its internal standard operating procedures to align with the ESF-2 standard operating procedures. FEMA officials said that coordination between the two offices is a continuous process with frequent meetings. However, there continues to be some confusion among the Disaster Emergency Communications Division,

¹³ Title 6 U.S.C., sections 313(b)(2)(G); 314(a)(7); and 579(c)(1).

the National Communications System, and other federal ESF-2 partners. This was evident during disaster response operations in American Samoa.

FEMA recently entered into an interagency agreement with the FCC to provide incident-area impact analysis in the immediate aftermath of an incident. FEMA can mission assign the FCC to deploy equipment and technicians to disaster areas to identify commercial, public safety, and critical infrastructure communications outages. Using this information, ESF-2 can coordinate the restoration of these communications systems. Identifying these outages is of vital importance to FEMA in ensuring that public welfare and evacuation information is disseminated to the disaster area in a timely and accurate manner.

Recognizing the importance of a rapid response to an incident, FEMA has developed 11 pre-scripted mission assignments with the FCC, the U.S. Coast Guard, the Department of Defense, the National Communications System, and the U.S. Forest Service. The U.S. Coast Guard has agreed to provide mobile communication teams to support first responders and to coordinate initial operations in response to a disaster. The U.S. Forest Service will provide telecommunications equipment and personnel to support response operations, and the Department of Defense will provide 24-hour voice, data, and video communications solutions. These pre-scripted mission assignments provide FEMA with the communications equipment and personnel necessary for rapid response to an incident.

Working with federal, state, tribal, and local responders, FEMA helped to establish in each of its ten regions the congressionally mandated Regional Emergency Communications Coordination Working Groups, which are headed by local responders and consist of their federal, state, and local counterparts. The working groups assess the status of local emergency communications systems and report annually to federal stakeholders. FEMA told us that nine regions have completed their annual reports. When all reports are complete, FEMA will compile the submissions into a national report. FEMA is also assisting regional and state jurisdictions to develop emergency communications plans that allow FEMA to be better prepared to pre-position and deploy needed communications assets during catastrophic incidents. To date, 27 states and 4 regions have emergency communications plans.

FEMA has participated in multiple emergency communications exercises. FEMA officials said that they recently participated in an interoperable radio exercise with the U.S. Secret Service; a joint exercise with the Transportation Security Administration and the U.S. Army using the Military Affiliate Radio System as a backup in case of widespread devastation, as occurred after Hurricane Katrina; and an exercise with the U.S. Coast Guard. FEMA will also participate in the 2011 National Level Exercise focusing on a catastrophic earthquake in the New Madrid Seismic Zone. Before the exercise, states will provide information on the types of communications assets they own. FEMA will conduct a scenario-based

impact assessment using the information provided and present the assessment results to the states so they can exercise based on the results. The Regional Emergency Communications Coordination Working Groups will work with state and local representatives to identify continuity exercises within the region that include communications as a component. Finally, FEMA recently participated in an ESF-2 exercise that simulated operations during the response and recovery phases after an earthquake in Salt Lake City, Utah. Participants included DHS; the Department of Defense; the General Services Administration (GSA); the U.S. Forest Service; and state, county, and city officials. FEMA officials said that the exercise provided a better understanding of the roles, capabilities, and authorities of, and coordination with, ESF-2 departments and agencies, and state and local agencies and officials.

Manage the deployment and operation of communications assets (Substantial) – FEMA has effectively deployed communications assets to the state and local emergency community through the Mobile Emergency Response Support (MERS) detachments. MERS detachments are comprised of trained professionals and specialized equipment, including interoperable high frequency, very high frequency, ultra high frequency, and 700/800 megahertz communications systems, as well as satellite systems. MERS communications assets can establish or reestablish connectivity with public safety wireless systems and command and control networks. MERS detachments can also interconnect and wire facilities within the disaster region and install computer, telephone, and video networks.

MERS detachments have been deployed in connection with major incidents almost continuously over the past year. Domestically, detachments deployed to several states, including most recently to North Dakota and South Dakota. During the international response effort in Haiti, FEMA sent several detachments to support urban search and rescue teams and other responders. MERS detachments also deployed in response to a tsunami in American Samoa and a typhoon in Guam.

Although MERS deployments have been successful, there have been some minor concerns. For example, during the deployment to American Samoa, there was confusion regarding who could contact MERS assets for information. FEMA is addressing this question with the National Communications System and its ESF-2 partners. In the after-action report for the Haiti deployment, FEMA identified the need for enhanced logistical support for deployed MERS detachments, specifically the acquisition of appropriate portable shelter equipment, and the need for updated policy and procedures related to the movement of FEMA assets outside the continental United States.

Manage emergency communications grants (Moderate) – FEMA has made progress in managing emergency communications grants to enhance state and local capabilities. From FY 2004 through FY 2008, the last year for which complete figures are available, DHS awarded more than \$3 billion in grants to

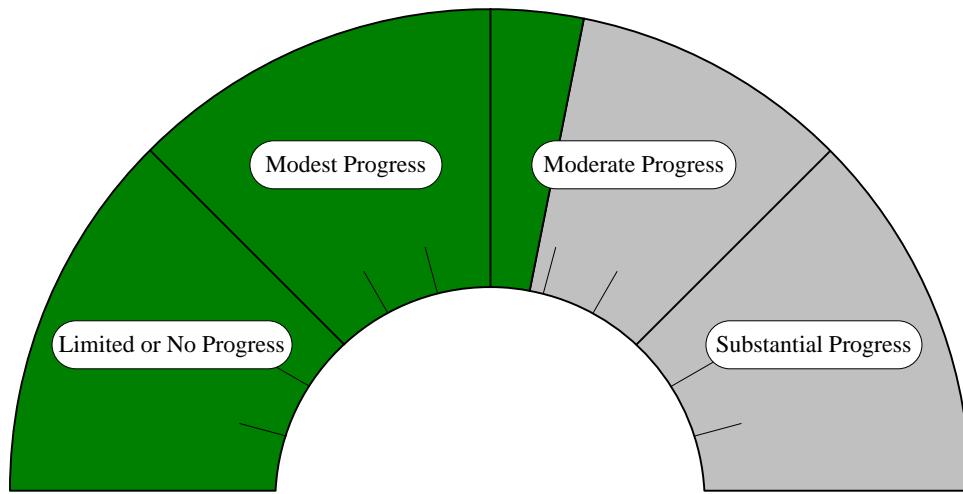
enhance state and local interoperable communications efforts. In addition, FEMA is administering, on behalf of the Department of Commerce, the Public Safety Interoperable Communications Grant Program, which is funded through proceeds from the auction of analog television frequency spectrum. This grant program, totaling almost \$1 billion, is designed to improve state and local public safety agencies' emergency communications. DHS has provided technical assistance and guidance to states and territories to develop Statewide Communications Interoperability Plans, which are a requirement for receiving grant funds. By April 2008, all 56 states and territories had a DHS-approved plan.

To measure the effectiveness of grants, in 2008 FEMA developed a Cost to Capability initiative. Following an agency-wide moratorium on new requests for information from state and local governments, the Cost to Capability initiative was suspended in November 2009. Therefore, there is currently no system in place to measure the impact of grants. However, FEMA's Reporting Requirements Working Group is developing a data collection system intended eventually to measure the effectiveness of several programs, including communications grants.

Continuing Concerns

Despite a robust program to coordinate and deploy communications support for federal, state, tribal, and local responders during Stafford Act incidents, FEMA has yet to field a system to measure the impact of communications-related grants.

Logistics



Background

The Logistics Management Directorate (LMD) is the agency's major program office responsible for policy, guidance, standards, execution, and governance of logistics support, services, and operations. Its mission is to plan, manage, and sustain the national logistics response and recovery operations in support of domestic emergencies and special events. LMD is organized around four core competencies:

- Logistics Operations
- Logistics Plans and Exercises
- Distribution Management
- Property Management

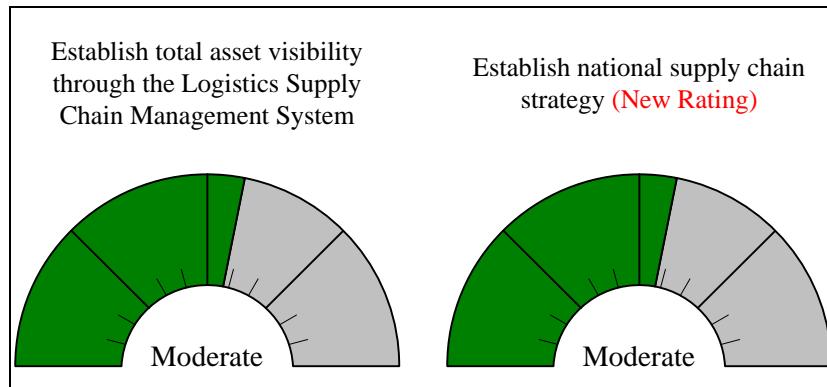
FEMA's logistics responsibilities include acquiring, receiving, storing, shipping, tracking, sustaining, and recovering commodities, assets, and property.

LMD's ability to track commodities is one of the keys to fulfilling its mission. The disasters of 2004 and 2005 highlighted inconsistencies stemming from multiple, independent computer and paper-based systems and highlighted a need for standardized policies and procedures.

After Hurricane Katrina, FEMA identified areas for improving its end-to-end supply chain and established the Total Asset Visibility (TAV) program to implement processes and automate the flow of commodity information.

FEMA management is focused on improving the logistics core competencies to a level that will respond effectively and efficiently to a catastrophic disaster. We assessed two critical areas to measure FEMA's progress to:

- Establish total asset visibility through the Logistics Supply Chain Management System (LSCMS); and
- Establish a national supply chain strategy.



Critical Components

Establish total asset visibility through the Logistics Supply Chain Management System (Moderate) – Prior to 2004, FEMA had invested in multiple systems to support its unique inventory needs, but they were not integrated and were duplicative. In response, FEMA began to implement the TAV program in FY 2005. Since implementation, TAV has undergone two phases of development.

TAV-Phase 1 was a pilot program that involved improving the visibility of select assets for two FEMA regions and distribution centers supporting the hurricane-prone Gulf Coast states. This phase of TAV was deployed in time to support the 2006 hurricane season and to allow FEMA to begin integrating modern logistics processes and applications with existing FEMA processes. At the end of FY 2009, FEMA transitioned from TAV-Phase 1 to the LSCMS (TAV-Phase 2). LMD implemented a number of LSCMS milestones during the current fiscal year, including:

- Wireless Enterprise Procurement - wireless package;
- Warehouse Management - functional design; and
- Trading Partner Management - development.

According to FEMA, every element of LSCMS is fully functional but not completely implemented. The entire application is scheduled to be implemented by the end of calendar year 2010.

LSCMS is expected to be interoperable with federal, state, county, municipal, tribal government, and nongovernmental organizations' disaster management supply chain processes and systems. The final product and implementation will encompass all aspects of FEMA operations, including inventory management, requisitions, order management, fulfillment, shipping, transportation management, situational awareness and reporting, and retrograde processes.

New LSCMS initiatives include change management, training, acceptance, and accountability. Officials said that FEMA is addressing change management across all ten regions by increasing communications throughout FEMA and by providing role-based training.

Establish a national supply chain strategy (Moderate) – During a disaster, when state and local governments' capabilities are exceeded, the state may request FEMA's assistance. The specific type and quantity of commodities and support assets needed will vary, but experience indicates that some common needs include water (usually bottled), emergency meals, cots, blankets, tarps, and generators.

FEMA has determined that pre-positioning commodities is neither logically prudent nor an effective use of taxpayer funds. FEMA has focused on eliminating potential waste by:

- Changing LMD business practices and procedures;
- Strengthening public and private sector solutions and relationships with partners such as the Defense Logistics Agency, U.S. Army Corps of Engineers, American Red Cross, and GSA; and
- Implementing a continuous process review and developing standard operating procedures at all FEMA Distribution Centers.

To develop a more responsive, flexible, and sustainable supply chain management strategy, LMD established the following workgroups:

- The Distribution Management Strategy Working Group (DMSWG) supports LMD as the National Logistics Coordinator, which collaborates with other federal agencies, public and private sector partners, nongovernmental organizations, and other stakeholders, ensuring a fully coordinated and effective service and support capability. The outcomes associated with this effort include addressing an excess capacity distribution strategy.
- The Resource Management Group, a component of the DMSWG, focuses on coordinating collaborative logistics and sourcing decisions.
- The Commodity Group, also a component of the DMSWG, focuses on sourcing strategy and defining inventory levels throughout the logistics disaster response partner community.

FEMA supported the United States response to the 2010 Haiti earthquake within 72 hours and provided water, meals, cots, blankets, tarps, plastic sheets and Joint Field Office kits. FEMA coordinated and moved more than 190 tractor-trailers of supplies to support the disaster response.

