



Department of Homeland Security Office of Inspector General

Management Advisory Report: FEMA's IMAT Program





Homeland
Security

January 6, 2010

MEMORANDUM FOR: The Honorable W. Craig Fugate
Administrator
Federal Emergency Management Agency

FROM: *Richard L. Skinner*
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Inspector General

SUBJECT: *Management Advisory Report: FEMA's IMAT Program
(OIG-10-32)*

This memorandum presents findings and recommendations for the Federal Emergency Management Agency's (FEMA) Incident Management Assistance Teams (IMAT) program. Our review's objective was to assess the economy, efficiency, and effectiveness of the IMAT program, including current operational design and status, coordination with other FEMA components and governmental organizations, and performance in recent disasters.

We identified several important concerns about the structure and operations of the IMAT program, including the mission, size, and roles of IMAT teams. However, while our fieldwork was being conducted, a new management team assumed control of the Disaster Operations Directorate (DOD) and initiated significant changes in the program's operational design. Although these changes are still being conceived and implemented, it appears that they will address many of the issues we identified. In addition, the changes are significant enough that they will invalidate the study of past IMAT performance as a basis for evaluating changes needed in the current program, so this review has been suspended.

The changes that are currently being made in the IMAT program should markedly improve the program. However, to help ensure that these changes will address each of the concerns we identified, we are issuing this advisory report to record the findings we were developing and our recommendations for program improvements. We discuss and recommend:

- 1) Clarifying the role of IMAT teams;
- 2) Re-evaluating the number and size of IMAT teams;
- 3) Addressing the roles of regional and national IMAT teams; and
- 4) Preventing asset losses and unnecessary expenditures.

We based our findings and recommendations on a review of pertinent congressional and FEMA documents and discussions with appropriate FEMA officials and other emergency management personnel.

We conducted our review 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 (now the Council of the Inspectors General on Integrity and Efficiency).

Background: History of the IMAT Program

As part of the *Post-Katrina Emergency Management Reform Act of 2006* (PKEMRA) (6 U.S.C.701), Congress amended the *Robert T. Stafford Disaster Relief and Emergency Assistance Act* (42 U.S.C. 5144) and required the establishment of “Emergency Support and Response Teams”. Specifically, FEMA was required to establish:

- “At a minimum, 3 national response teams;”
- “Sufficient regional response teams, including Regional Office strike teams under section 507 of the Homeland Security Act of 2002;” and
- “Other response teams as may be necessary to meet the incident management responsibilities of the Federal Government.”

The FEMA section of the Department of Homeland Security FY 2009 Office of Management and Budget (OMB) Budget Justification noted that FEMA was “developing a next generation of rapidly deployable interagency national and regional emergency response teams, identified as Incident Management Assist (sic) Teams (IMAT). These teams will be designed to provide a forward federal presence to better manage and coordinate the national response for catastrophic incidents.”... “Ultimately, three national-level IMATs and ten regional level IMATs will be built and will subsume the roles and responsibilities of the Federal Incident Response Support Teams (FIRSTs), the National Emergency Response Teams (ERT-N) and Emergency Response Teams-Advanced (ERT-A). When not responding to disasters, IMATs will engage in a range of training exercises and other activities strengthening FEMA’s critical relationships with state and local partners.”

The Budget Justification noted that ERT-Ns and ERT-As would “ultimately be subsumed by the IMATs, but some will continue to exist in FY 2009 during the transition to IMATs. ERT-A and ERT-N teams are made up of individuals from FEMA headquarters and regions that have additional day-to-day responsibilities beyond their team assignments.”

Unlike the ERT-N and ERT-A teams, the IMATs were originally designed to be staffed by full-time assigned employees, not by personnel with other primary day-to-day responsibilities. The national IMATs were to be staffed by 26 full-time employees, led by a FEMA-certified Federal Coordinating Officer (FCO). The regional IMATs were to be staffed by 15 full-time employees and also were to be led by an FCO. By early 2009, FEMA had established and partially staffed the National IMAT East in Washington, DC and the National IMAT West in Sacramento, CA. Regional IMAT teams in FEMA Regions II, IV, V, and VI were operational, and a fifth regional IMAT was scheduled to become operational by the end of the fiscal year. Contingent upon the availability of budget resources, FEMA officials envisioned that a full complement of 10 regional and three national teams would be in place by FY 2010.



