July 14, 2008

The Honorable Antonio Villaraigosa
The Honorable Rockard J. Delgadillo
The Honorable Members of the City Council

The City of Los Angeles certainly has suffered from its share of natural disasters, such as earthquakes, fires and flash floods. Unfortunately, since 2001 we also know that terrorist attacks are now additional potential man-made disasters. The City of Los Angeles and its residents and workers, should be well prepared for emergencies; and City government must take the lead. Just think of Hurricane Katrina and New Orleans.

In audit after audit, I have found that the City does not have a clear vision or strategic plans in areas including our park system, affordable housing, transportation, and gang violence prevention, etc. Given this fact, it is accurate to say that the City is groping in the dark without clear direction regarding the resolution of our many complex problems and issues. And of all the needed areas, emergency preparedness is the number one that cries out for a coordinated, constantly up-dated, state of the art strategic plan .

An additional problem lies in the organization that oversees our emergency preparedness. It is not easy to determine who is actually in charge, and who, for instance, assures that identified deficiencies in our preparedness are addressed. In fact, there are three entities that have key oversight: the EOO (Emergency Operations Organization); led by the Mayor, EOB (Emergency Operations Board), led by the Chief of Police; and the EMD (Emergency Management Department), led by its General Manager. It is also puzzling that the Fire Department, which is so very key in our emergency efforts, has no formal role as a member of the Emergency Operations Board.

Another key element to responding swiftly and effectively to a major disaster is coordination, especially with organizations outside of City government. My audit found that collaboration with other government, private and non-profit entities needs to be strengthened. For example, there is no formal agreement with the Red Cross specifying City and Red Cross responsibilities in the event of an emergency.

Many of the stand-alone emergency preparedness plans that the City does have are not up-to-date, timely or high-quality. Some of the Police Department's plans have not been revised in a decade and one Fire Department plan has not been up-dated since 1992. Further, almost all of the individual departmental emergency plans do not even meet National Incident Management standards.

This audit was conducted to ask and answer the question: Is the City of Los Angeles well prepared for a major emergency? How can we say the City is well prepared when it doesn't even have an overarching strategy that coordinates all the necessary pieces for a disaster recovery plan? How can we say the City is prepared when there is no follow-through to correct problems that are identified during training exercises?

An essential role of government is to ensure the safety of its residents, being prepared for a major emergency is paramount in providing that protection. It is now up to us, the elected leadership of Los Angeles, to take swift and effective action to assure that we are absolutely ready to meet any emergency or disaster that may come our way.

Sincerely,

LAURA N. CHICK
City Controller
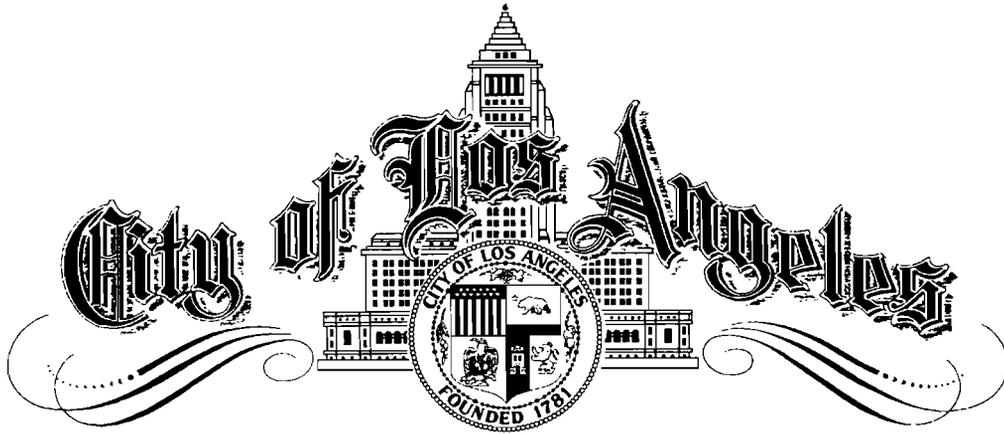
OFFICE OF
CONTROLLER

LAURA N. CHICK
CONTROLLER

200 N. MAIN STREET, RM 300
LOS ANGELES 90012
(213) 978-7200
www.lacity.org/ctr

July 14, 2008

Arif Alikhan, Deputy Mayor
Homeland Security and Public Safety
Office of the Mayor
200 N. Spring Street, Mezzanine M180
Los Angeles, CA 90012

James G. Featherstone, General Manager
Emergency Management Department
200 N. Spring Street, Room 1533
Los Angeles, CA 90012

Dear Mr. Alikhan and Mr. Featherstone:

Enclosed is a report entitled "Performance Audit of the City of Los Angeles' Emergency Planning Efforts and Citywide Disaster Preparedness." A draft of this report was provided to you and discussed on June 27, 2008. Comments by your respective Offices were considered prior to finalizing the report.

Please review this report and advise the Controller's Office by August 15, 2008 of actions to be taken to implement the report's recommendations, along with estimated timeframes. If you have any questions, please contact me at (213) 978-7392.

Sincerely,

FARID SAFFAR, CPA
Director of Auditing

Enclosure

c:      Robin Kramer, Chief of Staff, Office of the Mayor
        Jimmy Blackman, Deputy Chief of Staff, Office of the Mayor
        Raymond P. Ciranna, Interim City Administrative Officer
        Karen E. Kalfayan, Interim City Clerk
        Gerry F. Miller, Chief Legislative Analyst
        Independent City Auditors

July 11, 2008

Laura N. Chick
City Controller
City of Los Angeles
200 North Main Street, Room 300
Los Angeles, CA  90012

Dear Ms. Chick:

Harvey M. Rose Associates, LLC is pleased to present this *Audit of the City of Los Angeles' Emergency Planning Efforts and Citywide Disaster Preparedness.* The audit was requested by your office to (a) determine the adequacy of emergency planning and disaster preparedness efforts in the City, and (b) determine whether the needs of the public would be met by the City's response to a significant emergency or disaster.

Thank you for providing our firm with the opportunity to conduct this audit for the City of Los Angeles. Upon your request, we are available to present the report to the City Council or other responsible City officials.

Sincerely,

Stephen Foti
Project Manager

# Performance Audit of the City of Los Angeles' Emergency Planning Efforts And Citywide Disaster Preparedness

**Prepared for the Los Angeles City Controller by**

**Harvey M. Rose Associates, LLC**

**1390 Market Street, Suite 1025**
**San Francisco, CA  94102**
**(415) 552-9292**

**http://www.harveyrose.com**

**July 11, 2008**

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# Performance Audit of the City of Los Angeles' Emergency Planning Efforts and Citywide Disaster Preparedness

## EXECUTIVE SUMMARY

### Background

The City's emergency planning and disaster preparedness program involves nearly all of its departments. The roles and responsibilities of these departments vary and can be significant. The Police Department and Fire Department, with their primary public safety missions, are certainly key participants in the program. In addition, the Los Angeles World Airports and the Harbor Department have major responsibilities, due to inherent risk exposures of their operations. Because it manages major infrastructure for the City, the Public Works Department has responsibilities that touch on virtually every area of emergency response, recovery and reconstruction. Other departments can also have major emergency planning and disaster preparedness responsibilities. For example, the Parks and Recreation Department is responsible for opening shelters in the event of a major emergency or disaster and has involvement in services for the elderly and other special needs populations.

The organization of the City's emergency preparedness and response activities are established in the City Charter and Administrative Code. Activities are performed by all City departments, who are members of the Emergency Operations Organization (EOO). This group is led by the Mayor, who serves as the EOO Director. The Administrative Code also establishes the Emergency Operations Board (EOB), which governs and supervises City departments during an actual emergency, and governs the City's response and recovery activities. This structure was established to enhance centralized command and information coordination in the event of a major emergency or disaster, and is tasked with disaster and incident-based planning duties. By ordinance, the permanent chair of the EOB is the Police Chief.

In 2000, when the new City Charter gave the Mayor direct authority over the City's emergency management, a separate Emergency Management Department (EMD) was established. Previously, these functions were performed by staff within a division of the City Administrative Office. Led by an appointed General Manager, EMD provides coordination, management and leadership to help optimize the City's capability to effectively respond to large scale emergencies and ensure continuity of operations and government.

To answer the question of "whether the City is prepared," the City Controller asked for an evaluation of the structure that has been established and the activities of departments that are charged with major coordination or oversight responsibilities for the system. Therefore, although this performance audit touched on activities of all City departments, particular emphasis was directed toward the activities of the Emergency Operations Board (EOB), the Emergency Management Department (EMD) and the Mayor's Homeland Security and Public Safety Division (HSPS).

## Scope

The audit was initiated by the Controller to (a) determine the adequacy of emergency planning and disaster preparedness efforts in the City, and (b) determine whether the needs of the public would be met by the City's response to a significant emergency or disaster. Following a 2006 *National Peer Review* coordinated by the GAO and the U.S. Department of Homeland Security, the City Controller also requested an evaluation of the efforts being undertaken by the City to resolve peer review findings. The specific areas assessed during this performance audit included:

1. **Operational readiness.** The City of Los Angeles functions under a centralized emergency planning and disaster preparedness system, in accordance with the Los Angeles Administrative Code. The audit focuses on how well the City's plans address the functional areas of management direction and/or control of multiple stakeholders and resources, coordination with other agencies, and other emergency preparedness activities.

2. **Effective communication and coordination.** Effective emergency planning and disaster preparedness response for major events requires coordinated planning and actions across agencies, jurisdictions and levels of government. The audit focuses on how well the City's plans address communication and coordination of City, State, and federal agencies, as well as the City's public warnings and information dissemination protocol.

## Summary of Results

The City has not established an appropriate organizational structure or effective mechanisms for coordinating emergency planning and disaster preparedness activities. Authorities are not well balanced, overall missions and priorities have not been established and communicated by officials through a comprehensive Citywide strategy, and resources to accomplish key objectives are not clearly understood. Changes are needed to ensure the City is effectively prepared.

Further, the condition of the City's emergency plans, training programs and collaborations with external organizations does not adequately ensure that the City will have an effective response to emergencies or disasters. The audit found that emergency plans are outdated and incomplete; training is not approached strategically; corrective actions go unresolved for long periods; and collaboration with other government, private and non-profit entities needs strengthening. Because of the significance of the Department of Homeland Security grant programs in which the City participates, improvements are also needed in the administration and evaluation of key federal grant programs.

The audit found strengths with current operations. Recent changes in the leadership and structure of the Emergency Management Department are encouraging, with steps being taken to conduct internal assessments to improve the organization's effectiveness. Similarly, the Mayor's Office has recognized some of the weaknesses that have existed with UASI and SHSGP grant management, and has independently initiated improvements in FY 2007-08.

## Key Findings

☐ **The City has not articulated a strategic vision or developed a strategic plan for accomplishing critical emergency preparedness goals and objectives.**

Strategic plans are tools that assist organizations with defining their missions, goals and objectives; approaches toward achieving goals and objectives; and, methods for measuring the success of a program. Such plans communicate goals and objectives to constituencies, develop a sense of ownership by responsible officials, and provide a mechanism whereby an organization can develop strategies for leveraging scarce resources in a cost effective manner. Like a budget, a strategic plan should be established and built upon each year so that it addresses the changing needs and priorities of the organization.

In Los Angeles, emergency planning and disaster preparedness priorities are not driven by a Citywide strategic vision or plan, but rather by the requirements of federal and State government grant programs, immediate concerns expressed by various mayors and city councils, regional collaborations, and other initiatives that originate at the departmental level. The City has published a Master Plan and departmental emergency plans. However, these plans are designed to ensure operational readiness and the coordination of departments and external partners during an emergency. They do not provide the key elements of a strategic plan, which is intended to define overarching program goals and strategies for success.

Further, the City does not take full advantage of opportunities to define emergency preparedness goals, objectives or strategies. For example, the annual Lake Arrowhead Conference focuses on training, collaboration and limited emergency planning and disaster preparedness gap analysis. While the Conference is also intended to produce some policy direction from the Mayor and define short-term emergency preparedness objectives, a review of documentation from past conferences indicates that such results have been limited.

☐ **The current formal leadership structure of the EOB does not provide balanced authority or accountability for critical emergency preparedness functions. There is no formal role for the Fire Chief on the EOB; and, the EMD does not fulfill a top leadership role on the Board, or have the institutional authority to ensure consistent coordination of and cooperation from City departments.**

Other than simple membership, there is no formal role for the Fire Chief on the EOB, even though the Fire Department would play a critical role in virtually every major emergency or disaster. In addition to his role as a member of the EOB, the Administrative Code charges the General Manager of the EMD with coordinating "the authorities, powers, duties, and responsibilities of the Emergency Operations Board and Organization." However, the EMD does not fulfill a top leadership role on the EOB, nor does it have the institutional authority to ensure consistent coordination and cooperation from City departments on an ongoing basis.

The City of Los Angeles should explore alternatives for strengthening the formal authorities of the Fire Department and EMD through the EOB structure. One alternative would be to establish an Executive Committee of the EOB that would include the Police Chief, the Fire

Chief and the General Manager of EMD.  This group could be assigned specific authorities in the Administrative Code that would ensure a more balanced and strategic approach to emergency management in the City.  For example, the Executive Committee could be made responsible for directing activities related to the development and maintenance of a strategic plan, evaluating staffing and resource allocation requests for emergency management services across all City departments, providing oversight and recommendations to the Mayor regarding UASI and other major homeland security and disaster assistance grant programs, and generally directing the emergency planning and disaster preparedness activities of the departments, in accordance with directives received from the Mayor and City Council.

☐ **There is no up-to-date or complete inventory of all of the City's emergency plans. In addition, emergency plans are not timely, and the content of such plans is not consistent or of high quality in all cases.**

Emergency plans, if completed in a timely, clear, organized, and comprehensive manner, should serve as a critical and effective element of emergency management by defining the roles, responsibilities, and required actions by personnel and agencies during emergencies or disasters. The City of Los Angeles has many emergency preparedness plans with varying purposes and objectives, but many of these plans are not timely or up-to-date, have inconsistent plan content and quality, and have weaknesses relating to plan effectiveness..

For example, out of the 26 Departmental Plans reviewed for this audit, sixteen, or 62 percent, had not been updated for at least three years. Some of the Police Department plans that were on file at the Emergency Operations Center had not been revised since 1998, and one of the Fire Department plans had not been revised since 1992. Master Plan annexes, which are either disaster-specific (e.g., earthquake, tsunami) or functional (e.g., evacuation, care and shelter) plans that are intended to augment the City's Emergency Operations Master Plan and Procedures,  exhibited similar weaknesses. For example, 10, or 59%, of the Master Plan annexes had not been updated for over 10 years, and 6, or 35%, had not been revised since 1993. Further, eleven of the 26 departmental plans reviewed, or 42%, were non-compliant or inconsistent with the most recent EMD guidelines and standards. Not having timely and consistent emergency plans could result in inaccurate and confusing information during an emergency, which could negatively impact the City's overall emergency and disaster preparedness and response.

In addition, a formal review of departmental emergency plan compliance with the standard elements of Continuation of Operations/Continuation of Government (COOP/COG) has not been completed, and almost all departmental emergency plans do not meet National Incident Management (NIMS) standards, which include critical elements that should be incorporated into existing emergency plans.  When emergency plans do not comply with COOP/COG and NIMS standards, the overall effectiveness of the plans are limited, particularly with regards to ensuring the continuation of essential functions and maintenance of  governmental institutions during emergencies. Further, by not complying with these standards, the City cannot ensure consistency when preparing for, responding to, or recovering from an emergency or disaster situation. For example, no departmental plan described resources that

would be managed during an emergency event, nor did they include a comprehensive resource management protocol regarding mutual aid during exercises or actual events.

☐ **Emergency preparedness exercises and training are not well coordinated or planned**

Emergency exercises and training are integral parts of the City's overall emergency preparedness efforts. City employees participate in a variety of emergency preparedness-related exercises and training activities every year, but improved tracking, planning, and coordination are needed to ensure efficiency and effectiveness. For example, listings of emergency preparedness exercises and training are not always comprehensive and complete, making it difficult to assess whether the current exercises and training functions are duplicated or overlapping, and if specific gaps exist. Training and exercise activities are also not fully coordinated and the process for planning and prioritizing these activities has not been established. For example, the City chose to participate in a County sponsored tsunami response exercise during the period of this audit. However, after the first day of the three day exercise, the EMD General Manager determined that City departments were not prepared to participate since staff had not yet been fully trained on the recently adopted Tsunami Response Plan or the City's new on-line emergency information sharing software (i.e., Web EOC). Rather than participating in exercises merely because the opportunity presents itself, a strong centralized process for developing and implementing a needs-based, comprehensive, and multi-year approach to fulfilling the City's emergency preparedness exercise and training needs is necessary in order to ensure these efforts are effective.

☐ **After Action Reports corrective actions are not tracked or systematically followed for implementation**

The City does not have a systematic or consistent approach for tracking and following-up on actions needed to correct deficiencies identified through exercises and trainings. Because there is no mechanism for ensuring that corrective actions are fully implemented, the City does not always make the improvements that are necessary to effectively respond to or recover from large-scale emergencies or disasters.

After Action Reports (AARs) are required for training exercises to identify deficiencies during exercises and to document a plan for correcting such deficiencies. However, the City does not have formal mechanisms for ensuring that AARs and improvement plans are completed after every emergency exercise. There are no provisions in the Master Plan requiring the completion of AARs, or improvement plans for all types of exercises within specified time periods. As a result, AARs and improvement plans are not always completed after every emergency exercise.

Available AARs reviewed during this audit did not completely adhere to federal guidelines. For example, many AARs were missing critical required components, including formal improvement plans, intended to outline actions that the exercising jurisdiction plans to take, and list recommendations, specific actions, responsible parties for implementing recommendations, and target completion dates.

☐ **Comprehensive and collaborative strategies have not been developed with external public- and private-sector entities**

There are federal, State and local government mandates and initiatives that authorize how public officials must work collaboratively with each other, as well as with private, non-profit and individual community members to respond to significant emergency incidents. While there are numerous institutional barriers to effective and sustained emergency collaboration, a review of the City's efforts reveals that these collaborations are not systematically identified, organized, interrelated or maintained; nor has an overall structure and ongoing commitment to regularly and systematically partner with outside organizations been developed. As a result, overlapping and duplicative efforts, as well as significant gaps exist.

For example, there are not formal agreements with the Greater Los Angeles American Red Cross, such as exist in other cities and counties, specifying City and Red Cross responsibilities in the event of an emergency or disaster. In addition, both the Fire Department and Department of Neighborhood Empowerment (in cooperation with EMD) have community training programs, and until very recently, the Police Department had a similar program. Yet, these programs are not well coordinated and in some cases duplicate one another. In addition to building effective collaborations, the City of Los Angeles should coordinate outreach and public education campaigns regarding emergency preparedness so that effectiveness can be maximized.

☐ **The Homeland Security grant administration processes have inefficiencies that impact program timeliness and effectiveness**

Administration of a grant as large and complex as those provided through the Urban Area Security Initiative (UASI) is technically demanding and time consuming. Nonetheless, the administrative processes associated with these grants should be conducted as efficiently as possible, while still providing sufficient controls over the authorization and expenditure of funds. Failure to do so may unreasonably delay the execution of the grant program and place significant grant resources at risk.

Changes implemented by HSPS have not yet resulted in the substantial improvement in grant administration, especially those which are required for grant acceptance on behalf of City departments. Other improvements could be implemented, and the Administrative Code could be revised to streamline the process without compromising the Council's policy and oversight roles. For example, certain administrative processes presently performed by the Mayor's Office could be assigned to departments and the grants ordinance could be modified to provide certain delegated authorities to the Mayor.

☐ **The Emergency Management Department does not perform substantial Homeland Security grant monitoring or program evaluation functions**

Although the Homeland Security grant policy function is appropriately located in the office of the Mayor, the program and fiscal management of these grants reveal fiscal, grant and program management weaknesses that have a negative impact on the efficient use of grant funding and achievement of grant program goals and objectives. The responsibility to

monitor and evaluate the effectiveness of Homeland Security grant programs should be assigned to EMD, to ensure grant activities are fully integrated with the emergency management goals of the City, defined through a recommended strategic planning process.

□ **Mechanisms have not been developed for ensuring that Homeland Security grant activities can be sustained and cost impacts are known**

Homeland Security grant applications have not required a match, but will likely be required in the future. However, the City does not presently calculate discretionary fund contributions that grant funded activities require. Therefore, the City cannot easily identify resources that could be provided as matching contributions or estimate the cost to maintain grant funded activities in the event funding decreases. No City department or office is clearly responsible for determining the current or future General Fund obligation implied by acceptance of these grant funds.

The CAO's fiscal impact analysis of UASI funding has to date been limited to implications for funding within the grant period. Its reports enumerate and summarize current positions funded with grant funds, but do not provide a separate calculation of the City resources that will be necessary on a recurring yearly basis to sustain all grant funded activities, if UASI funds decline or if a matching requirement is required. Acceptance of these grant awards takes almost a year, which leaves little time for the CAO to conduct a full analysis of the fiscal impact beyond the grant period and inhibits the City Council from requiring that this analysis be conducted.

□ **Control procedures do not provide sufficient assurances that Emergency Operations Fund expenditures are consistent with intended purposes**

The Emergency Operations Fund (EOF) budget provides specific resources to assist various City departments within the Emergency Operations Organization to prepare for, respond to, mitigate, or recover from local emergencies such as terrorist attacks, earthquakes, fires, and other disasters. Currently, City departments use the EOF as a source of funds for various types of emergency preparedness-related expenses, including travel, training, equipment items, public outreach, supplies, and contractual services. A review of EOF charges found that some items charged against this special fund may not meet the intended purpose of the fund, including food catering expenses for events, monthly cable service fees, and software renewal fees. Establishing and actively implementing EOF policies and procedures are necessary in order to ensure the appropriateness and accountability of all projects and efforts that are funded through the EOF. In addition, the City should ensure that a portion of the annual EOF balance is set-aside as contingency to be used during a disaster or an emergency situation, when emergency funds are most needed.

□ **Progress implementing recommendations from a 2006 *National Peer Review* of the City's emergency planning has been slow or stalled in some cases**

Although substantial progress has been made in some areas, the City has not successfully implemented many recommendations for improvement that were identified as a result of a substantial evaluation effort made in 2006. Recommendations have not been implemented for

a variety of reasons, including lack of a strategic direction from City officials and clear authorities for EMD, weaknesses in centralized planning and management, an ineffective system for collaborating with external entities at the policy level, as well as other factors.

For example, the *National Peer Review* noted that plans do not incorporate private sector capabilities and resources into the City's emergency response and recovery strategy. During interviews, EMD staff confirmed that there has been minimal work with the private sector in this regard. Further, information from the Business and Industry Council for Emergency Planning and Preparedness (BICEPP) demonstrated that there has been little progress toward identifying private sector resources that could be made available during an emergency. Other research conducted for this audit confirmed that limited efforts have been made to formally incorporate non-profit resources into the City's response infrastructure. In one significant instance, the City has not entered into formal agreements with the Greater Los Angeles American Red Cross that define City and Red Cross responsibilities in the event of an emergency or disaster.

# Review of Report

On June 23, 2008, a draft report was provided to the management of the Mayor's Office of Homeland Security and Public Safety and the Emergency Management Department for review. Exit conferences were held with both departments on June 27, 2008 to discuss the contents of the report. The departments indicated general concurrence with the findings and recommendations. We considered the department's comments before finalizing the report.

Harvey M. Rose Associates, LLC would like to thank the management and staff from the many departments that participated in this performance audit.

# Table of Recommendations

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|---|---|
| **Section 1:   Strategic Planning** | **1-1** |
| The Mayor should:<br><br>1.1   Seek modifications to the Administrative Code to designate the Emergency Management Department as the strategic planning coordinating entity, charged with supporting the EOB and coordinating the involvement of City departments with its development and maintenance.<br><br>1.2   Seek modifications to the Administrative Code to require EOO member departments, through the EOB, to perform an annual update to the strategic plan that would be submitted to the Mayor and City Council for review and approval on a calendar year basis.<br><br>1.3   Direct the EOO, through the EOB, to initiate a strategic planning process that integrates locally defined priorities, goals, objectives and strategies with:<br><br>   a) Federal and State mandates, defined by the federal Department of Homeland Security, the State Office of Emergency Services and other departmental oversight bodies and partners;<br>   b) National Incident Management System and Standardized Emergency Management System standards and requirements; and,<br>   c) UASI, SHSGP and other homeland security and disaster preparedness grant programs.<br><br>1.4   Ensure that the strategic planning process appropriately addresses community preparedness with the locally defined priorities of City departments.<br><br>1.5   Integrate the goals, objectives and strategies defined by the strategic plan into the annual City budget process, along with the UASI and SHSGP grant application processes. | |

*Harvey M. Rose Associates, LLC*

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|---|---|
| **Section 2: Emergency Operations Organization Structure** | **2-1** |
| The Mayor should:<br><br>2.1  Seek modifications to the Administrative Code to:<br><br>   a)  Elevate the role of the Fire Chief and the General Manager of the EMD on the Emergency Operations Board;<br><br>   b)  Establish an EOB Executive Committee consisting of the Police Chief, Fire Chief and EMD General Manager, with rotating responsibilities as the EOB chair; and,<br><br>   c)  Assign specific responsibilities to the EOB, under the authority of the Executive Committee, such as directing activities related to the development and ongoing maintenance of a strategic plan, evaluating staffing and resource allocation requests for emergency management services across all City departments, also providing recommendations to the Mayor regarding UASI and other major homeland security and disaster assistance grant programs, and directing the emergency planning and disaster preparedness activities of the departments.<br><br>2.2  Request the CAO to update its evaluation of the EMD reorganization plan with a goal toward stabilizing staffing.<br><br>2.3  Request the CAO to develop a profile of all dedicated emergency planning and disaster preparedness resources in the City departments, linked to the scope of responsibilities assigned to each. Use the information to assign dedicated staff to EMD and City departments in a manner that more closely aligns with priorities and responsibilities. | |
| **Section 3: Emergency Preparedness Planning Efforts** | **3-1** |
| The Emergency Management Department should:<br><br>3.1  Maintain an up-to-date and complete master list of all completed and planned emergency plans (e.g., Departmental Plans, Master Plan Annexes, and Division Plans). At minimum, this master list should be:<br><br>   a)  Inclusive of detailed information such as the plan's last revision date, next revision date, and contact name and information;<br><br>   b)  Revised on an on-going and as-needed basis throughout the calendar year; | |

*Harvey M. Rose Associates, LLC*

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|---|---|
| c) Readily available from the Emergency Management Department; and<br><br>d) Used by the City as a tool for emergency management strategic planning.<br><br>3.2 Establish and implement clear policies and procedures that ensure the systematic and on-going review by Emergency Management Department staff of all emergency plans. At minimum, these policies and procedures should include:<br><br>a) Procedures for systematically reviewing plans for timeliness, completeness, consistency with existing guidelines, and overall quality and usefulness;<br><br>b) A system that holds Emergency Management Department staff accountable for conducting and documenting such emergency plan reviews on a regular basis; and<br><br>c) A system that assigns specific Emergency Management Department staff with oversight of and responsibility for tracking and monitoring emergency plans for a group of City departments.<br><br>3.3 In collaboration with the Mayor and other City departments, establish and implement policies and procedures that provide clear, practical, and proactive guidelines to facilitate collaboration and communication (i.e., beyond the Emergency Operations Board structure) between Emergency Management Department staff and other City departmental staff in drafting, revising, and reviewing emergency plans on an ongoing basis.<br><br>3.4 Regularly revise its "Guidelines for Department Emergency Plans" to include all relevant and up-to-date standards and protocols (e.g., NIMS requirements).<br><br>3.5 Proactively communicate and explain the Emergency Management Department's "Guidelines for Department Emergency Plans" to City department staff to ensure consistency, clarity, and usefulness of all emergency plans.<br><br>3.6 Establish and implement a systematic approach for ensuring that the emergency plans are effective and useful during an emergency or disaster situation. At minimum, this process should include: | |

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a)  Establishing a requirement for City departments to provide consistent and detailed information on departmental staff's emergency training and exercise needs, requirements and plans as part of the departmental emergency plans;

b)  When applicable, incorporating the corrective actions and recommendations that are included in After Action Reports into appropriate emergency plans; and

c)  Conducting systematic and on-going assessments of all emergency plans for their overall quality and usefulness.