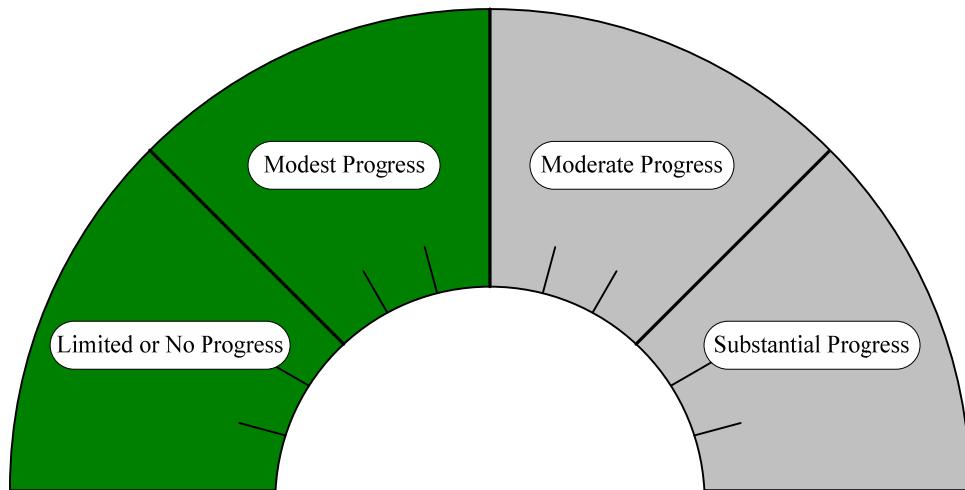
Continuing Concerns

FEMA personnel said that two of the primary challenges to improving the LSCMS business process are retaining sufficient staffing and implementing change management across all ten regions. Although LSCMS has been available, the primary methods of information transfer continued to be email, phone calls, and spreadsheets. Customer satisfaction surveys from 2008 and 2009 show low systems usage among logistics professionals in the field.

FEMA has improved its logistics systems and processes; however, LSCMS is not yet fully implemented and may not be fully effective until disaster response personnel have adopted all aspects of the new business process, as discussed in our recent report.¹⁴

¹⁴ *FEMA's Logistics Management Process for Responding to Catastrophic Disasters* (OIG-10-101), July 2010.

Evacuations

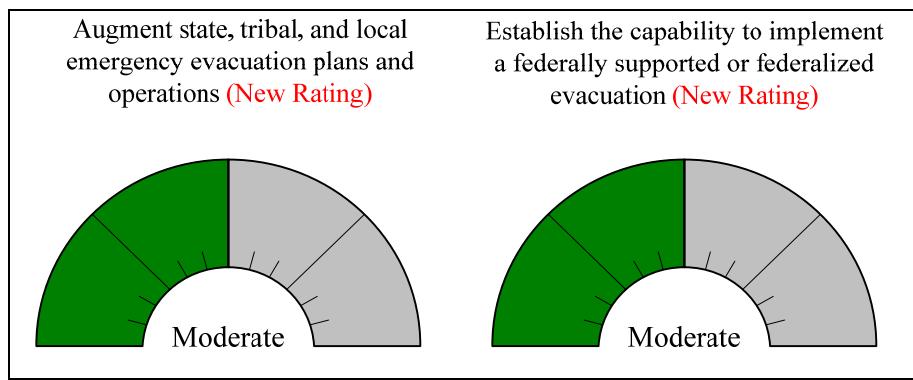


Background

Emergency evacuations are the responsibility of state and local governments. However, if state and local emergency management systems become overwhelmed, FEMA has several specific responsibilities. According to the National Response Framework's Mass Evacuation Incident Annex, FEMA will: (1) primarily augment state, tribal, and local government plans and operations; and (2) be capable of implementing a federally supported or federalized evacuation. FEMA is responsible for providing direction, guidance, and technical assistance on state and local evacuation plans that contain integrated information on transportation operations, shelters, and other elements of a successful evacuation. FEMA is also required to work with state, tribal, and local authorities to support contraflow planning, where the normal flow of traffic is reversed to aid in an evacuation, and is responsible for ensuring that adequate resources are available for evacuation efforts.

Our 2008 report assessed two specific initiatives involving evacuations: (1) the Gulf Coast Mass Evacuation Capability Enhancement Initiative; and (2) the Gap Analysis Program. For this report, we expanded our focus to include FEMA's full responsibilities and authorities outlined in the Post-Katrina Act. We reviewed FEMA's efforts to:

- Augment state, tribal, and local emergency evacuation plans and operations; and
- Establish the capability to implement a federally supported or federalized evacuation.



Critical Components

Augment state, tribal, and local emergency evacuation plans and operations (Moderate) – We assessed FEMA’s progress in this area, focusing on the Gulf Coast Mass Evacuation Capability Enhancement Initiative, the Gap Analysis Program, the Catastrophic Disaster Planning Initiative, and evacuation planning workshops sponsored by FEMA. Through these initiatives and others, FEMA has worked with at least 35 states and territories on evacuation planning since 2008.

FEMA launched the Gulf Coast Mass Evacuation Capability Enhancement Initiative in 2007 to develop an organized plan for evacuating the Gulf Coast region and to have state-to-state agreements in place for transporting and sheltering evacuees. Evacuations in response to Hurricane Gustav in 2008 demonstrate that FEMA’s efforts are having an impact. During the response, 15,000 Louisiana residents were transported by bus to shelters in evacuee host states; 2,025 were relocated by rail to Tennessee; and 5,050 were flown to Arkansas, Kentucky, or Tennessee.

The initiative has continued with the expanded goal of developing regional hurricane operations plans and federal support plans for several states. FEMA officials provided the Texas and Louisiana Federal Support Plans, the Arkansas Aviation Operations Plan, the South Carolina Motor Coach Evacuation Concept of Operations Plan, and the FEMA Region VI 2009 Hurricane Contingency Plan as evidence of progress in this area.

The Gap Analysis Program was designed to improve operational readiness by reducing response and recovery capability shortfalls throughout all levels of government. The 2008 Gap Analysis, which included an analysis of evacuation capabilities in 19 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands, indicated that 5 states have no gaps and would not require federal assistance. FEMA is working with other states to mitigate gaps that were identified. For example, one state needs federal assistance to evacuate 17,000 residents with special medical needs. FEMA, the Department of Defense, and the state developed a draft Air Evacuation Plan to mitigate this gap.

The 2009 Gap Analysis is not as informative as the 2008 analysis, because data collection was suspended in response to a moratorium issued by the FEMA Administrator, as discussed in previous sections. FEMA officials said that states can now use their tool of choice to assess capabilities. FEMA is continuing to use previously collected data to determine evacuation staffing estimates, and FEMA's regional planners continue working with the states.

FEMA's Catastrophic Disaster Planning Initiative is designed to conduct analyses and develop plans for mass evacuation, sheltering, and response to catastrophic disasters. In April 2009, GAO reported that FEMA had engaged in significant planning efforts regarding threats that are specific to certain regions, such as hurricanes and earthquakes, through this initiative, but that planning efforts were ongoing and had not been concluded.¹⁵ Examples of catastrophic disaster plans that incorporate evacuation plans include Northern California and Southern California Catastrophic Earthquake Plans, a Hawaii All-Hazards Concept Plan, and a New Madrid Seismic Zone Catastrophic Earthquake Contingency Plan.

FEMA officials said that planning for the New Madrid Seismic Zone Catastrophic Earthquake will be complete this year. Planning efforts included earthquake response capability assessments for each of the eight New Madrid Seismic Zone states and planning sessions with the counties and states through FEMA-supported workshops. Representatives of federal, state, tribal, local, and county emergency management and responder organizations, as well as the private and nonprofit sectors, participate in these workshops.

FEMA has also conducted a series of workshops in support of evacuation planning. For example, in January 2009 FEMA held a Gulf Coast contraflow evacuation workshop for federal and state entities to review hurricane contraflow evacuation operations throughout the Gulf Coast region. FEMA also plans to conduct a workshop in 2010 to support state and regional planning efforts for a mass evacuation.

Establish the capability to implement a federally supported or federalized evacuation (Moderate) – A large-scale federally supported evacuation has not been needed since Hurricane Katrina, but FEMA has provided evacuation support to state, tribal, and local governments during recent incidents, including hurricanes Gustav and Ike. FEMA is also finalizing a national system for states to track evacuees. Additionally, FEMA published a Mass Evacuation Incident Annex in June 2008. However, the Operational Supplement to the Annex that is intended to provide additional guidance for mass evacuations has not yet been finalized.

¹⁵ National Preparedness, FEMA Has Made Progress, but Needs to Complete and Integrate Planning, Exercise, and Assessment Efforts (GAO-09-369), dated April 2009.

According to a senior FEMA official, the Gulf Coast Evacuation Plan was successfully implemented in 2008 during Hurricane Gustav to evacuate residents from New Orleans using air, bus, and rail transportation. Residents considered this evacuation more orderly and better organized than the evacuation for Hurricane Katrina. Former FEMA Administrator David Paulison pointed out that FEMA had altered its procedures to avoid repeating errors made during Hurricane Katrina. During Katrina, buses and ambulances did not arrive until after the storm made landfall. FEMA now has in place prearranged contracts for ambulances and other emergency transportation services.

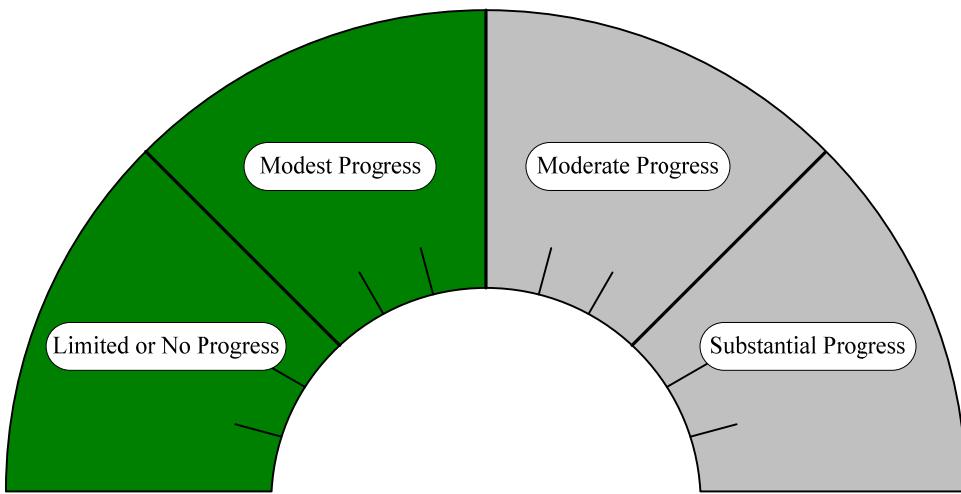
A senior FEMA official reported to Congress in February 2009 that FEMA is now much better prepared to coordinate medical special needs evacuations with the Department of Defense, the Department of Health and Human Services, and state governments. For Hurricane Gustav, FEMA reported that more than 600 prearranged ambulances were available to Louisiana, and that special Department of Defense aircraft were deployed to help evacuate critically ill patients. FEMA also activated its ground and air ambulance evacuation services contract and its contract with Amtrak. For Hurricane Ike, federal assets were standing by prelandfall to support air evacuations. More than 400 Transportation Security Administration personnel also deployed to assist with planned evacuations.

FEMA began developing a National Mass Evacuation Tracking System to track individuals as they arrive at or depart from certain locations, such as shelters. However, funding for system development was cut in 2008 and development did not resume until the spring of 2009. Several states and cities are testing the system, and FEMA officials stated that it will be ready by the 2010 hurricane season. FEMA is offering the system to states free of charge; however, FEMA cannot compel states to use the system.

Continuing Concerns

FEMA has made progress in both critical areas, but its preparedness to support a regional or large-scale evacuation outside the Gulf region remains a concern. FEMA has augmented state and local evacuations planning and operations and enhanced its own capabilities to implement a federally supported evacuation. However, FEMA officials said that they need more staff and funding for the Planning Division, and we are concerned that the Operational Annex to the Mass Evacuation Incident Annex in the National Response Framework has not been completed.

Housing



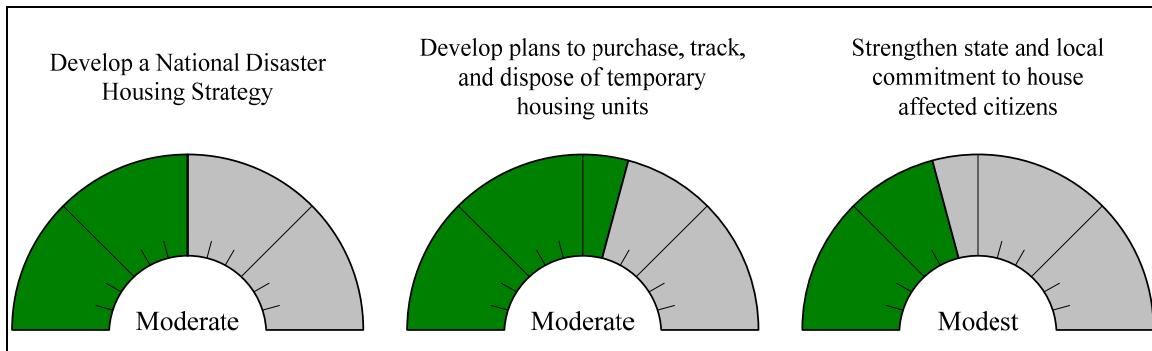
Background

In a presidentially declared disaster, FEMA administers the temporary housing response for individuals and households. Disaster housing assistance may include the use of financial resources and direct support from FEMA and other federal agencies; local, tribal, and state governments; and voluntary agencies. In the past, FEMA was criticized for its inability to provide immediate, short-term housing assistance to disaster survivors and to transition people needing it to more permanent forms of housing. As a result of congressional legislation, FEMA developed and released the National Disaster Housing Strategy to guide future disaster housing assistance efforts.