The FEMA Regions

When it took office in early 2009, the Obama Administration reassessed the established national and regional IMAT plans. By August 2009, DOD officials had decided that the previous plan was too costly and were revising the IMAT plans. IMAT doctrine was changed to provide that each regional team would consist of four full-time dedicated staff, and could be augmented by six collateral duty personnel, whose primary day-to-day responsibilities would be in other parts of the regional organization, resulting in savings of more than \$10 million per year. The regional teams would no longer be led by FCOs, but rather by team leaders who would report to the designated FCO at a disaster. DOD officials were also revisiting the national IMAT doctrine including the size and composition of national teams.

As of early October 2009, there were two national IMATs, an East team in Washington, DC and a West team in Sacramento, CA. FEMA considered regional IMATs to be functional in Regions II, III, IV, V, VI, VIII, and IX. Regions I, IV, VII, and X still had ERT-A teams.

Results of Review

Clarifying the Role of IMAT Teams

FEMA officials originally intended that the IMAT teams would “subsume the roles and responsibilities” of the FIRST, ERT-A, and ERT-N teams. The IMAT mission statement included elements of the functions of all three operations but did not result in a clear mission.

The 2008 IMAT Concept of Operations Plan (CONOPS) provided a definitive mission statement for the IMAT teams, even though it remained a deliberative/pre-decisional draft. The CONOPS established a three-part mission:

- “Build and maintain close working relationship with regional, State, tribal, and local emergency management officials, allied agencies, and other Federal partners to support optimal posturing and preparation for incidents requiring a joint response”;
- “Rapidly deploy to an incident or incident-threatened venue and become part of the unified command to lead a prompt, effective and coordinated Federal response in support of State, tribal, and local emergency management officials”; and
- “Provide initial situational awareness for State/Federal decision makers and other coordinators of assistance that is crucial to determine the level and type of immediate Federal support that may be required.”

The first two elements of this mission are related to the former ERT-A and ERT-N missions, while the third element is more related to the FIRST teams’ mission. Officials of several IMAT teams that had evolved from FIRST teams focused on the third element of “situational awareness” to a far greater extent than did IMAT teams which had not incorporated FIRST teams.

In addition to resulting in different IMAT teams having, in effect, different missions, there are significant adverse consequences of this condition. Gathering situational awareness information is primarily an “on-scene” function, carried out where the disaster is actually occurring. Coordinating federal efforts and supporting the state’s emergency response is a function that is carried out well behind the disaster scene at the State Emergency Operations Center (EOC) and at the Joint Federal Office (JFO) as the disaster develops. Gathering situational awareness therefore required splitting up a team and sending out part of the team as a forward element. These forward element teams carried with them the extensive communications facilities, including “streaming video” capability needed to communicate information back from the scene of the disaster. The teams that gathered this information believed their efforts were very worthwhile, framing the situation for FEMA headquarters officials, providing program information for local government officials, and sharing their communications capabilities with local officials when other communications systems were not operational.

However, the situational intelligence function had adverse effects as well. Splitting the IMAT team reduces the main team's capabilities of supporting the State effort and coordinating the federal response. In addition, providing information on FEMA programs directly to local officials can be seen as leaving a critical player, the state, out of the loop: we were told that some states saw this effort as harmful to coordination and cooperation. The situational awareness information that the teams sent directly to Washington DC could, and did, develop into a dialog between the teams and Washington officials that could exclude the FCO and state coordinating officials (SCO), thereby damaging the coherence of the disaster relief effort. In addition, the misconception that FEMA was

**Region IV IMAT team setting up a communications system.
August 5, 2008 (FEMA photograph)**



intended to be a first responder was re-enforced. While the communications equipment that the teams took to the disaster scene was potentially helpful, we were told that local officials usually did not need it.

