

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE INSPECTOR GENERAL**

**DISTRICT OF COLUMBIA
HOMELAND SECURITY AND
EMERGENCY MANAGEMENT AGENCY**

REPORT OF INSPECTION

April 2010



**CHARLES J. WILLOUGHBY
INSPECTOR GENERAL**

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General



April 22, 2010

Millicent D. Williams
Director
Homeland Security and Emergency Management Agency
2720 Martin Luther King, Jr. Avenue, S.E.
Washington, D.C. 20032

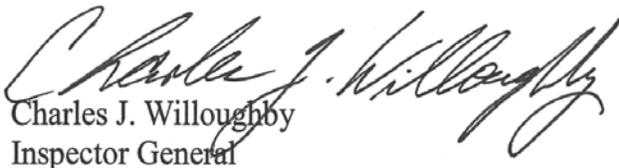
Dear Ms. Williams:

Enclosed is our *Report of Inspection of the Homeland Security and Emergency Management Agency* (OIG No. 10-I-0035BN). Comments from HSEMA on the inspection team's 5 findings and 5 recommendations are included in the report. This report will soon be available publically at <http://oig.dc.gov>; I encourage you to share it with your employees.

In addition, we have enclosed *Compliance Forms* on which to record and report to this Office any actions you take concerning each recommendation. These forms will assist you in tracking the completion of action(s) taken by your staff, and will assist this Office in its inspection follow-up activities. We track agency responses to all conditions cited and compliance with recommendations made in our reports of inspection. Please ensure that the *Compliance Forms* are returned to the OIG by the response date, and that reports of "Agency Action Taken" reflect actual completion, in whole or in part, of a recommended action rather than "planned" action.

We appreciate the cooperation shown by you and your employees during the inspection and look forward to your continued cooperation during the upcoming follow-up period. If you have questions or comments concerning this report or other matters related to the inspection, please contact me or Alvin Wright Jr., Assistant Inspector General for Inspection and Evaluations, at (202) 727-2540.

Sincerely,


Charles J. Willoughby
Inspector General

CJW/lg

Enclosure

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Inspections and Evaluations Division
Mission Statement

The Inspections and Evaluations (I&E) Division of the Office of the Inspector General is dedicated to providing District of Columbia (D.C.) government decision makers with objective, thorough, and timely evaluations and recommendations that will assist them in achieving efficiency, effectiveness, and economy in operations and programs. I&E goals are to help ensure compliance with applicable laws, regulations, and policies, to identify accountability, recognize excellence, and promote continuous improvement in the delivery of services to D.C. residents and others who have a vested interest in the success of the city.

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ACRONYMS

ACRONYMS

ACRONYMS

AAR	After Action Report
CAP	Corrective Action Program
CFO	Chief Financial Officer
D/HSEMA	Director/Homeland Security and Emergency Management Agency
DDOT	District Department of Transportation
DHS	U.S. Department of Homeland Security
DOH	Department of Health
DPW	Department of Public Works
DRP	District Response Plan
ECC	Emergency Communications Center
ELO	Emergency Liaison Officer
EMA	Emergency Management Agency
EMAP	Emergency Management Accreditation Program
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EPC	Emergency Preparedness Council
ESF	Emergency Support Function
FBI	Federal Bureau of Investigation
FEMA	Federal Emergency Management Agency
FEMS	Fire and Emergency Medical Services Department
FTE	Full-Time Equivalent
FY	Fiscal Year
GAO	U.S. Government Accountability Office (previously known as the General Accounting Office)

ACRONYMS

HSEEP	Homeland Security Exercise and Evaluation Program
HSEMA	Homeland Security and Emergency Management Agency
I&E	Inspections and Evaluations
ICS	Incident Command System
IP	Improvement Plan
MIR	Management Implication Report
MPD	Metropolitan Police Department
NCR	National Capital Region
NIMS	National Incident Management System
OCFO	Office of the Chief Financial Officer
OCP	Office of Contracting and Procurement
OCTO	Office of the Chief Technology Officer
OIG	Office of the Inspector General
ROI	Report of Inspection
SAA	State Administrative Agent
TEP	Training and Exercise Plan
WASA	Water and Sewer Authority
WMATA	Washington Metropolitan Area Transit Authority

ACRONYMS

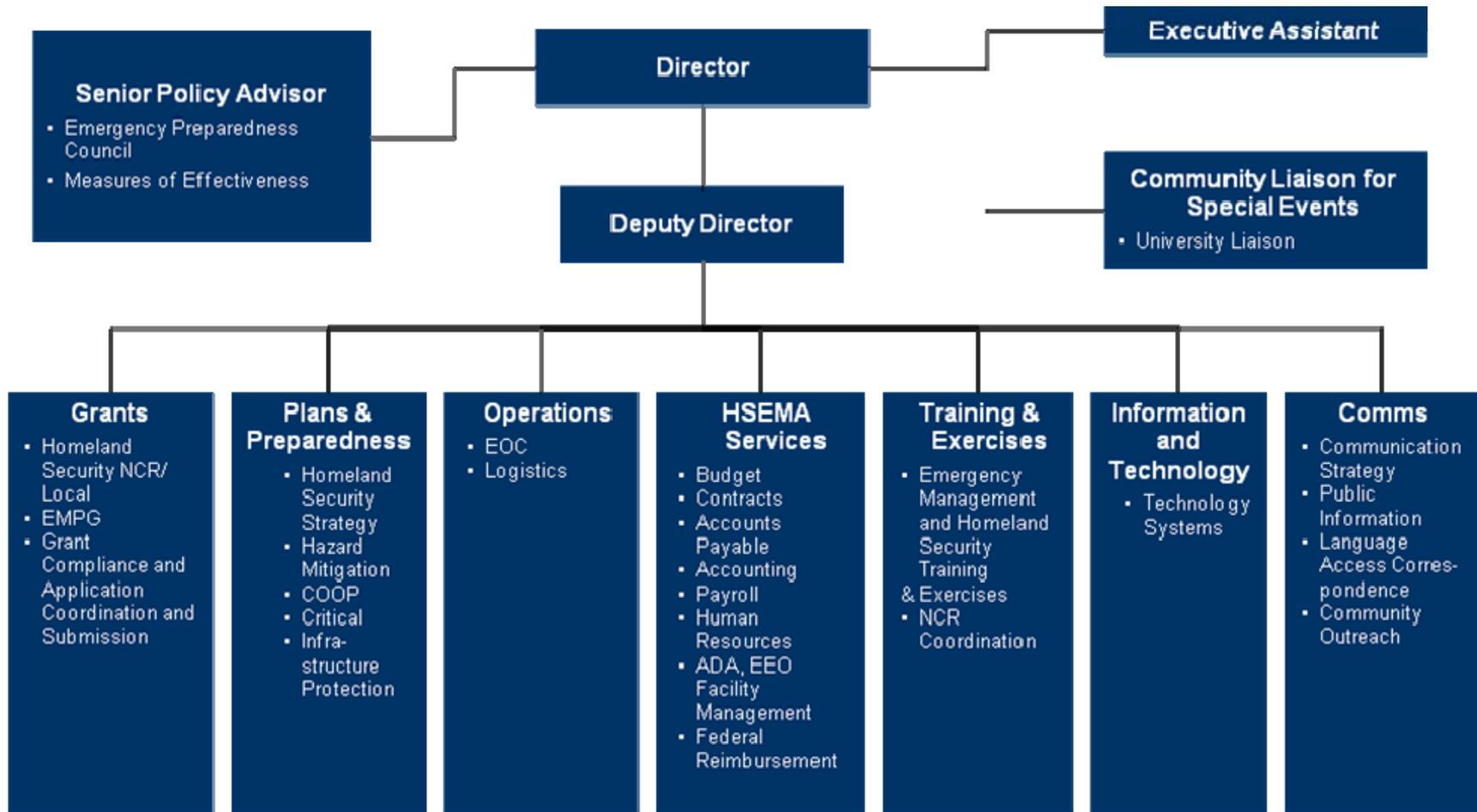
ORGANIZATION CHART

ORGANIZATION CHART

ORGANIZATION CHART

ORGANIZATION CHART

HSEMA Organization Chart



3/16/2009

Source: HSEMA.

ORGANIZATION CHART

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

OVERVIEW

The Inspections and Evaluations (I&E) Division of the Office of the Inspector General (OIG) first conducted fieldwork for an inspection of the Emergency Management Agency (EMA) in May 2006. That effort was overtaken by other work requirements and a report was not issued. In March 2007, EMA was restructured and renamed the Homeland Security and Emergency Management Agency (HSEMA). When OIG's inspection resumed, additional OIG fieldwork was required because of HSEMA's assumption of homeland security responsibilities. This report is based on fieldwork conducted from May 2008 - June 2009.

HSEMA's mission is to "manage the District's emergency operations to prevent, respond to, and recover from natural and man-made emergencies."¹ HSEMA is responsible for:

developing plans and procedures to ensure emergency response and recovery capabilities for all emergencies and disasters; coordinating emergency resources for emergencies and disaster incidents; providing training for all emergency first responders, city employees, and the public; conducting exercises; and ... [providing] public awareness and outreach programs, and [providing] 24-hour emergency operations center capabilities.²

The agency also serves as the central communications point during regional emergencies.