Since our 2008 report, FEMA has made strides toward implementing a comprehensive strategy for managing disaster housing resources. However, limited federal, state, and agency coordination; constant housing plan revisions; and limited federal funding have hindered final National Disaster Housing Strategy implementation efforts.

Overall, FEMA disaster housing progress is rated as moderate; however, we anticipate additional progress as FEMA continues to refine and implement its future housing strategy and mission. We reviewed FEMA's current progress in three critical housing components:

- Develop a National Disaster Housing Strategy;
- Develop plans to purchase, track, and dispose of temporary housing units; and
- Strengthen state and local commitment to house affected citizens.



Critical Components

Develop a National Disaster Housing Strategy (Moderate) – In response to the Post-Katrina Act, FEMA released the National Disaster Housing Strategy in January 2009. The strategy was developed as a combined effort of FEMA and its federal partner agencies, and incorporated feedback from volunteer organizations, private sector businesses, and individuals. The strategy summarizes FEMA’s disaster housing process, including sheltering and housing capabilities, principles, and policies. It outlines a number of potential housing programs that can assist disaster survivors in finding interim housing. In September 2009, we issued a report stating that the National Disaster Housing Strategy is a positive yet interim step forward.¹⁶

The strategy has several components. First, it requires the creation of a National Disaster Joint Housing Task Force. The task force is charged with developing a Disaster Housing Implementation Plan that translates the strategy’s goals into measurable actions and milestones; a Comprehensive Concept of Operations that integrates and synchronizes existing housing capabilities across all levels of government, nongovernmental organizations, and the private sector; and a Catastrophic Concept of Operations that addresses the unique requirements for a large-scale disaster. A current example of a unique disaster requirement would be the American Samoa permanent housing construction pilot program, which was developed as a result of the September 29, 2009 tsunami that struck American Samoa.

OMB approved the Disaster Housing Implementation Plan on March 16, 2010. The Comprehensive Concept of Operations is scheduled to be completed and released immediately following the release of the National Disaster Recovery Framework.

FEMA has also developed a Non-congregate Housing Program that uses hotels and motels or federally owned unoccupied housing units as a sheltering resource.

¹⁶ *Management Advisory Report: FEMA’s Housing Strategy for Future Disasters* (OIG-09-111), September 2009.

Each option has unique challenges. FEMA has a contract to place disaster survivors in an average of 1,250,000 hotel or motel rooms per night for an extended period. The program allows for sheltering a maximum of 500,000 disaster-affected households after a catastrophic event. However, the program's success depends on leveraging the full capabilities of the federal government along with state and local governments, the private sector, community members, and the disaster survivors. An additional constraint to this program is the unknown readiness and availability of FEMA-identified hotel/motel sheltering option components. Nationwide, FEMA has identified approximately 46,715 federally owned unoccupied housing units. These units are readily available; however, this option has potential unit habitability and readiness concerns. Disaster survivors must be willing to relocate to areas where housing is available, and states must agree to accept these survivors.

Develop plans to purchase, track, and dispose of temporary housing units (Moderate) – Since 2008, FEMA has developed extensive plans to purchase, track, and dispose of temporary housing units.

Numerous concerns arose over FEMA's use of travel trailers after Hurricane Katrina. In March 2009, FEMA testified that it will consider the use of travel trailers only as a last resort.¹⁷ However, FEMA will consider a state's specific request for travel trailers during extraordinary disaster conditions when no other forms of interim housing are available. FEMA managers will apply the following conditions: (1) Travel trailers may be authorized only for use on private property; (2) FEMA will not authorize travel trailers for use in group sites; (3) FEMA will authorize travel trailer use for a maximum of 6 months' occupancy, and only when the level of damage to the occupant's predisaster dwelling can be repaired in less than 6 months; (4) FEMA will provide travel trailers that are within formaldehyde levels the state has determined to be acceptable; and (5) FEMA will provide units with air exchange controls that meet or exceed FEMA specifications.

In light of the decision to consider travel trailers as a last resort housing option, FEMA has been assessing new and innovative forms of temporary alternative housing through several programmatic actions. In 2006, Congress appropriated \$400 million for a FEMA-operated 4-year Alternative Housing Pilot Program. Through an interagency agreement with the Department of Housing and Urban Development, this program is designed to identify and evaluate better ways to house disaster survivors. For example, in Texas, FEMA has developed a housing unit that can be assembled in less than 10 hours and can be stored flat for reuse.

¹⁷ Written testimony of Nancy Ward (then Acting Administrator of FEMA). The title of the hearing: "A New Way Home: Findings from the Disaster Recovery Subcommittee Special Report and Working with the New Administration on a Way Forward" before the Ad Hoc Subcommittee on Disaster Recovery, Committee on Homeland Security and Governmental Affairs, United States Senate. Washington, DC, March 18, 2009.

A final report to Congress on the Alternative Housing Pilot Program is due December 31, 2011.

In 2008, FEMA awarded provisional contracts to seven alternative housing manufacturers to install temporary housing units for students attending classes at FEMA's National Emergency Training Center in Emmitsburg, MD. The Recovery Division's Joint Housing Solutions Group continues to monitor and evaluate each unit for future suitability to house disaster survivors.

For FY 2010, FEMA has a baseline inventory of 4,000 ready-for-dispatch temporary housing units. In January 2010, FEMA began an effort to sell more than 101,000 excess temporary housing units through GSA online auctions.¹⁸ When the GSA auction closed on January 29, 2010, FEMA had sold most of its excess inventory; however, bidders are still in the process of removing the housing units. By the end of 2011, FEMA is scheduled to close all supporting storage sites.

Strengthen state and local commitment to house affected citizens (Modest) – Since 2008, FEMA has developed two approaches to strengthen how state and local governments assist disaster survivors with temporary housing. However, each approach has specific limitations, such as insufficient numbers of experienced disaster housing staff, limited federal and state funding, and poor coordination with state and local governments.

In its Disaster Housing Practitioner's Guide, FEMA said that each state should create and maintain a standing disaster housing taskforce. FEMA will assist states by providing best practices information, operational guidance, and a standardized housing plan template that can be tailored to unique disaster housing needs. In 2007, the first State-Led Disaster Housing Taskforce was convened in response to the California wildfires. FEMA sent headquarters-based subject matter experts to provide technical support when disasters struck American Samoa, Iowa, Louisiana, and Texas. However, FEMA has only limited headquarters and regional staff to fully execute an expert-based disaster housing mission for every disaster. Typically, states do not have disaster housing experts. FEMA officials told us that additional federal funding is needed to develop the federal and state disaster housing expertise.

Also, the Housing Strategy stated that when it is necessary to build temporary group housing sites, state and local government are responsible for identifying public land that is suitable for a group site or, when publicly owned land is unavailable, for identifying other sites for FEMA to lease. In this case, FEMA emphasizes the role of state and local governments in providing shelter for their

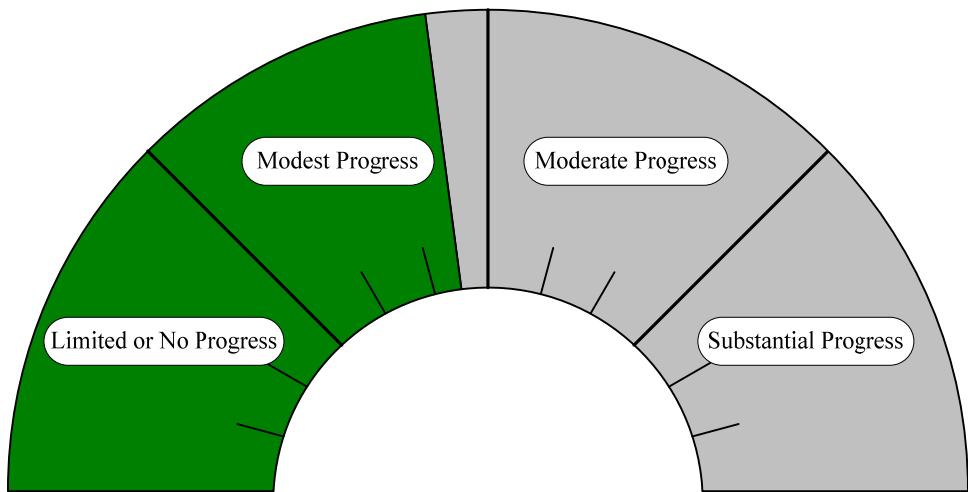
¹⁸ In response to hurricanes Katrina and Rita in 2005, FEMA purchased 143,699 temporary housing units for a total price of over \$2.6 billion, an average of more than \$18,000 per unit. As a result of the 2010 GSA auctions, more than 101,000 of these excess units were sold at an average price of \$1,309 per unit.

residents. Given the current budget climate, some state and local governments may not fulfill these responsibilities; FEMA will need to encourage the state and local role in developing and implementing housing solutions.

Continuing Concerns

Since 2008, FEMA has made moderate progress toward developing a comprehensive National Disaster Housing Strategy. However, we are concerned that FEMA has not clearly defined its roles and responsibilities with regard to the long-term housing needs of disaster survivors (i.e., beyond the standard 18 months of assistance).

Disaster Workforce



Background

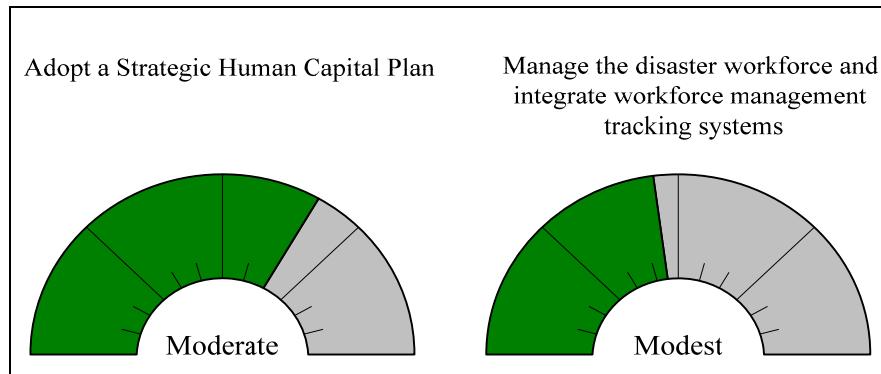
The need for a trained, effective disaster workforce is one issue mentioned consistently in reports regarding FEMA's response to Hurricane Katrina. FEMA's disaster workforce consists mainly of reservists who serve temporarily during a disaster. FEMA struggled to provide adequate numbers of staff in response to Hurricane Katrina and did not have the automated support needed to deploy more than 5,000 disaster personnel on short notice. New hires did not receive adequate training during FEMA's accelerated orientation process, and FEMA did not have a central training records management system. The shortage of qualified staff for key positions responding to Hurricane Katrina negatively impacted the effectiveness of FEMA's response and recovery operation.

The Post-Katrina Act provides for rebuilding FEMA's permanent and reserve workforces through tools such as a strategic human capital plan, structured career paths, and recruitment and retention bonuses. The act also requires a plan to establish and implement a surge workforce, including an adequate number of trained personnel to meet specific response team capabilities.

As FEMA and DHS have evolved, the disaster workforce structure and systems have not kept pace. Since 1992, FEMA has initiated 12 studies to look at the use and structure of its disaster workforce; however, FEMA has not implemented all of the recommendations from those studies.

We reviewed two critical areas identified as weaknesses after Hurricane Katrina to assess FEMA's efforts to:

- Adopt a Strategic Human Capital Plan; and
- Manage the disaster workforce and integrate workforce management tracking systems.



Critical Components

Adopt a Strategic Human Capital Plan (Moderate) – In May 2008, FEMA published the “Strategic Human Capital Plan 2008–2012,” which established FEMA’s plans for staffing standards, a restructured workforce composition, new core competencies, and professional development.¹⁹ This is FEMA’s first official plan for managing, strengthening, and building a forward-leaning workforce. The strategic plan includes five key strategic initiatives aimed at recruiting and maintaining a strong, competent, and credible workforce:

- Understanding the composition and character of the workforce;
- Rightsizing the agency;
- Building core competencies;
- Training and professionally developing the workforce; and
- Building the culture of the new FEMA.

Our 2008 report stated that FEMA completed an assessment of its legacy Disaster Assistance Employee program and published the report *FEMA: A New Disaster Reserve Workforce Model*. The report included 25 recommendations, and FEMA management identified 9 recommendations that would produce the greatest positive near-term effects (see table 1). The remaining 16 recommendations would be incorporated as a result of completing the first 9 or implemented over a longer period.

¹⁹ *FEMA Strategic Human Capital Plan 2008–2012* (FEMA P-692), May 2008.

Table 1. Top Nine Recommendations from FEMA: A New Disaster Reserve Workforce Model

Recommendation	Status
New Office of FEMA Reserves Organization	Completed
Office of FEMA Reserves Management Positions	Completed
Cross-Functional Strategic & Operational Plans	Completed
Policy Development and Compliance	Completed in Part
Policy Communication and Development Processes	Completed in Part
Position Specific Training and Credentialing Requirement	Completed in Part
Reserve Workforce Planning Tool	Completed in Part
Decision-making Structure	Completed in Part
Standard Reservists Levels	Completed in Part

Source: *FEMA: A New Disaster Reserve Workforce Model*.

In September 2008, Disaster Reserve Workforce Division staff established an ad hoc working group with counterparts in the Transportation Security Administration and the U.S. Citizenship and Immigration Services to develop a concept of operations for the Surge Capacity Force described in section 624 of the Post-Katrina Act. The first draft of the concept of operations was completed in December 2008. Senior FEMA and DHS management have not approved the draft plan.