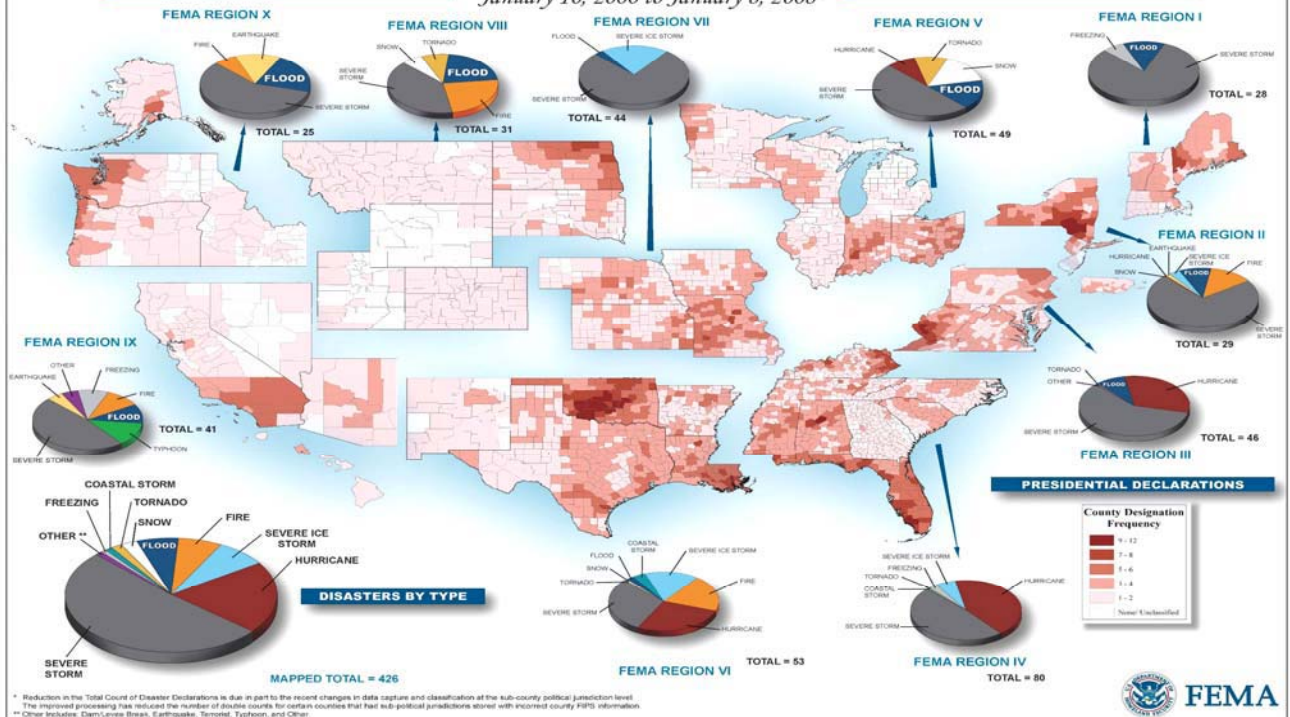
We concluded that the mission of the IMAT teams has not been sufficiently clear. Some IMAT team members have different views of the mission and different teams have carried out differing roles, degrading the overall effectiveness of the IMAT teams. The April 2009 draft interim revision of the CONOPS provides a mission

statement that could resolve some of these issues. However, the implementation of this mission needs to address several remaining questions including:

- Does the usefulness of the situational awareness function justify its staffing and costs?
- If situational awareness has FEMA headquarters officials as its directors and primary customers, how can it avoid subverting the role of the FCO and SCO?
- Should IMAT teams be working directly with affected local communities without state officials being involved?

PRESIDENTIAL DISASTER DECLARATIONS

January 10, 2000 to January 8, 2008



Re-evaluating the Number and Size of IMAT Teams

The number of IMAT teams is based on past numbers of teams involved in the ERT-A and ERT-N efforts and an interpretation of congressional intent. Fewer teams might be sufficient. Additionally, while the number of regional team members has recently been reduced, staffing on the national teams may still be excessive.

The PKEMRA legislation called for “at a minimum, 3 national response teams” and “sufficient regional response teams.” The legislation does not define what is required to provide these capabilities, leaving those decisions to FEMA. In addition, FEMA officials could not provide analyses indicating that three 26-person national IMATs were necessary to meet foreseeable disasters. While more than two major disasters could occur at one time, that does not mean that three newly-established national teams would be needed. Several of the regional teams are very experienced, are regarded as being highly competent, and could be considered as operationally qualified to fulfill the congressional requirement for a third national response team.