3.7    Lead the effort to ensure that all City departments' emergency plans and efforts comply with relevant standards and guidelines, including those pertaining to COOP/COG and NIMS guidelines and provisions. At a minimum, EMD should ensure that:

a)  The formal review of the departmental emergency plans' compliance with the standard elements of the Continuity of Operations (COOP) and Continuity of Government (COG) planning guidelines is completed and that the results are implemented;

b)  Relevant City departmental emergency plans comply with appropriate COOP/COG standards; and

c)   All recommendations contained in the report provided by ICF International to the City regarding NIMS compliance are implemented.

| **Section 4:   Emergency Exercises and Training** | **4-1** |
|---|---|

The Emergency Management Department, in collaboration with other City departments, should:

4.1    Establish and maintain a central database containing all emergency preparedness-related exercises, including all department-specific exercises, that City staff have participated in. At a minimum, this database should include the following:

a)  Exercise title;

b)  Exercise type (e.g., tabletop, full-scale, functional, etc.);

c)  Exercise date(s);

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|   |   |

d) Exercise location;

e) Exercise description/scenario;

f) Exercise's lead entity/organizer;

g) Exercise contact information; and

h) Information that indicates whether an after action report exists for the exercise, and if so, a link to the final after action report.

4.2 Establish and maintain a central database containing all emergency preparedness-related training, including all department-specific training and those that are non-EOF funded, that City staff have participated in. At a minimum, this database should include the following:

a) Training title;

b) Training date(s);

c) Training type (e.g., NIMS-requirement, department-specific, etc.);

d) Training location;

e) Training description/scenario, including the training goals and objectives and how these goals and objectives relate to the City's overall exercise/training priorities;

f) Total number of participants (including a breakdown of City employees vs. non-City employees);

g) Training lead entity/organizer.

4.3 Revise the exercises and training master lists to ensure their completeness and accuracy on an on-going basis.

4.4 Use the exercise and training master lists as a key tool in its emergency management strategic planning.

4.5 Identify the gaps and deficiencies in the City's emergency exercise plans on an ongoing basis.

4.6 Conduct a formal assessment of the emergency exercise needs of City staff on an ongoing basis.

4.7 Identify the gaps and deficiencies in the City's emergency training plans on an ongoing basis.

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| 4.8    Conduct a formal assessment of the emergency training needs of City staff on an ongoing basis.<br><br>4.9    Revise the City Master Plan's Training Annex to reflect current training requirements and standards.<br><br>4.10    Ensure that exercise and training functions and activities are not duplicated or overlapping, that specific gaps are addressed, and that activities are modified or enhanced, accordingly.<br><br>The Mayor should:<br><br>4.11    As part of the strategic planning efforts, work with the Emergency Operations Board and the Emergency Management Department in drafting and implementing a multi-year exercise and training plan/program to provide a roadmap for the City in accomplishing its emergency preparedness priorities.<br><br>4.12    Ensure that the multi-year exercise and training plan/program is a living document that is updated and refined annually.<br><br>4.13    Ensure that the exercise and training plan/program includes a multi-year training and exercise schedule that represents natural progression of training and exercises that should take place. | |
| **Section 5:   After Action Reporting and Corrective Actions** | **5-1** |
| The Emergency Operations Organization should:<br><br>5.1    Establish formal policies and procedures that require the full completion of an After Action Report and Improvement Plan after each exercise. At minimum, these policies and procedures should:<br><br>    a)  Require the completion of AARs and improvement plans for all emergency exercises (i.e., for both discussion-based and operations-based exercises) in the City;<br><br>    b)  Identify the specific parties or agencies responsible for the drafting, completion, and finalizing of the AARs;<br><br>    c)  Explicitly specify when (e.g., after 30 days) an after action report and improvement plan should be completed and submitted to the Emergency Operations Board; and, | |

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d) Require that the Emergency Management Department work with other City departments to compile and maintain a comprehensive list of after action reports.

5.2    Ensure the quality and completeness of each AAR/IP by:

a) Establishing a standard format to be followed when drafting After Action Reports. In doing so, The EOB should consider using the standard format suggested by the U.S. Department of Homeland Security's Exercise and Evaluation Program (HSEEP); and

b) Making the Improvement Plan Matrix a mandatory component of each AAR. At minimum, this Improvement Plan Matrix should include specific tasks, recommendations, improvement actions, the party/agency responsible for the implementation of the recommendations, and a full implementation date.

5.3    Establish a formal accountability mechanism for prioritizing, tracking, monitoring, and following-up on the implementation status of all corrective actions and areas for improvement that are identified in each AAR. Such a process should include:

a) Establishing a master database containing all recommendations, improvement actions, the party/agency responsible for the implementation, and a full implementation date;

b) Identifying the party/agency responsible for monitoring and following-up on the implementation status of all corrective actions and areas for improvement; and,

c) Requiring relevant parties/agencies to provide formal reports on the implementation status of pending corrective actions and areas for improvement on an ongoing basis.

| Section 6:   External Collaborations | 6-1 |
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The Mayor should seek to:

6.1    Modify the Administrative Code to require that other public, business and non-profit leaders in the emergency management field be integrated into the Emergency Operations Board through a Disaster Council structure, so that information is consistently shared with all players.

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| 6.2    Modify the Administrative Code to designate the Emergency Management Department as the lead agency for community preparedness responsibilities, to insure a continuing collaborative approach among departments and other partners.<br><br>The Emergency Management Department should:<br><br>6.3    Identify emergency preparedness public outreach and training programs and collaboratively work with City departments, County agencies, business groups and nonprofit organizations to coordinate participant groups, outreach strategies, training content and curriculum, calendars and locations of events.<br><br>6.4    As part of the strategic planning process, described in Section 1 of this report, (a) identify specifically how other public agencies, private businesses and nonprofit organizations can be systematically included in the emergency planning and preparedness in Los Angeles, and (b) address the goals and objectives for emergency preparedness and response for the special needs population, in order to identify short and long-term coordinated strategies for achieving these objectives.<br><br>6.5    Develop mutual public campaigns with other public agencies, nonprofit organizations and businesses to insure consistent emergency preparedness messages are disseminated which will maximize the limited resources and the effectiveness of such preparedness campaigns.<br><br>6.6    Work with the City Attorney and other relevant City departments (e.g., Recreation and Park Department) to develop Memorandum of Understanding (MOUs) with key external participants, such as the American Red Cross, to clarify general and specific responsibilities in emergency preparedness, training, response and recovery.<br><br>6.7    Develop an inventory of outside organizations and contact persons with whom the City and the Emergency Management Department maintains ongoing emergency relations. Initially review to insure that all major sectors of the private economy and non-profit organizations are included and annually contact individuals to maintain an updated, emergency list.<br><br>6.8    Develop guidelines and standards for City departments to include contingency plans for activating private resources in the event of a disaster or emergency, as required by the City's Emergency Operations Plan. Annually review such City department plans to ensure that their private sector contingency plans are incorporated, and consistent with the City's Emergency Operations Plan. | |

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| **Section 7: Grant Administration** | **7-1** |
| The Mayor should, subject to legal counsel received from the City Attorney, seek to:<br><br>7.1     Amend the Administrative Code to provide the City Council with the authority to delegate authority to the Mayor's Office and, as appropriate, to departments to enter into UASI sub-recipient agreements and vendor contracts, subject to the parameters defined in the grant award and other general restrictions defined in law.<br><br>7.2     Amend the Administrative Code to permit modifications of homeland security grants by the CAO which entail minor changes in approach or City entity and by the Mayor's Office for changes in jurisdiction, investment justification, solution area or financial years up to an appropriate amount.<br><br>The City Council should:<br><br>7.3     Require the CLA and CAO to report to the Council on the Investment Justification decisions made by the Approval Authority at the beginning of the UASI grant process, and at the project selection stage prior to submission of the projects to the state OHS, and to provide a quarterly summary report of UASI project modifications, focused on changes between investment justifications, solution areas or jurisdictions.<br><br>7.4     Consider establishing a grant committee, or a special joint committee with representatives from Budget and Finance, Personnel and Public Safety, to expedite consideration of the UASI grant award, consistent with recommendations made by the City Controller in her December 2007 report on City grant processes.<br><br>7.5     Require a full report from responsible City officials on actions taken using delegated authority at six month and 12 month intervals after acceptance of the grant, to ensure consistency with the Council's intentions.<br><br>The Mayor should:<br><br>7.6     Continue to begin collecting implementation plans, budgets, necessary contractual and personnel authorizations when the UASI projects are initially selected. | |

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| Recommendations | Page Reference |
|---|---|
| 7.7    Expedite the implementation of the UASI grant by requesting contract and personnel approvals as they are completed rather than waiting for the entire package to be finalized, and/or requesting approval authority to execute sub recipient agreements, vendor contracts and personnel transactions, subject to restrictions defined by the approved award and the Administrative Code. | |
| 7.8    Develop a summary management report of significant modifications in grant usage for periodic presentation to the City Council. | |
| 7.9    Utilize the list of projects originally requested through the Approval Authority but not funded as a starting point for replacement projects when originally funded projects become infeasible. Require subrecipients to identify projects unlikely to be completed earlier in the funding cycle. | |
| **Section 8:   Grant Management Structure** | **8-1** |
| The Mayor should: | |
| 8.1    Prioritize program management. Assign the responsibility to monitor and evaluate outcomes of programs funded by the UASI and SHSGP grant programs to EMD, to ensure grant activities are fully integrated with the defined emergency management goals of the City. | |
| 8.2    Structure and staff the grants administrative function with consideration toward the continuity and development of expertise in City financial processes that would carry on regardless of changes in mayoral administrations. | |
| 8.3    Develop performance standards for evaluating the efficiency of financial management of these grant funds. Efficiency outcomes should be continuously monitored, and if they are not met, consider transferring the UASI and SHSGP financial management functions to another City department with experience administering multiple streams of complex funding involving multiple stakeholders | |

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| **Section 9: Sustaining Commitments to Grant Activities** | **9-1** |
| The Mayor should:<br><br>9.1 Assign responsibility for assessing the ongoing commitments by the City that are not funded by the UASI or SHSGP grants but result from grant activities to the Emergency Management Department, in coordination with the CAO providing supporting fiscal analysis.<br><br>9.2 Assign routine analysis of general fund and proprietary fund monies necessary to sustain or complete emergency preparedness and homeland security projects to the Emergency Management Department in coordination with the CAO.<br><br>9.3 Assign the Emergency Management Department with the responsibility to assess general fund or proprietary fund amounts necessary, if the federal Department of Homeland Security requires a 25% match for the UASI grant, in coordination with the CAO.<br><br>9.4 Direct the CAO to study the feasibility of programming UASI and SHSGP funding in the City budget, with direction to avoid supplantation of existing general funds with grant funds. | |
| **Section 10: Emergency Operations Fund** | **10-1** |
| The Mayor should seek to:<br><br>10.1 Revise Section 8.72 of the Los Angeles Administrative Code to:<br><br>    a) Provide a clearer description of the Emergency Operations Fund's purpose and intended uses; and<br><br>    b) Require that a portion of the annual EOF balance is reserved as contingency to be used during a disaster or an emergency situation.<br><br>The Emergency Management Department and the Emergency Operations Organization should strengthen EOF's oversight and internal controls by:<br><br>10.2 Establishing and implementing policies and procedures specifically for the administration and management of the Emergency Operations Fund that would ensure sufficient fund oversight and accountability. At a minimum, these policies and procedures should: | |

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| a) Consistent with the revision to the Administrative Code (see recommendation 10.1.a), provide clear descriptions of allowable/not allowable expenditure items to be charged against the EOF; <br><br> b) Establish standardized procedures and a list of required documentation (e.g., statement of compliance with the EOF budget policy, discussion of why the item is being requested through the EOO rather than departmental budget, detailed description of the requested item, etc.) for City departments as part of the EOF funding application/request process; <br><br> c) Establish standardized procedures for reviewing EOF funding requests, including establishing clear, relevant, and up-to-date criteria as part of the EOF funding request review and approval process; <br><br> d) Include provisions to centrally, formally, and regularly maintain an up-to-date inventory of all emergency preparedness-related equipment, devices, and supplies purchased by City departments through the EOF; <br><br> e) Establish a system that would ensure that charges made against the EOF allocation are appropriate and that an audit of the EOF is conducted on a regular basis to ensure proper fund use; <br><br> f) Include provisions that an external entity (e.g., the Controller's Office) may conduct a regular compliance review or audit of the EOF and that the results of this review or audit are made public; and, <br><br> g) Include provisions that these policies and procedures will be revised as frequently as necessary to reflect all relevant and up-to-date guidelines. | |
| **Section 11: National Peer Review** | **11-1** |
| The Mayor should: <br><br> 11.1 Direct the Emergency Operations Board to adopt a plan for implementing National Peer Review recommendations. <br><br> 11.2 Ensure that the plan includes a report on implementation status for each identified deficiency and recommendations for the specific corrective action to be employed by the City, with estimates of costs that might impact implementation success. | |

# Introduction

Harvey M. Rose Associates, LLC (HMR) is pleased to present this *Performance Audit of the City of Los Angeles' Emergency Planning Efforts and Citywide Disaster Preparedness.* This report was prepared at the request of the City Controller in accordance with the powers and duties prescribed for the City Controller in Article II, Section 261(e) of the City Charter.

## Objectives, Scope and Methodology

*Objectives and Scope*

The audit was initiated by the Controller to (a) determine the adequacy of emergency planning and disaster preparedness efforts in the City, and (b) determine whether the needs of the public would be met by the City's response to a significant emergency or disaster. Following a 2006 review by the GAO and the U.S. Department of Homeland Security, the City Controller also requested that HMR review the efforts undertaken by the City of Los Angeles to resolve the peer review findings. The specific areas assessed during this performance audit included:

1. **Operational readiness.** The audit focused on the City's functions under a centralized emergency planning and disaster preparedness system, in accordance with the Los Angeles Administrative Code, including how well the City's plans address the functional areas of management direction and/or control of multiple stakeholders and resources, coordination with other agencies, evacuation procedures for the City's employees and residents, and public health and emergency medical response.

2. **Effective communication and coordination.** Effective emergency planning and disaster preparedness response for major events requires coordinated planning and actions across agencies, jurisdictions and levels of government. The audit focused on how well the City's plans address communication and coordination of City, State, and federal agencies, as well as the City's public warnings and information dissemination protocol.

The performance audit excluded detailed reviews of City department plans for business resumption, data control and recovery efforts.

*Methodology*

The performance audit was conducted in accordance with *Government Auditing Standards, July 2007 Revision* by the Comptroller General of the United States. In accordance with these standards and best practices for conducting performance audits, the following five key tasks were conducted:

1. Entrance conferences were held with City officials responsible for implementing the emergency planning and disaster preparedness program to introduce HMR staff, describe the performance audit process and protocol, and request general information on the program.

2. An initial review of emergency planning and disaster preparedness program activities was performed, including interviews with key City officials and selected regional partners and a review of documentation provided by City departments. At the conclusion of these activities, a more detailed plan was developed for conducting subsequent performance audit activities.

3. Field work was conducted to research key elements of the City's program with additional interviews, and collection and analysis of data. During the field work phase, members of the performance audit team were able to observe a tsunami response exercise sponsored by the County, which required activation of the City's Emergency Operations Center (EOC). At the conclusion of field work activities, preliminary findings, conclusions and recommendations were developed.

During the initial review and field work phases, HMR consultants interviewed emergency preparedness managers and staff from selected member departments of the Emergency Operations Board (EOB) to obtain an understanding of the roles of these departments in emergency planning and disaster preparedness. These interviews were supplemented by a structured telephone survey of all EOB operating departments to obtain more detailed information on the scope of duties assigned to each department, staffing dedicated to emergency preparedness activities and other information used in the preparation of this report.

In addition, an internet search was conducted to obtain emergency preparedness governance, organization and staffing information for other major cities and metropolitan areas in the United States. Representatives from six of these jurisdictions participated in telephone interviews designed to obtain a more detailed understanding of programs and structure in their jurisdictions, including: Atlanta, Houston, Miami, Philadelphia, Phoenix, and San Francisco. However, certain key jurisdictions - including New York City and Washington DC - chose not to participate in the telephone interview portion of the survey, although some information was available from the internet and from other sources.

## Background

The organization of the City's emergency preparedness and response activities are established in the City Charter and Administrative Code. Activities are performed by all City departments, who are members of the Emergency Operations Organization (EOO). This group is led by the Mayor, who serves as the EOO Director.

The Administrative Code also establishes the Emergency Operations Board (EOB), which governs and supervises City departments in actual emergency preparation, response and recovery activities. The permanent chair of the EOB is the Chief of Police, and membership consists of the general managers of the Police, Fire, Airports, Building and Safety, Emergency Management, General Services, Information Technology, Harbor, Personnel, Public Works, Recreation and Parks, Transportation, and Water and Power departments, as well as the City Administrator and Chief Legislative Analyst. This structure has been established to enhance centralized command and information coordination in the event of a major emergency or disaster, and is tasked with disaster and incident-based planning duties.

In addition to its role as a member of the EOO and EOB, the Emergency Management Department (EMD) provides support to the EOB. The EMD General Manager is charged with a variety of responsibilities related to providing such support, as well as coordination of City departments, liaison with external agencies, and other functions.

*EMD Staffing and Organization*

During the period of the Initial Assessment, the EMD had authorized staffing and volunteer resources of approximately 45.0 Full Time Equivalent (FTE) positions. The table below summarizes these staff and volunteer resources, and is followed by a discussion of each broad grouping of personnel and volunteers. Attachment 2 provides an organization chart that displays staff and volunteer assignments within the EMD organization.

## Table 1

## Emergency Management Department Staffing Summary

| Position Classification | Permanent Positions | | | Resolution Authority Positions | | | External Authority Positions | | | Total Positions | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Admin/ Mgmt | Program | Subtotal | Admin/ Mgmt | Program | Subtotal | Admin/ Mgmt | Program | Subtotal | Admin/ Mgmt | Program | Subtotal |
| General Manager | 1.0 | - | 1.0 | - | - | - | - | - | - | 1.0 | - | 1.0 |
| Assistant General Manager | 1.0 | - | 1.0 | - | - | - | - | - | - | 1.0 | - | 1.0 |
| Executive Management Assistant III | 1.0 | - | 1.0 | - | - | - | - | - | - | 1.0 | - | 1.0 |
| Secretary | 1.0 | - | 1.0 | 1.0 | - | 1.0 | - | - | - | 2.0 | - | 2.0 |
| Account Clerk II | 1.0 | - | 1.0 | - | - | - | - | - | - | 1.0 | - | 1.0 |
| Senior Management Analyst 1 | - | - | - | 1.0 | - | 1.0 | - | - | - | 1.0 | - | 1.0 |
| Senior Project Coordinator | - | 1.0 | 1.0 | - | - | - | - | - | - | - | 1.0 | 1.0 |
| Emergency Preparedness Coordinator II | - | 4.0 | 4.0 | - | - | - | - | - | - | - | 4.0 | 4.0 |
| Emergency Preparedness Coordinator I | - | 4.0 | 4.0 | - | 7.0 | 7.0 | - | - | - | - | 11.0 | 11.0 |
| Management Analyst II | 1.0 | 2.0 | 3.0 | - | - | - | - | - | - | 1.0 | 2.0 | 3.0 |
| Health Planner | - | - | - | - | - | - | - | 1.0 | 1.0 | - | 1.0 | 1.0 |
| International Fellow | - | - | - | - | - | - | - | 1.0 | 1.0 | - | 1.0 | 1.0 |
| AmeriCorps Volunteers (Full FTE Count) | - | - | - | - | - | - | - | 17.0 | 17.0 | - | 17.0 | 17.0 |
| TOTAL | 6.0 | 11.0 | 17.0 | 2.0 | 7.0 | 9.0 | - | 19.0 | 19.0 | 8.0 | 37.0 | 45.0 |

Key attributes of the EMD personnel and volunteer profile are described below:

- The Department has been allocated a total of 17 permanent positions that are funded from General Fund discretionary resources. Of these positions, six (35.3 percent) perform general management and administrative support functions; and, eleven positions (64.7 percent) perform program functions. Included in the program subtotals are four Emergency Preparedness Coordinator II positions that are responsible for overseeing the activities of the Department's four principal divisions (Operations, Planning, Training and Exercises, and Community Preparedness). In addition to performing a supervisory and oversight role, these staff directly perform various program activities (e.g., planning, training and analysis). One Senior Project Coordinator is exempt, added in FY 2007-08 to perform monitoring and reporting functions related to the Department's use of AmeriCorps grant funds.

- During the period of this audit, EMD had also received resolution authority (i.e., temporary City Council authority) for a total of nine positions through June 30, 2008. Primarily, these positions were wholly or partially funded by federal and State grants, including FY 2006 Urban Area Security Initiative (UASI) and AmeriCorps monies. Two of these positions - a Secretary and Senior Management Analyst - are funded by General Fund discretionary

resources. The Secretary position has reportedly been kept as a long-term vacancy to achieve salary savings. The remaining seven positions, for which the Department has received resolution authority, are all Emergency Preparedness Coordinator I positions. These staff are assigned to a variety of functions in Planning, Training and Exercises, and Community Preparedness. Three of these positions will be responsible for overseeing the activities of the 17 AmeriCorps volunteers, added to Community Preparedness in February 2008.

- The Department also utilizes 19 positions that are contributed to the City by external entities. The majority are the 17 AmeriCorps volunteers, who receive their assignments and stipend from the federal government. The other two positions include: (1) One Health Planner, who is on loan to the City from the County of Los Angeles; and, (2) One International Fellow, who is participating in Department activities as part of his graduate studies.

*EMD Budgeted Resources*

In FY 2007-08, the Emergency Management Department was allocated $1,807,309 for operations. According to documentation received from the Department, $330,607 of this amount was funded from the Disaster Assistance Trust Fund. Therefore, the net General Fund cost of the Department was budgeted to be $1,476,702 for the year, excluding $1,113,681 in funding for "Related and Indirect Costs" of operations (e.g., employee pensions and retirement, human resources benefits, water and electricity, communications services, etc.).[1] The table below displays the components of the budget.

## Table 2

## Emergency Management Department Adopted Budget

|  | General Fund | Disaster Assistance Trust Fund | Other Grants | TOTAL |
|---|---|---|---|---|
| FY 2007-08 Adopted Budget | 1,476,702 | 330,607 | - | 1,807,309 |

Source: EMD Proposed Budget Package for FY 2008-09. Does not include $1,113,681 in funding for "Related and Indirect Costs" of operations (e.g., employee pensions and retirement, human resources benefits, water and electricity, communications services, etc.)

In FY 2008-09, the Department proposed that funding be increased by $1,081,811. Of this amount, $544,877 would provide resources for staff compensation adjustments and continuation of funding for six positions for which the Department currently has resolution authority. This portion of the increase would be financed by the General Fund ($122,005), as well as Homeland Security and AmeriCorps grants ($422,872). The remaining $536,934 would provide funding for program augmentations, and would be financed by the General Fund ($406,999), Proposition Q ($79,935) and MICLA ($50,000). Instead, the FY 2008-09 EMD budget adopted by the City Council just prior to the release of this report, increases the appropriation to $1,976,288, and provides resolution authority for two new Emergency Preparedness Coordinator I positions.

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[1] Consistent with the City's budgeting practices for all departments.

It should be noted that the Department reports that it has received authorization to initiate the AmeriCorps Program in FY 2007-08, and was in the process of hiring and assigning up to 17 volunteers during the month of February to work in the Community Preparedness Division. These volunteer staff are fully funded by the grant.

*Other Departments*

As a coordinating department, the EMD has not been charged with direct responsibility for many of the emergency planning and disaster preparedness functions that are performed within the City of Los Angeles. Many City departments, including first responders such as the Police and Fire departments, as well as General Services, Public Works, the Port, Los Angeles World Airports, and others, have internal emergency planning and disaster preparedness organizations and incorporate many responsibilities into their regular operations. In addition, the Office of the Mayor directly manages homeland security and public safety grants; and, the Office of the City Administrative Officer manages disaster recovery and reconstruction monies, including Federal Emergency Management Agency (FEMA) claim processing. Section 2 of this report provides detailed information on dedicated emergency preparedness staffing in the departments, amounting to over $10.9 million per year.

*Grant Funds that Support Emergency Planning and Disaster Preparedness Functions*

An analysis of emergency planning and disaster preparedness activities of the City would not be complete without an assessment of major homeland security grant programs and disaster assistance reimbursement programs. The City has been the recipient of significant grant funding through the United States Department of Homeland Security (DHS) the Federal Emergency Management Agency (FEMA) and the State Office of Emergency Services (OES). These funds come to the City through a variety of channels, depending on source.

Principally, the management of major homeland security grant programs, such as the money received through the federal Urban Area Security Initiative (UASI) are managed by the Mayor's Office Homeland Security and Public Safety Division (HSPS). Because the City is the regional fiscal agent for UASI, the Grants Unit and Financial Management Unit in the HSPS are responsible for overseeing grant activities for the entire Los Angeles/Long Beach UASI. The County of Los Angeles is the fiscal agent for regional State Homeland Security Grant Program (SHSGP), so the Mayor's Office has a reduced role for this program. Disaster assistance received from the Federal Emergency Management Administration (FEMA) and the State Office of Emergency Services (OES) are managed by the Office of the City Administrative Officer.

The table below shows the total grant funding reported by the City in the FY 2007-08 budget, amounting to $49.6 million for the year. The cumulative estimated total from these sources reported in budgets for the three year period FY 2005-06 through FY 2007-08 amounted to approximately $152.3 million.

## Table 3

## FY 2007-08 City of Los Angeles Emergency Planning and Disaster Preparedness Estimated Grant Funds

| Source Description | Fund Type and Department | | | | | | Total | Match |
|---|---|---|---|---|---|---|---|---|
| | GF Mayor | GF CAO | GF EMD | GF Fire | PROP Harbor | PROP DWP | | |
| California OES Natural Disaster Asst Act | - | 3,000,000 | - | - | - | - | 3,000,000 | - |
| Department of Homeland Security | - | - | - | - | - | - | - | - |
| DOJ Domestic Preparedness | - | - | - | - | - | - | - | - |
| Emergency Management Performance | - | - | 293,000 | - | - | - | 293,000 | 293,000 |
| Federal Transortation Security Administration | - | - | - | - | 6,783,493 | - | 6,783,493 | - |
| FEMA Disaster Assistance (Claims) | - | 12,000,000 | - | - | - | - | 12,000,000 | - |
| FY04 State Homeland Security Grant | - | - | - | - | - | - | - | - |
| FY04 Urban Area Security Initiative | - | - | - | - | - | - | - | - |
| FY05 State Homeland Security Grant | 3,000,000 | - | - | - | - | - | 3,000,000 | - |
| FY05 Urban Area Security Initiative | 24,000,000 | - | - | - | - | - | 24,000,000 | - |
| State California Homeland Security | - | - | - | - | - | - | - | - |
| State California UASI FY03, Part II | - | - | - | - | 1,241 | - | 1,241 | - |
| State Homeland Security Grant Program | - | - | - | - | - | 100,000 | 100,000 | - |
| Urban Area Security Inirtiative Part I | - | - | - | - | - | - | - | - |
| Urban Area Security Inirtiative Part II | - | - | - | - | - | - | - | - |
| Urban Search & Rescue - WMD Admin Prep | - | - | - | - | - | - | - | - |
| **TOTAL EMERGENCY & DISASTER RELATED** | **27,000,000** | **15,000,000** | **293,000** | **-** | **6,784,734** | **100,000** | **49,177,734** | **293,000** |
| Americorps (Funding EMD Community Preparedness) | 423,000 | - | - | - | - | - | 423,000 | 250,000 |
| **GRAND TOTAL USED FOR EMERGENCY & DISASTER** | **27,423,000** | **15,000,000** | **293,000** | **-** | **6,784,734** | **100,000** | **49,600,734** | **543,000** |

Source: City of Los Angeles FY 2007-08 Adopted Budget, Pages 345 through 349.