HSEMA has 46 full-time equivalent (FTE) positions, and its fiscal year (FY) 2009 approved budget of \$249,388,940 was a significant increase from its FY 2008 actual budget of \$47,330,234. Less than two percent of the FY 2009 budget was derived from District funds; the remainder came from federal grants, which are multi-year grants that span 3 years.³ From its FY 2009 budget, \$7.4 million was allocated to HSEMA's Personal Services costs. According to HSEMA's previous Director,⁴ the budget increase resulted from HSEMA becoming the State Administrative Agent (SAA) for all U.S. Department of Homeland Security (DHS) grants awarded to the District of Columbia and the National Capitol Region (NCR).⁵ Previously, the City Administrator was the designated SAA.⁶

¹ [Http://hsema.dc.gov/dcema/cwp/view,a,3,q,531996,dcemaNav_GID,1531,dcemaNav,%7C31868%7C,.asp](http://hsema.dc.gov/dcema/cwp/view,a,3,q,531996,dcemaNav_GID,1531,dcemaNav,%7C31868%7C,.asp) (last visited Jun. 3, 2009).

² [Http://hsema.dc.gov/dcema/cwp/view,a,3,q,531996,dcemaNav_GID,1531,dcemaNav,%7C31868%7C,.asp](http://hsema.dc.gov/dcema/cwp/view,a,3,q,531996,dcemaNav_GID,1531,dcemaNav,%7C31868%7C,.asp) (last visited Jun. 3, 2009).

³ HSEMA officials stated that although the Department of Homeland Security grants span several years, the total amount of funds for each grant is attributed to the budget year in which it is awarded.

⁴ In October 2009, the Mayor announced his selection of a new Director of HSEMA as the previous Director had taken a position with the White House Security Staff.

⁵ The District coordinates preparedness activities with jurisdictions in the NCR. The NCR consists of the District, Northern Virginia, central and southern Maryland, and eastern West Virginia, and areas of Delaware and Pennsylvania.

⁶ HSEMA officials stated that the City Administrator was the SAA until 2007, but the current mayoral

EXECUTIVE SUMMARY

As SAA, HSEMA is responsible for ensuring that grant spending meets DHS guidelines and applicable District regulations. According to HSEMA's previous Director, "[t]he SAA provides programmatic oversight to the numerous individual grant-funded homeland-security projects in D.C. and the NCR to ensure that the projects are making progress, meeting milestones, and are in compliance with applicable grant guidance. The SAA ... authorizes reimbursement payments for the allowable expenses that the projects incur."⁷ HSEMA has 12 employees in its Grants Division to monitor the grants.

The previous Director estimated that approximately 15 percent of the FY 2009 budget was allocated to NCR and District emergency preparedness training and exercises. The OIG team asked HSEMA officials how they distributed the FY 2009 budget funding within HSEMA and to the NCR. The team also requested the amount that HSEMA allocated to state and local agencies in Maryland and Virginia, but did not receive aggregate figures on how much was allocated to each. An HSEMA senior official stated that "it's difficult to reflect the grant figures in simple terms." HSEMA did, however, provide a detailed explanation of the approximately \$3.1 million allocated in FY 2009 to training and exercise projects that HSEMA was primarily responsible for implementing.

In addition, the team reviewed HSEMA's grant spending reports for the NCR grants. Examples of multi-year grants to recipients included:

- \$7.7 million to Washington Metropolitan Area Transit Authority (WMATA) for the Alternate Operations Control Center;
- \$7.3 million to Loudoun County Department of Fire, Rescue and Emergency Management for NCR Bomb Squad Upgrades; and
- \$5.6 million to the Arlington County Fire Department for Bomb Squad enhancements.

Management Implication Report Summary (MIR)

On January 16, 2009, the OIG issued a Management Implication Report (MIR-09-I-001) to the Office of the City Administrator and the Department of Public Works (DPW). The MIR informed these agencies that DPW employees had not been able to determine the operational availability and status of emergency fixed and mobile generators maintained by most District

administration did not want the SAA role to be handled by the City Administrator. They added that when the D.C. Council changed the agency's name from EMA to HSEMA, HSEMA was given the role of grants administration. ⁷ HSEMA officials explained that when HSEMA is awarded a grant from DHS as the SAA, the funds are not physically transferred from DHS to a bank account at HSEMA. Rather, DHS sends HSEMA an award letter for the grant funds, which acts as authority to spend the funds. The grant period begins when HSEMA receives this award letter and lasts up to 3 years. In order to receive reimbursement from a grant, a sub-grantee will submit a reimbursement request to HSEMA. If HSEMA approves the request, the sub-grantee is paid by the D.C. Treasury and HSEMA requests reimbursement from DHS. To ensure that reimbursements are appropriate, DHS conducts audits twice a year.

EXECUTIVE SUMMARY

government agencies and offices designated as Emergency Support Function (ESF) Primary Agencies. The team learned of this problem while conducting interviews during the HSEMA inspection. The Director of DPW had sent a letter and questionnaire to 12 ESF agencies to determine the sufficiency and operational capability of their generators, but only 3 of the 12 agencies responded to the questionnaire. The lack of this information was a serious deficiency that endangered the effectiveness of the District Response Plan's (DRP) implementation during an ongoing emergency, as well as the District's short- and long-term preparation for emergency conditions.

The OIG recommended that:

- the City Administrator direct all affected agencies to respond immediately to the DPW questionnaire and to cooperate expeditiously and fully with the Emergency Power Task Force in quickly identifying and filling their emergency power needs; and
- the Director of DPW coordinate with affected agencies on these activities on a priority basis, and implement procedures and assurance steps necessary to reduce the impact of energy system outages at critical facilities.

In May 2009, a DPW official contacted the OIG and stated that because of the MIR, DPW had received all of the information it needed from affected District agencies to complete the survey of emergency fixed and mobile generators. The complete MIR and its recommendations as well as DPW's response may be accessed via the OIG's website.⁸

Key Findings

HSEMA did not have a finalized written training and exercise plan for emergency preparedness training. (Page 24) At the conclusion of the OIG's inspection fieldwork in June 2009, the team found that HSEMA did not have a finalized training and exercise plan (TEP). One of the HSEEP's requirements is that jurisdictions develop and maintain a multi-year TEP. The TEP should outline a jurisdiction's training and exercise priorities; how an agency chooses its training courses and exercises, tracking mechanisms for training and exercises with respect to progression and improvement; and should include a graphic illustration of a multi-year training and exercise schedule broken into quarters and months that reflects the years in which training and exercises will be held.

HSEMA prepared After Action Reports for some, but not all emergency preparedness exercises. In addition, improvement plans were not always developed and implemented. (Page 27) The OIG team reviewed After Action Reports (AARs) from HSEMA's exercises and found that some AARs did not include Improvement Plans (IPs) to identify specific corrective actions, assign tasks to responsible parties, and establish target dates for completion. AARs, a primary

⁸ See <http://oig.dc.gov>, click on Inspection and Evaluation reports to find the April 23, 2009, MIR.

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tool of an exercise evaluation process, capture observations of exercises and make recommendations for post-exercise improvements.

Additional Findings

The team also found that HSEMA:

- lacks written protocols for the Emergency Manager position;
- has high turnover in the Chief of Training and Exercises position; and
- does not sufficiently analyze training participants' course evaluations.

Additionally, the following issue of concern was identified during fieldwork, but not reported as a finding. Many employees identified communication and morale issues at HSEMA. Some employees stated that management is disrespectful, unprofessional, and rude. A few employees stated that they would like to see more direct communication and interaction between the executive staff and the employees. An OIG request for EEO information found that only three EEO complaints were filed in 2007 and 2008. Two employees explained, however, that grievances have not been filed for fear of retaliation. Two employees from external District agencies expressed concerns about employee morale at HSEMA. Although the team did not issue a survey to HSEMA employees to address morale, the team believes that the information presented above warrants a review by management to determine the extent of any morale problems.

The OIG team asked senior managers what steps they have taken to ensure morale is positive. One senior official stated that HSEMA had a staff appreciation day, holiday potluck, and conducted a voluntary and anonymous survey allowing employees to provide feedback about their managers. However, few employees participated in the survey. Another senior official stated that HSEMA held monthly all-hands meetings with all staff members to inform them of management's expectations, and that the agency holds employees accountable and treats them the way the agency officials would want to be treated.

Recommendations

The OIG made five recommendations to HSEMA to improve the deficiencies noted, establish and implement internal controls, and increase operational effectiveness. Some recommendations focused on developing written plans and protocols, improving AARs, and analyzing training evaluations.

Scope and Methodology

The team assessed HSEMA's compliance with District statutes and regulations and reviewed relevant best practices. The inspection objective was to examine the effectiveness and efficiency of HSEMA's emergency preparedness training and exercises. The team conducted 60

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interviews with HSEMA officials and employees, and 11 representatives from all the District's Emergency Support Function (ESF) Primary Agencies, 4 private sector agencies/companies,⁹ 3 representatives from the Federal Emergency Management Agency (FEMA), and 2 representatives from the Emergency Management Accreditation Program (EMAP). In addition, the team observed two "tabletop" simulated emergency exercises, and issued a confidential online survey to HSEMA stakeholders from various District agencies and non-profit organizations. The team reviewed pertinent District laws and regulations; HSEMA and FEMA policies, procedures, plans, and reports; as well as emergency management and homeland security documents from other jurisdictions. A list of the report's five findings and five recommendations is at Appendix 1.