Regional Team Issues

PKEMRA does not call for each of the 10 FEMA regions to have a regional IMAT team, and it is not likely that 10 teams would be required at any one time. The already-established regional teams could serve the needs of regions, such as Regions I, II, VIII and X, that have not had as many disasters. However, the regions, and more importantly the states in each region, are likely to prefer their “own” teams, and having a team in each region is a first step to increasing regional

preparedness and coordination with state and local officials. Reducing the number of full-time employees on each team from 15 persons to 4 should at least lower the cost of having 10 regional teams.

Reducing the full-time staff numbers for regional teams appears to be justified to improve the economy and efficiency of the program. Some of the previous 15 team members told us that they had spent an inordinate amount of time in training and were still not fully occupied. Under the new regional team concept, full-time staff will fill only the four key positions (team leader, operations, planning, and logistics). Six other positions will be filled by collateral-duty staff whose normal day-to-day positions will be elsewhere in the regional office. This concept appears workable, but only if regional officials maintain a cadre of qualified individuals assigned to and training with the teams, rather than deferring to an unqualified and untrained “pick-up team” in response to disasters.

FEMA will need to monitor the effectiveness of each region’s plan for supporting and augmenting the core team in case of disasters. FEMA should determine whether any regions that have not established such a qualified designated support cadre actually need to have a core IMAT team. FEMA might be better served by having such regions be served by teams from other regions.

National Team Issues

It is not clear that the national IMAT teams need 26 members. Only one of the two national teams is presently at full size and both teams are still fully occupied during the “down time” between disasters with efforts to fill out the team, qualify their new members, establish team cohesiveness, and other team-building efforts. For the long term, some officials justify the teams’ size by pointing out that any chemical, biological or nuclear event could require such a large team, as might some major disasters. The question that remains is whether such events could be more economically addressed by augmenting a smaller sized national team with regional teams. Or, if 26 person national teams are considered necessary for major events, does FEMA need a third new team? One of the stronger regional teams might be able to serve and be designated as the third national response team.

FEMA needs to determine how many teams of each type are needed and how many staff each team should have. The experience to date with these teams is probably not sufficient to provide well-supported answers to these questions. FEMA officials will need to start with reasonable team numbers and sizes and adjust them as experience dictates.

Addressing Operational Issues

Two significant operational issues concerning the national and regional IMATs need to be addressed. There is some confusion concerning the relative roles of the national and regional IMATs. Clarification is also needed as to who will be in charge when a national IMAT, headed by an FCO, is dispatched to a state that already has a pre-designated FCO.

Roles of Regional and National Teams

The FEMA response to Hurricane Ike demonstrated confusion concerning the respective roles of the regional and national IMAT teams. We were told that, while the regional team was well coordinated

with the FCO and the state of Texas, the national team was reporting to FEMA headquarters and “had its own game plan.” Some described the IMAT teams as “tripping over each other”. Since then, progress has been made in clarifying the roles and responsibilities of the various teams, but differing viewpoints about the roles of national and regional teams still exist.

Some view the national IMAT teams as the prime responders to any major disaster, while regional teams are the prime responders to smaller disasters. The proponents of this view did not see any confusion or competitiveness in the roles and responsibility of teams; they view the national IMAT as the senior partner, with any regional IMATs playing a supporting role.

A number of observers believe the national IMATs should take the lead only in a multi-state, multi-region disaster. They view the regional IMATs as better positioned to take the lead in most disasters because those teams know the area and have already established planning and a working relationship with state and local officials. Some of these individuals also do not believe the national IMAT should be launched until the FCO, in coordination with state officials requests its participation. We were told that several states hold this view. In addition, observers view some of the regional IMAT teams as more experienced than the national teams.

FCO Responsibility

Another important issue needing clarification the role of FCOs when more than one qualified FCO is present at a disaster. As originally envisioned, each of the IMAT teams was to be headed by an

**The IMAT task force base camp on Galveston Island, TX.
September 22, 2008 (FEMA photograph)**



FCO. However, many of the hurricane-prone states have pre-designated FCOs who have already worked with state officials to plan for cooperation in a disaster. If another FCO arrives in the immediate aftermath of a disaster, confusion in roles could result, harming the response mission. This possibility was reduced when the reductions in size of the regional IMATs were accompanied by removing the FCO position from the regional teams. However, there could still be a “who’s in charge”

issue when a national IMAT, headed by an FCO, arrives at a disaster in a state that already has a pre-designated FCO.