## Auditor Observations and Comments

The City of Los Angeles has a significant emergency planning and disaster preparedness program, involving nearly all of its departments. The roles and responsibilities of these departments vary and can be significant. The Police Department and Fire Department, with their primary public safety missions, are certainly key participants in the program. In addition, the Los Angeles World Airports and the Harbor Department have major responsibilities, due to inherent risk exposures and the complexities of their operations. Because it manages major infrastructure for the City, the Public Works Department has responsibilities that touch on virtually every area of emergency response, recovery and reconstruction. Other departments with very different operational missions can also have major emergency planning and disaster preparedness responsibilities. For example, the Parks and Recreation Department is responsible for establishing shelters in the event of an emergency or disaster and has involvement in services involving the elderly and other special needs populations.

Recognizing the complexity of the services provided by the operating departments, the City Controller did not anticipate or request evaluations of emergency response, recovery or reconstruction service quality or level of preparedness by each of these departments. Instead, to answer the question of "whether the City is prepared," the City Controller asked for an evaluation of the structure that has been established and activities of departments that are charged major coordination or oversight responsibilities for the system. Therefore, although this performance audit touched on activities of all City departments, particular emphasis was directed

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toward the activities of the Emergency Operations Board, the Emergency Management Department and the Mayor's Homeland Security and Public Safety Division.

As will be seen in this report, there are many opportunities to improve or enhance the systems established to achieve preparedness. Principally, the audit found that the organization and coordination of emergency planning and disaster preparedness activities needs to be strengthened to ensure that authorities are well balanced, missions and resources available to accomplish key objectives are understood, and priorities are established and communicated by officials.

Further, as will also be seen in this report, the audit found that emergency plans are outdated and incomplete; training is not approached strategically; corrective actions go unresolved for long periods; and collaboration with other government, private and non-profit entities needs strengthening. Because of the significance of the homeland security grant programs in which the City participates, the administration of the UASI and SHSGP grant programs need improvement and potential changes in the organization of responsibilities.

Despite these weaknesses, the audit found that there are many strengths to current operations. Recent changes in the leadership and structure of the Emergency Management Department are encouraging, with steps being taken to conduct internal assessments of the operations with a goal toward improving the organization's effectiveness. Similarly, the Mayor's Office has recognized some of the weaknesses that have existed with UASI and SHSGP grant management, and has independently initiated improvements in FY 2007-08. Implementation of the recommendations contained in this report should further the ability of the City to achieve its improvement goals.

## Acknowledgements

Harvey M. Rose Associates, LLC would like to thank the management and staff from the many departments that participated in this performance audit. In particular, we would like to thank those individuals in the Emergency Management Department who took considerable time to discuss the City's program and provide much detailed information to the audit team. Throughout the audit, these individuals were extremely cooperative and went out of their way to ensure that auditor requests for information were met.

# 1.    Strategic Planning

- **The City has not articulated a strategic vision or developed a strategic plan for accomplishing critical emergency planning and disaster preparedness goals and objectives. Priorities are driven by federal and State government mandates and grant requirements, regional collaborations with other agencies, immediate concerns expressed by various mayors and city councils, and other initiatives that originate without reference to a larger, City-wide plan. The City has published an Emergency Operations Master Plan, specific plan annexes that describe response procedures for specific types of emergencies (e.g., civil disturbance, earthquake), as well as departmental emergency plans. Although these plans provide direction regarding operational readiness, they do not represent an overarching strategic plan that defines specific goals, objectives or measures for evaluating emergency planning and management progress.**

- **The City departments, through the Emergency Operations Board, should be charged with the development of a strategic plan that defines the vision, principles, goals and objectives of an integrated emergency planning and disaster preparedness program. Such a plan should provide overarching guidance for ensuring that City officials are able to combine various resources and initiatives in a logical and directed manner.**

- **Combined with a strengthened organizational infrastructure, the creation of a strategic plan will increase the probability that local priorities, goals and objectives have been clearly defined, communicated to constituencies, appropriately coordinated, and accomplished in a timely manner.**

Strategic plans are tools that assist organizations with defining their missions, goals and objectives; approaches toward achieving goals and objectives; and, methods for measuring the success of a program. Such plans communicate goals and objectives to constituencies, develop a sense of ownership by responsible officials, and provide a mechanism whereby an organization can develop strategies for leveraging scarce resources in a cost effective manner. Like a budget, a strategic plan should be established and built upon each year so that it addresses the changing needs and priorities of the organization.

## Overview of Los Angeles Emergency Planning and Priority Setting

In accordance with federal guidelines and State requirements, the City of Los Angeles has developed an Emergency Operations Master Plan. The Plan states:

> "The California Emergency Services Act (Chapter 7 of Division 1 of Title 2 of the Government Code) in Article 3, Section 8568, states: 'The State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof.' The Emergency Operations Master Plan and Procedures (Master Plan) for the City of Los Angeles is established in accordance with Division 8, Chapter 3 of the Los Angeles Administrative Code (LAAC). The Master Plan is consistent and compatible with the State Emergency Plan."

The Master Plan states that its purposes are "to:

1. Describe the authority, responsibilities, functions, and operations of civil government during local emergencies, states of emergency and war emergencies.

2. Provide a basis for the conduct and coordination of operations and the management of critical resources during emergencies.

3. Provide a basis for incorporating into the City Emergency Operations Organization (EOO), non-governmental agencies and organizations with required emergency resources."

Accordingly, the Emergency Operations Master Plan is an umbrella document designed to ensure operational readiness and coordination of all departments and external partners in an emergency. The Plan discusses such topics as *Authorities Related to Emergencies*, *Emergency Operations Organization and Structure*, *Emergency Operations*, *Emergency Operations Centers*, and *Multi-Agency and Multi-Jurisdictional Coordination*. Although there is a section on objectives, these are broadly defined statements such as "Save lives and protect property."

The Emergency Operations Master Plan is supplemented by topical "annexes," which describe the City's response procedures for specific emergencies or disasters. For example, there is a "Civil Disturbance" annex developed after the Rodney King riots, an "Earthquake" annex and others that describe the roles and responsibilities of City agencies for selected emergency types.

Supplementing the Master Plan and annexes, are departmental plans. These are updated each year based on guidelines developed by the Emergency Management Department (EMD) and are intended to provide procedural guidance to departments regarding responses to emergencies or disasters.[1] As discussed in Section 3 of this report, the quality and completeness of such reports varies. Further, departments that have regular interactions with other levels of government may also produce plan elements that intersect with other governmental entities. For example, the Airport's plan discusses collaboration with federal agencies, including the National Transportation Safety Board (NTSB), Transportation Security Administration (TSA), and others.

The City is also involved with planning efforts as a participant in regional bodies that determine the use of federal and State grants, such as the Los Angeles/Long Beach Urban Area Security Initiative (LA/LB UASI) and State Homeland Security Grant Program (SHSGP). Annual collaborations with these entities can result in one-year or multi-year planning for the expenditure of grant funds.

## Mechanisms for Defining Planning Initiatives and Priorities

The City's planning initiatives and priorities are driven by a number of internal and external factors. The Mayor, as the Director of the Emergency Operations Organization, defines general emergency preparedness and policy for the City. This activity is performed primarily by the Mayor's Homeland Security and Public Safety Division (HSPS) under the direction of a Deputy Mayor. Any short- or long-term goals and objectives defined by the Mayor are generally

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[1] As described in Section 3 of this report, although updated, many departmental plans are non-compliant or inconsistent with annual EMD guidelines and standards.

communicated through the budget, the City's regional grant negotiations or directives. Other goals and objectives are included in the budget, but these are typically general or related to expenditure strategies for the year.

To assist the Mayor with the formulation of program priorities, an annual conference of City departments is conducted. Known as the "Lake Arrowhead Conference" after its location, this annual meeting provides an opportunity for training, collaboration and limited emergency planning and disaster preparedness gap analysis. An After Action Report (AAR) is prepared after each annual conference, and specific directives, goals or objectives may result. However, the City does not take full advantage of this opportunity to define emergency preparedness goals, objectives or strategies. While the Conference is intended to produce some policy direction from the Mayor and define short-term emergency preparedness objectives, a review of documentation from past conferences indicates that such results have been limited.

The City Council may also provide direction regarding emergency planning and assist with the development of priorities for the EOO. For example, the Council was reportedly instrumental in elevating the priority for developing a Tsunami Response Plan (completed in early 2008), in response to concerns regarding a potential tsunami threat arising from the 2004 disaster in Sumatra. Individual members of the City Council have also provided suggestions on the emergency management organization structure and other matters on an ad hoc basis.

Throughout the City, emergency planning and disaster preparedness activities are driven by many internal and external organizations. Significantly, the City retained the services of a consultant to assess plan compliance with the federal National Incident Management System (NIMS), which defines minimum standards for emergency planning conducted by local jurisdictions. The City has developed a schedule for achieving compliance with the findings of that report. Similarly, the City participated in a *National Peer Review* project spearheaded by the federal Department of Homeland Security in 2006. The City is presently implementing corrective actions to resolve several of the plan deficiencies identified through that exercise. However, as discussed extensively in Section 3 and Section 11 of this report, the City has fallen behind its established schedule for the implementation of needed plan changes; and, continues to show limited progress implementing corrective actions for approximately 41.2% of *National Peer Review* finding areas considered deficient.

Despite all of these activities and efforts, the City has not developed a comprehensive plan that defines its strategic vision, principles, goals and objectives regarding emergency preparedness; program priorities; the organization of services or approaches toward achieving prioritized goals and objectives; and, methods for measuring the success of program efforts.

## Defining Strategic Plan Components

A structured approach to creating a strategic plan provides a greater likelihood that it will incorporate critical components necessary to operate a successful program. Of the six jurisdictions responding to a telephone survey conducted as part of this audit, four indicated they have developed a strategic plan (Houston, Philadelphia, Miami and San Francisco); and, one indicates it has established a formal priority setting process without a strategic plan (Atlanta).

The experiences of these jurisdictions could provide a perspective on approaches that the City of Los Angeles could take when attempting to accomplish a similar goal.

For example, in 2008, the City and County of San Francisco utilized grant funds[2] to develop an *All Hazards Strategic Plan* that includes each of the components discussed in this report. That plan was "designed to assist citywide senior leadership in directing programmatic efforts, accomplishing results, ensuring accountability, and properly allocating limited resources over the next five years." This initial effort would serve as a good template for implementation of a plan in the City of Los Angeles, since it is based on national standards "using the *DHS Target Capabilities List* and support(s) the best practices described in the *Emergency Management Accreditation Program* standards." The following discussions describe each component of the San Francisco plan more fully.

## Strategic Vision

The San Francisco plan defines its vision in a hierarchy of component parts, as follows:

*Vision Statement:* Describes the City's desired future state for emergency management and homeland security capabilities.

*Mission Statement:* Describes the organizational mission and the parameters that define how the vision will be achieved.

*Guiding Principals:* Describe the values to be followed by stakeholders when developing the strategic goals necessary for achieving the stated mission.

The City of Los Angeles has not formally articulated a strategic vision for its emergency preparedness and management activities, although parts exist in various documents reviewed for this audit. For instance, the Emergency Management Department has developed a mission statement for its operations, the Master Plan provides some insight to the overall mission of emergency management, and various Administrative Code Sections define minimum standards for performing emergency planning and disaster preparedness activities. In addition, it is clear that many of the City's subject area experts are able to individually articulate vision and mission statements for their areas of responsibility.

## Goals Setting

The San Francisco *All Hazards Strategic Plan* sets out goals against specified guiding principals defined by the principal stakeholders within the jurisdiction. These goal statements are arranged within five general categories that correspond with the primary functions of emergency preparedness activities in the City. They include: (1) Common Mission Area Strategic Goals; (2) Prevent Mission Area Strategic Goals; (3) Protect Mission Area Strategic Goals; (4) Response Mission Area Strategic Goals; and, (5) Recover Mission Area Strategic Goals.

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[2] Governor's Office of Homeland Security through the Department of Homeland Security, Office for Domestic Preparedness.

While Los Angeles has projects that are active in all of these areas, the City has not articulated how these projects intersect with a more broadly defined strategic vision. This is critical, if the City is to have a well directed program that most effectively leverages its scarce resources.

## Achieving Strategic Objectives

The strategic vision and goals define the broad foundation upon which strategic objectives can be articulated. In San Francisco, strategic objectives are established for each of the goals stated in the plan. In addition, the City has established some metrics for defining progress toward achieving the strategic objectives. For example, the City has established the following strategic goal within the "Prevent Mission Strategic Goals" category, followed by an associated strategic objective and performance metric for measuring success.

*Goal Statement:*     Provide sufficient resources and assign qualified personnel to effectively prevent, protect, mitigate, prepare for, respond to, and recover from all hazards.

*Strategic Objective:*     Assign staff with appropriate authority to serve as liaisons for emergency preparedness and response activities. Assess whether current resources are adequate to support their assigned roles.

*Performance Metric:*     Number of City departments that have assigned personnel (sufficient number and authority) to work on emergency preparedness efforts.

Again, the City of Los Angeles has not defined its strategic goals, objectives or measures of performance. On multiple occasions we requested documentation that would link activities to an overarching vision or strategic goal, or would demonstrate how the City has been achieving intended objectives. At all levels within the City organization, we were told that such documentation does not exist.

## Measuring Performance and Maintaining the Strategic Plan

The value of a strategic plan diminishes unless there is a meaningful process for measuring performance against objectives, and maintaining the plan so that the plan reflects the current priorities of the organization within the context of available resources.

Because goals and objectives are not strategically set in Los Angeles, there is currently no mechanism in place for the City to measure performance against strategic objectives. As the City embarks on the development of such a plan, a system should be established for collecting and analyzing critical data that would demonstrate emergency management performance. Measurement and monitoring activities should be assigned to EMD, as the designated coordinator of such activities in the City.

In addition, San Francisco's strategic plan encompasses a five year horizon and is to be updated every two years. While a five year horizon with two year update intervals is an acceptable approach over the long term, the plan would be more effective if initially updated annually to include performance data that would inform the City budget process and major grant activities.

Therefore, at least initially, we would suggest that Los Angeles establish a five year plan with annual updates on a calendar year basis. This schedule would permit annual priorities to intersect with other major planning tools within the City, including the budget. As the process becomes more refined and mechanisms are established for routinely measuring performance against stated goals and objectives, the City could consider lengthening the update intervals.

## Organizational Foundation for Strategic Planning

The program goals and objectives that exist in the City's various emergency preparedness venues are ambitious. As a result, a limited number of staff are attempting to accomplish multiple projects that in many instances exceed the departments' capacities. As a result, and as demonstrated throughout this report, plan development is outdated, training and exercises are not well coordinated, and community preparedness activities could be more effectively organized.

To effectively implement goals and achieve strategic objectives, an organizational infrastructure must be in place that will support the effort. An effective organizational infrastructure in Los Angeles would include an appropriate legal framework defined in the Administrative Code, the empowerment of a strong central coordination and oversight entity, and the establishment of a stakeholder structure with clearly defined responsibilities and resource structures that will accomplish intended outcomes. In Los Angeles, improvements in all of these areas are required and are the topics of other findings in this report.

Significantly, departmental resources committed to emergency planning and disaster preparedness have not been compiled from a program perspective or rationally determined based on need. Instead, each department receives staffing allocations based on requests from departmental management, individual departmental budget assessments performed by the City Administrative Officer, and recommendations from the Mayor that are approved by the City Council through the annual budget process. As part of this study, information was requested from EMD and/or the CAO to define the organization of emergency preparedness services within the entire City. Some significant gaps in available information are described below.

- The City does not maintain documentation that defines the breadth and depth of emergency preparedness responsibilities for each of the primary departments of the Emergency Operations Board. Although general descriptions were provided by EMD during interviews, and other information was present in departmental plans, a more complete understanding was obtained for this audit only after conducting individual interviews with department representatives. The richness of emergency planning and disaster preparedness in departments such as Police, Fire, the Airport, the Harbor and Public Works was not immediately evident from any materials reviewed for this audit. Further, the unique characteristics of emergency preparedness responsibilities for some of the smaller departments were difficult to ascertain from available documentation.

- A consolidated program budget for emergency preparedness program activities does not exist. There does not appear to be a regularly produced comprehensive source document that describes resources that the City dedicates to the departmental emergency planning and

disaster preparedness programs. The CAO stated that it would be difficult to compile such information from the budget system, and suggested that the most accurate portrayal of resource allocation would need to be obtained directly from the departments. The last City effort to compile such information was a one-time effort in 2005, in response to a Budget and Finance Committee inquiry regarding a proposal to restructure the organization and reporting lines for emergency preparedness personnel.[3]. In addition, even though the Administrative Code requires EMD to annually report to the EOB on "recommended budgetary items related to emergency services activities of each City Department having control of a division of emergency services and which items are included in the Mayor's recommended budget,"[4] this report is not prepared.

- On August 2, 2006, the Emergency Preparedness Department (EPD) submitted an *Emergency Preparedness Department Reorganization Plan and FY 2006-07 Budget Enhancement* report that discussed staff augmentations and internal restructuring to better address disaster preparedness needs. This plan also recommended renaming EPD as the Emergency Management Department, to better define its role. The report received general support from City officials and is reportedly being implemented in phases. Yet the report does not include an assessment of resources in other departments or how such resources complement those proposed for EMD. Instead, the report indicates more generally that "the enhanced EMD planning and community emergency management functions will align with the Police and Fire Departments' planning, training and community outreach efforts. The new EMD will also be able to work more closely with all City departments to collectively develop new programs, expand existing emergency preparedness efforts and increase emergency management capabilities throughout the City". Without a comprehensive assessment of City-wide resources dedicated to emergency preparedness services, a full understanding of the capacity to accomplish strategic objectives cannot be known.

- As discussed extensively elsewhere in this report, the City has not established a structure that effectively integrates general emergency planning and disaster preparedness activities with those funded with Urban Area Security Initiative (UASI) and State Homeland Security Grant Program (SHSGP) resources. Because of the importance of these grants to the overall emergency preparedness program, the resources that they provide should be fully considered when developing strategies for accomplishing the City's emergency preparedness goals.

## Strategic Planning Roles

The Administrative Code provides direction regarding the roles and responsibilities of City officials in the event of a disaster or emergency, as well as a basic framework for emergency preparedness activities. There is not a discussion of strategic planning, but the framework suggests that the principal staff activity for this function should reside within EMD.

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[3] May 3, 2005, Memo to Budget and Finance Committee, *Emergency Preparedness Positions in Other Departments,* William T. Fujioka, City Administrative Officer

[4] City of Los Angeles Administrative Code Section 8.37(4).

The Mayor and the City Council should therefore consider changes to the Administrative Code that would form the legal structure for ensuring that a strategic plan is implemented and maintained. In addition to these basic requirements, the Administrative Code should:

- Require the Emergency Operations Board, under the general direction of the Mayor as the Emergency Management Director for the City, to oversee the development of a strategic plan and implement a process for ensuring that the plan is annually updated to reflect the City's current emergency preparedness priorities.

- Require the Emergency Management Department General Manager and staff to support the EOB and coordinate the involvement of City departments with the development and maintenance of a strategic plan.

- Require that the strategic plan and annual updates be submitted to the City Council for consideration by January 1 of each year, so that approved objectives and priorities can be integrated into the annual fiscal year budget and UASI and SHSGP planning processes.

# Conclusions

The City of Los Angeles has not articulated a strategic vision or plan for accomplishing critical emergency planning and disaster preparedness goals and objectives. Instead, priorities are driven by federal and State government grant programs, immediate concerns expressed by various mayors and city councils, regional collaborations and other initiatives that originate at the departmental level. Although the Department has published a Master Plan, specific plan annexes and departmental emergency plans, these documents do not represent a strategic plan.

To successfully accomplish the goals and objectives contained in an emergency management strategic plan, the Emergency Operations Board should clearly define the organizational structure, depth of responsibility and resources available in all City departments to accomplish plan objectives and generally support emergency planning and disaster preparedness activities.

# Recommendations

The Mayor should:

1.1     Seek modifications to the Administrative Code to designate the Emergency Management Department as the strategic planning coordinating entity, charged with supporting the EOB and coordinating the involvement of City departments with its development and maintenance.

1.2     Seek modifications to the Administrative Code to require EOO member departments, through the EOB, to perform an annual update to the strategic plan that would be submitted to the Mayor and City Council for review and approval on a calendar year basis.

1.3    Direct the EOO, through the EOB, to initiate a strategic planning process that integrates locally defined priorities, goals, objectives and strategies with:

    a) Federal and State mandates, defined by the federal Department of Homeland Security, the State Office of Emergency Services and other departmental oversight bodies and partners;

    b) National Incident Management System and Standardized Emergency Management System standards and requirements; and,

    c) UASI, SHSGP and other homeland security and disaster preparedness grant programs.

1.4    Ensure that the strategic planning process appropriately addresses community preparedness with the locally defined priorities of City departments.

1.5    Integrate the goals, objectives and strategies defined by the strategic plan into the annual City budget process, along with the UASI and SHSGP grant application processes.

# Costs and Benefits

The strategic planning effort should be spearheaded by the EMD with participation by existing staff in the departments. Although this effort will require EMD and the departments to reprioritize emergency preparedness workload, there should be no additional cost to implement the recommendations. Combined with organizational changes recommended elsewhere in this report, the creation of a strategic plan will increase the probability that local priorities, goals and objectives have been clearly defined; appropriately coordinated between departments; and, accomplished in a timely manner.

# 2. Emergency Operations Organization Structure

- **The Administrative Code creates the Emergency Operations Board (EOB) and charges it with supervision, control and management of the City's overall Emergency Operations Organization (EOO). EOB membership includes the general managers of 15 of 29 core City departments, including the Emergency Management Department (EMD). By ordinance, the permanent Chair of the EOB is the Police Chief.**

- **Other than simple membership, there is no formal role for the Fire Chief on the EOB, even though the Fire Department would play a critical role in virtually every major emergency or disaster. In addition to his role as a member of the EOB, the Administrative Code charges the General Manager of the EMD with coordinating "the authorities, powers, duties, and responsibilities of the Emergency Operations Board and Organization." However, the EMD does not fulfill a top leadership role on the EOB, nor does it have the institutional authority to ensure consistent coordination and cooperation from all City departments on an ongoing basis.**

- **Further, EMD staffing substantially includes positions funded with grants and other temporary sources, impacting operational stability. As a result, the current composition of EMD dilutes its ability to fulfill its mandated functions. This weakness is exacerbated because other EOO member department staffing resources have not been strategically defined based on the scope of duties and responsibilities for each organization.**

- **The placement of the Chief of Police as the Assistant Director of the EOO is appropriate. However, the governance structure of the EOB should be reexamined and alternatives considered by the City to elevate the Fire Chief and General Manager of the EMD to permanent leadership roles on the Emergency Operations Board. One alternative would be to formally establish an Executive Committee of the EOB that would include the Police Chief, the Fire Chief and the General Manager of EMD. Further, the City should explore alternatives for strengthening the formal authorities of the Fire Department and EMD through the EOB structure.**

The organization of the City's emergency preparedness and response activities are established in the City Charter and Administrative Code. Activities are assigned to the Emergency Operations Organization (EOO), which is comprised of all City agencies, and is led by the Mayor, who serves as the EOO Director. The Emergency Operations Board (EOB) supervises, controls and manages the City's EOO in actual emergency preparation, response and recovery. The permanent chairperson of the EOB is the Chief of Police and the Fire Chief has been selected as the vice chairperson by action of the Board.[1]

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[1] While Administrative Code Section 8.40 establishes the Police Chief as the "permanent chairperson," there is no code requirement designating the Fire Chief as the Vice Chair.

EOB membership consists of the general managers of the Police, Fire, Airports, Building and Safety, Emergency Management, General Services, Information Technology, Harbor, Personnel, Public Works, Recreation and Parks, Transportation, Water and Power departments, and the City Administrator and Chief Legislative Analyst. This body has been established to enhance response capabilities and information coordination in the event of a major emergency or disaster, and is tasked with disaster and incident-based planning duties. Other City departments within the larger Emergency Operations Organization (EOO) can be activated by the Mayor in the event of an emergency, and will be asked to participate in preparedness on an as-needed basis.

## Emergency Management Department

In addition to its role as a member of the EOB, the Emergency Management Department (EMD) provides support to the EOB. The EMD General Manager is charged with a variety of responsibilities related to providing such support, as well as coordination of City departments, liaison with external agencies, and other functions. The Emergency Management Department is formally charged with:

(1) The Citywide coordination of interdepartmental preparedness planning, training and recovery operations of the Emergency Operations Organization (EOO) divisions, participating departments, units or groups;

(2) The operational readiness of the City's Emergency Operations Centers;

(3) Arranging municipal, State, federal and private sector mutual aid;

(4) Public emergency preparedness training and community outreach;

(5) Coordinating the responsibilities of the Emergency Operations Board (EOB) and EOO;

(6) Developing emergency operations program papers and applications for associated federal and state funds;

(7) Developing the annual EOO budget and administration of the City's Emergency Operations Fund (EOF); and

(8) Other duties conferred upon it by the EOB and Mayor of the City of Los Angeles."[2]

To accomplish these responsibilities, the Department received $1,807,309 in funding for FY 2007-08, including $1,476,702 in General Fund and $330,607 in Disaster Assistance Trust Fund appropriations. These appropriations funded 16 FTE positions, but did not include $1,113,681 in funding for "Related and Indirect Costs" of operations (e.g., employee pensions and retirement, human resources benefits, water and electricity, communications services, etc.).[3]

In addition, EMD has received resolution authority for certain positions funded from grants, has a health planner on loan from the County and oversees the activities of an international fellow assigned to the department. In FY 2007-08, the Department also received funding for AmeriCorps volunteers and supervisors, who were recruited and hired in the Spring of 2008. At the time this report was prepared, the Department had the equivalent of 45 FTE positions and paid volunteers, funded from General Fund, Disaster Assistance Trust Fund and grant resources, or contributed to the City by external organizations.

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[2] FY 2007-08 Los Angeles City Budget, Page 77.

[3] Consistent with budgeting practices for all City departments.

As noted in Section 1 of this audit report, on August 2, 2006, the Emergency Preparedness Department (EPD) submitted an *Emergency Preparedness Department Reorganization Plan and FY 2006-07 Budget Enhancement* report that discussed staff augmentations and internal restructuring to better address disaster preparedness needs. This plan also recommended renaming EPD as the Emergency Management Department (EMD), to better define its role. The report has received general support from City officials and is reportedly being implemented in phases. However, the continued reliance on limited duration grant funding and use of resolution authority positions suggests that the City has been piecing together its principal emergency preparedness coordination activity without making a long-term commitment to the function. As discussed below, the staffing augmentations that have occurred within EMD do not appear to have considered the significant emergency planning and disaster preparedness resources that are available within other City departments.

## Other City Departments

The perspective of the *EPD Reorganization Plan* suggests that the breadth, depth, complexities and capacity of Citywide emergency preparedness capabilities are not fully appreciated. The report does not include an assessment of resources in other departments or how such resources complement those proposed for EMD. Instead, the report indicates more generally that "the enhanced EMD planning and community emergency management functions will align with the Police and Fire Departments' planning, training and community outreach efforts. The new EMD will also be able to work more closely with all City departments to collectively develop new programs, expand existing emergency preparedness efforts and increase emergency management capabilities throughout the City".

As stated in Section 1, without a comprehensive assessment of Citywide resources dedicated to emergency preparedness services, a full understanding of the City's capacity to accomplish strategic objectives cannot be known. As also discussed in Section 1, this is further compounded by the lack of a program budget that defines emergency preparedness organizational resources across departments, and weaknesses in the integration of major homeland security grant planning and programs into an overall strategic vision for the City. These conditions are repeated in this section to demonstrate the complexity of emergency planning and disaster preparedness activities in the City, as well as the importance of the coordinating role charged to EMD through the Administrative Code.