All HSEMA officials and staff members were cooperative and responsive throughout the inspection.

OIG inspections comply with standards established by the Council of Inspectors General on Integrity and Efficiency, and pay particular attention to the quality of internal control.¹⁰

The OIG asked HSEMA to review the draft of this report prior to publication, note agreement or disagreement with each recommendation, and provide explanatory comments. On February 5, 2010, HSEMA's Director responded to our findings and recommendations by e-mail, and subsequently, HSEMA also sent a response in hard copy and on compact disc. Because there were a slight variations among the three versions, OIG used the Director's e-mailed version as the official HSEMA response for publication. HSEMA's comments appear verbatim following each recommendation.

Note: The OIG does not correct an agency's grammatical or spelling errors, but does format an agency's responses in order to maintain readability of OIG reports. Such formatting is limited to font size, type, and color, with the following exception: if an agency bolds or underlines text within its response, the OIG preserves these elements of format.

Compliance and Follow-Up

The OIG inspection process includes follow-up with HSEMA on findings and recommendations. Compliance forms will be sent to HSEMA along with the report of inspection (ROI). I&E will coordinate with HSEMA on verifying compliance with recommendations over

⁹ The District Response Plan (DRP) provides the framework for the District's response to, recovery from, and mitigation of all hazards. The DRP applies to all District agencies, non-governmental organizations, and private entities that may be asked to provide assistance during emergencies.

¹⁰ "Internal control" is synonymous with "management control" and is defined by the U.S. Government Accountability Office as comprising "the plans, methods, and procedures used to meet missions, goals, and objectives and, in doing so, supports performance-based management. Internal control also serves as the first line of defense in safeguarding assets and preventing and detecting errors and fraud." STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT, Introduction at 4 (Nov. 1999).

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an established period. In some instances, follow-up activities and additional reports may be required.

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INTRODUCTION

INTRODUCTION

INTRODUCTION

Background and Perspective

D.C. Code § 7-2205 (2) authorizes HSEMA to institute training programs and public information programs, train civil defense units that include regularly-employed District government personnel, and take all other preparatory steps in advance of an actual disaster. D.C. Code § 7-2231.07 authorizes HSEMA to “coordinate a regular program of readiness exercises to test the District of Columbia emergency preparedness, propose action to address any gap in preparedness, and coordinate with regional, federal, and private entities.” HSEMA provides and sponsors emergency preparedness training, seminars, and conferences to local first responders, such as police and fire responders.

HSEMA reported that from November 1, 2006 - October 31, 2008, 2,514 individuals attended 150 training courses. The attendees were from agencies such as DPW, District Department of Transportation (DDOT), Metropolitan Police Department (MPD), Fire and Emergency Medical Services Department (FEMS), Water and Sewer Authority (WASA), the American Red Cross, Gallaudet University, and the Federal Bureau of Investigation (FBI). Examples of training included Emergency Liaison Officer (ELO),¹¹ Preliminary Damage Assessment,¹² and Threat and Risk Assessment¹³ courses. DHS specifies that training conducted with federal funds should “contribute to building a capability that will be evaluated through an exercise” and that the training “should support the development and testing of the jurisdiction’s Emergency Operations Plan (EOP) or specific annexes....”¹⁴

Federal Emergency Management Agency’s (FEMA) HSEEP is a capabilities and performance-based program that provides a standardized policy, methodology, and terminology for exercise design, development, conduct, evaluation, and improvement planning. It provides a multi-year planning system, tools, and guidance necessary to build and sustain exercise programs that enhance homeland security capabilities and preparedness. According to HSEEP, it “provide[s] common exercise policy and program guidance that constitutes a national standard for exercises.”¹⁵ HSEEP compliance requirements include the development and maintenance of an annual Training and Exercise Workshop and multi-year TEP. Because HSEMA receives federal funding for its emergency preparedness exercise program, it should be managed in accordance with HSEEP.

¹¹ The Emergency Liaison Officer training provides an introduction to the duties of an ELO assigned to work in the District’s Emergency Operations Center in a major crisis.

¹² The Preliminary Damage Assessment is a joint assessment conducted by FEMA and a state team that is used to determine the magnitude and impact of an event’s damage.

¹³ The Threat and Risk Assessment course prepares emergency response managers, community leaders, private sector entities, and non-government organizations to conduct a comprehensive, capabilities-based threat and risk assessment for a terrorism/all-hazards incident.

¹⁴ U.S. Department of Homeland Security, Fiscal Year 2008 Homeland Security Grant Program, Guidance and Application Kit, 21 (February 2008).

¹⁵ [Http://hseep.dhs.gov/pages/1001_HSEEP5.aspx](http://hseep.dhs.gov/pages/1001_HSEEP5.aspx) (last visited Jun. 3, 2009).

INTRODUCTION

According to HSEEP, exercises are used to identify “potential preparedness shortfalls in the areas of planning, organization, training, and equipment prior to real-world incidents.”¹⁶ There are two main categories of exercises: discussion-based and operations-based. Discussion-based exercises familiarize personnel with existing plans, policies, interagency/inter-jurisdictional agreements, and procedures. Discussion-based exercises include seminars, workshops, “tabletop” exercises, and games. Operations-based exercises are used to validate the plans, policies, agreements, and procedures solidified in discussion-based exercises. Two examples of operations-based exercises are drills and full-scale exercises.

HSEMA reported that from November 1, 2006 - October 31, 2008, it conducted six exercises.¹⁷ More than 100 participants from District, federal, and state agencies as well as colleges and hospitals were involved. Some participants included the: City Administrator’s Office; MPD; FEMS; DPW; D.C. National Guard; FBI; American, Howard, and Gallaudet universities; as well as Providence and Sibley hospitals. The exercises addressed scenarios such as terrorist attacks and a college campus shooting.

A FEMA representative stated that FEMA annually conducts onsite reviews of HSEMA projects that are funded by federal grants. During these visits, FEMA reviews the District’s strategy for spending its funds and how the projects relate to its strategy, and measures its progress toward achieving programmatic objectives. The representative added that HSEMA is one of the few agencies that attempts to identify gaps in emergency preparedness and apply funds to address issues identified.

Emergency Management Accreditation Program (EMAP)

HSEMA is currently accredited by EMAP,¹⁸ a voluntary accreditation process for state and local emergency management programs. EMAP was created by a group of national organizations, such as DHS, to foster continuous improvement in emergency management capabilities. Through this accreditation process, HSEMA conducts a self-assessment and is observed by a peer review team to ensure that HSEMA meets national standards for emergency management programs.¹⁹ An EMAP representative stated that HSEMA was one of the first programs to become accredited. The representative added that HSEMA has submitted its required reports in a timely manner to maintain accreditation and there have been no concerns with the information that HSEMA has provided to EMAP.

¹⁶ U.S. DEPARTMENT OF HOMELAND SECURITY, HOMELAND SECURITY EXERCISE AND EVALUATION PROGRAM (HSEEP), VOLUME I: HSEEP OVERVIEW AND EXERCISE PROGRAM MANAGEMENT 2 (February 2007).

¹⁷ The OIG did not include one other exercise in this count as its corresponding AAR reflected that the exercise was conducted in 2005.

¹⁸ See www.emaponline.org for more information.

¹⁹ According to an EMAP representative, a peer review is conducted prior to granting accreditation, and the accreditation lasts for 5 years. HSEMA was initially accredited in 2004 and received re-accreditation in 2009. The EMAP peer review team’s last on-site visit at HSEMA was in February 2009.

INTRODUCTION

STAKEHOLDER SURVEY RESULTS

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STAKEHOLDER SURVEY RESULTS

Stakeholder Survey Methodology

HSEMA provided the OIG with a list of Emergency Liaison Officers (ELO) and other key contacts at the District's primary and secondary response agencies. In January 2009, we administered a confidential online survey to these individuals to gather their feedback about the quality of HSEMA's emergency preparedness training and exercises. The team issued 48 surveys, and received 14 responses,²⁰ which was a response rate of 29.2 percent.

In addition to gathering demographic information, the survey consisted of two types of questions. First, employees responded to closed-ended statements by selecting from a Likert scale²¹ of Strongly Agree, Agree, Disagree, and Strongly Disagree. (See Table 1, below, for the percent and frequency of these responses.) The second type of questions were open-ended to solicit employees' narrative feedback.

Overall, most respondents were positive about their experience with HSEMA's emergency preparedness exercises and training. There were a few instances in which a respondent had a negative response, such as with the frequency of exercises and clarity of roles.

Results from Closed-Ended Questions

Twelve respondents indicated that they were the ELO for their respective agency and two said they were not. Eight of the respondents stated that they attended one to three exercises, two attended four to six exercises, and four never attended an HSEMA exercise.²² Seven of the respondents stated that they have attended 1 – 3 training courses, 1 attended 4 – 6 training courses, 1 attended 10 or more training courses, and 5 never attended a training course.²³ Figure 1, on the following page, reflects each respondent's tenure as an ELO.

²⁰ The OIG analyzed the responses received as of February 6, 2009. A survey was also inadvertently issued to an HSEMA manager who was requested by the OIG not to complete it.