Manage the disaster reserve workforce and integrate workforce management tracking systems (Modest) – FEMA: A New Disaster Reserve Workforce Model recommended that FEMA establish a director-level office to improve the effectiveness and efficiency of professional operations and address disaster reserve workforce challenges. In response to this recommendation, FEMA launched the Disaster Reserve Workforce Division (DRWD) in FY 2008. A key aspect of DRWD's mission is to assist in credentialing and deploying FEMA's full-time workforce and Disaster Reserve Workforce. As of March 2009, the Disaster Reserve Workforce consists of 21 cadres located in all 10 FEMA regions and at FEMA headquarters. FEMA has 7,995 registered disaster reservists, of whom 1,322 are immediately deployable.

In June 2008, DRWD launched an agency-wide credentialing effort, which resulted in the creation of FEMA's Credentialing Program. The program is responsible for the design and implementation of a plan to standardize the recruiting, training, and credentialing of FEMA's Disaster Reserve Workforce. In April 2009, FEMA developed the Agency-Wide Disaster Workforce Credentialing Plan, which contains the required processes that all cadres must implement in order to ensure that FEMA applies a consistent and fair process to

credential each cadre member.²⁰ Before the program was developed, disaster workforce responsibilities and approaches were not standardized, resulting in inconsistent quality and efficiency in delivery of services.

The Credentialing Program consists of 21 cadres. FEMA reported the following results:

- Eleven cadres have a complete and approved Cadre-Specific Plan (CSP). Five of these eleven cadres have migrated to the existing credentialing framework;
- Six cadres have a complete CSP that awaits approval; and
- Four cadres have begun the initial planning in order to credential their disaster workers under the FEMA Qualification System.

FEMA estimates that half of the Disaster Reserve Workforce will be credentialed by the second quarter of FY 2012 and all will be fully credentialed by FY 2013. Half of the full-time workforce will also be credentialed by FY 2013 and the rest by FY 2014.

Even with the credentialing plans in place, training of newly hired disaster professionals continues to be a major challenge. FEMA's Emergency Management Institute (EMI) has developed training courses consistent with the requirements in the credentialing plans but is still relying on the old model of training staff during deployment.²¹ FEMA attributes this to EMI's training schedule, which is booked one year in advance. To further address training, FEMA is developing an orientation program and related materials to instruct newly hired disaster staff on standards of conduct, ethics, Equal Employment Opportunity, and other topics. FEMA expects to complete and disseminate the Disaster Assistance Employee orientation program by the end of FY 2010.

DRWD uses the Automated Deployment Database (ADD) to identify and maintain a record of the personnel deployed during disasters, with Web ADD serving as its online interface. However, the use of Web ADD was suspended because it did not adequately monitor employee deployment readiness, length of deployment, or location, limiting FEMA managers' ability to supervise the Disaster Relief Workforce. The inability to manage deployment information hinders the ability of FEMA staff to manage deployment and disaster activities.

²⁰ FEMA Agency-Wide Disaster Workforce Credentialing Plan (April 2009).

²¹ EMI is FEMA's training institution in Emmitsburg, MD.

Continuing Concerns

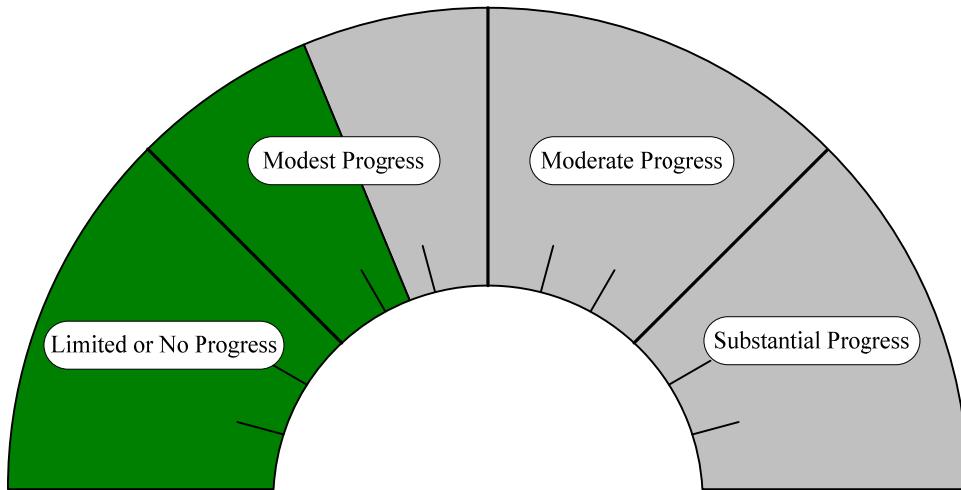
The DRWD is seeking to develop a new system to replace Web ADD and has tasked a contractor with performing a functional requirements analysis. The DRWD expects to have identified either a commercial-off-the-shelf or government-off-the-shelf product by spring 2011.

Training courses consistent with the Credentialing Program will not be offered until FY 2011, and the new-hire orientation program is still under development. Deployed staff will have to rely on field training until EMI offers the new training courses.

The FEMA workforce has undergone tremendous transformation stemming from changes in national laws, policies, and mission focus. The workforce has also experienced significant growth in size, workload, and composition to support increasing demands, changing processes, and advancing technologies. As a result, Congress determined that a baseline assessment of FEMA's current federal workforce, including all disaster reservists, was warranted. In the last quarter of FY 2009, FEMA partnered with the Homeland Security Studies and Analysis Institute (HSSAI) and launched an agency-wide Integrated Strategic Workforce Planning Initiative to develop a capabilities-driven workforce planning effort designed to create the FEMA of the 21st century and beyond. The HSSAI assessment, which is the first phase of that initiative, assesses FEMA's workforce in both steady state (normal day-to-day operations) and disaster situations (when responding to an active disaster).²² The results of this assessment were provided to Congress in May 2010. We will continue to review and assess this important initiative.

²² HSSAI, *Federal Emergency Management Agency Workforce Baseline Assessment* (RP09-55-04), March 31, 2010.

Mission Assignments



Background

FEMA is responsible for coordinating the urgent, short-term emergency deployment of federal resources to address threats and for stewardship of the associated expenditures from the Disaster Relief Fund. FEMA uses mission assignments (MAs) to request disaster response support from other federal agencies.²³ Past audits and reviews of MAs have concluded that FEMA's management controls were generally not adequate to ensure that:

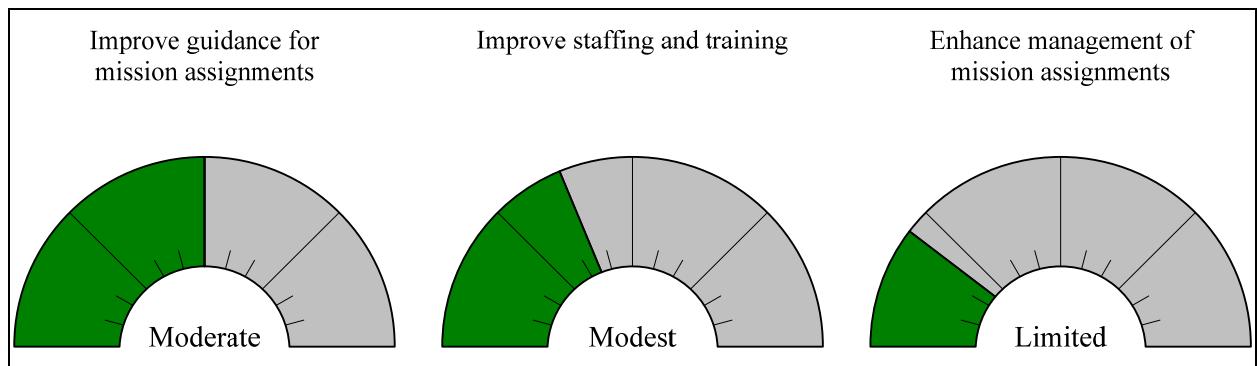
- Deliverables (missions tasked) met requirements;
- Costs were reasonable;
- Invoices were accurate;
- Federal property and equipment were adequately accounted for or managed; and
- FEMA's interests were protected.

In our 2008 report, of all the areas reviewed, this area needed the most improvement. At that time, FEMA had initiated an ambitious project to reengineer the processes, relationships, and resources involved in managing MAs. An intra/interagency Mission Assignment Working Group (MAWG) was formed to review MA processes and procedures and develop recommendations for the management of MAs. This group developed processes, policies, and procedures that have increased FEMA's MA effectiveness.

²³ A mission assignment is a work order issued by FEMA to another federal agency that directs the completion of a specific task to meet urgent, immediate, and short-term needs. The assigned federal agency must complete the mission assignment within 60 days after the declaration, unless FEMA extends the authorized performance period. Mission assignments can include a number of goods and services from a variety of agencies, ranging from emergency meals and water to mobile communication teams and medical evacuation of patients.

We reviewed three critical components to assess FEMA's efforts to:

- Improve guidance for mission assignments (i.e., regulations, policies, and operating procedures);
- Improve staffing and training; and
- Enhance management of mission assignments.



Critical Components

Improve guidance for mission assignments (Moderate) – FEMA has developed an intranet website for MAs that provides documents and guidance necessary to execute MAs during an emergency. It includes various reference materials, such as policies and procedures, MA authorities, and forms needed to execute MAs.

The “Pre-Scripted Mission Assignment Catalogue” contains 237 pre-scripted MAs.²⁴ An additional 64 are under development. Pre-scripted MAs provide standard “statements of work” and cost estimates developed before an actual emergency or disaster and are used to quickly execute MAs with other federal agencies. The pre-scripted MAs cover capabilities that are outside an agency’s regular or emergency authority, and involve known or frequently used resources.

Not all MAs have pre-scripted language, as each disaster has unique requirements. FEMA developed a standard operating procedures manual for MAs that outlines policies, procedures, and processes used to collaborate with other federal agencies and organizations when responding to disasters. This manual is under revision; the previous version was never issued as final.

Improve staffing and training (Modest) – In FEMA’s latest reorganization, MAs were assigned to the Facilities, Assets, and Contracts Management Branch in the Response Directorate. This Branch not only develops and manages pre-scripted

²⁴ Pre-scripted MAs are prearranged and preapproved agreements between FEMA and other federal agencies to (1) expedite deployment of response assets and (2) allow agencies to be more proactive in moving personnel, equipment, and supplies in anticipation of a disaster declaration.

MA, but is also responsible for the Response Directorate's contract oversight, space and office move management, and equipment and supplies purchase management. While FEMA has increased its MA staffing in the past few years, it relies heavily on contractors to supplement staff during periods of high activity.

FEMA has developed employee task books for three MA positions (MA Manager, MA Specialist, and MA Action Tracker). These task books are posted on FEMA's NRF site. FEMA's training institute offers several courses that are designed for FEMA MA workers and for federal partners often tasked through MAs. However, due to budget constraints, recent course offerings have been cancelled.

Previous reviews have recommended that FEMA establish and invest in MAs as a program area rather than a collateral functional process or duty that comes into play only during an incident response. The development of an MA program office, with a dedicated full-time staff and management team, established budget, and officially delegated authorities and responsibilities, would substantially improve all aspects of the MA process.

Enhance management of mission assignments (Limited) – Managing and accounting for MA resources is crucial to managing the federal response to an incident. FEMA has established MA guidance but still faces challenges in its IT systems.

FEMA has developed but not implemented an electronic action request form.²⁵ MA officials say they are having difficulties finding funding for updating any systems useful in tracking MAs. FEMA currently uses the Enterprise Coordination and Approvals Processing System (eCAPS). This system was designed with a focus on the administrative aspects of documenting, approving, and reporting on MAs, rather than tracking the actual work requested and performed or the status and outcomes of missions.²⁶ Because of the proprietary nature of information presented in eCAPS, FEMA's partners do not have access to this system. Once funding is made available, MA officials hope to move to a system that will allow more flexibility, while securing data. Additionally, other offices with disaster response functions use their own information systems, which do not interface with those used in MA and other offices. MA officials say the need for an integrated IT system hampers their progress in developing into a truly effective enterprise.

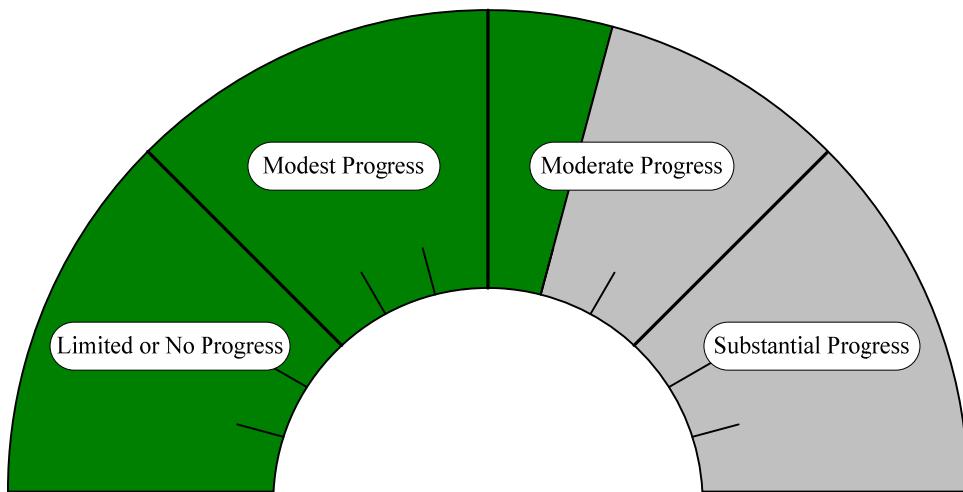
²⁵ This is the system states use during disaster response to request services and goods. The action request form is not standardized throughout FEMA disaster response; each region has developed its own form.