*Departmental Emergency Preparedness Staffing Profile*

As discussed previously, the Emergency Operations Board is comprised of 15 departments. As part of this audit, a survey of 12 of the largest departments on the EOB was conducted to determine the number and salaries of dedicated staff for emergency preparedness and disaster planning personnel within the departments.[4] Based on the departments' self-reported data, the staffing for the departments is summarized in ranked order in Table 2.1 below.

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4 Excludes EMD, which is reported separately, as well as the City Administrative Office and the Chief Legislative Analyst. As discussed in Section 1 of this report, the City does not maintain a program budget or other consolidated personnel or resource information, and such information must be compiled from individual departments.

**Table 2.1**

**Number and Cost of Staff Dedicated to Emergency
Preparedness and Disaster Planning in Twelve City Departments**

| Department | Dedicated Staff (FTE) | Total Cost |
|---|---|---|
| Police Department | 31.0 | $2,941,223 |
| Harbor | 14.5 | 1,344,611 |
| Fire Department | 8.0 | 711,032 |
| Information Technology Agency | 7.0 | 696,202 |
| Public Works Department | 6.4 | 582,562 |
| Airport | 6.0 | 309,855 |
| Water and Power Department | 4.0 | 369,000 |
| Building and Safety Department | 3.4 | 495,691 |
| Transportation Department | 3.2 | 236,693 |
| General Services Department | 3.0 | 236,680 |
| Recreations and Parks Department | 1.0 | 92,075 |
| Personnel Department | 0.25 | 21,498 |
| **TOTAL** | **87.8** | **$8,037,123** |
| | * | **$10,850,116** |

Source: EOB Department Survey

\* Includes 35% indirect cost and benefits multiplier

As Table 2.1 indicates, the City presently assigns total dedicated staff of nearly 88 full-time equivalent positions for emergency preparedness and disaster planning activities within the direct service departments, costing nearly $10.9 million in salaries and benefits each year. In addition, a broad range of staffing, from less than one full-time employee to 31 full-time dedicated employees exists across these twelve departments. Not shown are additional resources contributing to emergency planning and disaster preparedness activities within these departments. In some cases, these contributing staff may have minor or periodic roles related to emergency preparedness. In other cases, large groups of staff within the departments have significant ongoing responsibilities, even though they are not dedicated to these functions. For example, the Airport and Harbor both have police and security personnel who are continually involved with emergency planning and disaster preparedness activities, but they are not necessarily shown in the "dedicated staff" mix displayed in the table.

In addition, departments have varied and complex roles in Citywide emergency preparedness and disaster planning. Altogether, these roles and responsibilities create the need for different staffing levels in each department. However, no clear criteria or procedures exist that outline how appropriate dedicated staffing levels should be defined. Several examples of inconsistencies are discussed below to highlight operational and staffing differences between the departments.

- The Police Department and Fire Department both assume major responsibilities for planning and preparedness activities. Planning for a coordinated response to any emergency or disaster in the City would require resources from both departments, ranging from management oversight and coordination to frontline response. Despite these similar levels of Citywide responsibility and the broader public safety missions of the departments, reported dedicated staffing for the two departments differs widely. The Police Department reports 31 full-time employees and the Fire Department reports 8 full-time employees for the defined functions. The difference of 21 dedicated employees is significant, and it is not clear the extent to which other resources within each department are used to support the activities of dedicated staff. For example, many Police Department responsibilities related to planning, preparedness and response rest within the *Counter Terrorism and Criminal Intelligence Bureau* and the operating bureaus, which is not reported in these numbers. Similar support is provided to the dedicated staffing in the Fire Department by the *Operations Bureau*.

- The Recreation and Parks Department chairs the Emergency Shelter subcommittee for the Emergency Operations Organization, which is currently developing plans to increase the readiness to use park facilities as emergency shelters after large scale disasters. In discussions with department staff, the department also represents the perspective of the Council on Aging and the Department on Disability at the EOB level. These multiple roles and responsibilities assumed by the department are significant. However, only one dedicated employee was reported for the planning and preparedness functions within the Department.

- The Harbor and Airport both oversee their own police forces that operate independently from the Police Department. The scale of operations for both departments, the unique security risks associated with operations at their facilities, and the amount of public and/or tenant interface at those facilities, all contribute to the need for the input of departmental police personnel into the department's emergency preparedness and disaster planning activities. In addition, these two departments must coordinate with multiple external federal agencies who have responsibilities ranging from security to customs and immigration. At the time of the audit, the Harbor reported a total 14.5 FTE dedicated employees for these functions, of which 11.5 FTE positions were part of the police unit. The Airport reported a total of six approved full-time employees, of which only 4 were actually filled, and none of which were part of the department's police unit. While the Airport Police Division previously had a 6-person Critical Infrastructure Protection Unit that supported emergency preparedness and disaster planning, the responsibilities were consolidated under the department's separate emergency preparedness unit over the last two fiscal years and the police unit, while available for emergency preparedness support, was no longer considered part of the dedicated personnel for emergency preparedness or disaster planning.

Given the dynamic needs of emergency preparedness and disaster planning, clear criteria and procedures, as well as tracking mechanisms to determine appropriate staffing levels are essential for ensuring appropriate performance by the departments. Baseline staffing needs assessments for all City departments would be essential for assuring adequate emergency preparedness and disaster planning.

*Departmental Emergency Preparedness Coordinator Staffing*

Emergency Preparedness Coordinators (EPC) are the core classification used by the City for emergency planning and disaster preparedness activities. In each of the past three years, the CAO has prepared memos to the City Council reporting on emergency preparedness and disaster planning staffing in the departments. The 2005 memo focused on the number and organization of EPC positions at the department level, while the 2006 and 2007 memos focused on the number and organization of EPC positions within the Emergency Management Department, and discussed possible consolidation of EPC positions within the EMD. In the 2005 memo, the CAO recognized that EOB member departments should receive the highest priority for receiving EPC staff, to enhance emergency preparedness, operations, training, and planning functions.

Of the twelve EOB departments surveyed for this audit, seven were identified as not having an EPC in 2005: (1) Building and Safety, (2) Fire Department, (3) General Services Department, (4) Information Technology Agency, (5) Personnel Department, (6) Recreation and Parks, and (7) Transportation. Three years later, 6 departments do not have an EPC, as shown in Table 2 on the next page. Therefore, since 2005, the General Services Department and the Recreation and Parks Departments have gained an EPC position. However, the Police Department lost an EPC position.

A discussion of the departments that currently do not have an EPC position follows the table that displays the results from audit analysis, below.

## Table 2.2

## Emergency Preparedness Coordinators in Twelve EOB Departments

| Department | Number of Full-Time Emergency Preparedness Coordinators (EPCs) |
|---|---|
| Airport | 4.0 |
| Public Works Department | 2.0 |
| Harbor | 2.0 |
| Water and Power Department | 1.0 |
| General Services Department | 1.0 |
| Recreation and Parks Department | 1.0 |
| Building and Safety Department | 0 |
| Fire Department | 0 |
| Information Technology Agency | 0 |
| Personnel Department | 0 |
| Police Department | 0 |
| Transportation Department | 0 |
| **TOTAL** | **11.0** |

Source: EOB Department Survey.

\* Survey did not include EMD, Chief Legislative Analyst, and the CAO

- Neither the Police Department nor the Fire Department, which serve as the Chair and Vice-Chair of the EOB, have EPC positions. Based on discussions with staff in both departments, the EPC position, while important, is secondary given the role of uniformed personnel in emergency preparedness, public safety and first responder functions that are conducted on a daily basis. A similar condition exists within the Fire Department. However, the Fire Department indicated that rather than an EPC position, it has a Disaster Preparedness Officer that fulfills many of the same responsibilities that would typically be assumed by an EPC. No similar position exists in the Police Department.

- The Building and Safety Department indicated that it plans on adding an EPC beginning in July 2008 (the start of FY 2008-2009), funded either completely through the enterprise fund or possibly split with some minimal support from the General Fund, depending on the recovery and reconstruction duties that will be finalized for the EPC.

- The Information Technology Agency reports that it has a technical, non-EPC position classification that performs the functions of an emergency preparedness coordinator. Despite repeated requests in previous budget cycles, the EPC position has not been approved for ITA. The current non-EPC employee also fulfills Building Emergency Coordinator responsibilities for the department (i.e., building evacuation and drills program).

- The Personnel Department currently has minimal staffing to support emergency preparedness in general, with a total dedicated staffing level of 0.25 FTE filled by a Senior Management Analyst. The primary function of the position has been focused on Building Emergency Coordinator responsibilities and report preparation.

- The Transportation Department has requested approval for EPC positions in previous budget years, but the positions have not been approved. This has been a recognized deficiency, discussed in interviews with various EOB member department staff and identified in a consultant report. In discussions with Transportation Department staff, the lack of an EPC impacts the representation of the department at EOB meetings, annex planning and report writing, and coordination with other departments that have important complementary disaster planning roles (e.g., Public Works and managing street traffic and detours).

## Impacts on the Emergency Operations Board Structure

Several general conclusions can be drawn from an assessment of the above information:

- The Police Chief is assigned as the permanent chairperson of the EOB, despite the significant role the Fire Department has in virtually every emergency action required of the City. The Fire Chief has been separately appointed as the vice chairperson because the Board has recognized the importance of the Department's role.

- The General Manager of the EMD does not have a leadership role on the EOB, despite being the principal coordinator of emergency planning and disaster preparedness functions across the City, and his responsibility to ensure that the Mayor's emergency preparedness directives are implemented by departments.

- In the past, EMD has not conducted assessments of emergency planning and disaster preparedness staffing and other resource requirements for the departments, but has focused instead on assessments of staffing needs within its own organization. Past analyses conducted by the CAO have focused primarily on the assignment of EPC positions for the departments, but has not evaluated total emergency preparedness staffing and resource needs Citywide.

- The complexities of emergency planning and disaster preparedness functions within the departments do not appear to have been fully recognized or evaluated by the City.

- The responsibilities of the departments and resources available for emergency planning and disaster preparedness functions have not been rationally aligned. Several departments with significant responsibilities related to these functions have been required to assign personnel other than EPCs to perform critical planning and preparedness duties.

The scope of this audit did not include an assessment of the emergency preparedness capabilities of the departments. Instead, the analysis was designed to examine the mechanisms established to ensure departmental resources are being appropriately coordinated. Accordingly, the audit does not attempt to define appropriate staffing levels for the departments.

Nonetheless, understanding departmental capacity in relation to the range of activities each performs is a critical question to be answered as the City improves upon the infrastructure it has established. Once this is achieved, the EOB would be positioned to advise the Mayor and the City Council on the most appropriate structure and resource allocation within the City's emergency preparedness community. To accomplish this successfully, the interests of all Emergency Operations Organization members would need to be appropriately represented.

One way to accomplish this is by modifying the governance structure of the EOB. Within the context of governance restructuring, the Fire Chief, as the manager of a critical first responder department; and, the EMD General Manager, as the head of the coordinating department responsible for accomplishing emergency planning and disaster preparedness objectives Citywide, would be elevated to formal leadership roles on the EOB.

There are several ways to potentially accomplish this change in governance. Discussions with some City officials prior to the release of this report suggested that establishing a co-chairperson structure with quarterly rotations of sitting chairpersons is one alternative. Another alternative, which we believe is preferable, would be to establish an Executive Committee of the EOB. Included on the Executive Committee would be the Police Chief, the Fire Chief and the General Manager of the EMD. Chairpersonship of the Board would rotate to each member on an annual basis and would be restricted to the performance of ministerial duties related to the operations of the Board. The EOB Executive Committee, as a single entity, would be charged with specific duties and responsibilities. These could include:

- Setting the meeting agenda for the EOB;

- Forming subcommittees for specified activities of the Board;

- Directing the development and maintenance of an emergency management strategic plan;

- Constructing an annual program budget for the Emergency Operations Organization and proposing modifications of departmental personnel and funding appropriations for Citywide emergency planning and disaster preparedness activities to the Mayor;

- Providing general oversight and recommendations to the Mayor regarding UASI and other major homeland security and disaster assistance grant programs; and,

- Directing the emergency planning and disaster preparedness activities of City departments.

This structure would balance authority and leadership on the Board, while also providing greater assurance that critical functions will be performed by City departments more efficiently and effectively. Linking responsibility for developing and recommending strategic planning with personnel and resource budgeting across departments would unify the EOO and establish a coordinated voice for the City's emergency planning and disaster preparedness program.

# Conclusions

The City of Los Angeles could explore alternatives for strengthening the formal authorities of the Fire Department and EMD through the EOB structure. One alternative would be to formally establish an Executive Committee of the EOB that would include the Police Chief, the Fire Chief and the General Manager of EMD. This group could be assigned specific authorities in the Administrative Code that would ensure a more balanced and strategic approach to emergency management in the City. For example, the Executive Committee could be made responsible for directing activities related to the development and maintenance of a strategic plan, evaluating staffing and resource allocation requests for emergency management services across all City departments, providing oversight and recommendations to the Mayor regarding UASI and other major homeland security and disaster assistance grant programs, and generally directing the emergency planning and disaster preparedness activities of the departments, in accordance with directives received from the Mayor and City Council.

# Recommendations

The Mayor should:

2.1    Seek modifications to the Administrative Code to:

    a) Elevate the role of the Fire Chief and the General Manager of the EMD on the Emergency Operations Board;

    b) Establish an EOB Executive Committee consisting of the Police Chief, Fire Chief and EMD General Manager, with rotating responsibilities as the EOB chair; and,

    c) Assign specific responsibilities to the EOB, under the authority of the Executive Committee, such as directing activities related to the development and ongoing maintenance of a strategic plan, evaluating staffing and resource allocation requests for emergency management services across all City departments, also providing recommendations to the Mayor regarding UASI and other major homeland security and disaster assistance grant programs, and directing the emergency planning and disaster preparedness activities of the departments.

2.2    Request the CAO to update its evaluation of the EMD reorganization plan with a goal toward stabilizing staffing.

2.3    Request the CAO to develop a profile of all dedicated emergency planning and disaster preparedness resources in the City departments, linked to the scope of responsibilities assigned to each. Use the information to assign dedicated staff to EMD and City departments in a manner that more closely aligns with priorities and responsibilities.

# Costs and Benefits

There would be no cost to implement recommendations related to the reorganization of the Emergency Operations Board. An assessment of the number and distribution of EMD and departmental personnel dedicated to emergency preparedness and response coordination responsibilities could result in a shifting of resources or other recommendations that would result in increased costs to the City.

This structure would balance authority and leadership on the Board, while also providing greater assurance that critical functions will be performed by City departments more efficiently and effectively. Linking responsibility for developing and recommending strategic planning with personnel and resource budgeting across departments would unify the EOO and establish a coordinated voice for the City's emergency planning and disaster preparedness program.

# 3. Emergency Preparedness Planning Efforts

- **The City of Los Angeles has various emergency preparedness plans that have varying purposes and objectives. Most are geared towards individual departmental preparedness and some are highly specialized plans that cross departments, including hazard-specific Master Plan annexes. These emergency preparedness plans, which total 83, include one City of Los Angeles Emergency Operations Master Plan and Procedures, 17 Master Plan Annexes, 14 Division Plans, and 51 Departmental Plans. Despite having such diverse and numerous plans, the Emergency Management Department does not regularly maintain an up-to-date or complete inventory of all of the City's emergency plans and annexes.**

- **Emergency plan timeliness could be improved, based on our review of existing departmental emergency plans and Master Plan annexes. For example, out of the 26 Departmental Plans reviewed for this audit, sixteen, or 62 percent, had not been updated for at least three years. Some of the Police Department plans that were on file at the Emergency Operations Center had not been revised since 1998, and one of the Fire Department plans had not been revised since 1992. Master Plan annexes exhibited similar weaknesses. For example, 10, or 59 percent, of the Master Plan annexes had not been updated for over 10 years, and 6, or 35 percent, had not been revised since 1993. The EMD should work with City departments to ensure that all plans are completed and are revised on a regular basis.**

- **Plan consistency and quality could also be improved. For example, eleven of the 26 departmental plans reviewed, or 42 percent, were non-compliant or inconsistent with the most recent EMD guidelines and standards. In addition, a formal review of departmental emergency plan compliance with the standard elements of the COOP/COG has not been complete, and almost all departmental emergency plans do not meet NIMS standards. Overall, the City currently does not have a systematic approach for ensuring that the emergency plans are effective or would be useful during an actual emergency or disaster situation. Ensuring that the City's departmental emergency plans are clear, complete, organized, and comprehensive, and that plans adhere to relevant and timely guidelines are crucial elements of the City's emergency management and operations efforts.**

Emergency plans are formal, written plans that help identify what actions will be taken, and provide guidance on when and who will perform such actions during an emergency or a disaster situation. Emergency plans, if completed in a timely, clear, organized, and comprehensive manner, serve as critical and effective elements of emergency management and provide the foundation for information and training.

The City of Los Angeles' Executive Directive No. EP-1 requires every General Manager of each City department to prepare, implement, and maintain a departmental emergency plan in conformance with guidelines approved by the Emergency Operations Board and available from the Emergency Management Department. This Directive also provides that every General Manager should ensure that their department's emergency plan is reviewed and, as necessary, updated annually; and, that the Emergency Management Department General Manager should evaluate and report on all departmental annual reports to the Emergency Operations Board and to the Mayor on the state of the City's emergency preparedness.

In addition to these local directives, federal and State standards require that City departments have a plan for operational continuity that ensures the contniuation of government services during an emergency or disaster situation. In addition, the State of California (Government Code, Section 8607(a)) has established a requirement applicable to all state and local agencies to implement and operate the Standardized Emergency Management System (SEMS) for response, management, and coordination of incidents involving multiple agencies or multiple jurisdictions. Furthermore, the federal National Incident Management System (NIMS) was established in 2003 to provide a consistent nationwide template designed to enable federal, State, tribal nations and local governments, as well as private-sector and nongovernmental organizations, to effectively and efficiently work together to prevent, prepare for, respond to, and recover from domestic incidents.

## City of Los Angeles Emergency Plans

The Planning Division of the Emergency Management Department is responsible for coordinating the maintenance and revision of the Master Plan and the Master Plan annexes. The EMD Planning Division chairs the Emergency Management Committee (EMC) Planning Subcommittee and meets monthly to discuss emergency planning issues, as well as matters related to necessary maintenance of all existing emergency plans. The Planning Subcommittee reports to the EMC, which makes planning-related recommendations to the Emergency Operations Board. All revisions, amendments, and corrections to the Master Plan and annexes are subject to Emergency Operations Board (EOB) approval.

The City of Los Angeles has various emergency preparedness plans with varying purposes and objectives, most are geared towards individual departmental preparedness. Some are highly specialized plans that cross departments, including hazard-specific Master Plan annexes. These emergency preparedness plans, which total 83, include one City of Los Angeles Emergency Operations Master Plan and Procedures, 17 Master Plan Annexes, 14 Division Plans, and 51 Departmental Plans[1].

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[1] The 51 Departmental Plans include those available at the Emergency Operations Center at the time of the review. Some departments (e.g., Fire, Police, Airports, Water & Power, and Public Works) have multiple emergency plans for different departmental functions, activities, and bureaus, which we included in this count.
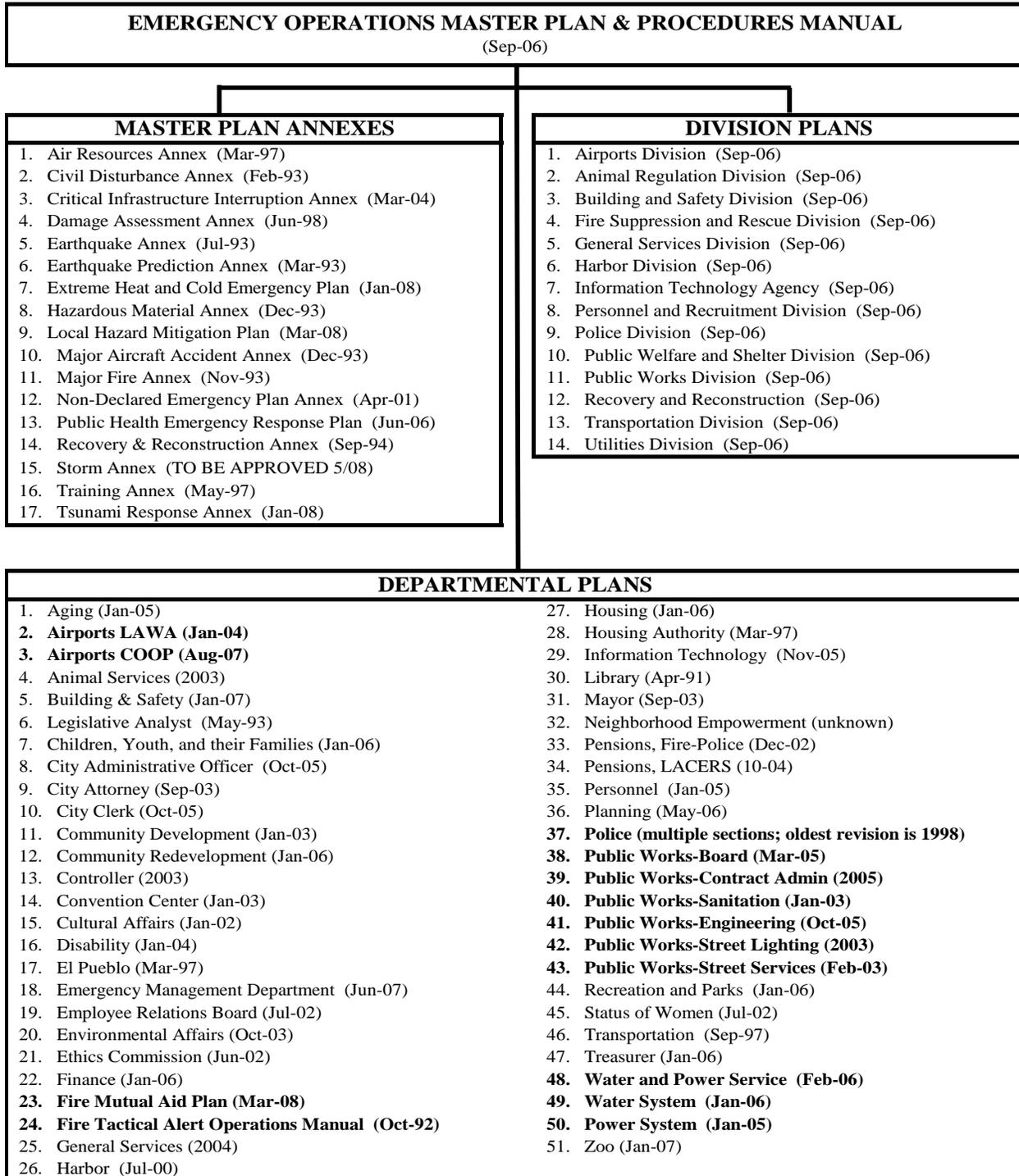
- **City of Los Angeles Emergency Operations Master Plan and Procedures (1)**: The City's Master Plan was established in accordance with Division 8, Chapter 3 of the Los Angeles Administrative Code (LAAC). The purpose of the Master Plan is to (1) describe the authority, responsibilities, functions, and operations of civil government during local emergencies, states of emergencies, and war emergencies; (2) provide a basis for the conduct and coordination of operations and the management of critical resources during emergencies; and (3) provide a basis for incorporating into the City Emergency Operations Organization (EOO), non-governmental agencies and organizations with required emergency resources. The Emergency Management Department, with support from various EOO member departments, is the lead department responsible for drafting, maintaining, and revising the Master Plan.

- **Master Plan Annexes (17)**: The Master Plan annexes are intended to augment the Emergency Operations Master Plan and Procedures. These annexes are either disaster-specific (e.g., earthquake, tsunami) or functional (e.g., evacuation, care and shelter), and are intended to provide specific information and direction regarding multi-department and multi-agency operations (i.e., what is the function and who is responsible for carrying it out) during an emergency situation. Like the Master Plan, the Emergency Management Department, is the lead department responsible for drafting, maintaining, and revising the Master Plan, with support from various EOO member departments.

- **Division Plans (14)**: Division Plans are operational plans that are drafted by the various Emergency Operations Organization (EOO) Divisions. These divisions have been established to consolidate and coordinate the many resources of the City involving more than one department or agency. Lead departments in each of the 14 EOO functional divisions are assigned as the leads responsible for drafting, maintaining, and revising division plans (e.g., Recovery and Reconstruction, Building and Safety, Utilities, etc.) .

- **Departmental Emergency Plans (51)**: Departmental Emergency Plans are prepared by each City department to provide department-specific plans and procedures for responding to emergency and disaster situations. The purposes of these plans are intended to include: (a) addressing elements of the departments' Business Continuity/Continuity of Operations strategy for ensuring the provision of emergency functions; (b) addressing the department's role in managing its internal emergency operations and supporting City-wide emergency response and/or recovery; and (c) addressing the department's program for ensuring employee safety and preparedness. Some departments (e.g., Fire, Police, Airports, Water & Power, and Public Works) have multiple emergency plans for various departmental functions, activities, and bureaus. Each department is responsible for drafting, maintaining, and revising its Departmental Plan, but each year the EMD provides departments with guidelines and support for revising and completing the Departmental Emergency Plans.

Figure 3.1 below shows a chart of all of the emergency plans that HMR was able to identify during the course of this audit, including the most recent revision dates.