²¹ A Likert scale is bipolar scaling, measuring either positive or negative response to a statement. The format of a Likert scale is typically a five-level item such as 1) Strongly Disagree 2) Disagree 3) Neither Agree nor Disagree 4) Agree 5) Strongly Agree.

²² This information was gathered from Question 3 of the survey. Respondents who stated that they never attended an HSEMA emergency preparedness exercise were automatically prevented from answering the survey's section regarding emergency preparedness exercises.

²³ This information was gathered from Question 15 of the survey. Respondents who stated that they never attended an HSEMA emergency preparedness training were automatically prevented from answering the survey's section regarding emergency preparedness training.

STAKEHOLDER SURVEY RESULTS

Figure 1

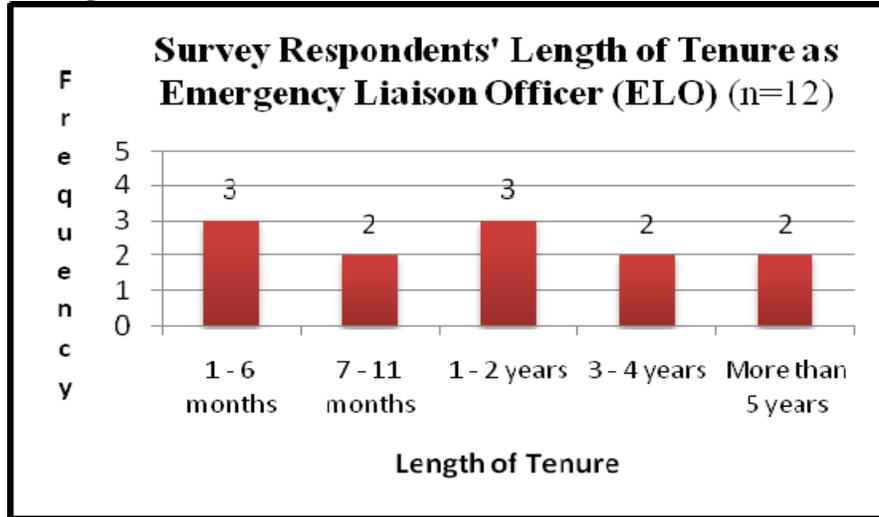


Table 1

Survey of HSEMA's Emergency Preparedness Exercises and Training					
Statement	Percent and Frequency				Not Applicable (Frequency)
	Highly Agree	Agree	Disagree	Highly Disagree	
HSEMA EXERCISES					
4. HSEMA provides adequate advance notice of its planned emergency preparedness exercises.	30% 3	70% 7			(4)
5. The frequency of emergency preparedness exercises conducted by HSEMA is adequate.		80% 8	20% 2		(4)
6. HSEMA's emergency preparedness exercises address pertinent and relevant scenarios.	20% 2	80% 8			(4)
7. All appropriate District agencies are present at the emergency preparedness exercises.	30% 3	60% 6	10% 1		(4)
8. HSEMA effectively informs me of my agency's role(s) during emergency preparedness exercises.	22% 2	78% 7			(5)
9. HSEMA clearly and professionally communicates with me during emergency preparedness exercises.	40% 4	60% 6			(4)

STAKEHOLDER SURVEY RESULTS

Survey of HSEMA's Emergency Preparedness Exercises and Training					
Statement	Percent and Frequency				Not Applicable (Frequency)
	Highly Agree	Agree	Disagree	Highly Disagree	
10. HSEMA solicits my comments and feedback on emergency preparedness exercises.	30% 3	70% 7			(4)
11. HSEMA seeks my suggestions for future emergency preparedness exercises to conduct.	10% 1	90% 9			(4)
12. After participating in HSEMA's emergency preparedness exercises, I am better prepared to assist my agency in responding to exercises. ²⁴	10% 1	80% 8	10% 1		(4)
13. When an emergency preparedness exercise identifies an area of improvement for my agency, HSEMA provides me with detailed feedback and suggests appropriate "next steps" that my agency should take.		100% 10			(4)
14. After emergency preparedness exercises are completed, I provide timely and pertinent feedback to my agency management.	10% 1	80% 8	10% 1		(4)
HSEMA TRAINING					
16. HSEMA's emergency preparedness training courses address pertinent and relevant information to prepare for or handle an emergency. ²⁵	13% 1	75% 6	13% 1		(6)
17. The instructors are knowledgeable of the training material.	33% 3	67% 6			(5)
18. As a result of completing HSEMA's emergency preparedness training courses, I obtained additional skills to respond to emergencies.	33% 3	67% 6			(5)

²⁴ This was the exact phrasing of the question. The last word of the statement was meant to have said "emergencies."

²⁵ Percentages do not total 100 percent due to rounding.

STAKEHOLDER SURVEY RESULTS

Survey of HSEMA's Emergency Preparedness Exercises and Training					
Statement	Percent and Frequency				Not Applicable (Frequency)
	Highly Agree	Agree	Disagree	Highly Disagree	
19. I disseminate pertinent information that I learned during HSEMA's emergency preparedness training to the appropriate management and staff within my agency.	33% 3	67% 6			(5)
20. HSEMA seeks my suggestions for future emergency preparedness training to conduct.	11% 1	78% 7	11% 1		(5)

Results from Open-Ended Questions

The survey included a few open-ended questions about HSEMA's emergency preparedness exercises and training. In response to a question regarding what HSEMA does well during or when conducting emergency preparedness exercises, the most frequent response was communication, particularly with participating agencies. In response to a question seeking suggestions to improve HSEMA's emergency preparedness exercises, the most frequent response was to involve more agencies.

In response to a survey question regarding areas of HSEMA's emergency preparedness training that operate well, the most frequent response related to the type of training offered. One respondent commented that "HSEMA does a good job in sponsoring emergency preparedness training that can be applie[d] for all-hazards." Another made positive comments about the benefits of National Incident Management System (NIMS)²⁶ training to the District and its agencies. The most frequent response recommended increasing the amount of training as a way to improve the emergency preparedness training program.

²⁶ NIMS is a systematic approach to guide government agencies and the private sector to prevent, respond to, recover from, and mitigate the effects of incidents.

STAKEHOLDER SURVEY RESULTS

**SELECTED FEEDBACK, OPINIONS FROM
STAKEHOLDER INTERVIEWS**

**SELECTED FEEDBACK, OPINIONS FROM
STAKEHOLDER INTERVIEWS**

**SELECTED FEEDBACK, OPINIONS FROM
STAKEHOLDER INTERVIEWS**

Methodology

The team interviewed stakeholders to obtain feedback on HSEMA emergency preparedness training and exercise functions. The team interviewed 11 ESF stakeholders (excluding HSEMA staff), as well as stakeholders from another District agency and 3 private agencies. (See Appendix 3 for a complete list of the ESF agencies interviewed.)

The interviews were conducted from August 2008 to December 2008. Table 2, below, summarizes themes and individual opinions voiced by stakeholders regarding the strengths and areas needing improvement in HSEMA’s emergency preparedness training and exercises. The table does not reflect all opinions gathered. While this information was not gathered using a scientific or structured methodology, it provides valuable insights and recommendations for HSEMA to consider.

Table 2

Strengths
<p>Training</p> <ul style="list-style-type: none"> • Training informs us of the resources that HSEMA can provide. • The recent pandemic flu training provided “great tips” on preventative measures. • Consultants and federal instructors from the Department of Homeland Security have been brought in for training. <p>Exercises</p> <ul style="list-style-type: none"> • Exercise scenarios are realistic. • Exercises are organized and well planned. • The exercises demonstrate the linkages among the ESFs. • Sufficient discussion was held during Tabletop exercises to make logical decisions in these scenarios. <p>Other Strengths Reported</p> <ul style="list-style-type: none"> • Key stakeholders are brought together from District agencies and non-government agencies. Relationships are developed. There is good participation. • Preparedness is enhanced by providing information to understand roles, coordinate, and make quick and difficult decisions. • Agencies were informed of current trends in the field of emergency preparedness.

**SELECTED FEEDBACK, OPINIONS FROM
STAKEHOLDER INTERVIEWS**

Areas Needing Improvement

Training

- A number of management changes at HSEMA have impacted the flow of training information.
- Need to return to offering basic training held years ago, such as Incident Command Training.
- Provide training at some of the ESF locations for convenience.
- Need a refresher Emergency Liaison Officer (ELO) training course once a year that differs from the original course.
- No notices issued when training is cancelled and there are problems with confirmation of training courses.

Exercises

- Exercises are not realistic and tend to focus on worst-case scenarios. [Note: contradicts a reported strength.]
- There are not enough exercises, particularly with federal partners.
- Need higher level (upper management) involvement in exercises as well as participation from ESF agencies.
- The previous Mayor attended exercises but the current one has not.
- Tabletop exercises do not focus on a particular agency and its primary functions. They need a more narrow scope.
- Need more “live” drills where people actually respond instead of “conceptual” drills.
- HSEMA does not respond to participants’ recommendations and requests in the post-exercise surveys.
- The MPD has not participated in HSEMA exercises; they conduct their own.

Other Areas Needing Improvement

- Not enough detail is provided in AARs.
- Need to update participants when there are changes in designated points of contact.
- ELOs should have identification to enter the HSEMA facility during an emergency.
- Volunteers need credentials to show they are certified.
- Lack of resources, such as having contractors in place for emergency distribution of water, ice, and sandbags; supply kits for staff; and radios during an emergency.