²⁶ *FEMA's Sourcing for Disaster Response Goods & Services (OIG-09-96)*, August 2009.

Continuing Concerns

FEMA management support will be required to implement the MAWG's processes, policies, and procedures. A significant investment of personnel, training, time, and budget resources will be required to begin the reengineering efforts. Most importantly, MA needs to have reliable IT systems that are integrated with its federal partners' systems, so that information is efficiently and effectively shared. After the revised infrastructure has been put into place, an MA program office will need resources to sustain the effort.

Acquisition Management

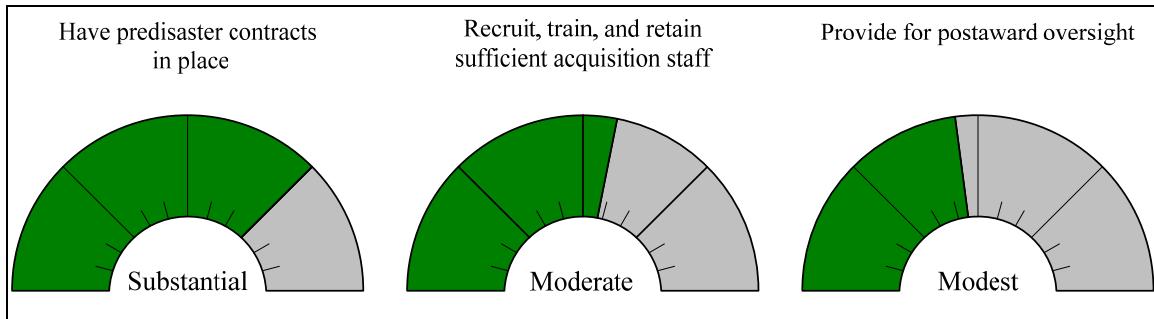


Background

Acquisition management is more than awarding a contract; it is the entire process that begins with identifying and clarifying a mission need and ends with the final closeout of an award. Without good acquisition management, response capabilities are weakened, taxpayer money is often wasted, and public trust in the government falls.

FEMA's acquisition function was heavily tasked in responding to hurricanes Katrina and Rita and suffered from several shortcomings. These shortcomings included a need for predisaster contracts, untrained staff, and insufficient planning for postaward monitoring and oversight. In recent years, FEMA management has focused on developing the acquisition function to a level that can respond effectively and efficiently to another catastrophic disaster. To assess FEMA's progress in this area, we reviewed three critical components:

- Have predisaster contracts in place;
- Recruit, train, and retain sufficient acquisition staff; and
- Provide for postaward oversight.



Critical Components

Have predisaster contracts in place (Substantial) – Awarding contracts before a disaster gives FEMA time to run a full and open competition in order to ensure the best value to the government. Without predisaster contracts in place, FEMA is forced to award contracts on a noncompetitive basis or to less qualified vendors in order to support a prompt response. FEMA’s Office of the Chief Procurement Officer (OCPO) has developed a series of contracts for each of the FEMA directorates needing specific contract support during a disaster. The list of contracts is available on FEMA’s intranet and identifies what specifically is contracted for, the contracting officer’s technical representative (COTR) and contact number, and the responsible OCPO contracting official.

OCPO officials stress the importance of the quality, rather than quantity, of predisaster contracts. Lessons learned from major disasters guide decisions on which contracts are no longer needed and the best sources for goods and services. For example, FEMA strives to avoid competing with cities and states for resources that are available via existing contracts, or for assets that are part of a limited pool, such as ambulances and buses.

OCPO has also created an Acquisition Program and Planning Division, which functions as the primary link between acquisitions and the program areas that generate requirements, to assist with predisaster contracts. This has proven successful, as the program areas now have dedicated contracting support. OCPO needs to issue formal guidance requiring FCOs, contracting officers, and purchase cardholders to use the predisaster contracts when acquiring goods and services.

Recruit, train, and retain sufficient acquisition staff (Moderate) – Currently, OCPO has 214 positions authorized, 137 of which are filled. Finding qualified candidates and filling open positions continues to be a challenge throughout the government. While FEMA and other agencies needing acquisition staff in the GS-1102 job series have received direct hire authorization, all are recruiting from the same pool of candidates for both trainee and experienced staffs. The acquisition staffing shortages have led some agencies to offer higher pay for journey-level staff. This has caused accelerated turnover as staff change agencies for promotions. DHS has implemented an intern program in acquisitions to

increase GS-1102 staff. FEMA has benefited from this program but still needs additional contracting personnel.

Because of competition among agencies that post their openings on usajobs.gov, OCPO is considering using monster.com for posting acquisition openings, especially for regional positions. A problematic software system that caused delays in hiring has been discontinued, and a few new hires are on board and others are expected to be working soon.

Provide for postaward oversight (Modest) – Contracting responsibilities do not end with the issuance of an award. In fact, one of the most important aspects of the job, contract monitoring and oversight, begins after the award has been made. A lack of postaward oversight has been a continuing problem for FEMA.

OCPO's Acquisition Policy and Legislation Division has issued directives and standard operating procedures to provide additional guidance to staff on contract maintenance and monitoring. Policies exist that detail the contents of contract files, outline the process for transferring contract files from one contracting officer to another, and call for internal reviews of contract files.

In September 2009, the FEMA Administrator signed a management directive establishing a COTR Tiered Certification Program, which has resulted in better contractor performance and increased value for taxpayers. The number of trained COTRs has increased from 700 to 1,450 since our last report.

A topic FEMA highlighted in 2008 was the upcoming transition to PRISM as the system of record for contract management. FEMA officials said many existing contracting documentation problems would be corrected once FEMA adopted PRISM as its system of record for contract management. At that time, FEMA was using ProTrac. The PRISM transition did not occur because of a contract protest outside of FEMA's control. Until PRISM can be installed, FEMA continues to use an upgraded version of ProTrac. This version provides FEMA with additional tools to improve contract management, but despite improvement to the available IT systems, FEMA still experiences contract management issues.

Continuing Concerns

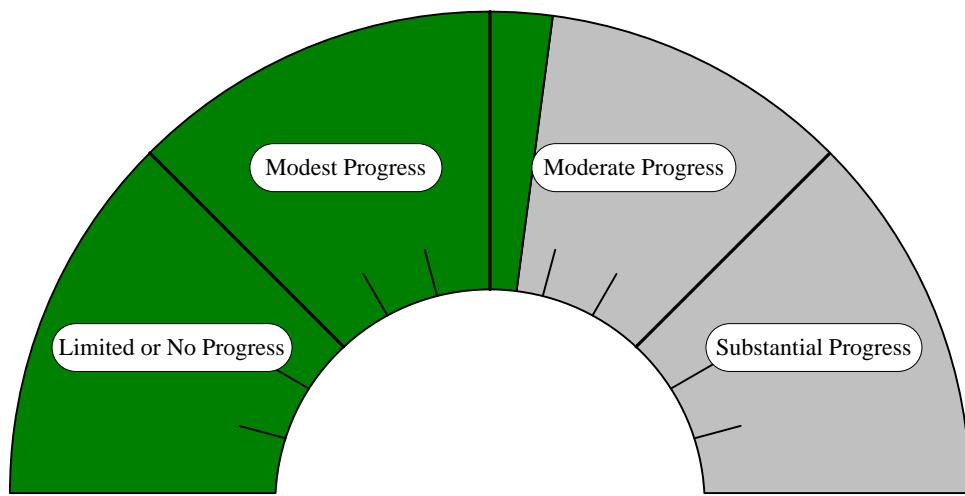
While FEMA has made progress in a number of areas and has improved its acquisition management function, many concerns remain. FEMA said many more predisaster contracts are in place. However, some Joint Field Office officials and contracting personnel still contract separately for the same goods rather than using the established contracts.

OCPO officials acknowledged that hiring continues to be a major concern. The vacancy rate is almost 36%, although the rate is unusually high because of

recently authorized positions and past problems with a software program. There are too few people to meet the government-wide need for acquisition personnel. FEMA is unable to retain experienced personnel, who obtain promotions by moving to other agencies. FEMA-specific incentives are not in place to attract or retain personnel.

Even though OCPO has hired a number of contracting employees, a FEMA official said new contracting personnel often have less than three years of experience. It is critical that FEMA have an effective training regimen for these new employees.

Mitigation



Background

FEMA leads and supports a risk-based, comprehensive emergency management system to reduce the loss of life and property and to protect the Nation from all hazards. Mitigation, considered the cornerstone of emergency management, attempts to prevent hazards from developing into disasters or to reduce the effects of disasters when they occur. The mitigation phase differs from the other phases of emergency management in that it focuses on long-term actions to reduce or eliminate risk from hazards and their effects.

Hazards typically fall into three broad categories: natural, technological, and manmade. Natural hazards are generally associated with weather and geological events, such as floods, hurricanes, tornados, or earthquakes. Technological hazards refer to human activities such as dam and levee construction or the manufacture, transportation, storage, and use of hazardous materials. Manmade hazards are typically associated with criminal or terrorist attacks using weapons such as explosive, biological, or chemical agents.

Mitigating a hazard can involve both structural and process measures. Structural mitigation measures are generally technology-based solutions such as building flood levees and designing new or retrofitting existing buildings to make them more resistant to hazards. Process measures include policy-based measures such as enacting land use ordinances that prohibit residential development in flood-prone areas or requiring hazard insurance for structures susceptible to hurricanes.

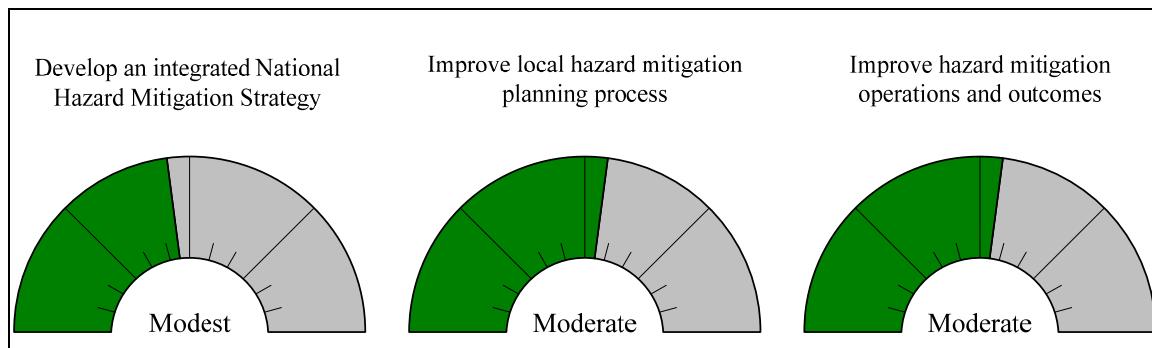
The principal federal statutes guiding disaster mitigation at the state and local levels are the National Flood Insurance Act of 1968 (P.L. 90-448), the Stafford

Act, and the Disaster Mitigation Act of 2000 (P.L. 106-390). The National Flood Insurance Act established the National Flood Insurance Program (NFIP), which encourages local governments to mitigate flood risks through local regulation and financial incentives. The Stafford Act is the country's basic disaster relief law and authorizes disaster programs implemented by FEMA. The Disaster Mitigation Act established the requirement for state and local hazard mitigation plans as a precondition for receipt of federal hazard mitigation project funds.

FEMA's Mitigation Directorate manages a range of programs designed to reduce future losses to homes, businesses, schools, public buildings, and critical facilities from natural disasters. It also provides building design guidance for mitigating multihazard events and promotes state and local multihazard mitigation planning.

To assess FEMA's progress in this area, we reviewed the following critical components:

- Develop an integrated National Hazard Mitigation Strategy;
- Improve local hazard mitigation planning process; and
- Improve hazard mitigation operations and outcomes.



Critical Components

Develop an integrated National Hazard Mitigation Strategy (Modest) – The FY 2010 Quadrennial Homeland Security Review defines broad national objectives for mitigation:²⁷

- Reduce the vulnerability of individuals and families: Improve individual and family capacity to reduce vulnerabilities and withstand disasters.
- Mitigate risks to communities: Improve community capacity to withstand disasters by mitigating known and anticipated hazards.

The challenge for FEMA is to translate these objectives into an integrated national hazard mitigation strategy. Our October 2009 report stated that a coordinated

²⁷ *Quadrennial Homeland Security Review Report: A Strategic Framework for a Secure Homeland*, February 2010.

risk-based, all-hazards mitigation strategy mandated by the Post-Katrina Act had yet to be developed.²⁸ We recommended that FEMA use the established network of mitigation partners along with enhanced collaboration with DHS components, other federal agencies, and private sector stakeholders to develop and implement a risk-based, all-hazards mitigation strategy. FEMA is striving to accomplish this by working through the White House sponsored Long-Term Disaster Recovery Working Group to address pre- and post-disaster all-hazards mitigation. FEMA has also collaborated with the National Emergency Management Association to develop a strategic white paper, *Recommendations for an Effective National Mitigation Effort*, which outlines principles and approaches for hazard mitigation at the national, state, local, and tribal levels.