**Figure 3.1**

**City of Los Angeles Emergency Plans**

**CITY OF LOS ANGELES EMERGENCY PLANS CHART** (with revision dates)

| EMERGENCY OPERATIONS MASTER PLAN & PROCEDURES MANUAL |
|:---:|
| (Sep-06) |

**MASTER PLAN ANNEXES**

1. Air Resources Annex  (Mar-97)
2. Civil Disturbance Annex  (Feb-93)
3. Critical Infrastructure Interruption Annex  (Mar-04)
4. Damage Assessment Annex  (Jun-98)
5. Earthquake Annex  (Jul-93)
6. Earthquake Prediction Annex  (Mar-93)
7. Extreme Heat and Cold Emergency Plan  (Jan-08)
8. Hazardous Material Annex  (Dec-93)
9. Local Hazard Mitigation Plan  (Mar-08)
10. Major Aircraft Accident Annex  (Dec-93)
11. Major Fire Annex  (Nov-93)
12. Non-Declared Emergency Plan Annex  (Apr-01)
13. Public Health Emergency Response Plan  (Jun-06)
14. Recovery & Reconstruction Annex  (Sep-94)
15. Storm Annex  (TO BE APPROVED 5/08)
16. Training Annex  (May-97)
17. Tsunami Response Annex  (Jan-08)

**DIVISION PLANS**

1. Airports Division  (Sep-06)
2. Animal Regulation Division  (Sep-06)
3. Building and Safety Division  (Sep-06)
4. Fire Suppression and Rescue Division  (Sep-06)
5. General Services Division  (Sep-06)
6. Harbor Division  (Sep-06)
7. Information Technology Agency  (Sep-06)
8. Personnel and Recruitment Division  (Sep-06)
9. Police Division  (Sep-06)
10. Public Welfare and Shelter Division  (Sep-06)
11. Public Works Division  (Sep-06)
12. Recovery and Reconstruction  (Sep-06)
13. Transportation Division  (Sep-06)
14. Utilities Division  (Sep-06)

**DEPARTMENTAL PLANS**

1. Aging (Jan-05)
2. **Airports LAWA (Jan-04)**
3. **Airports COOP (Aug-07)**
4. Animal Services (2003)
5. Building & Safety (Jan-07)
6. Legislative Analyst  (May-93)
7. Children, Youth, and their Families (Jan-06)
8. City Administrative Officer  (Oct-05)
9. City Attorney (Sep-03)
10. City Clerk (Oct-05)
11. Community Development (Jan-03)
12. Community Redevelopment (Jan-06)
13. Controller (2003)
14. Convention Center (Jan-03)
15. Cultural Affairs (Jan-02)
16. Disability (Jan-04)
17. El Pueblo (Mar-97)
18. Emergency Management Department  (Jun-07)
19. Employee Relations Board (Jul-02)
20. Environmental Affairs (Oct-03)
21. Ethics Commission (Jun-02)
22. Finance (Jan-06)
23. **Fire Mutual Aid Plan (Mar-08)**
24. **Fire Tactical Alert Operations Manual  (Oct-92)**
25. General Services (2004)
26. Harbor  (Jul-00)
27. Housing (Jan-06)
28. Housing Authority (Mar-97)
29. Information Technology  (Nov-05)
30. Library (Apr-91)
31. Mayor (Sep-03)
32. Neighborhood Empowerment (unknown)
33. Pensions, Fire-Police (Dec-02)
34. Pensions, LACERS (10-04)
35. Personnel  (Jan-05)
36. Planning (May-06)
37. **Police (multiple sections; oldest revision is 1998)**
38. **Public Works-Board (Mar-05)**
39. **Public Works-Contract Admin (2005)**
40. **Public Works-Sanitation (Jan-03)**
41. **Public Works-Engineering (Oct-05)**
42. **Public Works-Street Lighting (2003)**
43. **Public Works-Street Services (Feb-03)**
44. Recreation and Parks  (Jan-06)
45. Status of Women (Jul-02)
46. Transportation  (Sep-97)
47. Treasurer (Jan-06)
48. **Water and Power Service  (Feb-06)**
49. **Water System  (Jan-06)**
50. **Power System  (Jan-05)**
51. Zoo (Jan-07)

Despite having responsibility for coordinating such diverse and numerous planning activities, the Emergency Management Department does not maintain an up-to-date or complete inventory of all of the City's emergency plans or plan annexes. A single, comprehensive and up-to-date emergency plan database and tracking system is critical for determining gaps that may exist and monitoring the City's emergency planning efforts. Having a complete and detailed account of all emergency plans would not only provide the City with a tool for assessing the overall effectiveness of efforts, but it would also assist with setting the City's emergency planning priorities and long-term strategies. The Emergency Management Department should, with support from City departments, maintain an up-to-date and complete master list of all completed and planned emergency plans and annexes (e.g., Master Plan, Master Plan Annexes, Division Plans, and Departmental Emergency Plans). At minimum, this master database should be (a) inclusive of detailed information, such as the plan's last revision date, next revision date, and contact name and information; (b) revised on an on-going and as-needed basis throughout the year; (c) readily available from the EMD; and (d) used by the City as a tool in its emergency management strategic planning.

# Opportunities for Improving Emergency Planning Activities

*Timeliness*

Emergency plans timeliness could be improved for existing Departmental Emergency Plans and Master Plan Annexes. For example, out of the 26 Departmental Plans reviewed for this audit, sixteen, or 62 percent, have not been updated for at least three years. One Departmental Plan has not been updated since 1993 (Chief Legislative Analyst) and another since 1997 (Transportation), even though both departments belong to the Emergency Operations Board. In addition, some of the Police Department plans that were on file at the Emergency Operations Center at the time of the review have not been revised since 1998, and one of the plans for the Fire Department has not been revised since 1992. Table 3.1 below shows the results of the file review on emergency plans timeliness.

## Table 3.1

## Summary of Departmental Emergency Plan Timeliness

| | DEPARTMENTS | Date of Last Revision | Has not Been Revised in Over 3 Years? |
|---|---|---|---|
| 1 | Airports LAWA | January-04 | X |
| 2 | Airports COOP | August-07 | |
| 3 | Aging | January-05 | X |
| 4 | Animal Services | 2003 | X |
| 5 | Building & Safety | January-07 | |
| 6 | Administrative Office | October-05 | |
| 7 | Chief Legislative Analyst | May-93 | X |
| 8 | Emergency Management | July-07 | |
| 9 | Fire Mutual Aid Plan | March-08 | |
| 10 | Fire Tactical Alert Operations Manual | October-92 | X |
| 11 | General Services | 2004 | X |

| | DEPARTMENTS | Date of Last Revision | Has not Been Revised in Over 3 Years? |
|----|-----------------------------|--------------------------|---|
| 12 | Harbor | July-00 | X |
| 13 | Information Technology Agency | November-05 | |
| 14 | Personnel | January-05 | X |
| 15 | Police | (oldest revision is 1998) | X |
| 16 | Public Works-Board | March-05 | X |
| 17 | Public Works-Contract Admin | 2005 | X |
| 18 | Public Works-Sanitation | January-03 | X |
| 19 | Public Works-Engineering | October-05 | |
| 20 | Public Works-Street Lighting | 2003 | X |
| 21 | Public Works-Street Services | February-03 | X |
| 22 | Recreation & Parks | January-06 | |
| 23 | Transportation | September-97 | X |
| 24 | Water and Power Service | February-06 | |
| 25 | Water System | January-06 | |
| 26 | Power System | January-05 | X |

EMD representatives state that the timeliness of plans do not necessarily diminish the plans' usefulness. However, a review of the departmental plan content found that plan accuracy was severely compromised in some instances. For example, some plans included rosters of key employees to be contacted in the event of an emergency. Yet, some of these rosters were clearly out-of-date and would be an inaccurate information resource during an emergency. Although EMD manages a centralized electronic call-out list that is more up to date and available through the City's communications network, the presence of inaccurate data in the core departmental emergency plan could lead to difficulties during the confusion that often accompanies an emergency or disaster.

Similar weaknesses were also identified in a number of the Master Plan annexes that we reviewed. For example, ten, or 59 percent of the Master Plan Annexes have not been updated for over ten years; and six, or 35 percent, have not been revised since 1993.[2] In addition,, the 5-year schedule prepared by the Emergency Management Department to revise all City emergency plans is already behind schedule and is, therefore, generally unrealistic. For example, revisions to the Master Plan were supposed to have been completed by April 2007, but this has not yet been completed at the writing of this report.

Table 3.2 below shows EMD's five-year plan to revise the City's emergency plans.

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[2] The Master Plan Annexes that have not been revised since 1993 are: (1) Civil Disturbance Annex; (2) Earthquake Annex; (3) Earthquake Prediction Annex; (4) Hazardous Materials Annex; (5) Major Aircraft Accident Annex; and (6) Major Fire Annex.

# Table 3.2

# LA-EMD Five-Year Emergency Plan Revision Schedule

| EMERGENCY PLANS / ANNEX | PLANNED COMPLETION DATE | LAST UPDATED | LEAD DEPT | PRIMARY FOCUS |
|---|---|---|---|---|
| Master Plan | Apr-07 | Sep-06 | EMD | Fed Req/ Revision |
| Tsunami Evacuation Plan | Sep-07 | | EMD | New Plan |
| Extreme Heat & Cold Emergency Plan | Sep-07 | Apr-01 | EMD | Revision |
| City Hazard Mitigation Plan | Nov-07 | N/A | EMD | Annual Revision |
| Storm Response Plan | Dec-07 | May-93 | EMD | Revision |
| Debris Management Plan | Dec-07 | N/A | PW | New Plan |
| Specific Needs Assessment Plan (SNAP) - Phase I & II | Dec-07 | | Op Area/EMD/ Consultant-UCLA | New Plan |
| Dept. Emergency Plans - NIMS Compliance Review | Dec-07 | N/A | EMD/ ICF Consultant | Fed Req |
| Ad Code Revision - EMD/ESF Conversion | May-08 | Sep-06 | EMD | Major Revision |
| Point of Dispensing Sites (PODS) Emergency Plan | May-08 | N/A | OP Area/EMD/ Consultant | New Plan |
| Citywide Logistics Plan | Jun-08 | N/A | EMD/GSA/ITA | New Plan / Fed Req |
| Master Plan Revision - EMD/ESF Conversion | Jul-08 | Apr-07 | EMD | Major Revision |
| Hazardous Material Plan Annex Revision | Jul-08 | Jun-93 | LAFD/EMD / LAPD | Revision / Update |
| Earthquake Plan Annex | Aug-08 | Jul-93 | EMD | Revision |
| Communications Plan | Nov-08 | N/A | EMD/ITA | New Plan |
| Mass Evacuation Plan | Dec-08 | N/A | Operational Area Plan | New Plan/ Fed Req |
| Emergency Public Information Plan | Feb-09 | N/A | EMD | New Plan/ Fed Req |
| Emergency Warning Plan | Apr-09 | N/A | EMD/ITA | New Plan/ Fed Req |
| COOP/COG Plan | Jun-09 | Dec-05 | EMD | Finish Incomp Plan |
| Disaster Recovery Center Plan | Sep-09 | N/A | EMD | New Plan |
| Recovery & Reconstruction Annex | Nov-09 | Sep-94 | EMD | Revision |
| Mass Care Plan | Dec-09 | N/A | EMD/R&P | New Plan |
| Major Fire Annex | Feb-10 | Nov-93 | EMD/LAFD | Update |
| Damage Assessment Annex | Apr-10 | Jun-98 | EMD/LAFD | Update |
| Civil Disturbance Annex | Jun-10 | Feb-93 | LAPD/EMD | Update |
| Aircraft Accident Annex | Aug-10 | Dec-93 | LAFD/EMD | Update |
| Air Resources Annex | Oct-10 | Mar-97 | EMD | Update |
| Non-Declared Emergency Plan Annex | Dec-10 | Apr-01 | EMD | Update |
| Mass Evacuation Plan Phase II | Apr-11 | N/A | Regional Plan - OA | New Plan/ Fed Req |
| Training Annex | Jun-11 | May-97 | EMD | Update |
| Critical Infrastruct Interruption Annex | Sep-11 | Mar-04 | EMD | Update |

Timely and up-to-date emergency plans are critical components of an effective emergency management system. Maintaining such plans ensures the relevance and effectiveness of the roles, responsibilities, and required actions by appropriate personnel and agencies during emergency and disaster situations. Based on interviews with management and staff, the Emergency Management Department historically has been "hands-off" in its approach to the oversight of emergency preparedness planning, particularly with regards to the City's departmental plans. Currently, the Emergency Management Department does not have a formal system that holds its staff or City departments accountable for making sure that all emergency plans are maintained, consistent, complete, of quality, and effective. The impact of not having an effective accountability structure is compounded by the absence of a more formalized and systematic set of procedures (i.e., beyond the Emergency Operations Board structure) that provides for direct and active collaboration between the Emergency Management Department and other City departments, in terms of drafting, revising, and reviewing emergency plans on an ongoing basis.

The weaknesses in emergency plans timeliness, consistency, and usefulness limit the overall plan effectiveness at identifying actions that should be taken, when the actions should be taken, and who will perform key activities when an emergency or disaster occurs. Not having a complete and up-to-date inventory of all plans makes it difficult for City leaders to obtain a comprehensive, Citywide view of the emergency plans that currently exist or their status. In addition, because the 5-year schedule to revise all emergency plans is already behind schedule and likely unrealistic, the City will likely be unable to strategically revise and complete its diverse and numerous emergency plans in the near future.

The Emergency Management Department should, therefore, work with City departments to establish and implement clear policies and procedures for ensuring a systematic and on-going review by the EMD staff of all emergency plans. In addition, EMD should also collaborate with the Mayor and other City departments in establishing and implementing policies and procedures that provide clear, practical, and proactive guidelines for facilitating collaboration and communication (i.e., beyond the Emergency Operations Board structure) between Emergency Management Department staff and other City departmental staff in drafting, revising, and reviewing emergency plans on an ongoing basis.

### *Consistency and Quality*

Inconsistencies in plan content and quality were also evident from the plan review conducted for this audit. For example, eleven of the 26 departmental plans that were reviewed, or 42 percent, were non-compliant or inconsistent with the most recent EMD guidelines and standards, omitting critical elements such as training components that specify personnel training requirements to prepare for an emergency.[3] This non-compliance can be partly explained by the fact that certain City departments have very specialized divisions or functions (e.g., Fire, Police, and Airports), but most of this non-compliance appears to be due to plans that have not been updated in years.

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[3] The Emergency Management Department issues a document entitled "Guidance for Department Emergency Plans," which is intended to provide City departments with a set of required elements and format recommendation for drafting departmental emergency plans.

Table 3.3 below shows the results of the file review of departmental emergency plans compliance with EMD's published guidelines.

**Table 3.3**

**Departmental Emergency Plan Compliance with EMD Guidelines**

| | DEPARTMENTS | Date of Last Revision | Compliant with EMD Guidelines |
|---|---|---|---|
| 1 | Airports LAWA | January-04 | **No** |
| 2 | Airports COOP | August-07 | **No** |
| 3 | Aging | January-05 | **Yes** |
| 4 | Animal Services | 2003 | **Yes** |
| 5 | Building & Safety | January-07 | **Yes** |
| 6 | City Administrative Office | October-05 | **No** |
| 7 | Chief Legislative Analyst | May-93 | **No** |
| 8 | Emergency Management | July-07 | **Yes** |
| 9 | Fire Mutual Aid Plan | March-08 | **No** |
| 10 | Fire Tactical Alert Operations Manual | October-92 | **No** |
| 11 | General Services | 2004 | **Yes** |
| 12 | Harbor | July-00 | **No** |
| 13 | Information Technology Agency | November-05 | **No** |
| 14 | Personnel | January-05 | **No** |
| 15 | Police | (oldest revision is 1998) | **No** |
| 16 | Public Works-Board | March-05 | **Yes** |
| 17 | Public Works-Contract Admin | 2005 | **Yes** |
| 18 | Public Works-Sanitation | January-03 | **Yes** |
| 19 | Public Works-Engineering | October-05 | **Yes** |
| 20 | Public Works-Street Lighting | 2003 | **Yes** |
| 21 | Public Works-Street Services | February-03 | **Yes** |
| 22 | Recreation & Parks | January-06 | **Yes** |
| 23 | Transportation | September-97 | **No** |
| 24 | Water and Power Service | February-06 | **Yes** |
| 25 | Water System | January-06 | **Yes** |
| 26 | Power System | January-05 | **Yes** |

In addition, the overall quality of departmental emergency plans varied widely. For example, while some departmental emergency plans contain detailed evacuation, recall, and response procedures, others only have general information on evacuation procedures. The departmental emergency plans also reflect inconsistencies in the departments' emergency training plans. Some departments list actual required training for various staff classifications, while others only provide a generic statement about staff training needs. Also, one department's emergency plan (Information Technology Agency) on file at the Emergency Operations Center was incomplete, and one City agency (Human Relations) did not have an existing emergency plan on file at all.

The City also has not conducted a formal review of departmental emergency plan compliance with the standard elements of the Continuity of Operations (COOP) and Continuity of Government (COG) planning federal guidelines. The City's efforts were found to be "Sufficient" in the 2006 National Peer Review in terms of COOP/COG planning, but the City is out of compliance with a mayoral directive to update, test and exercise each plan. COOP/COG planning ensures the continuation of essential functions through a wide range of emergencies and disasters. COOP plans are efforts within departments and agencies to ensure the continued performance of minimum essential functions during a wide range of potential emergencies. Essentially, it is the capability of maintaining the business of government under all eventualities. COG planning is the preservation, maintenance, or reconstitution of the institution of government. It is the ability to carry out an organization's constitutional or legal responsibilities, which is accomplished with leadership succession plans, the pre-delegation of emergency authority, and active command and control. EMD staff reported that the review for COOP/COG compliance of departmental emergency plans has not yet been implemented but that this review is scheduled to be completed by June 2009, which is already a postponement of a previous deadline set by EMD, which was March 2009. EMD should ensure that relevant City departmental emergency plans comply with appropriate COOP/COG standards.

Further, a separate consultant report by ICF International[4] identified various quality-related deficiencies in existing departmental emergency plans, mainly in relation to relevant National Incident Management System (NIMS) standards. Such deficiencies can have an effect on the overall effectiveness and usefulness of such plans during an actual emergency or disaster situation. Below are just some of the general findings from the ICF report:

- No Department Emergency Plan explained how that department would manage their resources during an emergency event.

- No Department Emergency Plan included a comprehensive resource management protocol or its applicability to mutual aid, exercises or actual events.

- Emergency Plans for the City of Los Angeles Fire and Police Departments[5] did not reference the Tactical Interoperations Communications Plan (TICP) and did not include

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[4] Source: ICF International's report entitled: "City of Los Angeles Emergency Preparedness National Incident Management System (NIMS) Compliance Draft Final Report" November 21, 2007. The City of Los Angeles selected ICF International to review 40 City Department, Bureau, and Agency (referred to collectively as Department) Emergency Plans for compliance with NIMS. A detailed review of 45 total plans and sub-plans was completed for departments with the responsibility to develop, maintain, and use Emergency Plans. The review was performed with a tool created by ICF using the 2005-2007 NIMS compliance requirements for local governments presented by the National Integration Center NIMS Implementation Matrix for FY 2007.

[5] The Police and Fire departments have been the recipients of significant federal and State grant funds for assessing threats, increasing the availability of emergency equipment, and improving emergency communications and operability. Accordingly, these first responder departments have developed robust planning and emergency

the information required to be fully compliant with the integrated communications NIMS criterion. Through department interviews with the Los Angeles Fire Department (LAFD), the Los Angeles Police Department (LAPD), and the Information and Technology Agency (ITA) it was evident that the LAFD and LAPD each have their own methods and equipment to ensure interoperability within their Departments and, to some degree, with other City responders.

- The NIMS Review Team found no guidance or current Emergency Plan that described the roles and responsibilities of the City Mayoral office staff during a catastrophic City-wide emergency.

- Most City Department Emergency Preparedness representatives from these Departments were aware that their department could be called upon to staff a certain position in the EOC. However, the Emergency Plans did not typically indicate who would fulfill those responsibilities.

- Department Emergency Plans did not significantly distinguish, in most cases, the activities that would take place at the Department Operations Center from the activities that the department would be managing from the City EOC.

The City currently does not have a systematic approach for ensuring that the emergency plans are effective or would be useful during an actual emergency or disaster situation. Ensuring that the City's departmental emergency plans are clear, complete, organized, and comprehensive, and that they adhere to relevant and timely guidelines are crucial elements of the City's emergency management and operations efforts. As such, the Emergency Management Department should (a) establish procedures for systematically reviewing plans for timeliness, completeness, consistency with existing guidelines, and overall quality and usefulness; and (b) establish a system that holds EMD staff accountable for conducting and documenting such emergency plan reviews on a regular basis. In addition, the EMD should regularly revise the "Guidelines for Departmental Emergency Plans," and provide assistance to City departments in adhering to such guidelines. Further, EMD should ensure that all City departmental emergency plans comply with relevant requirements, including NIMS and COOP/COG standards.

## Conclusions

Emergency plans, if completed in a timely, clear, organized, and comprehensive manner, should serve as a critical and effective element of emergency management by defining the roles, responsibilities, and required actions by personnel and agencies during emergencies or disasters. The City of Los Angeles has many emergency preparedness plans with varying purposes and objectives, but improvements are needed to ensure planning timeliness, consistency, and effectiveness. For example, weaknesses in emergency plans timeliness, consistency, and quality were evident based on several reviews of existing Departmental Emergency Plans and Master

management functions, but, based on the ICF report, more can be done to improve National Incident Management System (NIMS) compliance.

Plan Annexes. The EMD should work with City departments to ensure that all plans are completed, are revised on a regular basis, and are in compliance with relevant standards and guidelines, including those pertaining to COOP/COG and NIMS guidelines and provisions.

# Recommendations

The Emergency Management Department should:

3.1.  Maintain an up-to-date and complete master list of all completed and planned emergency plans (e.g., Departmental Plans, Master Plan Annexes, and Division Plans). At minimum, this master list should be:

  a)  Inclusive of detailed information such as the plan's last revision date, next revision date, and contact name and information;

  b)  Revised on an on-going and as-needed basis throughout the calendar year;

  c)  Readily available from the Emergency Management Department; and

  d)  Used by the City as a tool for emergency management strategic planning.

3.2.  Establish and implement clear policies and procedures that ensure the systematic and on-going review by Emergency Management Department staff of all emergency plans. At minimum, these policies and procedures should include:

  a)  Procedures for systematically reviewing plans for timeliness, completeness, consistency with existing guidelines, and overall quality and usefulness;

  b)  A system that holds Emergency Management Department staff accountable for conducting and documenting such emergency plan reviews on a regular basis; and

  c)  A system that assigns specific Emergency Management Department staff with oversight of and responsibility for tracking and monitoring emergency plans for a group of City departments.

3.3.  In collaboration with the Mayor and other City departments, establish and implement policies and procedures that provide clear, practical, and proactive guidelines to facilitate collaboration and communication (i.e., beyond the Emergency Operations Board structure) between Emergency Management Department staff and other City departmental staff in drafting, revising, and reviewing emergency plans on an ongoing basis.

3.4.  Regularly revise its "Guidelines for Department Emergency Plans" to include all relevant and up-to-date standards and protocols (e.g., NIMS requirements).

3.5.   Proactively communicate and explain the Emergency Management Department's "Guidelines for Department Emergency Plans" to City department staff to ensure consistency, clarity, and usefulness of all emergency plans.

3.6.   Establish and implement a systematic approach for ensuring that the emergency plans are effective and useful during an emergency or disaster situation. At minimum, this process should include:

a)   Establishing a requirement for City departments to provide consistent and detailed information on departmental staff's emergency training and exercise needs, requirements and plans as part of the departmental emergency plans;

b)   When applicable, incorporating the corrective actions and recommendations that are included in After Action Reports into appropriate emergency plans; and

c)   Conducting systematic and on-going assessments of all emergency plans for their overall quality and usefulness.

3.7.   Lead the effort to ensure that all City departments' emergency plans and efforts comply with relevant standards and guidelines, including those pertaining to COOP/COG and NIMS guidelines and provisions. At a minimum, EMD should ensure that:

a)   The formal review of the departmental emergency plans' compliance with the standard elements of the Continuity of Operations (COOP) and Continuity of Government (COG) planning guidelines is completed and that the results are implemented;

b)   Relevant City departmental emergency plans comply with appropriate COOP/COG standards; and

c)   All recommendations contained in the report provided by ICF International to the City regarding NIMS compliance are implemented.

# Costs and Benefits

The initial implementation of these recommendations should be accomplished using existing resources, supplemented by consultant support, if required. The benefits include improved mechanisms for tracking and monitoring the completeness, timeliness, and consistency of all emergency plans in the City, which have the potential to ultimately improve the City's overall emergency management and operations. Establishing and implementing formal procedures for assessing emergency plans would help ensure that planning gaps, deficiencies, and weaknesses are identified and documented. Finally, ensuring that all of the City's emergency plans are timely, consistent, of quality, and useful would help enhance the City's ability to identify what actions will be taken, when they should be taken, and who will perform them should an emergency or disaster situation take place.

# 4. Emergency Exercises and Training

- **In 2007, hundreds of City employees participated in over 20 different tabletop, functional and full-scale training exercises, including the Annual Citywide Emergency Preparedness Exercise; the Beverly Center Evacuation Drill; and the Oaks Hill Brush Fire Evacuation Exercise. However, records of emergency preparedness exercises are not always comprehensive. Having a complete and detailed accounting of all emergency preparedness exercises would provide the City with a tool for assessing overall effectiveness, and would assist in setting emergency exercise priorities and long-term strategies.**

- **In addition, the City has not developed a strategic approach for planning and coordinating emergency exercises. For example, the City does not have a multi-year, strategic plan for providing exercise opportunities to City staff, nor does it conduct a formal assessment of exercise requirements or needs. Because exercise planning is not effective or well coordinated, it is unclear whether the exercises currently provided to employees meet the broader emergency operations needs or goals of the City. A more comprehensive, multi-year approach to planning and coordinating exercises are important for ensuring a successful progression of exercise design and execution.**

- **Thousands of City employees participated in a variety of emergency preparedness-related training activities in 2007, including National Incident Management System (NIMS) and Standardized Emergency Management System (SEMS) sessions, Building Emergency Education Program (BEEP) training, Emergency Operations Center (EOC) training, and Fire/Life Safety training. However, the City does not have a formal, centralized database of emergency preparedness-related training activities.**

- **The City's Master Plan Training Annex, which is supposed to conceptually define the training requirements for City employees, is extremely outdated. The City should establish effective training plans and coordination mechanisms to ensure that training gaps and deficiencies are addressed, and that training priorities and strategies are developed and modified, as appropriate.**

Emergency exercises and training both play crucial roles in an organization's emergency preparedness efforts. Exercises are an important means of testing an organization's response plans and preparing individuals and organizations for emergency and disaster incidents. Training provides organizations and individuals with the necessary knowledge and skills to effectively respond and quickly recover from various types of disasters.

# Emergency Exercises Overview and Assessment

## *Emergency Exercises Overview*

Emergency exercises are conducted to test emergency plans, procedures, equipment, facilities, and training and to evaluate capabilities under controlled, predetermined conditions. Exercises are activities which require participants to actually perform disaster response duties. The two general kinds of exercises are discussion-based exercises and operations-based exercises. Discussion-based exercises (e.g., workshops, seminars, and interactive tabletop lessons) focus on training for higher-level skills involving plans, policies, mutual-aid agreements, and procedures. Operations-based exercises (e.g., drills, functional exercises, and full-scale exercises), on the other hand, focus on action-oriented activities to clarify roles and responsibilities, identify gaps in resources, and improve individual and team performance. The three most common types of exercises are tabletop exercises, functional exercises, and full-scale exercises.

- Tabletop Exercise: The purpose of a tabletop exercise is to facilitate a learning environment where response agencies can come together, face to face, to understand and talk through an integrated response to a specific emergency situation. During tabletop exercises, emergency operations centers are not activated and emergency response forces are not deployed. Tabletop exercises provide an environment for learning, discussing, and identifying issues that may not be as apparent when participants are physically separated. In addition, tabletop exercises also provide an opportunity to compare what participants actually expect to do with what is written in the local emergency plan, identifying changes that may need to be made to the plan. Tabletop exercises are frequently conducted as part of the preparation for a later functional or full-scale exercise.

- Functional Exercise: A functional exercise is designed to test and evaluate selected emergency functions and the interaction of various levels of government, response organizations, volunteer groups, and industry in a simulated emergency environment. This type of exercise usually involves key decision-makers and representatives of response and support organizations. The local Emergency Operating Center may also be activated, and field response units are not normally deployed during a functional exercise. Instead controllers and simulators who manage the exercise events, may simulate certain field response activities, and may represent external organizations pertinent to the exercise scenario that are not participating in the exercise, such as federal agencies.

- Full-Scale Exercise: A full-scale exercise includes all the components of the functional exercise, plus activation of an incident command post and actual deployment of response personnel and equipment to respond to a simulated emergency situation. Full-scale exercises may also involve participation of other jurisdictions providing mutual aide, and federal and State coordination and response elements. A full-scale exercise is intended to test and evaluate the operational capability of the overall emergency management organization to respond to a realistic scenario.

City of Los Angeles staff generally participate in local, regional and national-level exercises that provide the means to conduct "full-scale, full system tests" of collective preparedness, interoperability, and collaboration across all levels of government and the private sector. In 2007, hundreds of City employees participated in over 20 different tabletop, functional and full-scale exercises (11 tabletop exercises, 9 functional exercises, and 3 other types of exercises). Some of the major Citywide emergency preparedness exercises included the Annual Citywide Emergency Preparedness Exercise; the Bio-Watch Functional Exercise; the Los Angeles World Airports' "Air Ex" Exercise; the Beverly Center Evacuation Drill; the Oaks Hill Brush Fire Evacuation Exercise; and the Port of Los Angeles' Evacuation Exercise. Between August 2005 and March 2008, City of Los Angeles employees participated in over 50 exercises, most of which were organized/led by the City of Los Angeles Fire and Police departments, the County of Los Angeles, the Los Angeles Urban Area, the State of California, and private sector entities.