**SELECTED FEEDBACK, OPINIONS FROM
STAKEHOLDER INTERVIEWS**

KEY FINDINGS

Findings and Recommendations:

KEY FINDINGS

KEY FINDINGS

1. **HSEMA had not finalized a written plan that details its emergency preparedness training, exercise activities, and future courses.**

HSEMA receives federal funding for its emergency preparedness training and exercises program.²⁷ In order to comply with HSEEP, HSEMA must conduct an annual Training and Exercise Plan Workshop and develop and update a multi-year TEP.²⁸ The TEP “identifies an entity’s priorities as articulated in the entity’s strategy, and identifies the capabilities that are most relevant to achieving those priorities. It then outlines a multi-year schedule of training and exercise activities that an entity will undertake to enhance and validate its capabilities.”²⁹ In addition, according to HSEEP, the multi-Year TEP is “the foundational document guiding a successful exercise program. . . .”³⁰

According to a FEMA representative, the TEP should outline the training and exercises to be covered in a 3-year period. Every jurisdiction uses this template and should complete each section in it. The TEP provides a roadmap for an agency to follow in accomplishing the priorities described in the Homeland Security Strategy and should include a training and exercise schedule. According to the Multiyear Training and Exercise Plan template, the purpose of a TEP is to provide a graphic outline of a jurisdiction’s training and exercise priorities; how an agency chose its training courses and exercises; tracking mechanisms for training and exercises with respect to progression and improvement, and should include a graphic illustration of a multi-year training and exercise schedule broken into quarters and months that reflects the years in which training and exercises will be held for the next 3 years.

An HSEMA official explained that a TEP forms the foundation to ensure that participants are trained according to current homeland security and emergency management standards and have received the training necessary to perform their duties. The same official explained that exercises are used, in part, to evaluate training and to measure participants’ knowledge and understanding of training they have received. The official added that a TEP helps to ensure that HSEMA is meeting and achieving its priorities established in the training and exercise strategy and federal government priorities.

An HSEMA official stated that HSEMA’s TEP is to be incorporated into the NCR and the FEMA Region III³¹ training and exercise plans. A DHS manager explained that a TEP is used to ensure that training is provided in a well thought-out and coordinated manner. The manager added that it does not impact DHS when a jurisdiction is without a training and exercise

²⁷ Exercises funded with DHS funds must be managed and executed in accordance with HSEEP.

²⁸ See https://hseep.dhs.gov/support/Multiyear_Plan_Draft_Template.doc.

²⁹ U.S. DEPARTMENT OF HOMELAND SECURITY, HOMELAND SECURITY EXERCISE AND EVALUATION PROGRAM (HSEEP), VOLUME I: HSEEP OVERVIEW AND EXERCISE PROGRAM MANAGEMENT 5 (February 2007).
³⁰ *Id.*

³¹ “FEMA’s Region III works in partnership with the emergency management agencies of the District of Columbia, Delaware, Maryland, Pennsylvania, Virginia, and West Virginia to prepare for, respond to and recover from disasters.” [Http://www.fema.gov/about/regions/regioniii](http://www.fema.gov/about/regions/regioniii) (last visited Jun. 22, 2009).

KEY FINDINGS

plan. However, it is helpful to have a TEP from each jurisdiction to coordinate their efforts as DHS uses it to schedule the training and exercises it will hold in the region.

During the inspection, HSEMA officials presented a confusing picture of the status of HSEMA's TEP. The team was given three plans and documents variously described as "draft" or finalized, or was told that there is no TEP in place. The team's conclusion is that as of June 2009, HSEMA did not have a finalized and coordinated TEP as required by HSEEP.

In July 2008, the Chief of HSEMA's Training and Exercise Division provided the team with a document entitled *District of Columbia Homeland Security and Emergency Management Agency Strategic Training Plan 2007*.³² In October 2008, HSEMA appointed a new Chief for this division. When the team interviewed the new Chief in January 2009 and provided a copy of the 2007 strategic training plan, the official stated that he/she was unaware of this plan and that to his/her knowledge, no one was using it. The official stated that HSEMA would not complete a TEP until the *District of Columbia Homeland Security Strategy* (Strategy) was finalized to provide guidance and focus its exercise efforts. The official added that conducting exercises before the Strategy is finalized would not be efficient.

An HSEMA senior official added that although he/she had seen the prior chief's 2007 strategic training plan, he/she was not familiar with it. The senior official added that a training and exercise strategy was developed but was not implemented because information was not communicated well during the transition between the Training and Exercise Division chiefs. He/she explained that previous exercises were not well coordinated and HSEMA subsequently halted exercises from approximately October 2007 to the spring of 2008. HSEMA used this time to assess its TEP and develop a strategy.

In January 2009, an HSEMA official provided a copy of the *District of Columbia Multi-Year Training and Exercise Strategy, Strategic Plan and Schedule FY09-FY13* that was marked as "draft." This document included a training and exercise strategy and strategic plan. However, it did not include a schedule of training and exercises that is required in the multi-year TEP. In June 2009, the same HSEMA official stated that HSEMA had finalized this document. However, when the team reviewed this document, it did not include a specific training and exercise schedule broken into quarters as required by HSEEP.

In January 2009, the team also received a document entitled *District of Columbia Training and Exercise Program Request for Information Process*. While it included a training and exercise schedule broken into quarters for 2008 through 2010, this document was marked as "draft." In June 2009, an HSEMA official stated that a contractor began developing this document, but HSEMA did not use it because it did not meet the agency's needs. This official

³² According to page 3 of the *District of Columbia Homeland Security and Emergency Management Agency Strategic Plan 2007*, the document "introduces a framework to ensure that the development of training is invested and targeted strategically...."

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was unable to provide the team with further details as to why this document did not meet HSEMA's needs or how much the contractor was paid to develop this document because it preceded his/her start at HSEMA.

An HSEMA senior official acknowledged that HSEMA had not finalized a training plan, but added that HSEMA provides basic training, such as Incident Command System (ICS) courses. HSEMA's previous Director stated that while HSEMA does not have a finalized exercise plan, it uses the experience of HSEMA's senior management. An HSEMA official explained that events such as the 2009 presidential inauguration delayed completion of the Strategy document and ultimately HSEMA's TEP. This official added that some things were not completed while the Chief of the Training and Exercise Division position was vacant. In February 2009, HSEMA's previous Director stated that the TEP would hopefully be completed in 30 to 60 days and agreed that the presidential inauguration planning had consumed HSEMA's time and put other matters on the "back burner."

In March 2009, an HSEMA senior official informed the team that the Mayor had issued the *District Homeland Security Strategic Plan*,³³ and that HSEMA would now focus on developing a 3-year training and exercise plan. In June 2009, an HSEMA official stated that HSEMA still needed to meet with other D.C. agencies to gather input about their training needs to complete the plan and this information had not yet been gathered.

Training and exercises provide emergency responders the knowledge and skills needed to react to emergencies. A finalized multi-year TEP is not only a HSEEP requirement, but also a fundamental management tool that would help HSEMA anticipate and justify its future training and exercise needs.

Recommendation:

That the Director/HSEMA (D/HSEMA) give the highest priority to finalizing HSEMA's multi-year training and exercise plan and institute a formal mechanism through which it is regularly reviewed and updated.

Agree **X** Disagree

HSEMA's February 2010 Response, as Received:

The preliminary Office of the Inspector General (OIG) analysis, based on the initial information provided in November 2008 was correct. HSEMA assigned high priority for completion of the 3-Year Training and Exercise Plan and institutionalization of a peer review process. Beginning November 20, 2009, HSEMA extended an invitation for stakeholders to

³³ According to an HSEMA official, this document is a guide that explains the actions HSEMA plans to take in relation to training and exercises.

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engage in efforts to update the Training and Exercise Plan. Departments were requested to compile and coordinate their respective exercise requirements through the Training and Exercise Group. On November 24, 2009, HSEMA sponsored an Improvement Planning Workshop Webinar to provide a facilitated forum for all District agencies to review action items gleaned from the FY 2008 After-Action Reports (AARs) and real-world events to drive the innovation of planning priorities. These coordinated efforts accomplished four goals:

- Translation of the District of Columbia Multi-Year Training and Exercise Strategic Plan Program Priorities into practical direction and guidance for exercises in the District of Columbia Multi-Year Training and Exercise Schedule;
- Identification of areas for integration of agency training and exercise plans;
- Adjudication of scheduling conflicts in the Multi-year Training and Exercise Schedule; and
- Engagement of agency input into priorities for training curricula; and corrective actions to specific departments or agencies.

HSEMA captured respondent data through a web-based survey, which required all responses to be completed by December 1, 2009. Subsequent to completion of the survey, HSEMA collaborated with stakeholders to synchronize the exercises, deconflict the calendar and document capability improvements realized through exercise efforts during the Training and Exercise Plan Workshop (TEPW) conducted December 14, 2009. Subsequent to this forum, HSEMA completed the final draft plan for dissemination to training stakeholders for review and comment. Responses are due no later than February 10, 2010. The final plan will be completed by February 28, 2010.

OIG Response: **With its response, HSEMA provided the OIG with a copy of a “final draft plan.” Given that HSEMA has not informed the OIG that it has finalized the plan, HSEMA should give the highest priority to finalizing it and update the OIG after it has done so.**

2. HSEMA prepares AARs for some, but not all emergency preparedness exercises. In addition, improvement plans are not always implemented.