Improve local hazard mitigation planning process (Moderate) – The Disaster Mitigation Act established requirements for state and local hazard mitigation plans. In the subsequent decade, FEMA has effectively promoted mitigation planning, and as of March 2009, 50 states, 6 territories, 33 tribal governments, and 18,000 local jurisdictions had approved local mitigation plans, covering approximately 77% of the Nation’s population.

The challenge going forward is to improve the quality and impact of this mitigation planning enterprise and, ultimately, to reduce disaster losses and expenditures below what they would have been otherwise. The long-term nature of most mitigation planning makes it hard to measure effectiveness, and FEMA is working with DHS Centers of Excellence and independent researchers to develop better measurement frameworks and tools.

State and local hazard mitigation officials continue to report large gaps in the capacity and will of communities to plan and implement mitigation strategies. One consequence of the lack of local capacity is a costly reliance on external consultants to develop and write hazard mitigation plans. Further, the intent of local planning is to engage local stakeholders in the planning process, because they are in the best position to identify and address local risks and vulnerabilities.

Improve hazard mitigation operations and outcomes (Moderate) – FEMA faces a number of challenges in its efforts to improve hazard mitigation operations and outcomes. The most important challenge is the scope and complexity of the mitigation landscape—literally thousands of entities and individuals must work together in a loosely coordinated effort to achieve nationally significant results. Mitigation stakeholders, including flood plain managers, risk managers, insurers, property developers, homeowners, government officials, environmentalists, and the public at large, bring conflicting priorities and interests to any discussion of mitigation.

²⁸ *FEMA’s Progress in All-Hazards Mitigation* (OIG-10-03), October 2009.

A second major challenge is that FEMA is limited by statute to the promotion of effective mitigation and does not have the authority to compel property owners to mitigate floods or other hazards. This is true even when hazard mitigation appears desperately needed, as in the case of repetitively flooded properties that drain resources from the NFIP.

In the face of these systemic challenges, however, FEMA has achieved a number of mitigation successes, strengthening resilience in communities across the United States. Most important, the NFIP currently has more than 5.6 million policies in force, protecting property owners against building and contents damage from flooding.

More than 21,000 communities across the United States and its territories participate in the NFIP by adopting and enforcing flood plain management ordinances to reduce future flood damage. In exchange, the NFIP makes federally backed flood insurance available to homeowners, renters, and business owners in these communities. Community participation in the NFIP is voluntary. Buildings constructed in compliance with NFIP building standards suffer approximately 80% less damage annually than those not built in compliance. FEMA estimates that \$1.2 billion in flood losses are avoided annually because communities have implemented flood plain management requirements.

In addition to providing flood insurance and reducing flood damages through flood plain management regulations, the NFIP identifies and maps the Nation's flood plains. Mapping flood hazards creates broad-based awareness of the hazards and provides the data needed for flood plain management programs and to actuarially rate new construction for flood insurance.

Although it has achieved significant successes in its 42-year history, the NFIP also faces a number of systemic challenges that pose financial and operational risks to FEMA and the American taxpayer. These challenges, which we, the GAO, and others have discussed in depth include: (1) a lack of geographical balance (68% of policies are written in five states); (2) a lack of financial balance (the NFIP bears the underwriting risk while paying private insurers up to two-thirds of all premium revenue to write policies and process claims); (3) a lack of market penetration (fewer than 50% of property owners nationally in 100-year flood plains carry flood insurance); (4) extreme vulnerability to catastrophic disasters (post-Katrina claims payouts exceeded the total amount of all claims paid in the history of the NFIP from 1978 to 2004); and (5) a lack of consensus and funding among FEMA, the U.S. Army Corps of Engineers, and levee districts regarding how and when to upgrade and accredit levees. The history of the NFIP has shown that these issues are likely to continue to challenge the NFIP and its stakeholders in the years ahead.

Continuing Concerns

Opportunities for improvement can be found in all phases of the mitigation planning and implementation process. These opportunities are generally known to primary mitigation stakeholders at the federal, state, and community levels, but will require focused, systematic effort to achieve. The key for FEMA will be to integrate these diverse stakeholders into the effort, and to coordinate and access the full range of mitigation resources. There are a number of opportunities for improvement, including the following:

- Continue working with the Long-Term Disaster Recovery Working Group, the National Emergency Management Association, and other stakeholders to develop an integrated national hazard mitigation strategy.
- Continue standing up the NFIP Reform Working Group to involve multiple stakeholders in shaping the future NFIP.

Conclusion and Recommendations

FEMA is under increasing pressure to provide more assistance to state, local, and tribal governments whose diminishing resources in tough economic times are quickly overwhelmed by large and catastrophic disasters. It is more important than ever that FEMA be prepared to assist state, local, and tribal first responders.

FEMA has made progress in all of the areas we reviewed, although in some areas this progress has been modest. In a number of other preparedness areas, FEMA identified corrective actions, but implementation has not yet begun. FEMA would benefit from increased oversight of key preparedness areas to ensure that implementation of initiatives is sustained.

The following concerns are common to our review of the critical components:

- The need for more effective coordination with state, local, and tribal governments;
- The need for IT systems that are updated and integrated agency-wide;
- Too few experienced staff to handle the increasing workload; and
- Funding that is not adequate to maintain initiatives; meet the costs of disasters; and recruit, train, and retain staff.

FEMA is an agency that is in a constant state of flux. With so much change, it is often difficult for staff to determine the agency's current priorities. Plans, initiatives, draft guidance, and working groups often, understandably, take a back seat to disaster response and recovery, and momentum toward finalization and implementation of key initiatives is slowed or lost. In light of FEMA's increased involvement in routine disasters, coupled with the recent economic downturn, which has resulted in some state and local governments reducing their emergency management funding, we remain concerned about whether FEMA has sufficient staff focused on planning and preparedness efforts.

We and the GAO have made many recommendations in our audits of FEMA operations that involve the key preparedness areas mentioned in this report. Many of these recommendations remain open. (See appendix C for a list of recent OIG and GAO reports.) We will continue to work with FEMA to ensure that corrective action plans are developed and that progress is made in fully implementing report recommendations. In addition, we plan to report the status of recommendations in our semiannual report.

Our 2008 report, *FEMA's Preparedness for the Next Catastrophic Disaster*, made recommendations that touched on most of the critical areas discussed above. We recommended: (1) improving the agency's overall awareness of its readiness for a catastrophic disaster; (2) developing and sustaining systems to track the progress of major programs, initiatives, and other activities; and (3) regularly sharing reports on the status of such activities with key stakeholders. We reiterate the recommendations, which

remain open, and will continue to work with FEMA to ensure that progress is made toward better preparedness for the next catastrophic disaster.

Management Comments and OIG Analysis

FEMA provided written comments on the draft of this report and concurred with the three recommendations. We consider the three recommendations resolved but open, pending receipt and review of FEMA's corrective action plan. FEMA also provided technical comments, which we have incorporated into the report as appropriate. (FEMA's written comments are in appendix B.)

FEMA provided updated information subsequent to OIG fieldwork, interviews, and message meetings with high-level FEMA officials. While we have incorporated this information where appropriate, we did not validate this additional information or adjust our assessment of FEMA's progress in the ten key preparedness areas.

FEMA provided specific comments in eight of ten preparedness areas. Our analysis of FEMA's comments in three areas is provided below:

Overall Planning: FEMA stated that the draft report does not reflect the full extent to which FEMA's assessment of the nation's preparedness has improved over the last two years. Specifically, FEMA said that we did not mention several reports that it deemed important. However, the reports were not provided, and their importance was not stressed during OIG interviews and message meetings with high-level officials. On page 14 of our draft report, we stated that FEMA was working to complete the draft National Preparedness Report. At the time of our assessment, the draft report was in the clearance phase with OMB.

Also, FEMA said that we should have included the Regional Catastrophic Preparedness Grant Program in our report because the program is a major effort with numerous initiatives focusing on planning for catastrophic events. However, FEMA did not provide documentation to support the implementation of specific program initiatives.

Logistics: FEMA contended that it has made substantial progress establishing a national supply chain strategy, one of the critical components we assessed. With its comments, FEMA provided us with presentations on a tiered sourcing concept and concepts of resource support for the 2009 and 2010 hurricane seasons. We appreciate this additional information. However, even considering this information, FEMA's progress in this area does not rise to the level of substantial implementation. While we acknowledge that numerous working groups and teams have been created to support the national supply chain strategy, full scale implementation of the strategy has not yet occurred.

Evacuations: FEMA noted that the Regional Catastrophic Preparedness Grant Program is designed to support planning for catastrophic events, including evacuation planning. FEMA said that 10 of 11 sites have projects related to evacuation planning efforts for

their regions. However, FEMA has not provided specific documentation supporting implementation of evacuation planning efforts.

Also, FEMA stated that it did not understand why its preparedness to support a regional or large-scale evacuation remains a concern after the successful evacuation in response to Hurricane Gustav. The concern persists for several reasons, including the need for increased staff and funding in the Planning Division, the need to complete the Operational Annex to the Mass Evacuation Incident Annex in the National Response Framework, and the challenges inherent in evacuations of large metropolitan areas.

In addition, FEMA provided comments in five areas: Emergency Communications, Housing, Disaster Workforce, Acquisition Management, and Mitigation. We believe that the report was responsive to FEMA's observations in these areas. FEMA did not provide comments in two areas: Coordination and Support, and Mission Assignments.

We look forward to working with FEMA as corrective action plans are developed to address the recommendations in this report.

Appendix A

Purpose, Scope, and Methodology

We conducted a high-level “scorecard” assessment of FEMA’s preparedness to respond to the next catastrophic disaster. Together with FEMA officials, we identified ten key areas as those most vital to FEMA’s preparedness:

- Overall Planning
- Coordination and Support
- Emergency Communications
- Logistics
- Evacuations
- Housing
- Disaster Workforce
- Mission Assignments
- Acquisition Management
- Mitigation

Within each area, numerous critical actions need to take place before FEMA is sufficiently prepared for a catastrophic disaster. To use our time and resources wisely, we collaborated with FEMA officials to select two to four critical components within each key area. Most of the critical components we assessed in 2010 were the same as in 2008. For a few areas, components were revised based on collaboration with FEMA officials and the current level of agreed-upon importance. We:

- Interviewed FEMA officials to obtain information and supporting documentation;
- Reviewed reports and testimony from our office, GAO, Congress, and others regarding FEMA’s readiness (see appendix C);
- Reviewed documents provided by FEMA, including plans, policies, organization charts, and self-assessments;
- Reviewed applicable laws, such as the Stafford Act (P.L. 100-707), Homeland Security Act (P.L. 107-296), and Post-Katrina Act (P.L. 109-295); and
- Conducted message meetings with FEMA officials from April 29 to May 21, 2010, to discuss review results.

Our ratings for the ten key areas are based on a four-tiered system ranging from “limited or no progress” to “substantial progress.” Throughout this report, we based our ratings on the following criteria:

Limited or No Progress: There is an awareness of the critical issues needing to be addressed, but specific corrective actions have not been identified. Within this phase, interim steps include a problem analysis, discussion of corrective actions, and development of a strategic plan.

Modest Progress: Corrective actions have been identified, but implementation is not yet underway. Within this phase, interim steps include selecting corrective actions, obtaining management approval, planning for implementation, and securing funding commitments from DHS for each action.

Moderate Progress: Implementation of corrective actions is underway, but few if any have been completed.

Substantial Progress: Most or all of the corrective actions have been implemented.

The 2010 ratings were assessed independently from the 2008 ratings.

We used the critical components, as well as our broader knowledge of the key areas, to gauge FEMA's overall progress. For ease of understanding, we used the same rating categories used to rate the critical components within each area; however, we adapted the criteria to present a better picture of FEMA's overall progress. For example, to achieve moderate progress overall, FEMA would have to identify and complete more than a few corrective actions. To achieve a rating of substantial progress overall, FEMA would have to complete most corrective actions in the key preparedness area.

We conducted our review between November 2009 and May 2010 under the authority of the *Inspector General Act of 1978*, as amended, and according to the Quality Standards for Inspections issued by the President's Council on Integrity and Efficiency. Major OIG contributors to the review are identified in appendix D.

Appendix B

Management Comments to the Draft Report

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



AUG 6 2010

MEMORANDUM FOR: Matt Jadacki
Assistant Inspector General
Office of Emergency Management Oversight
Office of Inspector General

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

SUBJECT: Comments on OIG Draft Report, *FEMA's Preparedness for the Next Catastrophic Disaster – An Update*

Thank you for the opportunity to review and comment on the Office of Inspector General's (OIG's) subject draft audit report. As the Federal Emergency Management Agency (FEMA) works toward refining its programs, the OIG's independent analysis of program performance greatly benefits our ability to continuously improve our activities.

We are happy to note that since your report in March 2008, OIG-08-34, *FEMA's Preparedness for the Next Catastrophic Disaster*, we have improved our performance in four of the nine preparedness areas (Emergency Communications, Evacuations, Housing, and Mission Assignments) you chose to evaluate and remained steady in the remaining areas. One new area, Mitigation has been added for this current review. Overall, we are very pleased that you have recognized our efforts and consider this to be a very favorable report.

FEMA concurs with the draft report's three recommendations which are reiterations of those contained in your 2008 report. We have implemented many of the previous OIG recommendations cited in Appendix C of your report and continue to develop corrective action plans for others. Clearly these efforts have led to the improved "scores" recorded in this updated report.