The Emergency Management Department (EMD) Training/Exercises Division staff maintains and revises this Master Exercise List based on the City's Master Exercise Calendar. This calendar is developed annually and revised on an ongoing basis, as EMD is informed by other City departments or external entities (i.e., non-City departments) of emergency exercises in which City employees can participate. In addition to the Master Exercise Calendar, another source for exercise information is the Emergency Preparedness Activities Annual Report, which is a report that is compiled by EMD, is annually provided to the Mayor, and is based on information reported by City departments regarding the exercises and training activities that City employees participated in during the calendar year. This annual report lists specific exercise events that are identified by EMD (based on the Master Exercise List), as well as general categories, such as "Others" and "Departmental Exercises," which are department-specific exercises that are not reported in the Master Exercise Calendar, as they are planned and led by a department to exercise its own staff on some aspects of the department's own emergency management or business continuity procedures (e.g., the Department of Aging practices a "call-down" to test employee notification systems in a disaster).

The Master Exercise List maintained by EMD is generally incomplete. For example, we found that some exercises that were identified in the Annual Report were not included on the Master Exercise List, including (a) the April 28, 2007 MTA Joint Security Training Functional Exercise; (b) the April 5-6, 2006 Bank of America Tabletop; and (c) the August 3, 2006 Operation Blue Shield Exercise. In addition, based on the results of our survey of City departments, the December 4, 2007 DHS Pandemic COOP Table-top Exercise was not included in EMD's Master Exercise List. Further, department-specific exercises are not reflected in the Master Exercise List, and the Annual Report does not provide sufficient details on such department-specific efforts. A comprehensive and up-to-date emergency preparedness exercise database and tracking system is critical in determining the gaps that exist in the City's emergency preparedness exercise efforts and to identify opportunities to expand exercise experiences to key partners. Having a complete and detailed account of all emergency preparedness exercises would not only provide the City with a tool for assessing the overall effectiveness of efforts, but it would also assist in setting the City's emergency exercise priorities and long-term strategies.

The EMD, in collaboration with all City departments, should establish and maintain a central database containing all emergency preparedness-related exercises, including all department-specific exercises in which City staff have participated. At a minimum, this database should include the exercise's title, type (e.g., tabletop, full-scale, functional, etc.), date(s), location, description/scenario, lead entity/organizer, and contact information. In addition, this database should also contain a field indicating whether an after action report exists for the exercise, and if so, a link to the final report.[1]

Attachment 1 provides a list of all emergency preparedness-related exercises identified during this audit, based on EMD's Master Exercise List, Emergency Preparedness Activities Annual Report, and survey of EOB member departments.

### *Emergency Exercise Planning and Coordination*

The City has not developed a robust or strategic approach for planning and coordinating emergency exercises. For example, the City's Master Exercise Calendar focuses only on the events that will take place during the current and the following calendar years and does not provide a multi-year, strategic approach or plan for addressing the City's overall emergency exercise needs. As previously mentioned, EMD updates the City's master exercise calendar on an annual and ad hoc basis only for the current and following calendar years. Further, there is no assessment of the exercise inventory to identify a strategy or exercise priorities, providing a multi-year perspective on the City's emergency exercise activities.

The City also does not conduct a formal assessment of its staff's overall exercise status and needs, which could be helpful in identifying whether duplication of effort exists or if opportunities for expanding participation in exercise activities might be beneficial, while planning for future exercise efforts. Due to the lack of effective exercise planning and coordination, it is unclear whether the exercises currently provided to City employees meet the broader emergency operations needs and goals of the City. In addition, it is difficult to assess whether the current exercise functions and activities are duplicative or overlapping, or if specific gaps are being addressed.

A more comprehensive, multi-year approach to the planning and coordination of critical exercises is important for ensuring a successful progression in exercise design and execution, as well as ensuring the overall efficiency and effectiveness of efforts. For example, the City chose to participate in a County sponsored tsunami response exercise during the period of this audit. However, after the first day of the three day exercise, the EMD General Manager determined that City departments were not prepared to participate since staff had not yet been fully trained on the recently adopted Tsunami Response Plan or the City's new on-line emergency information sharing software (i.e., Web EOC).

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[1] After action reports (AAR's) are further discussed in Section 5 of this report.

Rather than participating in exercises merely because the opportunity presents itself, a strong centralized process for developing and implementing a needs-based, comprehensive, and multi-year approach to fulfilling the City's emergency preparedness exercise and training needs is necessary in order to ensure these efforts are effective. The Emergency Management Department should work with City departments to (a) identify the current gaps and deficiencies in the City's emergency exercise plans and (b) conduct a formal assessment of the emergency exercise needs of City staff. In addition, the Mayor and the City Council, as part of its strategic planning efforts, should work with the Emergency Operations Board in drafting and implementing a multi-year exercise plan/program to provide a roadmap for the City in accomplishing its emergency preparedness priorities.

# Emergency Training Overview and Assessment

## *Emergency Training Overview*

New training standards continue to evolve to provide local government with the necessary knowledge and skills to effectively respond and quickly recover from all types of disasters. Emergency training is an instructor-driven type of learning that provides emergency responders and others with the skills and knowledge needed to respond to and act during emergency and disaster situations. To ensure that this occurs, the City of Los Angeles is required to be compliant with homeland security initiatives, such as the National Incident Management System (NIMS) and the Homeland Security Exercise and Evaluation Program (HSEEP). NIMS-related training is an important element for which local entities must become fully compliant as a condition of receiving federal funding assistance. NIMS and the California Standardized Emergency Management System (SEMS) require that certain training courses be completed by anyone who may be tasked with duties during an emergency.

The Mayor's Executive Directive EP-1 provides that in order to maintain the City's ability to respond to and recover from emergencies and disasters, every General Manager is directed to prepare, implement and maintain a departmental emergency training program. According to this directive, every General Manager is responsible for ensuring that an appropriate number of trained department personnel are ready to fulfill their respective emergency missions, and if necessary, respond to the City's Emergency Operations Center. In 2007, thousands of City employees participated in a variety of emergency preparedness-related training activities. City employees participated in NIMS and SEMS sessions, Building Emergency Education Program (BEEP) training, Emergency Operations Center (EOC) training, Fire/Life Safety training, and various inter-departmental and other training.

The Emergency Management Department currently maintains the Master Emergency Operations Organization (EOO) Training Database, but this database only includes those emergency preparedness-related training sessions that (a) provide some type of completion certification, (b) were self-reported by training attendees, and (c) were funded by the Emergency Operations Fund

(EOF).[2] According to EMD, they do not keep track of emergency training that is not funded by the EOF and that departments are responsible for tracking, such as emergency response training for their respective staff. Such limitations in terms of the information that EMD collects as part of its Master EOO Training Database impacts the overall completeness of this training database.

In addition to the Master EOO Training Database, the EMD also maintains and revises the City's Master Training Calendar, which, similar to the Master Exercise Calendar, is developed annually for the following calendar year and is revised on an ongoing basis. Furthermore, as previously mentioned, the EMD also generates the Emergency Preparedness Activities Annual Report, which is based on information reported by City departments regarding the training activities that City employees participated in during the calendar year. This Annual Report lists specific training workshops that are identified by EMD (based on the Master Training List), as well as general categories such as "Others" and "Inter-departmental Training," which are department-specific training that are not reported in the Master Training Calendar, as they are planned and led by a department to provide training to its own staff on some aspects of the department's own emergency management or business continuity (e.g., the Department of Building and Safety providing training to its inspectors on recent changes to building codes.).

The City currently lacks a formal and centralized database that contains a complete list of all emergency preparedness-related training in which City staff have participated. For example, the Master EOO Training Database maintained by EMD does not include several emergency training data, including data for those training sessions that are not funded by the EOF and those that are not self-reported by the training attendee. In addition, the Annual Report does not provide details on the department-specific training sessions that were provided by City departments to its own staff. A comprehensive and up-to-date emergency preparedness training database and tracking system is critical in determining the gaps that exist in the City's emergency preparedness training efforts. Having a complete and detailed account of all emergency preparedness training would not only provide the City with a tool for assessing the overall effectiveness of efforts, but it would also assist in setting the City's emergency training priorities and long-term strategies. The EMD, in collaboration with all City departments, should establish and maintain a central database containing all emergency preparedness-related training, including all department-specific training and those that are non-EOF funded, in which City staff have participated. At a minimum, this database should include the training's title, date(s), type (e.g., NIMS-requirement, department-specific, etc.), location, description/scenario, number of participants, and lead entity/organizer.

Attachment 2 provides a list of emergency preparedness-related training (including the number of City employees that participated in each training[3]) derived from the Emergency Preparedness Activities Annual Report.

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[2] See Section 10 of this report for the Emergency Operations Fund (EOF) discussion.

[3] While some employees attended only one training event, many participated in multiple types of training.

### *Emergency Training Planning and Coordination*

The City does not have a robust and strategic approach for planning and coordinating its emergency training activities. For example, the City's Master Training Calendar focuses only on training that will occur during the current and following calendar years and does not allow for a multi-year, strategic approach or plan for addressing the City's overall emergency training needs. As previously mentioned, EMD updates the City's Master Training Calendar on an annual and ad hoc basis only for the current and following calendar years, so that there is not a formal training program or plan that provides a multi-year perspective on the City's emergency training priorities. The City also does not conduct a formal assessment of overall staff training status and needs, which could be helpful for identifying gaps and duplication, as well as in planning for future training efforts.

In addition, the City's Training Annex, which is an annex to the City's Emergency Operations Master Plan and Procedures that conceptually defines the EOO-related training for City employees, is incomplete and outdated. The Training Annex identifies each department's primary responsibility for training by City employee category; specifies which department is responsible for ensuring that designated training occurs; identifies departments that, as subject matter experts, can assist other departments with training efforts; and, identifies departments, which as a result of City Council action, are functionally responsible for the coordination of a particular training program. The most recent version of the Training Annex did not include the table of training requirements and responsibilities, which was supposed to provide a summary of training requirements to City departments. This annex also has not been updated since 1997, even though training guidelines, language, and requirements have drastically changed since then.

Due to the lack of effective training plans and coordination, as evident from the absence of a strategic approach and from the outdated Training Annex, among others, it is unclear whether the training currently provided to City employees meets the broader emergency operations needs and goals of the City. In addition, it is difficult to assess whether the current training functions and activities are duplicative or overlapping, and if specific gaps are addressed. As we suggested previously in this section for exercise activities, the Emergency Management Department should work with City departments to (a) identify the current gaps and deficiencies in the City's emergency training plans, (b) conduct a formal assessment of the emergency training needs of City staff, and (c) revise the Master Plan's Training Annex to reflect current training requirements and standards. In addition, the Mayor and the City Council, as part of its strategic planning efforts, should work with the Emergency Operations Board in drafting and implementing a multi-year training plan/program to provide a roadmap for the City in accomplishing its emergency preparedness priorities.

# Conclusions

Emergency exercises and training are integral parts of the City's overall emergency preparedness efforts. City employees participate in a variety of emergency preparedness-related exercises and training activities every year, but improved tracking, planning, and coordination are needed to ensure efficiency and effectiveness. For example, listings of emergency preparedness exercises and training are not always comprehensive and complete, making it difficult to assess whether the current exercises and training functions are duplicated or overlapping, and if specific gaps exist. Training and exercise activities are also not fully coordinated and the process for planning and prioritizing these activities have not been established. A strong centralized process for developing and implementing a needs-based, comprehensive, and multi-year approach to fulfilling the City's emergency preparedness exercises and training needs is necessary in order to ensure these efforts' effective tracking, planning and coordination.

# Recommendations

The Emergency Management Department, in collaboration with other City departments, should:

4.1.   Establish and maintain a central database containing all emergency preparedness-related exercises, including all department-specific exercises, that City staff have participated in. At a minimum, this database should include the following:

   a)   Exercise title;

   b)   Exercise type (e.g., tabletop, full-scale, functional, etc.);

   c)   Exercise date(s);

   d)   Exercise location;

   e)   Exercise description/scenario;

   f)   Exercise's lead entity/organizer;

   g)   Exercise contact information; and

   h)   Information that indicates whether an after action report exists for the exercise, and if so, a link to the final after action report.

4.2.   Establish and maintain a central database containing all emergency preparedness-related training, including all department-specific training and those that are non-EOF funded, that City staff have participated in. At a minimum, this database should include the following:

   a)   Training title;

   b)   Training date(s);

   c)   Training type (e.g., NIMS-requirement, department-specific, etc.);

    d) Training location;

    e) Training description/scenario, including the training goals and objectives and how these goals and objectives relate to the City's overall exercise/training priorities;

    f) Total number of participants (including a breakdown of City employees vs. non-City employees);

    g) Training lead entity/organizer.

4.3. Revise the exercises and training master lists to ensure their completeness and accuracy on an on-going basis.

4.4. Use the exercise and training master lists as a key tool in its emergency management strategic planning.

4.5. Identify the gaps and deficiencies in the City's emergency exercise plans on an ongoing basis.

4.6. Conduct a formal assessment of the emergency exercise needs of City staff on an ongoing basis.

4.7. Identify the gaps and deficiencies in the City's emergency training plans on an ongoing basis.

4.8. Conduct a formal assessment of the emergency training needs of City staff on an ongoing basis.

4.9. Revise the City Master Plan's Training Annex to reflect current training requirements and standards.

4.10. Ensure that exercise and training functions and activities are not duplicated or overlapping, that specific gaps are addressed, and that activities are modified or enhanced, accordingly.

The Mayor and the City Council should:

4.11. As part of the strategic planning efforts, work with the Emergency Operations Board and the Emergency Management Department in drafting and implementing a multi-year exercise and training plan/program to provide a roadmap for the City in accomplishing its emergency preparedness priorities.

4.12. Ensure that the multi-year exercise and training plan/program is a living document that is updated and refined annually.

4.13. Ensure that the exercise and training plan/program includes a multi-year training and exercise schedule that represents natural progression of training and exercises that should take place.

# Costs and Benefits

The implementation of all recommendations should be accomplished using existing resources. The benefits include improved mechanisms for tracking, monitoring, and prioritizing emergency exercises and training efforts, which have the potential to ultimately improve the City's overall emergency preparedness. Establishing and implementing formal procedures for assessing the exercise and training status and needs of City staff, including identifying gaps, deficiencies, and overlaps, would help ensure the efficiency and effectiveness of the City's efforts. In addition, establishing systematic and formal exercise and training data collection and documentation procedures would result in a reduced risk of duplication of efforts and resources. Finally, establishing a more comprehensive, multi-year, and strategic approach to the coordination and prioritization of critical exercises and training would help the City in meeting its broader emergency operations needs and goals.

## Emergency Exercises Participated In By City of Los Angeles Employees

| NAME OF EXERCISE | DATE | LEAD AGENCY | SCENARIO | TYPE OF EXERCISE |
|---|---|---|---|---|
| Exercise Trojan Horse | March 29-30, 2008 | Joint Regional Intelligence Center / LA RTTAC | Suspicious Weapons/Chemical Packages and Bomb Threat | Full Scale Exercise |
| Operation Higher Ground 2008 | February 7, 2008 | LA County | The scenario involved an 8.8 earthquake in the Kuril Islands. The West Coast/Alaska Tsunami Warning Center issues a Tsunami Warning to the California State Warning Center. | Functional Exercise |
| San Andreas Earthquake Tabletop Exercise, AGM training | January 29, 2008 | LAFD | M7.8 Earthquake on Southern San Andreas Fault | Tabletop Exercise |
| Port Evacuation Exercise 2007 | December 10, 2007 | *NOT STATED* | *NO INFORMATION* | Full Scale Exercise |
| December 4, 2007 DHS Pandemic COOP TTX in Long Beach | December 4, 2007 | DHS | *NO INFORMATION* | Tabletop Exercise |
| Operation "Bel-Air Sinkhole" | December 4, 2007 | Los Angeles Bureau of Sanitation, Human Resources Development Div. | A sinkhole that develops in the intersection of Sunset Blvd. and Beverly Glen. Approx. half of the intersection is affected with pavement and soil being washed away, and a vehicle, driver and two dogs are trapped in the sinkhole. | Tabletop Exercise |
| Golden Guardian 2007 Full Scale Exercise | November 14, 2007 | State of California | The scenario for Golden Guardian 2007 consists of a large vehicle-borne improvised explosive device detonating adjacent to a train station during a large gathering event The explosion causes a significant number of casualties and chemical release near the explosion site. | Full Scale Exercise |
| State of California 2007 Statewide Medical & Health Disaster Exercise | October 25, 2007 | *NOT STATED* | The scenario stages the threat of exposure to occur on Monday 22, 2007, and the healthcare system responds to the overwhelming numbers of patients presenting with symptoms. Hospitals may conduct exercise for any number of hours during the exercise play. | Full Scale Exercise |
| Arrowhead TTX | October 17, 2007 | EMD | On October 14, 2007 at 6:00 a.m. a M7.8 EQ occurs on the South San Andreas fault causing a rupture from the Salton Sea to Lake Hughes. The slip along the fault measures 30 feet in some areas. The most impacted counties are Riverside, San Bernardino, and Los Angeles. | Tabletop Exercise |
| CAApartment Association TTX | September 26, 2007 | California Apartment Association | A strong earthquake jolted the Los Angeles region with strong ground motion lasting for several minutes. Preliminary reports from the United States Geological Survey (USGS) indicate that the movement occurred on the Whittier Fault With the epicenter in South Whittier. | Tabletop Exercise |
| LEAPS TTX | September 20, 2007 | Law Enforcement And Private Security (LEAPS) | The scenario is the detonation of a VBIED (vehicle borne improvised explosive devise) in downtown. | Tabletop Exercise |

## Emergency Exercises Participated In By City of Los Angeles Employees

| NAME OF EXERCISE | DATE | LEAD AGENCY | SCENARIO | TYPE OF EXERCISE |
|---|---|---|---|---|
| LAX Chemical Restoration Operational Technology Demonstration Workshop | September 18, 2007 | DHS | Department of Homeland Security (DHS) sponsored Chemical Restoration OTD Workshop focusing on the restoration and recovery from a release of a chemical warfare agent or toxic industrial chemical (CWA/TIC) at the Los Angeles International Airport (LAX). | Tabletop Exercise |
| 2007 Long Beach Exercise | August 15-16, 2007 | EMPCo / SEARIVER MARITIME, INC | The exercise simulated two unrelated incidents occurring within the same operating area and within two hours of each other. Specifically, a Sea River Maritime, Inc. vessel at anchor in Port of Long Beach was struck by a third party barge resulting in spill of approximately 1500 barrels of bunker fuel. The second incident, occurring two hours later, was detonation of an explosive device outside the property of EMPCo's Southwest Terminal. | Tabletop Exercise |
| The Oaks Brushfire Evacuation Exercise | July 28, 2007 | LAFD | Major Wildland Fire | Evacuation |
| Golden Phoenix Collaborative Training Event | July 16-26, 2007 | Marine Aircraft Group-46 | The scenario driving this training is a catastrophic earthquake along the San Andreas fault that severely impacts regional transit and civil infrastructures. | Training Exercise |
| Operation Relocate:'Git Em Up and Move Em Out Tabletop Exercise | June 6, 2007 | LAFD | 7.1 Earthquake on the Puente Hills Fault | Tabletop Exercise |
| Beverly Center Evacuation | May 17, 2007 | *NOT STATED* | Security dispatch receives a call from an unknown caller advising that there is a bomb near the theater lobby area, upon receiving the call, Dispatch contacts Kim Densmore, Security Director who then notifies Jeff Brown, Operations Director; however, the bomb explodes causing injury, windows are shattered, property is damaged and debris covers egress in the center. A second (2nd) device is located which also explodes which incurs a chemical "small" release; causing the Beverly Center to evacuate immediately. | Full Scale Exercise |
| LAX AIREX 2007 Full Scale Exercise | May 15, 2007 | LAWA | The scenario involves a large commercial jet approaching LAX with an uncontained engine failure and fire. Upon touchdown, the aircraft loses directional control and veers off the runway into an excavation for a new center taxiway. There is fire and catastrophic damage to the aircraft with multiple fatalities, injuries and survivors. Aircraft debris and body parts litter the airfield. | Full Scale Exercise |

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## Emergency Exercises Participated In By City of Los Angeles Employees

| NAME OF EXERCISE | DATE | LEAD AGENCY | SCENARIO | TYPE OF EXERCISE |
|---|---|---|---|---|
| California Regional Support Team Recovery Exercise - Bank of America | May 9,2007 | Bank of America | Earthquake | Tabletop Exercise |
| Community Emergency Response Team (CERT) Refresher Drill | May 2, 2007 | *NOT STATED* | This 5-hour CERT Refresher drill is opened to all City employees who are already CERT certified. Put into practice what you have already learned - Disaster Fire Suppression techniques, Disaster Medical Operations, Light Search & Rescue Operations, etc. | Full Scale Exercise |
| April 28, 2007 MTA Joint Security Training Functional Exercise | April 28, 2007 | MTA | *NO INFORMATION* | Functional Exercise |
| LAX AIREX 2007 TTX | April 27, 2007 | LAWA | The TTX is a discussion based forum in which emergency response is exercised through a facilitator. LAFD TACT Team in coalition with LAX Airport Operations will facilitate the discussions of emergency plans and procedures. The TTX hopes to resolve questions of coordination and assignment of responsibilities in an informal format without constraints of time or stress levels of actual simulations. | Tabletop Exercise |
| Coyote Wildfire Tabletop Exercise | March 6, 2007 | California State University San Bernardino | The TTX will include participants from the local and state level for preparedness and response to a fire outbreak on a university campus. | Tabletop Exercise |
| Network Leaders' Forum | March 1, 2007 | AT&T | *NO INFORMATION* | Workshop / Tabletop |
| BioWatch Functional Exercise Invitation | February 7, 2007 | Public Health Foundation Enterprises | 1. Test the Los Angeles BioWatch Region local and national conference call protocols as outlined in the Los Angeles Region BioWatch Notification Protocol. 2. Test the ability of the LA Region BAC to notify federal and state partners; and to acquire the local and national conference call bridge lines. | Functional Exercise |
| Operation: Shake, Rattle and Roll | January 17, 2007 | LAFD | Earthquake | Full Scale Exercise |
| Operation Double Header | November 9, 2006 | LA County | The functional exercise conducted on November 9 will simulate three 4-hour operational periods; rather than the standard 12 hour operational period. This is being done to end the confusion on time lines when the exercise design centers on simulating a 12 hour shift in a shorter period of time. | Functional Exercise |
| California Large Stadium Initiative (LSI) LA Memorial Coliseum Tabletop Exercise (TTX) | October 18, 2006 | State of California, OHS | Improvised Explosive Device ([ED) | Tabletop Exercise |

## Emergency Exercises Participated In By City of Los Angeles Employees

| NAME OF EXERCISE | DATE | LEAD AGENCY | SCENARIO | TYPE OF EXERCISE |
|---|---|---|---|---|
| Operation Hollywood Hills Brush Fire 2006 | August 23, 2006 | LAPD | The exercise will consist of group discussions exploring the command, control, and communications issues involving a multi-agency response to a large brush fire in the Hollywood Hills area. | Full Scale Exercise |
| August 3, 2006 Operation Blue Shield | August 3, 2006 | *NOT STATED* | *NO INFORMATION* | |
| Operation MAGMA-LA (Marne Air Group Military Assistance to Los Angeles) | July 18, 2006; July 19, 2006; July 20, 2006 | United States Marine Corps Marine Aircraft Group - 46 | The Los Angeles Area suffered a severe earthquake on July 18, 2006. The infrastructure damage, particularly to the freeway and rail systems, has created a critical need for non-traditional transportation in the affected areas. | Full Scale Exercise |
| June 23, 2006 LSI Tabletop | June 23, 2006 | *NOT STATED* | *NO INFORMATION* | Tabletop Exercise |
| Beverly Center Tabletop Exercise | May 12, 2006 | City of Los Angeles and the Beverly Center | At 12:30 pm today tow explosions occurred simultaneously at the Baldwin Hills Crenshaw Plaza (BHCP). One of the blasts occurred at the entrance of the Plaza near the LAPD substation and SEARS Department Store. The other occurred in front of the Magic Theaters. The blasts caused significant structural collapses and fires at several businesses in the Plaza. The police substation and numerous cars parked outside are on fire. | Tabletop Exercise |
| Sempra Energy TTX- Puente Hills Fault | May 11, 2006 | Southern California Gas Company | Scientific & Analytical Basis; California Institute of Technology; Office of Emergency Services; LA City and County; Gas Transmission; IT & Telecom; 7.1 M quake on Puente Hills Fault; 2:00PM on May 26, 2006; Friday before Memorial Day; LA and Orange County affected | Earthquake Tabletop |
| Washington Mutual SW Regional Readiness Exercise - Northridge Campus | May 11, 2006 | *NOT STATED* | 6. 5 Earthquake occurs at 3:13am on Thursday, May 11, 2006, severe damage reported throughout the City. | Tabletop Exercise |
| Operation Safe Passage Exercise - LAUA/LAX Full Scale Exercise | April 11, 2006 | LA Urban Area | The scenario calls for a multi-agency response to a vehicle borne improvised explosive device (VBIED) at LAX, simulated at the Los Angeles Convention Center. There will be multiple fatalities and multiple injuries. | Full Scale Exercise |
| April 5-6, 2006 Bank of America Tabletop | April 5-6, 2006 | *NOT STATED* | *NO INFORMATION* | Tabletop Exercise |
| California Regional Support Team Recover Exercise | April 4, 2006; April 5, 2006 | EMD | CNN is reporting that at 9:43 AM PT, a major power outage began affecting multiple counties in the San Francisco Bay Area. Currently power is out in the counties of San Mateo and San Francisco, The surrounding counties of Marin, Contra Costa, Alameda and Santa Clara appear to be unaffected at this time. | |

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## Emergency Exercises Participated In By City of Los Angeles Employees

| NAME OF EXERCISE | DATE | LEAD AGENCY | SCENARIO | TYPE OF EXERCISE |
|---|---|---|---|---|
| Operation Safe Passage Exercise - LAUA/Bob Hope Airport Full Scale Exercise | March 28, 2006 | LA Urban Area | *NO INFORMATION* | Full Scale Exercise |
| Operation: "Dorris Place Sinkhole" Exercise Plan | March 16, 2006 | City of Los Angeles Department of Public Works, Bureau of Sanitation | On the morning of March 16th, there is a sinkhole that develops in the intersection of Dorris Place and Blake Avenue. Approximately half of the intersection is affected with pavement and soil being washed away, and a vehicle and driver have been trapped in the sinkhole. The driver appears uninjured. | Tabletop Exercise |
| Operation Safe Passage - LAUA Functional Exercise | February 15, 2006 | LA Urban Area | This exercise will involve a level-three (full staffing) EOC activation. The exercise will focus on the LAUA's role in response to multiple coordinated terrorist attacks targeted at two major airports in Los Angeles County. Emphasis is on coordination, integration of capabilities, problem identification and resolution. | Functional Exercise |
| HERP | *NOT STATED* | *NOT STATED* | Infectious Disease Outbreak | Tabletop Exercise |
| Operation High Tower Full Scale Exercise | November 20, 2005 | LAFD | *NO INFORMATION* | Full Scale Exercise |
| Operation Chimera - 2005 Full-Scale Exercise | November 17, 2005; February 2, 2006 | LA County | Bioterrorism - Aerosolized Anthrax Release | Full Scale Exercise |
| Operation High Tower Command Post Exercise | November 2, 2005 | LAFD | *NO INFORMATION* | Command Post Exercise |
| LAX Quarantine Tabletop | October 20, 2005 | CDC | "Three (3) cross functional groups; (1) Airport stakeholders; (2) Local health care; (3) Public Health agencies, FBI, county, and federal health officials. * Phases went through initial notification of inbound fight aircraft on the ground requiring response and quarantine procedures; final recovery from the incident | Tabletop Exercise |
| Operation High Tower TTX | October 20, 2005 | LAFD | *NO INFORMATION* | Tabletop Exercise |
| USCG Tabletop Exercise "Port Evacuation & Closure/Reopening | October 12, 2005 | LAPD, Port of Los Angeles | One Day, tabletop exercise to determine Port evacuation procedures and evaluating closing and reopening procedures for a Port wide shutdown. | Tabletop Exercise |
| Operation Safe Passage Exercise - LAUA/Bob Hope Airport Tabletop Exercise | October 12, 2005 | LA Urban Area | Operation Safe Passage" objectives will be to exercise LAUA emergency responder and private sector coordination, problem identification with resolution, critical decisions, and integration of capabilities. | Tabletop Exercise |
| Operation Safe Passage Exercise - LAUAILAX Tabletop Exercise | October 6, 2005 | LA Urban Area | *NO INFORMATION* | Tabletop Exercise |
| Operation Safe Passage Exercise - LAUA Executive Tabletop Exercise (Lake Arrhead Sep. 28-29,2005) | September 28, 2005 | LA Urban Area | *NO INFORMATION* | Tabletop Exercise |