According to HSEEP, a primary tool of the exercise evaluation and improvement planning process is an After Action Report (AAR) that includes an improvement plan (IP). An AAR “captures observations of an exercise and makes recommendations for post-exercise improvements....”³⁴ The IP “identifies specific corrective actions, assigns these actions to responsible parties, and establishes target dates for action completion.”³⁵ The AARs and IPs are

³⁴ U.S. DEPARTMENT OF HOMELAND SECURITY, HOMELAND SECURITY EXERCISE AND EVALUATION PROGRAM (HSEEP), VOLUME III: EXERCISE EVALUATION AND IMPROVEMENT PLANNING 5 (February 2007).

³⁵ *Id.*

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completed after an exercise is conducted and should provide “a description of what happened, [describe] any best practices or strengths, [identify] areas for improvement that need to be addressed, and [provide] recommendations for improvement...”³⁶

According to HSEEP’s AAR template, some of the items that should be included in an IP are:

- a description of the corrective action;
- the primary agency responsible for addressing the corrective action;
- the date when work will begin to address the corrective action; and
- the date when the corrective action was completed.

An HSEMA official stated that HSEMA uses IPs to identify deficiencies during an exercise and training. For example, during a recent exercise, the official stated that HSEMA identified an agency to be responsible for assigning employees to drive an emergency command vehicle. However, the agency had not assigned a crew for the exercises and also did not ensure that employees completed the proper training to operate the vehicle. The official stated that after identifying any deficiencies, HSEMA will continually assess and modify the training and conduct additional exercises to assess whether training deficiencies have been addressed.

The OIG requested HSEMA AARs for exercises conducted between November 2006 – October 2008. HSEMA provided AARs for six exercises conducted³⁷ during this period. The team found that three of the six AARs did not include IPs. Two of the three AARs that lacked an IP listed some recommendations, but did not include all of the components required in an IP, such as the primary agency responsible for addressing each corrective action and the date when the corrective action was to be completed. The third AAR did not include any recommendations. HSEMA officials offered the following reasons why IPs were not included in three AARs:

- One of the exercises was a seminar and HSEEP did not require IPs for seminars.³⁸ (The team found that HSEEP documentation states that IPs are required for all exercises, regardless of type.)
- Another exercise was conducted in March 2007 and DHS did not require IPs for exercises until July 2007. (The team reviewed HSEEP documentation and found that IPs were required prior to 2007.)³⁹

³⁶*Id.* at 6. The AAR and the IP should be printed and distributed jointly as a single document following an exercise.

³⁷ For some of these exercises, HSEMA worked with another entity to conduct the exercise.

³⁸ According to HSEEP, a seminar is a discussion-based exercise that highlights existing plans, policies, and procedures.

³⁹ U.S. DEPARTMENT OF HOMELAND SECURITY, HOMELAND SECURITY EXERCISE AND EVALUATION PROGRAM (HSEEP), VOLUME II: EXERCISE EVALUATION AND IMPROVEMENT 6 (October 2003).

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- Another AAR did not have an IP because the majority of the items were the responsibility of a non-District government entity.

For the remaining three AARs, the team found that while IPs were included, they did not specify dates when improvements were to be made. HSEMA officials gave the following reasons for these incomplete IPs:

- Follow-up with items in the older IPs was “spotty” and HSEMA did not follow-up consistently with older plans.
- HSEMA has no control over other agencies’ actions.
- Corrective actions included in older IPs were too broad and almost impossible to address. For example, an HSEMA senior official explained that an IP would list a global statement such as the need to conduct more training, but it did not specify the type of training needed. Another official explained that previous IPs would list broad items such as a need for better planning, but would not specify the type of planning needed.

During the inspection, the team learned that HSEMA began taking steps to improve its follow-up with IPs. An HSEMA senior official stated that the more recent IPs are more specific. In June 2009, this official stated that for the past year, HSEMA began maintaining a spreadsheet to track improvement items.

This HSEMA senior official explained that during the exercises conducted in preparation for the presidential inauguration, HSEMA assigned one of its employees to work directly with the involved agencies to correct improvement action items in the IPs. The official added that this new approach worked well because of the importance of the inauguration, but opined that HSEMA might not receive the same level of cooperation at other times. In addition, an HSEMA official explained that they have reviewed past records and, when appropriate, entered information from the AARs into a formal IP as well as a DHS Corrective Action Program System (CAP) database.⁴⁰ In June 2009, HSEMA provided the team with a copy of an AAR from April 2009. The team found that it included an IP with all of the items required by HSEEP.

By not identifying specific corrective actions, assigning actions to responsible parties, and establishing target dates for completion, HSEMA may not be adequately addressing areas for improvement identified during or after emergency preparedness exercises.

⁴⁰ Corrective Action Program (CAP) System is “a web-based application that enables users to prioritize, track, and analyze improvement plans developed from exercises and real-world events.” [Http://hseep.gov/pages/1001_Toolk.aspx](http://hseep.gov/pages/1001_Toolk.aspx) (last visited Jun. 29, 2009).

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Recommendation:

That the D/HSEMA ensure that AARs are developed for all exercises, and when necessary, specific IPs are included and the action items in these IPs are tracked through resolution.

Agree _____ Disagree X

HSEMA's February 2010 Response, as Received:

HSEMA uses a formal after-action report process, in accordance with the Homeland Security Exercise and Evaluation Program (HSEEP) to prepare After-Action Reports containing an improvement Plan (IP) for all exercises sponsored by the agency. This protocol was implemented well before HSEMA provided the information to the OIG in November 2008. HSEMA utilizes the HSEEP Corrective Action Plan (CAP) web-based system to manage the corrective actions and track these recommendations through resolution.

OIG Response: As stated in the finding, HSEEP's AAR template requires an IP to include: a description of the corrective action; the primary agency responsible for addressing the corrective action; the date when work will begin to address the corrective action; and the date when the corrective action was completed. At the OIG's request, HSEMA provided AARs for six exercises conducted between November 2006 and October 2008. As stated in the finding, the team found that three of the six AARs did not include IPs. For the remaining three AARs, the team found that while IPs were included, they did not specify dates when improvements would be completed.

According to HSEMA's response, HSEMA uses the HSEEP Corrective Action Plan (CAP) web-based system to manage corrective actions. During fieldwork, the OIG focused its review on the hard-copy AARs. After reviewing HSEMA's response, the OIG team met with an HSEMA manager and observed HSEMA's use of the CAP web-based system in February 2010. This manager clarified that HSEMA uses both the hard-copy AARs and the CAP system to document corrective actions.

The team assessed whether the six AARs analyzed for this finding were entered into the CAP system. In four of six instances, the required information was not in the CAP system. Specifically:

- **HSEMA did not enter any information in the CAP system for two AARs.**
- **For two other AARs, HSEMA had entered the event name and event date for both and recommendations for one of them into the CAP system. However, neither included corrective actions, identified who was assigned to execute corrective actions, or completion dates for corrective actions. An HSEMA manager stated that**

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these exercises preceded his/her tenure with HSEMA and he/she was unsure why previous employees had not entered information into the CAP system.

- For the remaining two AARs, HSEMA entered information into the CAP system that included recommendations, corrective actions, primary organizations responsible for addressing corrective actions, and target dates for completing corrective actions.

An HSEMA manager provided two examples of an exercise conducted in 2009 that were in the CAP system. These two exercises reflected corrective actions and recommendations, identified who was assigned to resolve corrective actions, and completion dates for corrective actions in the CAP system. The manager stated that HSEMA began using the CAP system in 2006, but HSEMA has improved its use of the CAP system since then.

Due to the inconsistent information recorded in the CAP system and on hardcopy AARs, the OIG stands by its finding and recommendation as stated.

KEY FINDINGS

ADDITIONAL FINDINGS

**Findings and
Recommendations:**

ADDITIONAL FINDINGS

ADDITIONAL FINDINGS

3. **HSEMA lacks written protocols for an Emergency Manager.**

The Government Accountability Office (GAO) states that an agency should ensure that “appropriate policies, procedures, techniques, and mechanisms exist with respect to each of the agency’s activities.”⁴¹

According to DHS’s *National Response Framework*,⁴² an Emergency Manager is a “person who has the day-to-day responsibility for emergency management programs and activities [who coordinates] all aspects of a jurisdiction’s mitigation, preparedness, response, and recovery capabilities.”⁴³

HSEMA’s Emergency Operations Center (EOC) serves as the agency’s central communications point during emergencies, which includes the following: a) assessing resources and capabilities for emergencies; b) providing public awareness, outreach programs, and 24-hour emergency operation capabilities; and c) providing situational awareness to cooperating partners.⁴⁴

HSEMA’s Standard Operating Procedures for the EOC state that the:

Operations Division [Operations] manages the Emergency Operations Center (EOC) 24 hours-a-day, seven days a week. The Center manages the day to day internal operational functions of the HSEMA and acts as the State EOC for the District of Columbia integrating Regional, Federal and Local information and communications on a daily basis.⁴⁵

HSEMA’s previous Director stated that HSEMA’s Chief of the Operations Division is the point of contact during an emergency. He provided the team with a position description for the Chief of the Operations Division, which included the protocol of responsibilities for the role as a point of contact during an emergency. According to HSEMA’s Chief of the Operations Division, as the point of contact during an emergency, he coordinates first responders and is the main point of contact for the District.