Our following comments, many containing updated information for your consideration when preparing the final report, are organized by the preparedness areas in your report. Technical comments have been provided under separate cover.

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FEMA's Preparedness for the Next Catastrophic Disaster – An Update

Overall Planning

The draft report does not reflect the full extent to which FEMA's assessment of our nation's preparedness has improved over the past two years. For example, in this section the draft specifies the Cost to Capabilities initiative and Gap Analysis Programs (GAP) but does not mention the last three annual State Preparedness Reports, the most recent of which has evolved to a capabilities-based, quantitative self-assessment of each State's preparedness. It also does not reference the draft National Preparedness Report, which is currently in concurrence. These reports demonstrate that FEMA has substantially improved our assessments of capabilities/readiness at the national, state, and local levels.

With respect to the draft report's statement regarding an effort to update the status of catastrophic planning, more current information is now available. Protection and National Preparedness (PNP) has completed a review of the current status of catastrophic planning in all 50 states, six territories/ districts, and 75 of the Nation's largest urban areas. This analysis shows that, while significant progress has been made in core aspects of planning, there remains a gap in planning for the unique issues faced during catastrophic events.

Similarly, with respect to the information about Citizen Corps Councils, more updated information is available. Expanded online data collection tools to assess the activities of Citizen Corps Councils and Community Emergency Response Team (CERT) programs nationwide have been developed and were approved on February 12, 2010 by the Office of Management and Budget (OMB). FEMA is in the process of conducting outreach and technical assistance on the tools and is expecting to launch the tools in September 2010. Once the registration process is complete, anticipated by the end of November 2010, FEMA expects to contact the identified sponsoring organization for an appropriate sample size to verify the Council/CERT program and to confirm the listed point of contact. Expanded data collection will allow FEMA to maintain a greater understanding of both activity levels and challenges facing local councils and CERT programs in the activities they conduct to engage the community in planning for disasters and to prepare individuals and organizations. States will maintain their role in the approval process for re-registered Councils and the CERT Program. By December 30, 2010 FEMA will release a report of the data contained in the new Council and CERT program registries. FEMA believes in the importance of presenting the public with accurate information and will work to ensure the accuracy of the registry data of Citizen Corps Councils and CERT Programs on an ongoing basis.

We also wish to point out that community preparedness is integrated throughout FEMA's primary strategic tools including *The Quadrennial Homeland Security Review (QHSR): A Strategic Framework for a Secure Homeland*, released by the Department of Homeland Security in February 2010. The QHSR offers a vision for a secure homeland and a resilient people where resilience is defined as the need to "foster individual, community, and system robustness, adaptability, and capacity for rapid recovery." The FEMA Administrator's Intent for Building the FY 2012-2016 Future Year Homeland Security Program, also released in February 2010, echoes this theme of integrating participation from all sectors and from the public at large. In addition, the National Protection Directorate (NPD) strategic plan will identify partnerships

throughout the Agency to ensure a “whole of Agency” effort on pre-incident preparedness actions. The NPD strategic plan will incorporate the elements identified in the Community Preparedness Strategic Approach, as well as the 2009 NPD Operating Plan, the FEMA Strategic Plan and other relevant documents. NPD plans to have a strategic plan developed by the end of Calendar Year 2010.

Your draft report also fails to mention the Regional Catastrophic Preparedness Grant Program (RCPGP). This is a major effort underway with 11 Urban Area Security Initiatives to focus on planning for catastrophic events. The RCPGP provides funding and resources for the full-spectrum of catastrophic planning activities. The RCPGP is focused on the local and regional levels of government, and requires a chartered Regional Catastrophic Planning Team to address the challenges faced when planning for these events. Significant progress has been made to date in creating relationships, conducting joint planning, and producing products useful to the participants and the nation at large.

While the Overall Planning Section is rightfully concentrated on PNP, Response Catastrophic Planning efforts have been ongoing and are now a priority of the Administrator and of the Office of Response and Recovery. The following bullets reflect strong progress, continued success, and a path forward towards catastrophic planning by the Response Directorate and its Planning Division:

- Response is currently working to align existing federal response planning initiatives such as the Gap Analysis Program (GAP), catastrophic planning, evacuation planning, and emergency communications planning into a coordinated operational planning effort.
- These planning initiatives are now merged into one Planning Division which will provide technical assistance planning teams to assist with national and regional plan development.
- The Planning Division is working closely with both Logistics and Recovery Directorates.
- The Response Directorate is working with the National Preparedness Directorate to align the grant program initiatives with Regional, State, and local planning.
- In 2010, Response published a document intended to ensure plan consistency. The Regional Catastrophic Planning Guide serves as a “how to” for FEMA regional planners involved in any type of collaborative planning effort with Federal, state, territorial, and tribal partners.
- Our largest catastrophic planning initiative, the New Madrid Seismic Zone, is on target to be completed by September 2010.

Emergency Communications

We submit the following additional information on the Regional Emergency Communications Coordination Workgroups (RECCWGs) referenced in this section of the draft report. These ten Workgroups have been established to address interoperable emergency communications concerns:

- RECCWGs are mandated planning and coordinating bodies responsible for providing a forum to assess and address the survivability, sustainability, operability, and interoperability of emergency communications systems at all levels of government.

- RECCWGs provide insight into regional preparedness efforts by serving as a mechanism for state, local, and tribal agencies to support FEMA and other Federal agencies in defining and integrating emergency communications support during an incident.

Updated information is also available regarding the status of emergency communications plans. To date 31 states and 9 regions have emergency communications plans with 4 more state plans slated to be completed this fiscal year and the one remaining regional plan in its final stages. The remaining state plans will be completed at a rate of 6 per year under the current budget. We are also doing an annex for American Samoa which had not been planned but additional resources were identified to support the Tsunami alert and warning system initiative.

With respect to progress in the emergency communications area, we would point to the Public Safety Interoperable Communications (PSIC) Grant Program, which is administered by the Department of Commerce (DOC) in consultation with Department of Homeland Security (DHS)/FEMA, as a leading example of a Federal program that supports emergency communications activities. More than 90 percent (\$811 million) of PSIC funds were designated by State and local agencies for acquisition and deployment of equipment that will increase emergency communications interoperability. Jurisdictions invested in all frequency bands (specifically, VHF, UHF, 700 MHz, and 800 MHz) and relied heavily on advanced and standards-based (such as Project 25 [P25]) technology, including Internet Protocol (IP), satellite, and video for public safety purposes.

In consideration of the available Federal funding support for emergency communications technology, DHS/FEMA and the DHS Office of Emergency Communication (OEC) opted to maximize the impact of the Interoperable Emergency Communications Grant Program (IECGP) funding by focusing on strengthening state and local governance structures, to enable them to: (a) implement a statewide plan; (b) ensure that those plans align with national goals and objectives; (c) effectively manage large communications projects; and (d) improve emergency communications capabilities.

Logistics

The draft report indicates that FEMA has only made moderate progress since the 2008 audit in establishing a national supply chain strategy. Significant progress has been made on maturation of the national supply chain by building strong partnerships and developing clearly identified sourcing strategies for “routine” through catastrophic events. Consequently it is our position that we have made substantial progress in this area since 2008. All of our efforts have been consistent with the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA) mandate requiring the Administrator to develop an efficient, transparent, and flexible *logistics system* for procurement and delivery of goods and services necessary for an effective and timely response to major disasters, acts of terrorism, and other emergencies and for real-time visibility of items at each point throughout the logistics system. This legislation precipitated the National Logistics Coordinator (NLC) concept that is currently incorporated in the National Response Framework, Emergency Support Function, ESF #7 (Logistics Management and Resource Support), and the accompanying ESF #7 Annex.

Specifically, our national supply chain strategy is based upon a tiered sourcing concept that aligns with the incident magnitude (copy of this information to be provided under separate cover). Our deliberate planning efforts for effective supply chain support begin with our Regional Planning Assistant Team (RPAT). This team consists of Headquarters Logistics Planners who are individually assigned to each of our ten regions. The team works through our regional Logistics Chiefs, who work with their respective states to develop regional logistics support requirements. Once developed, the Resource Management Group (RMG), as mentioned in the OIG report, develops the definitive sourcing plan for each state. Both our 2009 and 2010 Hurricane Season Concept of Resource Support Briefs (copies to be provided under separate cover) are the direct outcomes of this process. Additionally, this concept was used to support two of the most challenging supply chain scenarios since Katrina, Haiti and Samoa. As described in the FEMA Tiered Sourcing Strategy/Planning document, the total cost of 2008 logistics support (including Hurricanes Gustav and Ike) exceeded \$1 billion and 2009 (including the American Samoa Tsunami) over \$42 million. The complexity, scale and efficiency of service and support provided during 2008 and 2009, could not have been accomplished without a highly effective national supply chain strategy.

Additionally, this report should note and emphasize that FEMA routinely collaborates with both DHS Science & Technology (S&T) and the FEMA Office of the Chief Information Officer (CIO). Specifically, the FEMA OCIO has appointed a dedicated Delivery Manager to the Logistics Supply Chain Management System (LSCMS) Program. Additionally, FEMA conducts weekly 30-minute Executive Briefings which the CIO personally attends. FEMA also conducts bi-weekly meetings which the project managers, along with OCIO key players attend. The FEMA CIO attends and co-chairs this meeting.

Evacuations

This section in the draft report mentions the Catastrophic Disaster Planning Initiative but nothing about the Regional Catastrophic Preparedness Grant Program. As discussed above, the RCPGP is designed to support planning for catastrophic events to include evacuation planning. To date, ten of the eleven sites have projects relating to evacuation planning efforts for their regions.

Also, the National Plan Review mentions several elements of progress regarding evacuation planning that should be included in this section. For example, the Evacuation Planning Technical Assistance program created in 2007 has been delivered 15 times since its inception and also states and urban areas have indicated an increased confidence in their Public Protection and Evacuation appendices.

We would also like to point out additional information regarding GAP. The GAP mission has remained the same; however, the former program has been integrated with a holistic approach and in a new functional organizational framework to achieve the same mission. GAP is now considered a tool not a program or how we develop a plan. It is an analytical tool to help develop initial mission analysis and staff estimates, which are both key steps in plan development. FEMA will continue to develop interagency and regional plans in FY2010 and

FY2011. The staffing estimate and capability assessment process is an imperative step in the development of these plans.

Finally, we do not understand why our preparedness to support a regional or large-scale evacuation still remains in question. Over 2 million people were successfully evacuated during the 2008 hurricane season with Gustav and Ike.

Housing

FEMA requests that you add the following information to your Housing section: "In addition to the progress FEMA has made towards improving the interagency and intergovernmental coordination of disaster housing through the progress of the National Disaster Housing Task Force, FEMA has also worked to clarify the roles and responsibilities of Individual Assistance (IA) personnel and key external stakeholders through its IA Disaster Housing Concept of Operations (DHOPS CONOPS). The DHOPS CONOPS will identify and explain the major program activities associated with providing FEMA disaster housing program while documenting each activities purpose, intended sequence, preferred methodology, and performance targets."

With respect to your discussion regarding the Non-congregate Housing Program, we request that you include the following: "FEMA has also developed a Non-congregate Housing Program that allows for sheltering 500,000 disaster-affected households after a catastrophic event. This Non-congregate Housing Program uses hotels and motels or federally-owned unoccupied housing units as a sheltering resource. Each option has unique challenges.

FEMA maintains a contract to place disaster survivors in hotel/motel rooms for an extended period. The vendor has access to a network of 14,000 participating hotels across the entire nation, and has proven capability of housing more than 93,000 households in a single night. However, hotels are not a long-term solution; they are a transition to longer term housing resources. The program's success depends on the ability to register disaster survivors quickly and on the existence of available hotel/motel resources where disaster victims have relocated.

In support of sheltering individuals in federally-owned and unoccupied housing units, FEMA has worked with other federal partners to identify approximately 46,715 units nationwide. Although these units are available, there are several constraints on this program. States must be willing and able to receive disaster survivors, disaster survivors must be willing to relocate to areas where this housing is available, and available units may not be ready for immediate occupancy without first being repaired."

While the report indicates that "FEMA has only limited headquarters and regional staff to fully execute an expert-based disaster housing mission for every disaster," we wish to point out that we are currently hiring and training more full time staff in the regional offices to increase capacity in this area.

With respect to encouraging the state and local role in developing and implementing housing solutions, the National Disaster Housing Task Force will work in conjunction with the FEMA

regional offices to encourage and provide technical assistance to states for developing their State- Led Disaster Housing Task Forces (SLDHTF). The goal is to develop SLDHTFs in all states.

Disaster Workforce

FEMA notes the following four significant developments regarding the disaster workforce:

Integration of the Disaster Reserve Workforce Division (DRWD) and the Office of the Chief Component Human Capital Officer (OCCHCO) - as mentioned in the OIG draft report, establishing and fully staffing a reserve-only program office was noted in the 2007 Agency assessment as the highest priority action which would transform the Disaster Reserve Workforce. While the assessment provided management with an initial focus for our efforts -- the Disaster Reserve Workforce -- we also identified shortfalls in the efforts and resources to sustain FEMA's full-time workforce, which also deploys during active disasters. In addition, it resulted in the duplication of efforts by the Disaster Reserve Workforce and Human Capital Divisions, which maintained separate budget management, policy development, and information systems functions. In February 2010, as part of a broader Headquarters realignment, the Disaster Reserve Workforce and Human Capital Divisions were integrated into a new OCCHCO. As a result, the Disaster Workforce Division now oversees the readiness and deployment functions for the entire disaster workforce of full-time and Reserve employees, while at the same time a critical mass of staffing in the budget, policy and system areas are able to provide more effective services to both the institutional workforce and the deployable workforce.