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## Emergency Exercises Participated In By City of Los Angeles Employees

| NAME OF EXERCISE | DATE | LEAD AGENCY | SCENARIO | TYPE OF EXERCISE |
|---|---|---|---|---|
| Operation Safe Passage Exercise - LAUA Natural Disasters Critical Response Issues | September 28, 2005 | LA Urban Area | *NO INFORMATION* | Tabletop Exercise |
| Arrowhead Executive Workshop | September 27-30, 2005 | EMD | *NO INFORMATION* | Tabletop Exercise |
| California Large Stadium Initiative (LSI) LA Staple Center Tabletop Exercise (lTX) | August 24, 2005 | CA HSTEP | Staples Center Staff indicated their desire for a two-prong attacked using Improvised Explosive Devices (IEDs): one inside the security area and a second outside after the crowds begin exiting the arena. The terrorist attack scenario of two explosive devices was approved by the Exercise Planning Team. | Tabletop Exercise |
| he 2005 County-Wide Exercise' Operation Chimera' | August 2, 2005; August4, 2005; August 9,2005 | LA County | (1) Guidance on the process for managing public information within the Operational Area during an incident that calls for Strategic National Stockpile (SNS) and Cities Readiness Initiative (CRI) activation, and (2) Information on the Cites' role in the activation and operation of regional point of dispensing (POD) sites. | Full Scale Exercise |

**Emergency Training Participated By City of Los Angeles Employees**

| TRAINING TITLE | # of Participants in 2007 | # of Participants in 2006 | # of Participants in 2005 |
|---|---|---|---|
| NIMS - IS 700 NIMS Awareness | 504 | 16,809 | |
| NIMS - IS 800 NIMS Awareness | 262 | 11,856 | |
| NIMS - ICS 100 Intro to ICS | 1,440 | 16,575 | |
| NIMS - ICS 200 ICS for Single Resources & Initial Action Incidents | 441 | 14,874 | |
| NIMS - ICS 300 Intermediate ICS for Expanding Incidents | 938 | | |
| NIMS - ICS-400 Advanced ICS Command & General Staff-Complex Incidents | 603 | | |
| | | | |
| Standardized Emergency Management System (SEMS) - Orientation | 340 | 4,170 | 1,278 |
| Standardized Emergency Management System (SEMS) - Field | 57 | 331 | 7,829 |
| | | | |
| Fire/Life Safety - Personal/Family Preparedness | 29,780 | 19,447 | 35,812 |
| Fire/Life Safety - Workplace/Home/Auto (Fire Drills, EQ Drills etc.) | 15,576 | 12,808 | 32,357 |
| | | | |
| Building Emergency Education Program (BEEP) - Building Emergency Coordinator (BEC) | 1,478 | 462 | |
| Building Emergency Education Program (BEEP) - Floor Warden | 1,342 | 989 | 1,147 |
| Building Emergency Education Program (BEEP) - CPR/First Aid/AED | 2,713 | 5,716 | 5,463 |
| Building Emergency Education Program (BEEP) - Emergency Response Team | 901 | 847 | 2,506 |
| Building Emergency Education Program (BEEP) - Hazard Mitigation | 275 | 686 | 1,438 |
| | | | |
| Department Operations Center (DOC) Training | 474 | 344 | 461 |
| Emergency Operations Center (EOC) Training | 259 | 128 | 353 |
| First Responder Training | 676 | 1,809 | 12,904 |
| | | | |
| OES/FEMA Sponsored Training (CSTI, EMI, etc.) | 94 | 134 | 1,173 |
| ICS/Unified Command Training and Exercises | 997 | 279 | 726 |
| | | | |
| Inter-Departmental Training | 159 | 1,575 | 11,612 |
| Other Training | 2,168 | 1,823 | 1,772 |
| | | | |
| Emergency Preparedness Fair | 146 | 111 | 170 |
| Neighborhood Preparedness Ambassador Program | 46 | 26 | 10 |
| Emergency Management Workshop | 142 | 106 | 91 |
| Private Emergency Preparedness Fair (USC, Getty, Library Tower) | 13 | | |
| New Employee Emergency Orientation | 2,723 | 2,452 | 1,780 |

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# 5. After Action Reporting and Corrective Actions

- **After Action Reports (AARs) are required to be produced after emergencies, disasters, other events and training exercises to identify performance weaknesses and to document a plan for corrective action. However, the City has not developed formal mechanisms for ensuring that AARs and improvement plans are completed after every emergency exercise. There are no provisions in the City's Master Plan requiring the completion of AARs and improvement plans for all types of exercises nor are there provisions in the Master Plan that set deadlines for when AARs should be finalized. As a result, AARs and improvement plans are not always completed after every emergency exercise. In addition, the AARs that were reviewed did not completely adhere to relevant Federal guidelines. The City's Emergency Operations Organization should ensure that AARs are completed for all exercises and that all AARs follow Federal guidelines, including making the Improvement Plan a mandatory component of each AAR.**

- **The City has also not developed a formal mechanism for ensuring that areas for improvement are routinely identified or that corrective actions are implemented. Based on a review of four exercise AARs that were drafted by EMD in 2007, of the 20 areas for improvement or corrective actions contained in four training exercises reviewed for this audit, none have been fully implemented. The absence of a formal mechanism limits the ability of City officials to enhance the effectiveness of the City's preparedness. The Emergency Operations Organization should ensure that formal accountability mechanisms are established for prioritizing, tracking, monitoring, and following-up on the implementation status of all corrective actions and areas for improvement.**

Emergency exercises are conducted to test emergency plans, procedures, equipment, facilities, and training in order to evaluate capabilities under controlled, predetermined conditions. The U.S. Department of Homeland Security Exercise and Evaluation Program (HSEEP)[1] provides common exercise policy and program guidance that constitutes a national standard for exercises. HSEEP standards require that all discussion-based[2] and operations-based[3] exercises result in

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[1] U.S. Department of Homeland Security Exercise and Evaluation Program (HSEEP) Volume III Exercise Evaluation and Improvement Planning, U.S. Department of Homeland Security; February 2007.

[2] Discussion-based exercises (e.g., workshops, seminars, and tabletops) focus on higher-level capability issues involving an entity's plans, policies, mutual-aid agreements, and procedures.

[3] Operations-based exercises (e.g., drills, functional exercises, and full-scale exercises) focus on action-oriented activities to clarify roles and responsibilities, identify gaps in resources, and improve individual and team performance.

the development of an after action report (AAR) and improvement plan, which is the final exercise document that provides a description of what happened during the exercise, describes any best practices or strengths, identifies areas for improvement that need to be addressed, and provides specific recommendations for improvement. Deficiencies noted during the exercise are documented and discussed in an AAR and an improvement plan is developed to identify problems that need to be corrected and who is responsible for correcting them, ultimately leading to changes in emergency plans, procedures, equipment, facilities, and training. These are again tested during the next exercise as a means of determining whether improvements have been made. According to HSEEP standards, AARs and improvement plans are required for all exercises, regardless of exercise type.

## After Action Reports Completion

The City has not established formal mechanisms for ensuring that AARs and improvement plans are completed after every emergency exercise, as evident from (a) of the absence of provisions in the City's Master Plan requiring the completion of AARs and improvement plans for all types of exercises; (b) the absence of provisions in the City's Master Plan that set deadlines for when AARs should be finalized; and (c) the absence of a centralized and complete inventory of all AARs that have been completed by City departments and those that still need to be completed. As a result, AARs and improvement plans are not always completed after emergency exercises.

The City of Los Angeles' Emergency Operations Plan (Master Plan) only includes guidance for the preparation and management of AARs for exercises and events that involve the activation of the Emergency Operations Center (EOC) and not for all other types of exercises, as required by HSEEP standards. Further, the City does not have a comprehensive set of guidelines for the completion of AARs beyond those involving EOC activation. According to the Master Plan, the Emergency Management Department (EMD) is responsible for the after action report process, which includes the coordination and compilation of AARs and the documentation, tracking and monitoring of corresponding corrective actions. To improve the City's emergency exercises and enhance its response and recovery process for various types of emergency and disaster situations, the City should expand the guidelines included in the Master Plan by incorporating policies and procedures for the completion of AARs and improvement plans for all types of exercises, including all discussion-based and operations-based exercises in which the City participates.

The City's Master Plan also does not explicitly specify when an AAR and improvement plan should be completed and submitted to the Emergency Operations Board (EOB). According to the Master Plan, each Emergency Operations Organization (EOO) Division is responsible for submitting a written AAR to EMD within 14 days following the deactivation of the EOC. After compiling and drafting the after action report, the EMD is required to submit a written and oral report to the Emergency Management Committee (EMC) for submission to the EOB at the Board's next scheduled meeting. However, according to EMD, they have been averaging between 60 days and 90 days to submit the AARs to the EMC. To ensure the effectiveness and usefulness of after action reports and to ensure timely completion, the City should explicitly specify in the Master Plan when (e.g., after 30 days) an after action report and improvement plan should be completed and submitted to the Emergency Operations Board.

In addition to the absence of Master Plan provisions regarding AARs, the Emergency Management Department, which is the department responsible for the after action reporting process, does not maintain an inventory of all after action reports and improvement plans that have been completed by City departments. Maintaining and compiling such a comprehensive and complete list of after action reports is necessary, not only to fully account for all emergency exercises, but to be able to track, monitor, and ensure AAR completion.

Because of the absence of formal mechanisms for ensuring AAR completion, after action reports are not always completed after every emergency exercise in the City. Table 5.1 below shows a number of emergency preparedness-related exercises that occurred in the City of Los Angeles, for which corresponding AARs were not available:

**Table 5.1**

**Exercises Without After Action Reports**

| NAME OF EXERCISE | DATE | TYPE OF EXERCISE |
|---|---|---|
| 1) Port Evacuation Exercise 2007 | December 10, 2007 | Full Scale Exercise |
| 2) Community Emergency Response Team (CERT) Refresher Drill | May 2, 2007 | Full Scale Exercise |
| 3) Beverly Center Evacuation | May 17, 2007 | Full Scale Exercise |
| 4) LAX Chemical Restoration Operational Technology Demonstration Workshop | September 18, 2007 | Tabletop Exercise |
| 5) LEAPS TTX | September 20, 2007 | Tabletop Exercise |
| 6) CA Apartment Association TTX | September 26, 2007 | Tabletop Exercise |
| 7) State of California 2007 Statewide Medical & Health Disaster Exercise | October 25, 2007 | Full Scale Exercise |
| 8) Operation Hollywood Hills Brush Fire 2006 | August 23, 2006 | Full Scale Exercise |

In order to improve the City's emergency preparedness exercise process, the City, through the Emergency Operations Organization, should revise its Emergency Operations Plan, or Master Plan, to include formal policies and procedures that (1) require the completion of AARs and improvement plans for all emergency exercises (i.e., for both discussion-based and operations-based exercises) in the City; (2) identify the specific parties or agencies responsible for the drafting, completion, and finalizing of the AARs; (3) explicitly specify when (e.g., after 30 days) an after action report and improvement plan should be completed and submitted to the Emergency Operations Board; and (4) require that the Emergency Management Department work with other City departments in maintaining and compiling a comprehensive and complete list of after action reports.

For those AARs that have been completed by City departments, none of them had a formal improvement plan (IP), which is supposed to outline the actions that the exercising jurisdiction plans to take and is supposed to list the recommendations, specific actions, party responsible for implementing the recommendation, and a completion date. In addition, available AARs that were reviewed did not completely adhere to the HSEEP guidelines, which (as noted) require or recommend the following AAR sections:

1. Report Cover Page (required)

2. Administrative Handling Instructions[4] (required)

3. Table of Contents (required)

4. Executive Summary (required)

5. Section 1: Exercise Overview (required)

6. Section 2: Exercise Design Summary (required)

7. Section 3: Analysis of Capabilities (required)

8. Section 4: Conclusion (required)

9. Appendix A: Improvement Plan (required)

10. Appendix B: Lessons Learned (optional)

11. Appendix C: Participant Feedback Summary (optional)

12. Appendix D: Exercise Events Summary Table (optional)

13. Appendix E: Performance Ratings (optional)

14. Appendix F: Acronyms (required)

The City's Emergency Operations Organization should ensure the quality and completeness of AARs for all types of exercises by (1) incorporating HSEEP requirements when establishing a standard format to be followed in drafting all after action reports, and (2) making the Improvement Plan a mandatory component of each AAR. These Improvement Plans should articulate specific corrective actions by addressing issues identified in the AAR; provide a completion date by which the corrective action should be accomplished; and identify and assign the person(s) or agencies responsible for the full implementation of the corrective actions.

## Corrective Actions Tracking and Implementation

Based on our review of four exercise AARs that were drafted by EMD in 2007,[5] of the 20 corrective actions or areas for improvement, none of the recommendations have been fully implemented, and only three of the recommendations have been partially implemented. The majority of the corrective actions have either not been implemented at all or the EMD was unable to provide evidence of implementation status at the writing of this report. In one instance, EMD reported that one of the areas for improvement involving the Department of Animal

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[4] These instructions should list and explain the appropriate security guidance for the report, such as For Official Use Only, By Invitation Only, or Sensitive But Classified. These instructions should also identify the authority for approval of dissemination and any additional guidance necessary regarding AAR/IP security, usage,

[5] This AAR review included the following exercises: (1) Operation: Shake, Rattle, and Roll Full Scale Exercise; (2) Griffith Park Wild Land Fire EOC Activation; (3) "The Oaks" Brush Fire Evacuation Exercise; and (4) Southern California Wild Land Fires. This review did not include the AAR for the annual emergency preparedness fair, which does not technically fall under a discussion-based exercise or an operations-based exercise category.

Services had been fully implemented, even though Animal Services reported that nothing had been done to address and implement the particular area of improvement.[6]  Table 5.2 below lists the corrective actions and areas for improvement that were reviewed.

**Table 5.2**

**AAR Corrective Actions Implementation Status Review**

| Event Name | Event Date | Recommended Areas of Improvement / Corrective Actions (per After Action Reports) | IMPLEMENTATION STATUS |
|---|---|---|---|
| Operation: Shake, Rattle, and Roll Full Scale Exercise | 1/17/2007 | Overall, the City-wide duck, cover and hold drill portion of the FSE ran smoothly but there were inconsistencies with the public address systems of the buildings involved in the exercise. | No Progress |
| Operation: Shake, Rattle, and Roll Full Scale Exercise | 1/17/2007 | Communication between Floor Wardens and Building Emergency Coordinators (BEC) should be practiced with regular frequency. | No Progress |
| Operation: Shake, Rattle, and Roll Full Scale Exercise | 1/17/2007 | The general Los Angeles Mall area should have speakers to provide the public with information regarding any emergency within the Civic Center complex. | No Progress |
| Operation: Shake, Rattle, and Roll Full Scale Exercise | 1/17/2007 | During drills, security personnel need to be given clear direction on whether to participate or perform their duties. | No Progress |
| Griffith Park Wild Land Fire EOC Activation | May 8 and 9, 2007 | Review and clarify EOC activation and responder call-out protocols to ensure that each agency with responsibilities for this function better understands its specific role. | (No Status Provided) |
| Griffith Park Wild Land Fire EOC Activation | May 8 and 9, 2007 | Review and reinforce the Public Welfare and Shelter functions and protocols outlined in the Los Angeles Administrative Code and the City's Emergency Operations Master Plan and Procedures at the field, Department Operations Center (DOC) and EOC level to ensure effective coordination and management of public shelters during a disaster. | Partially implemented. |

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[6] EMD initially reported that this recommendation has been fully implemented and that the Department of Animal Services is working with both City Attorney and American Red Cross. However, according to the Department of Animal Services, the Fire Department was to take the lead in developing a training curriculum and providing instruction for evacuation to agency first responders but this has not yet happened at the writing of this report.

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| Event Name | Event Date | Recommended Areas of Improvement / Corrective Actions (per After Action Reports) | IMPLEMENTATION STATUS |
|---|---|---|---|
| Griffith Park Wild Land Fire EOC Activation | May 8 and 9, 2007 | Continue and expand the effective use of the WebEOC information management application including regular training of EOC responders in that system and the enhancement of the resource management and shelter management capabilities. | (No Status Provided) |
| Griffith Park Wild Land Fire EOC Activation | May 8 and 9, 2007 | Review and clarify the protocols for request and declaration of a local emergency to insure more timely and efficient decision making. | (No Status Provided) |
| Griffith Park Wild Land Fire EOC Activation | May 8 and 9, 2007 | Assignment of DOC liaisons to the Incident Command Post (ICP) for status reporting. | (No Status Provided) |
| Griffith Park Wild Land Fire EOC Activation | May 8 and 9, 2007 | Review and revise as needed procedures for emergency public information regarding local television station use of closed captioning. | (No Status Provided) |
| "The Oaks" Brush Fire Evacuation Exercise | 7/28/2007 | Review methods and develop more effective procedures to assist and notify citizens with disabilities, | Partially implemented. |
| "The Oaks" Brush Fire Evacuation Exercise | 7/28/2007 | Ensure timely notifications to residents of a need to evacuate. | Partially implemented. |
| "The Oaks" Brush Fire Evacuation Exercise | 7/28/2007 | Ensure effective methods for the movement and housing of animals. | No progress[6] |
| "The Oaks" Brush Fire Evacuation Exercise | 7/28/2007 | Increase community participation at the Evacuation Center. | No Progress |
| Southern California Wild Land Fires | October 24-24, 2007 | EOC responder notification protocols need to be reviewed by EPD to ensure that all agencies are notified for response or informational purposes. Not all agencies were contacted. Specifically, not all Public Works bureaus were given individual notifications. | (No Status Provided) |
| Southern California Wild Land Fires | October 24-24, 2007 | Departmental EOC response rosters provided to EPD and ITA need to be reviewed again by EPD to insure there is no inaccurate or outdated information. Some responder data is incomplete. | (No Status Provided) |

| Event Name | Event Date | Recommended Areas of Improvement / Corrective Actions (per After Action Reports) | IMPLEMENTATION STATUS |
|---|---|---|---|
| Southern California Wild Land Fires | October 24-24, 2007 | EPD needs to continue and expand the effective use of the WebEOC information management application including regular training of EOC responders in that system. Several departments commented on lack of responder training in WebEOC. In some cases, departmental responders for this activation had not attended WebEOC classes conducted by EPD. EPD will continue to work with all responder departments to insure their staffs complete this training which is offered monthly. | (No Status Provided) |
| Southern California Wild Land Fires | October 24-24, 2007 | The resource management functions of WebEOC need to be reviewed and improved. Specific suggestions were offered by the GSD who coordinates the EOC Logistics function. EPD and ITA need to thoroughly review this aspect of WebEOC as part of the ongoing Citywide effort to develop a comprehensive Logistics Plan. GSD needs to work with EPD regarding their specific suggestions for improvement in EOC resource management workflow processes. | (No Status Provided) |
| Southern California Wild Land Fires | October 24-24, 2007 | LAFD and DOT need to review and revise if necessary the City's Red Flag Alert parking enforcement policy as it pertains to DOT. There was some uncertainty regarding enforcement and citation procedures. These issues are field level concerns that are not directly related to EOC operations. Recommend DOT continue to work with LAPD and LAFD on this matter directly. | (No Status Provided) |
| Southern California Wild Land Fires | October 24-24, 2007 | EPD needs to review and improve public information management procedures to insure all branches of the Operations Section have input into the process. Animal Services offered specific suggestions for improvement. | (No Status Provided) |

The City does not have a formal structure to ensure the full implementation of all corrective actions and areas for improvement, and accountability mechanisms do not exist that would ensure implementation of recommendations contained in the AARs. For example, EMD has not compiled a list of all corrective actions and areas for improvements that need to be implemented, nor does it have a formal mechanism for prioritizing, tracking, and monitoring corrective actions. According to one City department, no corrective action or recommendation follow-up occurs after the AAR has been drafted and submitted to EMD, resulting in no assurance that improvements will occur. The absence of a formal AAR accountability mechanism therefore, limits the ability of City officials to effectively identify best practices and enhance the effectiveness of the City's emergency exercises and overall preparedness efforts.

The Emergency Operations Organization should establish formal accountability mechanisms for prioritizing, tracking, monitoring, and following-up on the implementation status of all corrective actions and areas for improvement that are identified in each AAR. Such a process should include: (a) establishing a master database containing all recommendations, improvement actions, the party/agency responsible for the implementation, and a full implementation date; (b) identifying the party/agency responsible for monitoring and following-up on the implementation status of all corrective actions and areas for improvement; and (c) requiring relevant parties/agencies to provide a formal report on the implementation status for all pending corrective actions and areas for improvement on an ongoing basis.

# Conclusions

After action reports are required for training exercises to identify deficiencies during exercises and to document a plan for correcting such deficiencies. However, the City does not have formal mechanisms for ensuring that AARs and improvement plans are completed after every emergency exercise, including the absence of provisions in the Master Plan requiring the completion of AARs and improvement plans for all types of exercises and within a certain time period. As a result, AARs and improvement plans are not always completed after every emergency exercise. In addition, available AARs that were reviewed did not completely adhere to HSEEP guidelines. The City's Emergency Operations Organization should ensure that AARs are completed and that all AARs follow Federal guidelines, including making the Improvement Plan a mandatory component of each AAR. Further, the City does not have a systematic and consistent approach for corrective action tracking and follow-up to ensure the full implementation of corrective actions. The Emergency Operations Organization should ensure that formal accountability mechanisms exist for prioritizing, tracking, monitoring, and following-up on the implementation status of all corrective actions and areas for improvement.

# Recommendations

The Emergency Operations Organization should:

5.1.    Establish formal policies and procedures that require the full completion of an After Action Report and Improvement Plan after each exercise. At minimum, these policies and procedures should:

   a)  Require the completion of AARs and improvement plans for all emergency exercises (i.e., for both discussion-based and operations-based exercises) in the City;

   b)  Identify the specific parties or agencies responsible for the drafting, completion, and finalizing of the AARs;

   c)  Specify when (e.g., after 30 days) an after action report and improvement plan should be completed and submitted to the Emergency Operations Board; and,

      d) Require that the Emergency Management Department work with other City departments compile and maintain a comprehensive list of after action reports.

5.2.    Ensure the quality and completeness of each AAR/IP by:

      a) Establishing a standard format to be followed when drafting After Action Reports. In doing so, the EOB should consider using the standard format suggested by the U.S. Department of Homeland Security's Exercise and Evaluation Program (HSEEP); and

      b) Making the Improvement Plan Matrix a mandatory component of each AAR. At minimum, this Improvement Plan Matrix should include specific tasks, recommendations, improvement actions, the party/agency responsible for the implementation of the recommendations, and a full implementation date.

5.3.    Establish a formal accountability mechanism for prioritizing, tracking, monitoring, and following-up on the implementation status of all corrective actions and areas for improvement that are identified in each AAR. Such a process should include:

      a) Establishing a master database containing all recommendations, improvement actions, the party/agency responsible for the implementation, and a full implementation date;

      b) Identifying the party/agency responsible for monitoring and following-up on the implementation status of all corrective actions and areas for improvement; and,

      c) Requiring relevant parties/agencies to provide formal reports on the implementation status of pending corrective actions and areas for improvement on an ongoing basis.

# Costs and Benefits

Implementation of all recommendations should be accomplished using existing resources. The benefits include improved internal control mechanisms for prioritizing, tracking, and monitoring corrective actions, which have the potential to ultimately improve the City's emergency exercises and preparedness efforts. Establishing and implementing formal procedures for completing after action reports and improvement plans, as well as identifying and addressing weaknesses in the City's emergency preparedness efforts, would also result in enhanced effectiveness and/or efficiency of the City's emergency plans, policies, and procedures. In addition, establishing and implementing formal policies and procedures for completing AARs and prioritizing and implementing corrective actions would assist the City in making better and more informed funding/resource allocation decisions in terms of its exercise priorities.

# 6.   External Collaborations

- **There are various federal, State and local mandates calling for collaboration and coordination of public, private and nonprofit resources in preparation for and in response to an emergency. However, there are also barriers to effective and sustained coordination that can impact the effectiveness of such efforts.**

- **The City of Los Angeles attempts to accomplish its emergency preparedness objectives by implementing a number of individual initiatives through the offices of elected officials, EMD and departments. However, these collaborations are not systematically identified, structured or maintained, so that overlapping and duplicative efforts and gaps in services exist. In addition, public outreach campaigns and other efforts are not fully effective.**

- **Because the most effective response to a major emergency occurs when there is a shared responsibility from all levels of government, the private sector, non-profit organizations and individual citizens, the City needs to ensure that more comprehensive and collaborative strategies are established with external organizations and the public.**

During an emergency, the primary response should be coordinated at the lowest level possible. Therefore, the Los Angeles Fire and/or Police Departments typically provide the immediate response to a local disaster. However, as the scale of a disaster or emergency incident expands, there are existing local, State and federal government mandates and initiatives that define how public officials should work collaboratively with each other and with private, non-profit and individual community members to respond to emergency incidents.

## Overview of Major Federal, State and Local Initiatives

The most significant emergency management and preparedness mandates and initiatives for such coordination have been developed over the years and embedded in statute and regulations. The most significant of these are summarized below.

### Federal Legislative Mandates

- The *Federal Disaster Relief and Emergency Assistance Act*[1] authorizes the federal government to provide assistance in emergencies and disasters when state and local capabilities are exceeded.

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[1] Robert T. Stafford Federal Disaster Relief and Emergency Assistance Act, Congress of the United States (Public Law 93-288, as amended).

- *Homeland Security Presidential Directive No. 5*[2] authorizes the development and implementation of the National Incident Management System (NIMS), which established a single standardized incident management process for all participants to conduct coordinated response activities.

- The *National Response Framework*[3] provides a guide for effective "all hazards incident response," including the federal government's interaction with state and local governments, the private sector and non-government organizations. This Framework is specifically geared to government leaders, private executives, nonprofit organizations and emergency management professionals responsible for providing such response.

## State of California Mandates and Initiatives

- The *California Emergency Services Act*[4]*,* confers emergency powers with the Governor, establishes the State Office of Emergency Services (OES), delineates emergency responsibility of State agencies and establishes the State Mutual Aid system.

- The *California Disaster and Civil Defense Master Mutual Aid Agreement*[5] provides a basic structure for the voluntary provision of personnel and logistical support from one jurisdiction to another at no cost, when resources become strained during an emergency.

- *California Government Code Sections 8610-8614* provide that cities may create disaster councils, by ordinance, to develop emergency plans for the mobilization of all public and private resources within the jurisdiction.

- The *Federal Urban Area Security Initiatives (UASI)* grant program, provided through the Governor's Office of Homeland Security, provides a regional approach for the City of Los Angeles to collaborate with Los Angeles County, the City of Long Beach and other surrounding cities to collectively secure projects and funding for the region.

## City of Los Angeles Mandates

- *Mayoral Directive No. EP-1*[6] requires that all requests for mutual aid be approved by the Mayor, Mayor's Chief of Staff or Deputy Mayor or if unable to contact them, the General Manager of the Emergency Management Department, if no mutual aid agreement exists.

- *Administrative Code Sections 8.37 (1), (2) and (6)* requires the Director of the Emergency Management Department shall (1) coordinate the authority, powers, duties and responsibilities of the Emergency Operations Board and Organization, (2) establish and

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[2] Homeland Security Presidential Directive Number 5, issued by the White House in February of 2003.