⁴¹ GENERAL ACCOUNTING OFFICE, INTERNAL CONTROL MANAGEMENT AND EVALUATION TOOL, GAO-01-1008G, 34 (Aug. 2001).

⁴² “The *National Response Framework* is a guide that details how the Nation conducts all-hazards response - from the smallest incident to the largest catastrophe. . . . The Framework identifies the key response principles, as well as the roles and structures that organize national response.” NATIONAL RESPONSE FRAMEWORK FACT SHEET (Jan. 2008).

⁴³ DHS, NATIONAL RESPONSE FRAMEWORK 4 (Jan. 2008).

⁴⁴ HSEMA, Emergency Operations Center, Standard Operating Procedures 1 (Jul. 20, 2008)

⁴⁵ *Id.*

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The team found that the position description provided by HSEMA's previous Director did not specify the Chief of the Operations Division's responsibilities in coordinating and directing officials from various District agencies during an emergency. It did not list a title for this position, such as Emergency Manager. This document did not detail the protocols to be used with other agencies. The position description highlighted some of the following responsibilities of the Chief of the Operations Division regarding other agencies:

Provides standards, guidance and criteria for the development of reliable emergency warning systems for the dissemination of information and warnings to the citizens of the District and appropriate government agencies.

...

Assures that information received is evaluated and disseminated to key officials in a timely fashion so that appropriate decisions can be recommended.

During an interview, the Chief of the Operations Division stated that his position description did not include the responsibilities of a Chief of Emergency.⁴⁶ He added that many of the Chief of Emergency responsibilities fall under the category of other duties as assigned. The OIG team reviewed HSEMA Standard Operating Procedures (SOPs) for the EOC, which did not articulate the role of a Chief of Emergency in coordinating District agencies during an emergency.

An HSEMA official stated that a Chief of Emergency position does not exist, there are no written protocols for this role, and a specific person has not been designated to serve in this capacity. This official added that the Chief of the Operations Division and the Deputy Chief of the Operations Division are the primary people who serve as the coordinator on the scene of an emergency, and can designate a trained Operations employee to serve as the coordinator. The official opined that one person should not serve in this role because the volume of emergencies that can "burn out" one individual.

Without written protocols or duties for an Emergency Manager, HSEMA and the District may not be aware of all of the required roles and responsibilities of this position in an emergency. This could curtail employees at various District agencies from receiving sufficient guidance to perform their responsibilities during an emergency.

⁴⁶ During fieldwork, the team referred to the person responsible for handling an emergency as the Chief of Emergency. Subsequently, the team learned that DHS refers to this role as Emergency Manager.

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Recommendation:

That the D/HSEMA develop written protocols and identify a specific employee who acts as an Emergency Manager in accordance with the guidelines in DHS' *National Response Framework*.

Agree _____ Disagree _____ **X** _____

HSEMA's February 2010 Response, as Received:

The OIG report finds that HSEMA lacks an identified Emergency Manager as referenced and defined in the National Response Framework, and recommends "that D/HSEMA develop written protocols and identify a specific employee who acts as an Emergency Manager in accordance with the guidelines in DHS' National Response Framework."

The District, given its unique position as both a local and a state emergency management agency, fulfills the role of a local Emergency Manager as referenced in the National Response Framework (NRF) with its state Director. The NRF defines the Emergency Manager as follows:

"The local emergency manager has "day-to-day authority and responsibility for overseeing emergency management programs and activities. He or she works with chief elected and appointed officials to ensure that there are unified objectives with regard to the jurisdiction's emergency plans and activities. This role entails coordinating all aspects of a jurisdiction's capabilities..."

This is clearly the role of the Director of HSEMA. HSEMA recognizes that there could have been some misunderstanding during the interview with the previous HSEMA Director when reference was made to the Chief of Operations being the Emergency Manager. HSEMA, by the mere nature of having a Director, has satisfied this recommendation. The Disaster Response Plan (DRP) provides the protocol for establishing the HSEMA Director as the Consequence Management Director (Emergency Manager). Refer to the pages 14-17 of the DRP enclosed for review. Furthermore, DC Code Statute § 7-2202 authorizes establishment of HSEMA and appointment of the emergency management Director and personnel. DC § 7-2205 includes provisions that authorize HSEMA to execute specific emergency management responsibilities under the oversight of the Mayor.

The NRF further elaborates as follows:

"The local emergency manager is assisted by, and coordinates the efforts of, employees in departments and agencies that perform emergency management functions. Department and agency heads

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collaborate with the emergency manager during the development of local emergency plans and provide key response resources...”

This further clarifies the role of the Director of HSEMA as the Emergency Manager in accordance with the NRF.

Enclosed is copy of the current position description for the HSEMA Director. The incumbent maintains daily responsibility for emergency management programs for all aspects of District of Columbia’s emergency management infrastructure, including mitigation, preparedness, response and recovery. Also, HSEMA has been involved in the District of Columbia Government Classification Reform Project, which includes a component that requires the update of position description for all employees. HSEMA will be incorporating addition language to improve the clarity of the roles and responsibilities for the HSEMA Director.

OIG Response: The OIG received inconsistent information from HSEMA senior officials as to who has responsibility as the Emergency Manager at HSEMA. When the OIG team asked the former HSEMA Director the following questions about the person in charge at HSEMA during an emergency, the former Director provided the following responses:

- **Does HSEMA have a point person or Chief of Emergency? *Yes.***
- **If yes, who is this person and what is their title? *The Operations Chief.***
- **Is this person on-call to gather or coordinate the various emergency responders during an emergency? *When the EOC is activated, the EOC manager is prepositioned in the EOC with the Emergency Liaison Officers (ELOs). In a steady-state, the ELOs are on-call, the Emergency Command Center (ECC) operates 24 hours a day, seven days a week, and the Chief and Deputy Chief of Operations are always on-call.***
- **Do you have a written position description? *Yes and a copy of the Chief Operations Division was included.***
- **Do have written internal protocols for their responsibilities? *Yes, it contains a position description and protocol for responsibilities.***

During fieldwork, the OIG team also interviewed the Chief of the Operations Division and was informed that he was the point of contact during an emergency and that the Deputy Chief assists in this role. He stated that they coordinate the first responders and are the focal point for the city during an emergency. In addition, the Chief of the Operations Division stated that the responsibilities as the point of contact are implied and are not included in his/her position description as they fall under other duties as assigned.

After reviewing HSEMA’s response to this finding, the OIG interviewed HSEMA’s Director regarding the inconsistent information. HSEMA’s Director was unable to explain why her predecessor stated that Chief of the Operations Division served as the Emergency Manager. The current Director stated that the role has not changed, but the former Director’s understanding of the Emergency Manager’s role was clearly different than hers.

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She also stated that the former Director may have said that the Chief of the Operations Division was the Chief of Emergency because for the prior 4 years the Chief of the Operations Division responded quickly to incidents and was the first HSEMA person on the scene. In addition, the Chief of the Operations Division was acting in accordance with the agency's mission at the direction of the former Director. However, the Director clarified that she is the Emergency Manager and the Chief of the Operations Division will not respond to any emergency without approval from her. She stated that she consulted with HSEMA senior managers who agreed that she is the Emergency Manager.

The Director stated that the Chief of the Operations Division is responsible for managing logistics and staff members, and bringing resources and assigning additional staff to the scene of an emergency; the Emergency Manager is responsible for higher level issues such as coordinating with agency heads not on the scene and city leaders in order to provide them with information about the incident. The Chief of the Operations Division would provide updates to the Director about the resources needed and the Director would convey the information to the agency heads as well. The Director also stated that while she is not always the person on the scene of an emergency, she can designate an employee such as the Chief of the Operations Division to coordinate on the scene.

HSEMA stated in its response that D.C. Code § 7-2202 authorizes the establishment of HSEMA and appointment of the emergency management Director and personnel. D.C. § 7-2205 includes provisions that authorize HSEMA to execute specific emergency management responsibilities under the oversight of the Mayor. However, they do not define or assign the role of Emergency Manager. In addition, the Director's position description does not assign her the role of Emergency Manager. The DRP reflects global information on how the HSEMA Director is designated by the Mayor as the Consequence Management Team (CMT) Director and coordinates during emergency planning. However, it does not include detailed protocols as to actions that would be taken by the Emergency Manager.⁴⁷

While HSEMA's Director has clarified that she is the Emergency Manager, the OIG stands by its recommendation that written protocols for this role be developed to articulate the Director's responsibilities in this role. HSEMA's Director should share these protocols with HSEMA staff, District agency heads, and private sector agencies that respond to emergencies.

⁴⁷ Although HSEMA cited pages 4-7 of the DRP in its response, the team did not see any protocols pertaining to the Emergency Manager.

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4. **HSEMA has experienced high turnover in the Chief of Training and Exercises position.**

The GAO, *Internal Control Management and Evaluation Tool*, emphasizes the importance of having stability in key personnel functions such as operations and program management.⁴⁸

The Chief of the Training and Exercise Division fulfills an important leadership role. The Chief oversees the development of HSEMA's training and exercises plans including the DRP, which provides the framework for District agencies to respond to emergencies. In addition, the Chief assists other District agencies with the development and update of their emergency plans. The Chief also:

- develops strategy, schedules, plans, conducts, and evaluates education and training programs and exercises;
- advises HSEMA's Director on the effectiveness of training programs and the results of exercises to prepare for and respond to homeland security events; and
- directs, advises, and assists HSEMA's training and exercise staff.