Agency-Wide Credentialing Program - FEMA recognizes the need to prepare and deploy disaster workers who perform at expected standards of performance. While the existing credentialing program represents a vital first step forward, FEMA's credentialing program must be reconfigured to meet the demands of emerging operating doctrine, as well as to provide unity of effort with all levels of the emergency management community at the federal, state, local, tribal, and private sector levels.

In March 2010, FEMA began working on broadening the oversight of its Agency-wide credentialing program. Oversight of credentialing FEMA employees was transferred to the Deputy Administrator for Protection and National Preparedness. This change brings under one organizational "hat" a wide array of credentialing initiatives for which FEMA is responsible, and places them in the entity which ensures unity of efforts in line with the National Response Framework.

In addition to changes in program oversight, FEMA will begin moving from the existing approach to one which requires demonstrated performance in training and in the field in order to be credentialed. This is an approach which incorporates best practices from the model employed by the National Wildfire Control Group.

As FEMA builds out this new "FEMA Qualification System," execution of the existing credentialing program continues. At this time, FEMA reports the following updated status for

the existing program documented in the bulleted list on page 44 of the draft report:

- Eleven cadres have a complete and approved Cadre-Specific Plan (CSP). Five of these eleven cadres have migrated to the existing credentialing framework.
- Six cadres have a complete CSP that awaits approval.
- No cadres have a CSP that is actively in development.
- Four cadres have begun the initial planning in order to credential their disaster workers under the FEMA Qualification System.

Impact of Disaster Relief Funds Restrictions - a third development experienced subsequent to OIG interviews conducted for this report was a shortfall in Disaster Relief Funds (DRF) that negatively impacted all funding budgeted for the Disaster Reserve Workforce program in FY2010. From February until July, as a responsible step of stewardship, FEMA implemented proactive, immediate needs funding guidance in order to extend the available balance of DRF funding while waiting for supplemental funding. DRF funding is appropriated annually by Congress to aid disaster survivors and help communities across the country recover. Congress may offer supplemental appropriations, as needed, throughout a year to address additional needs. As a result of these restrictions, all expenses charged to the Disaster Readiness and Support account within the DRF were affected; including specific disaster-related functions such as the Hazard Mitigation Grant Program and certain categories of public assistance to states, local, and tribal governments.

The impact of “immediate needs” funding restrictions on the Disaster Reserve Workforce program has been severe. The program sent approximately 300 Reservists to credentialing-based training in FY2010, rather than the 2,000 it had planned. Contracting vehicles that provide the technology infrastructure to effectively manage the disaster workforce could not be not approved until late July 2010, when Congress approved a supplemental appropriation to replenish the DRF and FEMA could lift its “immediate needs” funding restrictions.

Surge Capacity Force Concept of Operations - subsequent to interviews by the OIG, FEMA achieved a major milestone towards creation of the plan for a Surge Capacity Force required by Section 624 of the Post-Katrina Emergency Management Reform Act.

On June 30, 2010, the FEMA Administrator approved the draft concept of operations plan for the Surge Capacity Force and forwarded it to DHS for review by all other DHS components. On a parallel track during June 2010, the DHS Office of the Chief Human Capital Officer established a working group of human resource managers from the DHS components to identify ways to avoid pitfalls experienced when FEMA has deployed employees from other federal agencies, as documented in OIG reports such as OIG-07-051, *Federal Emergency Management Agency's Volunteer Service Program Following Hurricane Katrina*, and OIG-06-32, *A Performance Review of FEMA's Disaster Management Activities in Response to Hurricane Katrina*.

A Surge Capacity Force Concept of Operations Plan, applicable to all DHS components, is expected to be finalized in FY2011.

Acquisition Management

The Office of the Chief Procurement Officer (OCPO) has placed the list of all pre-positioned disaster response contracts on its intranet site to provide easy access to those responding to disasters in the field. Additionally, OCPO has provided to all Federal Coordinating Officers (FCOs) the prepositioned contract list and additional information in a customer-friendly format called the FCO ToolBox. The tool box is also posted to OCPO's intranet site. FEMA must balance the use of prepositioned contracts with the requirements of Section 307 of the Stafford Act that require FEMA to contract with local vendors to the maximum extent possible when responding to a declared Major Disaster.

With respect to the need for additional staff, while your draft report indicated that OCPO has a 36% vacancy rate, the Acquisition Operations Division, under which the majority of contracting officers and contract specialists are employed, has a 12% vacancy rate. Finding qualified candidates and filling open positions continues to be a challenge. In an effort to improve the situation, FEMA has 18 interns on board in various stages of completion of their three-year rotation. For other positions in OCPO, in job series such as 1101, 340 and 343, no direct hiring authority exists, leaving these positions to be filled through lengthy merit system competitive recruitment process. For exceptional applicants, recruitment bonuses are used. Moreover, retention bonuses are also used to retain highly qualified acquisition personnel.

Training is another priority of the OCPO and the Office offers a robust series of courses through each fiscal year to include DHS sponsored and Federal Acquisition Institute and Defense Acquisition University no-cost acquisition training.

The number of FEMA Contracting Officer Technical Representatives (COTRs) has increased significantly (from 700 to 1450) and the OCPO has instituted a COTR Tiered Certification Program which your report correctly identifies as having "resulted in better contractor performance and increased value for taxpayers." We wish to emphasize that there are 57 COTRs certified at the Tier III level, 56 certified at the Tier II level and the remainder are Tier I certified. COTRs that are Tier III certified may be assigned to contracts of any dollar value; Tier II COTRs may be assigned to contracts up to \$57 million; and Tier III COTRs may be assigned to contracts up to \$5 million. As the Tiered COTR initiative is relatively new, FEMA COTRs have 18 months from the date of the signed COTR Directive to become certified at the appropriate level (March 28, 2011).

Moreover, the OCPO has taken a large step forward in increasing contract oversight and administration of disaster contracts. OCPO has gained approval for 26 Direct Charge CORE employees that will constitute a Disaster Acquisition Response Team (DART) whose primary focus will be to respond to disasters and provide contract administration and oversight of the large disaster contracts in the field. This staff will consist of Administrative Contracting Officers and Quality Assurance Representatives who will provide consistent contract lifecycle support in each disaster. This team's focus will also include the closing out of disaster contracts in an effort to assist in the overall Disaster Closeout Process and return funds to the Disaster Relief Fund. Most of the DART (23 of the 26 team members) will be located in Regions IV, VI and IX where a large part of disaster activity occurs. However, the team will also serve the disaster

contract administration and disaster contract close-out needs of the other regions. OCPO expects the team to be hired and in place at their regional locations within the next few months.

In March 2010, OCPO's Acquisition Program and Planning Division (APPD) created a new branch, the Business Management Operations Branch (BMOB), that is responsible for overseeing FEMA's compliance with DHS's Directive 201-01: *Acquisition Lifecycle Management*. In this capacity, the BMOB supports both FEMA's Head of Contracting Activity and Component Acquisition Executive in meeting their obligations to oversee FEMA's acquisition management activities for major acquisitions. In meeting its mission, the BMOB provides the executive support to FEMA's Acquisition Review Board (ARB), serves as the primary liaison to DHS's ARB and provides both acquisition oversight and technical assistance to FEMA program offices in the execution of FEMA major acquisitions. The BMOB continues to recruit and fill vacancies within the Branch, and establish operating procedures and working relationships with FEMA programs.

With respect to the report's identification of DHS information technology system issues impacting FEMA procurement, FEMA wishes to point out that even though the system's security plan is still in the DHS approval process, the FEMA CIO has permitted system upgrades as well as the installation of new acquisition provisions and clauses. Rather than being six months to a year behind in implementing new acquisition policies, the OCPO is able to install these new acquisition policies within 30 to 60 days of publication.

Finally, in the draft report's *Continuing Concerns* for Acquisition Management, you state that "FEMA has said that many more pre-disaster contracts are in place. However, some Joint Field office officials and contracting personnel still contract separately for the same good rather than using the established contracts." However, to comply with Section 307 of the Stafford Act, FEMA is supposed to minimize the use of prepositioned contracts, so this statement appears to be in conflict with the statutory mandate to use local firms.

Mitigation

The Federal Insurance and Mitigation Administration (FIMA) in FEMA has worked to increase progress in the critical components identified by OIG.

FIMA has worked with the National Emergency Management Association (NEMA) to coauthor a white paper – *Recommendations for an Effective National Mitigation Effort - Building stronger partnerships, increased resilience, and disaster resistance for a safer nation*. (<http://www.nemaweb.org/?3177>) The principles of this white paper, which offers strategic themes and elements of a national mitigation strategy, are being integrated into the ongoing development of the National Recovery Framework and efforts to adapt to climate change.

FIMA has initiated a new program, Risk MAP (Mapping, Assessment and Planning), that provides communities with flood information and tools they can use to enhance their mitigation plans and better protect their citizens. Through more accurate flood maps, risk assessment tools, and outreach support, Risk MAP builds on Map Modernization and strengthens local ability to

make informed decisions about reducing risk. The goals of this new program are laid out in the RiskMAP multi year plan (<http://www.fema.gov/library/viewRecord.do?id=3587>)

FIMA continues to make progress with the National Flood Insurance Program (NFIP) Reform Workgroup. The Workgroup has established a three phase reform process: Phase I - capture stakeholder concerns and recommendations from the NFIP Listening Session; Phase II - analyze stakeholder feedback, develop evaluation criteria and create a portfolio of public policy alternatives; and Phase III - evaluate public policy alternatives began in June 2010 and will last 18 to 24 months. Phase III will result in a comprehensive NFIP reform package that will be delivered to Congress.

Thank you again for the opportunity to comment on this draft report and we look forward to working with you on other issues as we both strive to improve FEMA.

Appendix C

Selected Reports

Overall Planning

DHS' Progress in Federal Incident Management Planning
(OIG-10-58), February 2010.

Management Advisory Report: FEMA's IMAT Program (OIG-10-32),
January 2010.

*Emergency Preparedness: FEMA Faces Challenges Integrating
Community Preparedness Programs into Its Strategic
Approach* (GAO-10-193), January 2010.

*National Preparedness: FEMA Has Made Progress, but Needs to
Complete and Integrate Planning, Exercise, and Assessment
Efforts* (GAO-09-369), April 2009.

*National Response Framework: FEMA Needs Policies and
Procedures to Better Integrate Non-Federal Stakeholders in
the Revision Process* (GAO-08-768), June 2008.

Coordination and Support

*Disaster Recovery: Experiences from Past Disasters Offer Insights for
Effective Collaboration after Catastrophic Events* (GAO-09-
811), July 2009.

Management Advisory Report: FEMA's Response to Hurricane Ike
(OIG-09-78), June 2009.

*National Disaster Response: FEMA Should Take Action to Improve
Capacity and Coordination between Government and
Voluntary Sectors* (GAO-08-369), February 2008.

*Homeland Security Information Network Could Support Information
Sharing More Effectively* (OIG-06-38), June 2006.

Emergency Communications

*Emergency Communications: Establishment of the Emergency
Communications Preparedness Center and Related
Interagency Coordination Challenges* (GAO-10-463R), March
2010.

*Review of DHS' Progress in Adopting and Enforcing Equipment
Standards for First Responders* (OIG-06-30), March 2006.

Logistics

FEMA's Logistics Management Process for Responding to Catastrophic Disasters (OIG-10-101), July 2010.

FEMA's Sourcing for Disaster Response Goods and Services (OIG-09-96), August 2009.

Logistics Information Systems Need to Be Strengthened at the Federal Emergency Management Agency (OIG-08-60), May 2008.

Evacuations

Status of Implementation of GAO Recommendations on Evacuation of Transportation-Disadvantaged Populations and Patients and Residents of Health Care Facilities (GAO-08-544R), April 2008.

Actions Needed to Clarify Responsibilities and Increase Preparedness for Evacuations (GAO-07-44), December 2006.

Housing

Disaster Assistance: Federal Assistance for Permanent Housing Primarily Benefited Homeowners; Opportunities Exist to Better Target Rental Housing Needs (GAO-10-17), January 2010.

FEMA Temporary Housing Property Management Controls (OIG-10-24), December 2009.

Management Advisory Report: FEMA's Housing Strategy for Future Disasters (OIG-09-111), September 2009.

Improvements to Internal Controls for FEMA's Individuals and Households Program Registration Process (OIG-09-110), September 2009.

Audit of Application Controls for FEMA's Individual Assistance Payment Application (OIG-09-104), September 2009.

Final Letter Report: Potential Duplicate Benefits Between FEMA's National Flood Insurance Program and Housing Assistance Programs (OIG-09-102), September 2009.

Disaster Housing: FEMA Needs More Detailed Guidance and Performance Measures to Help Ensure Effective Assistance after Major Disasters (GAO-09-796), August 2009.

FEMA's Temporary Housing Unit Program and Storage Site Management (OIG-09-85), June 2009.

Management Advisory Report: Computer Data Match of FEMA and HUD Housing Assistance Provided to Victims of Hurricane Katrina and Rita (OIG-09-84), June 2009.

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Appendix D

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