Some of the FEMA officials we interviewed believed that the FCO-appointment decision was situational, and the nature of the disaster and the qualifications of the candidates should determine who is appointed FCO. If the disaster was catastrophic or multistate, the national IMAT team FCO

would be the best choice to lead the effort. Different qualified FCOs have different capabilities and the FCOs leading the national teams tend to be among the most experienced.

However, some FEMA and state officials favored keeping the pre-designated FCO in charge of the federal efforts in any state. The state governors and emergency directors already know those FCOs and have developed a working relationship. They consider the pre-designated FCO, who has already exercised in state disaster preparation and met extensively with state officials to be the best fit for their operations.

In any case, the FCO should be named as soon as possible after a disaster to maximize the effectiveness of initial response efforts and avoid having “revolving-door FCOs.” In addition, FEMA headquarters can reinforce the concept of the FCO’s role and authority by always working through the designated FCO and not attempting to direct the activities of IMAT teams from Washington DC, as was sometimes done during the developmental phase of the IMAT program.

Preventing Asset Losses and Expenditures During the Program Transition

Significant program transformations frequently pose a risk of losing program assets or wasting previous expenditures. In the case of the IMAT program transformations, the major risks we identified include losing control or use of assets acquired under the previous, larger IMAT program and paying for leases that are no longer needed.

With the changes in IMAT teams, including team size, care will be needed to maintain control of assets purchased for the teams. In some cases, decisions will need to be made concerning how to make the best use of equipment that is no longer needed. Most notable among these assets are the many vehicles that were purchased for the program. Although some of the teams already had communications vehicles, each team was provided with a communications van, at a cost of more than \$300,000 each. These vehicles, designed for the situational awareness function, include streaming video and other sophisticated equipment. If the situational awareness function is no longer emphasized, these vehicles may not be needed. Also, with the downsizing of the regional teams resulting in the elimination of the communications specialist position, the IMAT staff may no longer have the expertise to maintain this more than \$3 million investment in communication vehicles. In addition, with the recent decision to downsize the regional IMAT teams, some teams, such as the Region IV team, may have far more leased space, including costly space improvements, than they will need in the future.

FEMA officials need to ensure that adequate controls are established for IMAT equipment during the program transition, effective methods are identified to maintain and use the communications equipment that has been purchased for the program, and unneeded leases are terminated.

Conclusions

Significant changes that should lead to improvements have already been made in the economy, efficiency and effectiveness of the IMAT program and changes that address some of the issues raised in this report are already in progress. However, some important issues need to be addressed in the program improvements that are currently underway. The mission of the IMAT teams needs to be clarified to address whether the teams’ focus is to be on leading and coordinating a federal response

in support of state and local disaster responses or whether they are also to pursue a situational awareness program. The number and staffing of IMAT teams will need to be adjusted based on rigorous analysis of actual experiences. The relative roles of the national and regional IMATs need to be clarified and the question of who is to serve as FCO when more than one candidate is on-site needs to be made clear before response efforts begin. Meanwhile, as changes in the program continue, efforts are needed to limit costs and protect and make the best use of program assets.

Recommendations

We recommend that the Administrator, Federal Emergency Management Agency:

Recommendation #1: Implement a CONOPS with a mission statement for the IMAT teams that clarifies their roles and responsibilities and addresses the role and priority of situational intelligence gathering and its effects on the teams' relationship with the FCO and state and local officials.

Recommendation #2: Evaluate the adequacy of each region's implementation of the new regional IMAT concept to ensure that qualified and adequately trained and exercised support cadres are maintained and reduce the number of regional teams as appropriate.

Recommendation #3: Determine whether a third national IMAT team is needed or required by congressional intent and the appropriate size of national IMAT teams as sufficient experiential evidence is obtained.

Recommendation #4: Clarify the role of national IMATs relative to the role of regional IMATs in different types of disasters.

Recommendation #5: Define how an FCO will be designated when national IMATs having FCOs report to states with pre-designated FCOs.

Recommendation #6: Reduce unneeded lease costs, protect program property, and find efficient uses for the communications vehicles that have been purchased during this period of ongoing program change.

Please advise us within 30 days of this memorandum of actions taken to implement our recommendations. If you have any questions, please call me, or your staff may contact Matt Jadacki, Deputy Inspector General for Emergency Management Oversight, at (202) 254-4100.

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