Since September 2007, three people have served as Chief of Training and Exercises. An HSEMA senior official explained that one of the past Chiefs was not a "good fit" and another Chief decided to leave the position a few months after the previous HSEMA Director was hired. Another senior official stated that past Chiefs did not have adequate management, leadership, and technical skills to fulfill their responsibilities. The current Chief has been in the position since October 2008.

Two HSEMA employees stated that there is a need for stable leadership as initiatives have changed with each Chief and there is uncertainty as to the future direction of agency initiatives. During interviews with the former and current Chiefs, the team received inconsistent information regarding the status of a strategic training plan (for additional information see Finding #1). In another interview, an HSEMA senior official stated that HSEMA intended to implement a training strategy; however, the transition between Chiefs has hindered this process. During interviews to obtain feedback about HSEMA's emergency preparedness training and exercises, one stakeholder stated that HSEMA's management turnover has impacted the flow of training information. Lack of leadership continuity may inhibit HSEMA's development and implementation of long-range training and exercises plans.

⁴⁸ GENERAL ACCOUNTING OFFICE, INTERNAL CONTROL MANAGEMENT AND EVALUATION TOOL, GAO-01-1008G, 13 (Aug. 2001).

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Recommendation:

That the D/HSEMA develop a strategy to improve the retention rate of a Chief of Training and Exercises.

Agree X Disagree _____

HSEMA's February 2010 Response, as Received:

Maintaining continuity for the Chief of Training and Exercises position is of paramount importance. The current Training Chief has been with the agency for 18 months, thereby demonstrating the progress that has been made. HSEMA continues to strategize on how to best improve personnel retention rates agency-wide.

5. HSEMA does not sufficiently analyze training participant evaluations.

Donald Kirkpatrick, an author in the field of training program evaluation, states that evaluation is necessary to determine ways to improve future training programs and determine whether certain programs should continue.⁴⁹ Kirkpatrick discusses one evaluation model used to gauge training effectiveness that includes a four-part process wherein the first part evaluates how participants react to a training program or learning experience. This includes collecting information on whether participants liked a training program, whether the training material was relevant, and whether the method of delivery was effective.⁵⁰ According to Kirkpatrick, every training program should be evaluated at least at this first level.⁵¹

Employees from the Training and Exercise Division and an HSEMA senior official informed the OIG team that HSEMA issues a course evaluation to all training participants at the end of each training course. When HSEMA uses a contractor to provide training, the contractor develops the evaluation based on input from HSEMA. HSEMA management provided the OIG team with copies of evaluations from several training courses. The evaluation forms included questions about the course and the instructor to be rated using a Likert scale. The forms also included open-ended questions, as well as an additional comment section.

⁴⁹ According to a Wikipedia article, Mr. Kirkpatrick is "Professor Emeritus of the University of Wisconsin in North America and a past president of the American Society for Training and Development (ASTD). He is best known for creating a highly influential model for training evaluation, consisting of four levels of learning evaluation." http://en.wikipedia.org/wiki/Donald_Kirkpatrick (last visited Dec. 11, 2009).

⁵⁰ See C2 Workshop's E-Learning Blog, Kirkpatrick's Four Levels Evaluation, Nov. 1, 2008, <http://c2workshop.typepad.com/weblog/2008/11/kirkpatrick-s-levels-of-evaluation.html> (last visited Feb. 3, 2009).

⁵¹ Kirkpatrick's Four Levels of Evaluation, <http://coe.sdsu.edu/eet/Articles/k4levels/start.htm> (last visited Feb. 4, 2009).

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According to an HSEMA employee, HSEMA does not aggregate and analyze the responses for all of the questions on the training course evaluations. HSEMA's main focus in examining the evaluations is to review the comment section, such as the usefulness of content and issues with the instructor or training materials. For instance, if respondents indicate that the training room was too hot or cold or had bad lighting, this information will be relayed to the training contractor.

Although an HSEMA manager stated that an employee tabulates the results of the evaluations to identify additional training needs, the team's observation of the evaluation process revealed that the agency does not tally or analyze the results for all training evaluations. Because there is only one employee responsible for reviewing and analyzing all training participant surveys and training requests, it is reportedly difficult for this employee to review all the surveys for each course due to the volume of training courses and requests. For example, in preparation for the 2009 inauguration, HSEMA trained over 1,300 people, which created challenges with processing training requests. An employee suggested that a training database would be helpful to aggregate data from the training surveys but the employee was informed it was too costly.

Because HSEMA does not thoroughly analyze its training evaluations, it may not identify areas for improvement that could impact the effectiveness of its emergency preparedness training. Such analysis may also help determine whether to continue offering a particular training course.

Recommendation:

That the D/HSEMA develop a process and provide sufficient resources to regularly aggregate and analyze the responses from all course evaluation surveys to gauge the effectiveness of its training efforts.

Agree _____ Disagree _____ **X** _____

HSEMA's February 2010 Response, as Received:

HSEMA administers a consistent training evaluation tool. The analysis of every student's training evaluation survey is consistent and utilized for all classes sponsored by HSEMA. Training personnel critique each course by engaging the instructor or contractor in a review of the evaluation surveys. The identification of short-falls or best management practices are integrated into the course curriculum for incorporation into future seminar offerings.

OIG Response: The OIG stands by its finding and recommendation. The OIG acknowledged that HSEMA has an employee designated to administer and review training surveys. This employee stated that he/she reviews participants' comments for themes. However, this employee does not tally and analyze the results from various questions with

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Likert scale responses. In addition, HSEMA has not provided any evidence that this information is aggregated.

APPENDICES

APPENDICES

Appendix 1	List of Findings and Recommendations
Appendix 2	Summary of Emergency Support Function Agencies

APPENDIX 1

LIST OF FINDINGS AND RECOMMENDATIONS

Key Findings

1. **HSEMA had not finalized a written plan that details its emergency preparedness training, exercises activities, and future courses.**

That the Director/HSEMA (D/HSEMA) give the highest priority to finalizing HSEMA's multi-year training and exercise plan and institute a formal mechanism through which it is regularly reviewed and updated.

2. **HSEMA prepares AARs for some, but not all emergency preparedness exercises. In addition, improvement plans are not always implemented.**

That the D/HSEMA ensure that AARs are developed for all exercises, and when necessary, specific IPs are included and the action items in these IPs are tracked through resolution.

Additional Findings

3. **HSEMA lacks written protocols for an Emergency Manager.**

That the D/HSEMA develop written protocols and identify a specific employee who acts as an Emergency Manager in accordance with the guidelines in DHS' *National Response Framework*.

4. **HSEMA has experienced high turnover in the Chief of Training and Exercises position.**

That the D/HSEMA develop a strategy to improve the retention rate of a Chief of Training and Exercises.

5. **HSEMA does not sufficiently analyze training participant evaluations.**

That the D/HSEMA develop a process and provide sufficient resources to regularly aggregate and analyze the responses from all course evaluation surveys to gauge the effectiveness of its training efforts.

APPENDICES

APPENDIX 2

APPENDICES

Summary of Emergency Support Functions (ESFs) in the District Response Plan

EMERGENCY SUPPORT FUNCTION	PRIMARY DISTRICT AGENCY	SUMMARY
ESF #1 Transportation	Department of Transportation	Emergency transportation support and guidance.
ESF #2 Communications	Office of the Chief Technology Officer	Communications support.
ESF #3 Public Works and Engineering	Department of Public Works	Technical advice and coordinating structural inspection and debris removal.
ESF #4 Firefighting	Fire and Emergency Medical Services	Fire suppression and emergency medical services.
ESF #5 Information and Planning	Homeland Security and Emergency Management Agency	Collection, analysis, and dissemination of information.
ESF #6 Mass Care	Department of Human Services	Providing mass care to victims (such as shelter, food, and water).
ESF #7 Resource Support	Office of Contracting and Procurement	Providing equipment, materials, supplies and personnel for emergency operations.
ESF #8 Health and Medical Services	Department of Health	Identify and respond to health and medical care needs.
ESF #9 Urban Search and Rescue	Fire and Emergency Medical Services	Providing specialized lifesaving assistance involving technical rescues (such as structural collapses).
ESF #10 Hazardous Materials	Fire and Emergency Medical Services	Response to actual or potential releases of hazardous substances.
ESF #11 Food	Department of Human Services	Responsible for identifying, securing, and arranging for transportation and provision of food.
ESF #12 Energy	Energy Office	Helps restore energy systems after a public emergency.
ESF #13 Law enforcement	Metropolitan Police Department	Provides for the safety of citizens and security of property.
ESF #14 Long-Term Community Recovery and Mitigation	Homeland Security and Emergency Management Agency	Assists with recovery from long-term consequences of a disaster.
ESF #15 Media Relations and Community Outreach	Office of Communications, Executive Office of the Mayor	Direct link to media outlets and the community to deliver critical information during and following a public emergency.
ESF #16 Donations and Volunteer Management	Serve DC	Provides guidance regarding donations and management programs, and provides framework for coordinating with volunteer organizations.

Source: Table created by OIG using information in the District Response Plan