[3] National Response Framework, issued by U.S. Department of Homeland Security, January of 2008.

[4] California Government Code, Emergency Services Act, Chapter 7, Division 1, Title 2.

[5] Governor of California, November of 1950.

[6] Executive Directive No. EP-1, executed on December 3, 2002 by Mayor James Hahn.

maintain liaison with other governmental agencies, city departments and private agencies as deemed necessary, and (6) coordinate and provide for dissemination of public information relating to the emergency operations activities as required.

# Barriers to effective and sustained collaborations

Despite these mandates and initiatives from the federal and State governments, and local requirements that call for the collaboration and coordination of public, private and nonprofit resources, there are institutional barriers to accomplishing effective and sustained emergency coordination.

## No Successful Comprehensive Model

Although there are mandates and general agreement that collaboration and coordination are essential for an effective response, there is no proven, successful model for incorporating comprehensive external collaborations in the emergency management field. Our survey of six cities[7] found various individual strategies for collaborating with external partners, as described in the examples, below:

- The City of Miami has entered into contracts with existing private vendors for food, shelter and pre-identification of support services (e.g. generators, tents, catering, etc.);

- The City of Philadelphia is working through their Fire and Police Departments, and City Building licensing and inspection units with private building owners and managers, to identify evacuation locations for every building in Philadelphia;

- The City of San Francisco has created a Disaster Council comprised of all major City and County representatives, as well as principal private and non-profit service organizations in one coordinating body.

- The City of Houston works with a "Multiple Agency Coordination Group" comprised of two cities and 13 counties to collaboratively solve emergency problems and manage emergency incidents on a regional basis.

- The City of Phoenix has evacuation plans that incorporate a broader regional approach, which includes potential public evacuations from San Diego and Los Angeles.

- The City of Atlanta has defined the involvement of specific non-profit organizations in their emergency operation plans, and other specific private companies that use and store hazardous materials are involved with the public local area planning committee.

However, in none of these cases, has a comprehensive collaborative approach been developed for working with other government, private or non-profit organizations.

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[7] The six jurisdictions included in our survey: Atlanta, Houston, Philadelphia, Miami, Phoenix and Miami.

## Fluctuating Interest and Resources

Another obstacle to sustained emergency coordination is the shifting levels of interest and resources typically available for emergency preparedness, which often vary depending on current events. For example, immediately after the terrorist attacks of September 11, 2001, significant federal, State and local resources and attention were diverted from natural disasters to terrorist activities. However, after a massive tsunami struck Sumatra in December of 2004, interest significantly increased in determining what the impacts might be if a comparable tsunami occurred in Los Angeles.[8] Similarly, after Hurricane Katrina wrecked New Orleans in August of 2005, and the public witnessed the chaotic response from public and private officials, federal, State and local government attention and resources shifted away from terrorism to an all-hazards collaborative approach that encompasses both natural and man-made disasters.

## Insufficient Staff and High Turnover

Yet another major barrier to ongoing emergency coordination is that there is often insufficient staff and a relatively high turnover of such staff assigned responsibilities for emergency preparedness and coordination in both public- and private-sector organizations. As individuals vacate positions or transfer to other assignments, emergency management information must be relearned and individual relations rebuilt.

## Unique Missions and Day-to-Day Responsibilities

Another related barrier to effective and sustained collaboration is that other than the Los Angeles Emergency Management Department, the State Office of Emergency Services and the federal Department of Homeland Security, other City departments, government organizations, private businesses, nonprofit organizations, and private citizens are focused on unique and demanding missions with critical day-to-day responsibilities. For example:

- The Metropolitan Transportation Authority (MTA) must provide transit services to thousands of commuters daily;

- Raytheon Company's primary business is defense technology use in commercial markets;

- The University of California, Los Angeles (UCLA) must concentrate its ongoing efforts on education and research; and,

- The Westside Center for Independent Living must focus on advocating and serving individuals with disabilities.

Requests for representatives from each of these organizations to participate in ongoing emergency preparedness, planning, training or other collaborative activities, takes time, staff and resources away from core, day-to-day functions and responsibilities. Therefore, the Los Angeles

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[8] This significant interest resulted in the preparation of a Tsunami Annex Plan for the City of Los Angeles which was completed in early 2008.

Emergency Management Department must assume a primary responsibility to lead, develop and sustain collaborative emergency planning efforts with other City departments, private sector, educational institutions and nonprofit organizations, and in this leadership role must be mindful of the limited capacity of others to actively participate.

## EMD Community Outreach and Support

Despite these institutional barriers, the City of Los Angeles has made significant individual efforts to support and collaborate with other jurisdictions, private businesses, non-profit organizations and the public at large. Some primary examples include:

- The Joint Los Angeles County and City Emergency Management Council, chaired by the County's Chief Administrative Officer and comprised of the City's Emergency Operations Board and the County's Emergency Management Council, meets annually to discuss emergency management projects and areas of concern to the City and County of Los Angeles.

- The Annual Lake Arrowhead Conference, each September, brings together various City, County, other government organizations and select private and nonprofit representatives for a conference to discuss emergency management issues of concern to the City of Los Angeles.

- Representatives from the Emergency Management Department attend monthly meetings of the Emergency Network Los Angeles (ENLA), an umbrella organization of nonprofits that are interested in emergency services, and the Business and Industry Council for Emergency Planning and Preparedness (BICEPP), a nonprofit organization of Los Angeles businesses that share information on emergency preparedness and services.

- Staff from the Emergency Management Department coordinate and develop annual public emergency preparedness fairs for the community, make numerous presentations to citizen groups and business organizations and respond to individual requests for emergency preparedness information.

- The Neighborhood Preparedness Ambassador Program, coordinated between the Department of Emergency Management and the Department of Neighborhood Empowerment, is a three-session training Program intended as a "Train the Trainers" for Neighborhood Council representatives.

- The Emergency Management Department's website provides links to the Emergency Operations Organization and Emergency Operations Board, Emergency Operation Plans, Public Information, Monthly Bulletins, Family Disaster Plan, International Partners in Preparedness and Disaster Services and the American Red Cross.

- Web-Emergency Operations Center (EOC) Software Project, working with the Information Technology Agency (ITA) to develop, which will specifically highlight Resource Management module, although not yet fully implemented.

- The AmeriCorps program, in which the City is participating this year, assigning volunteers to activities focused on community preparedness through the Emergency Management Department.

- A new nonprofit Los Angeles Emergency Foundation, recently initiated by the Director of the Emergency Management Department in response to the City's FY 2008-2009 budget crisis, as a means of accessing needed emergency preparedness revenues and other resources from the private sector.

## Efforts by the Police and Fire Departments

In addition to the efforts undertaken by the Emergency Management Department, there are significant community infrastructure development and outreach activities performed by the City's first responder agencies, Police and Fire. Some of the most significant of these are described below.

- The Police Department's Regional Public Private Infrastructure Collaborative System (RPPICS) is a Microsoft-based computer program that provides real time communication links to quickly connect counter-terror professionals with the City of Los Angeles' critical public and private infrastructure networks. This System is being developed by the Los Angeles Police Department to share secure information across organizations and to coordinate effective law enforcement response to critical infrastructure in the City.

- The Joint Regional Intelligence Center has been established to coordinate efforts among FBI, County law enforcement, and other local law enforcement agencies. In addition, *InfraGard,* is an information sharing tool being developed for public/private cooperation between law enforcement and businesses.

- LAPD's "Operation Archangel" is tasked with the development of the *Automated Critical Asset Management System (ACAMS)*, to identify critical infrastructure weaknesses for local, regional, State and private organizations within the City. The Operation Archangel Program is a main outreach mechanism to protect critical infrastructure in the City by ensuring collaboration with private sector entities that own or operate such key resources.

- An Information Technology Agency (ITA) project, being conducted in collaboration with Police and Fire, that is designed to create virtual floor plans of major public and private buildings and venues.

## Formal Structures Need to be Developed

While individual City departments have developed various relationships with each other; undertaken numerous individual efforts to collaborate with the County and other external public sector agencies, the private sector and nonprofit organizations; and, conducted community outreach efforts, these relationships are not systematically identified, organized, interrelated or maintained. An overall structure and ongoing commitment to regularly and systematically partner with such outside organizations has not been developed. As a result, as highlighted in

some of the following examples, overlapping and duplicative efforts, as well as significant gaps in such collaborations currently exist.

## Overall Structure

The Emergency Operations Board, and the Emergency Management Committee, the formal organizations for the City that meet monthly to address emergency management, preparedness and response, only includes City representation. No other government, private or nonprofit organizations are currently represented. Yet, California State Government Code Sections 8610-8614 provides that cities may create disaster councils, by ordinance, to develop emergency plans for the mobilization of all public and private resources within the jurisdiction. The City of Los Angeles has not created a disaster council, thereby, missing an opportunity to create an overall framework for establishing strong relationships with other public, private and non-profit sector organizations for emergency response and recovery activities. A disaster council model could be integrated with the existing Emergency Operations Board to provide a more comprehensive structure, potentially meeting quarterly to fully integrate public, private and nonprofit emergency management issues in Los Angeles.

While the Emergency Management Department maintains a list of the Emergency Operations Board and related City department representatives, and has listings of the annual attendees at the Lake Arrowhead Conferences, the Department does not maintain a current database or complete listing of all area contact persons by organization. One crucial tool for emergency management staff to effectively collaborate with others, especially during an emergency, is to be able to easily contact organizations that may be able to provide disaster response resources, or who may be responsible for critical parts of the local infrastructure. Given the relatively high level of turnover in both public and private sector staff, it is imperative that such a listing be frequently updated. A comprehensive inventory of public, private and nonprofit organizations and contact people, including updated addresses, office telephone numbers, cellular phone numbers and email addresses should be developed and maintained by EMD.

## County and Regional Collaborations

As discussed above, there is an existing Joint Los Angeles County and City Emergency Management Council, which meets annually. This Joint Council is chaired by the County's Chief Executive Officer and is comprised of the City's Emergency Operations Board and the County's similar Emergency Management Council. However, there is also a separate Emergency Preparedness Commission, created by the Los Angeles County Board of Supervisors to specifically address emergency management issues. This Emergency Preparedness Commission not only includes representatives from the County, such as County Health, Public Health, Sheriff and Emergency Management Division, and the Los Angeles City Police, Fire and Emergency Management departments, but was more encompassing and included representatives from other cities within Los Angeles County. The Emergency Preparedness Commission met more frequently than the Joint Los Angeles County and City Emergency Management Council. However, the Emergency Preparedness Commission has not met since May of 2006 and, as a result, the County Board of Supervisors is currently considering its elimination.

There is also the Los Angeles Operational Area Advisory Board, which is comprised of the Disaster Management Area Coordinators from each area in the county (the City of Los Angeles, Area H, is represented by a staff person from the Department of Emergency Management) and representatives from the County, cities and special districts (e.g., Los Angeles Unified School District, sanitation and water districts, etc.), non-profit organizations (e.g., the American Red Cross and Emergency Network Los Angeles, or ENLA) and the State Office of Emergency Services Los Angeles County region. The Operational Area Advisory Board is a working group composed of emergency management staff that is chaired by the County's Chief Administrative Officer, which is responsible for providing area mutual aid when required. The group regularly meets to provide a forum for discussing pre-disaster area planning and preparedness issues and making recommendations to the County and State regarding emergency preparedness concerns. However, this group is not responsible for decisions regarding the allocation of the Urban Area Security Initiative (UASI) grants, State Homeland Security grants or other major funding sources to the region.

Rather, there is a separate UASI working group, comprised primarily of first responder (Police, Fire, Health and Sheriff) agency representatives from the City and County of Los Angeles, City of Long Beach and area cities. This UASI working group, is primarily responsible for the identification of specific emergency area projects for the allocation of the annual UASI grant funds. The City of Los Angeles, through the Office of the Mayor, is the fiscal administrator for the regional UASI grant. While the City and County and other cities in the Los Angeles and Long Beach region may collaborate in order to receive UASI, SHSGP and other grant funds, joint project collaborations do not necessarily proceed in the most effective manner.

For example, although the former Director of the City's Emergency Management Department initially presented the idea for a Specific Needs Awareness Planning (SNAP) project for consideration through the SHSGP process, the project was not fully approved by the SHSGP Working Group for inclusion as a funded project. However, the Los Angeles County Office of Emergency Management (OEM) funded the project with other available funding it had the discretion to use in support of the proposal. The City was unable to jointly fund the project with UASI or other General Fund dollars.

Once the OEM funding was identified, the SNAP project, being developed by UCLA through a contract with Los Angeles County OEM was to (1) identify community resources (i.e., acute care facilities, drug rehabilitation hospitals, pharmacies, police and fire stations, etc.), (2) allow disabled individuals to register their special needs in order to identify vulnerable populations that are at-risk during disasters, and (3) map out the accessibility of pre-planned evacuation centers.

Delays in completion of the SNAP project were based primarily on the availability of timely continuation of funding. Through the 2007 UASI grant, allocation to OEM for $150,000 will support the project. The intent by OEM is to continue its contractual relationship with UCLA and make the database available to the City and other jurisdictions in the county. Also included in the 07 UASI Grant, the City's Department on Disability (DoD) is initiating a separate step-by-step emergency preparedness program for people with disabilities and their families. This project is intended to create a website planning tool whereby persons with disabilities can self identify themselves and have the program generate a personalized emergency plan and/or preparedness

guide. This website is intended to ultimately have a link to the SNAP website to assist those individuals who are interested in self registering for location assistance as will be determined through the next phase of the SNAP development. Although this DoD project is scheduled to receive $130,000 of 2007 UASI grant funds, and is specifically addressing a subset of the population targeted by the County SNAP project, this City emergency preparedness program is a separate program and should not be considered a subset of the SNAP program.

There are no reported UASI 2008 grant funds being allocated to either of these projects. Without ongoing coordinated resources and plans by the City and County to maintain, update and sustain the SNAP Project's database nor the Department on Disability's program for disabled users, the data will very quickly become obsolete, potentially negating the value of the creation of these projects and their future viability. Through the strategic plan, the City needs to address the goals and objectives for emergency preparedness and response for the special needs population, in order to identify both short and long-term coordinated strategies for achieving these objectives.

## Collaborations with Other City Departments

The City's Emergency Operations Master Plan specifies that each Emergency Operations Organization division shall develop contingency plans to obtain private resources to assist that division in fulfilling its responsibilities. However, the Emergency Management Department's guidelines and standards for other City departments do not list or specify requirements for the development of such contingency plans with private organizations. Furthermore, a review of City department plans found that such plans did not include contingency plans for obtaining private resources. When queried regarding such contingency plans, the Emergency Management Department's Planning Division staff advised that the Recovery and Reconstruction Annex addresses how the City will interface with businesses and nonprofit organizations. However, this audit found that the Recovery and Reconstruction Annex, dated September 19, 1994, does not address how each City department plans to obtain private resources during an emergency.

The Los Angeles Fire Department has developed and implemented an extensive Community Emergency Response Team (CERT) training program, which provides free 17.5 hour disaster preparedness training for businesses, community groups and individuals throughout Los Angeles. In addition, as discussed above, the Emergency Management Department, working with the Department of Neighborhood Empowerment, developed the Neighborhood Preparedness Ambassador Program, a three-part "train the trainer" program for Neighborhood Council representatives to learn how to create personal emergency plans and become familiar with disaster preparedness. Until very recently, the Los Angeles Police Department also conducted community emergency trainings.

Other organizations external to the City also provide emergency training. For example, the Homeland Security Advisory Council is working to provide training to its member businesses interested in preparing for and responding to security threats and catastrophic events. The American Red Cross also provides disaster preparedness trainings for the public.

An internal survey conducted by EMD documented that EMD staff want to be working partners with the Fire Department's CERT and American Red Cross's emergency training programs,

providing the public with information about classes offered by these organizations. While the Emergency Management Department does not need to provide all public emergency trainings, as the lead coordinating agency, the Department should collaboratively work with all City departments, County agencies, business groups and nonprofit organizations to identify public emergency preparedness training programs, and assist in coordinating participant groups, outreach strategies, training content and curriculum, calendars and locations of such events.

## Collaborations with Private and Nonprofit Organizations

An Emergency Management Department (EMD) staff person meets regularly with the Business and Industry Council for Emergency Planning and Preparedness (BICEPP), a nonprofit organization that provides a forum for the business community to enhance emergency preparedness and contingency planning. However, the preliminary survey results conducted by EMD found that other than BICEPP, City staff noted that there were no other significant private sector collaboration efforts being undertaken with the business community for establishing a strong City/private-sector partnership. This is despite the fact that the prior Mayor's Office staff developed and collaborated with a separate Los Angeles City business emergency networking group. And the current Deputy Director of Public Safety for the Mayor's Office is now initiating contact with the Homeland Security Advisory Council, an active coalition of businesses working with Los Angeles County and Orange County to create links between the private sector and government to enhance the communities' capabilities to prevent, respond to and recover from disasters. In addition, another EMD staff person meets regularly with the Emergency Network Los Angeles (ENLA), a network of Los Angeles County nonprofit, community-based organizations that provide assistance to individuals and groups following emergencies and disasters. Upon request, EMD staff has also provided presentations to the Building Owners and Management Association (BOMA), various Chamber of Commerce groups, schools, faith-based and other nonprofit and community organizations.

The City has not systematically identified needed supplies and services and then entered into Memorandum of Understandings (MOUs) with private, non-profit organizations or other government agencies to partner in obtaining emergency supplies and services. The 2006 federal peer review found that the City of Los Angeles had achieved only limited progress in providing outreach to the private sector and identified the City's focus toward the private sector as solely as receivers of emergency services, rather than also as potential suppliers of resources. One significant example is that, although the American Red Cross is specified in the City's Administrative Code[9] to provide welfare and shelter, the City has not entered into a general MOU or any specific agreements with the Greater Los Angeles American Red Cross to specify the responsibilities of each organization in an emergency. Based on discussions with the Greater Los Angeles American Red Cross, this important emergency nonprofit organization has entered into MOUs with other cities and counties specifying each partners' emergency responsibilities. The American Red Cross currently has three MOUs with Los Angeles County and would

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[9] Article 9, Section 8.59, Public Welfare and Shelter Division.

welcome both a Master Agreement with the City that identifies broad roles and expectations, as well as specific MOUs that address particular shelter, training or preparedness responsibilities.

Clearly, the City, through the Emergency Management Department and primarily the first responder departments, has engaged public, non-profit and private organizations and participants in numerous individual emergency preparedness projects and activities. However, these efforts have not been systematically identified and developed and then comprehensively organized within a sustainable structure. As part of the strategic planning process, efforts should be directed to examine how other public agencies, private businesses and nonprofit organizations can be systematically included in the emergency planning and preparedness in Los Angeles.

## Community Preparedness and Public Education

After building effective general collaborations with such organizations, the Emergency Management Department should then establish collaborations to more effectively provide outreach and education to the public regarding emergency preparedness. The City has launched numerous public emergency preparedness campaigns, including:

- *Update LA,* sponsored by the Emergency Operations Organization, is a website that will provide information of potential interest to the public and the media during an emergency.

- *ReadyLA,* developed by the Los Angeles Fire Department, is a user-friendly website that provides various public information videos and links to emergency and non-emergency phone numbers, the Fire Department's CERT training program and emergency planning kits for individuals, organizations and businesses, and other City, County, State and Federal emergency related contacts.

- *Monthly Bulletins,* initiated by the City in 1998, have been developed to educate both City employees and the public regarding emergency preparedness and safety. Each month, the Emergency Management Department prepares these one-page flyers, which address different topics, including wildfires, earthquakes, tsunamis, hazardous materials, etc. Monthly Bulletins are placed in the lobbies of Civic Center buildings, emailed to various organizations and posted on EMD's website.

- *Synergy Newsletter,* developed by the Emergency Preparedness Department, was a quarterly newsletter, addressing emergency preparedness issues. Examples of and links to the Synergy Newsletter is still on the Emergency Management Department's website. However this newsletter has not been published since 2006.

- *Dare to Prepare,* a public education emergency preparedness campaign prepared by earthquake professionals, business leaders and emergency managers provides free information regarding safety and retrofit measures to protect individuals, families and property. This effort was jointly funded by the Federal Emergency Management Agency (FEMA), the California Office of Emergency Services (OES), the California Earthquake Authority, the National Science Foundation (NSF) and the U. S. Geological Survey (USGS), and is targeted to Southern California residents.

Rather than separately developing public outreach campaigns which appear to overlap and duplicate one another, and can quickly become dated, the Emergency Management Department, as the lead agency, should coordinate the public outreach and education campaign with its collaborative partners to most effectively and efficiently reach the public. This could be accomplished through the development of a more user friendly Emergency Management Department website which should link the City's collaborative partners. In addition, the City should develop mutual public campaigns with other City departments, the County and other public agencies, non-profit organizations and private companies to ensure that consistent emergency preparedness messages are disseminated. Working collaboratively should not only maximize the limited resources available for such advertising campaigns, but also provide a consistent public message that would enhance the effectiveness of preparedness campaigns.

# Conclusions

There are federal, State and local government mandates and initiatives that authorize how public officials must work collaboratively with each other, as well as with private, non-profit and individual community members to respond to significant emergency incidents. There are also numerous institutional barriers to effective and sustained emergency collaboration. Yet, the City of Los Angeles has made significant individual efforts to support and collaborate with other jurisdictions, private businesses, nonprofit organizations and the public at large.

However, a review of the City's efforts reveals that these collaborations are not systematically identified, organized, interrelated or maintained; nor has an overall structure and ongoing commitment to regularly and systematically partner with such outside organizations been developed. As a result, overlapping and duplicating efforts, as well as significant gaps exist. In addition to building effective collaborations, the City of Los Angeles should coordinate outreach and education campaigns to the public regarding emergency preparedness so that effectiveness can be maximized.

# Recommendations

The Mayor should seek to:

6.1    Modify the Administrative Code to require that other public, business and non-profit leaders in the emergency management field be integrated into the Emergency Operations Board through a Disaster Council structure, so that information is consistently shared with all players.

6.2    Modify the Administrative Code to designate the Emergency Management Department as the lead agency for community preparedness responsibilities, to insure a continuing collaborative approach among departments and other partners.

The Emergency Management Department should:

6.3     Identify emergency preparedness public outreach and training programs and collaboratively work with City departments, County agencies, business groups and nonprofit organizations to coordinate participant groups, outreach strategies, training content and curriculum, calendars and locations of events.

6.4     As part of the strategic planning process, described in Section 1 of this report, (a) identify specifically how other public agencies, private businesses and nonprofit organizations can be systematically included in the emergency planning and preparedness in Los Angeles and (b) address the goals and objectives for emergency preparedness and response for the special needs population, in order to identify short and long-term coordinated strategies for achieving these objectives.

6.5     Develop mutual public campaigns with other public agencies, nonprofit organizations and businesses to insure consistent emergency preparedness messages are disseminated which will maximize the limited resources and the effectiveness of such preparedness campaigns.

6.6     Work with the City Attorney and other relevant City departments (e.g., Recreation and Park Department) to develop Memorandum of Understanding (MOUs) with key external participants, such as the American Red Cross, to clarify general and specific responsibilities in emergency preparedness, training, response and recovery.

6.7     Develop an inventory of outside organizations and contact persons with whom the City and the Emergency Management Department maintains ongoing emergency relations. Initially review to insure that all major sectors of the private economy and non-profit organizations are included and annually contact individuals to maintain an updated, emergency list.

6.8     Develop guidelines and standards for City departments to include contingency plans for activating private resources in the event of a disaster or emergency, as required by the City's Emergency Operations Plan. Annually review such City department plans to ensure that their private sector contingency plans are incorporated, and consistent with the City's Emergency Operations Plan.

# Costs and Benefits

There would be no cost to accomplish many of the recommendations contained in this section. However, as external collaborations are strengthened, the City may be required to invest in joint projects and other initiatives for improvement. If the strategic recommendations are implemented as suggested, existing duplication of efforts as well as significant gaps in coordination would be eliminated, limited resources would be maximized to provide consistent public messages that enhance the effectiveness of preparedness campaigns and a comprehensive collaborative approach would be developed for working with other government, private or non-profit organizations.

# 7.   Grant Administration

- **Administration of a grant as large and complex as UASI is technically demanding and time consuming. The amount of information needed to prepare and submit the transmittal of UASI and SHSGP funds for Council is substantial, encompassing budget information, hiring and contracting authorities, and implementation plans, and must be gathered from numerous City departments and other jurisdictions.  Nonetheless, administration of the UASI and SHSGP grants in Los Angeles is characterized by excessive processing delays and a lack of management reporting. This condition compromises the City's ability to 1) spend UASI and SHSGP funding effectively and in a timely manner, and 2) monitor and achieve the goals and objectives of the grant funded programs.**

- **The Administrative Code could be modified to permit the City Council to delegate authority to the Mayor or the CAO to execute contracts with vendors and implement personnel modifications, subject to parameters defined by the City Council (e.g., consistency with award intent, dollar limits, resolution authority for positions, etc.). This delegation of authority would allow many City projects to proceed more quickly, instead of being delayed by circumstances arising from more complex or problematic occurrences.**

- **Further, the Administrative Code could be modified to allow more efficient use of grant funds by providing the CAO with the authority to implement modifications that entail minor changes in approach or City entity. Similarly, the Mayor's Office should be granted authority to implement modifications that involve changes in jurisdiction, investment justification, solution area or financial years, up to an appropriate predetermined amount.**

- **Once this structure is established, the City Council should focus its review on approving the broad scope and policy issues associated with the UASI and SHSGP grants. Early City Council familiarization with the Investment Justifications being requested by the region, and with the specific projects to be pursued will insure that the Council is able to more effectively participate in policy setting.**

## Current UASI grant acceptance process

The UASI grant funding process begins when the federal Department of Homeland Security (DHS) and California's Office of Homeland Security (OHS) release guidance for use by the Urban Areas (UA) to submit their applications for funding (called Investment Justifications, or "IJs"). Once the guidance is published, staff in the Mayor's Office of Homeland Security and Public Safety (HSPS), assisted by a consultant, prepare the grant application for the Los Angeles/Long Beach Urban Area. The lengthy and complex UASI grant funding process is presented in Attachment 7.1.

*Harvey M. Rose Associates, LLC*

The Urban Area Approval Authority[1] develops the application's overall program strategy and HSPS sends the application to the State OHS. California's five Urban Areas then participate in a peer review process aimed at strengthening the State's applications before they are submitted to DHS. OHS and DHS set deadlines for each of these preliminary steps and no extensions to the submission deadline are allowed.

After the application is submitted, but before DHS awards the grant, a workgroup comprising of representatives from the County of Los Angeles, the City of Los Angeles and other jurisdictions in the Urban Area, begins the process of selecting individual projects for funding. Projects must support one or more of the Investment Justifications, and are then grouped into three tiers based on three possible funding scenarios: 1) flat funding, 2) increased funding, and 3) decreased funding. Thus, once funding is allocated, the Urban Area should be able to quickly identify the projects that it wishes to pursue.

When DHS notifies the urban areas of their award amounts, the workgroup makes the final project selection and submits the projects to OHS, which forwards them to the DHS for final approval. Upon receipt of notification by OHS, the Mayor's Office begins to collect project details from City departments and other jurisdiction (collectively known as sub recipients). These details -- budgets, project implementation plans, and contracting and position authorities --- are used to draft the transmittal recommending acceptance of the grant to the City Council.

## Lengthy Delays in the UASI Transmittal Reduce the City's Ability to Achieve Program Goals and Objectives

For at least the last two UASI grant cycles, there have been significant delays between the City's acceptance of the grant and actual disbursement of the award to City departments and sub-recipients in other jurisdictions. As shown in Attachment 7.2, a significant source of the delay has been in the preparation and submission of the transmittal to the City Council by the Mayor's Office of Homeland Security and Public Safety (HSPS).

For example, submission of the 2006 UASI transmittal by HSPS required 175 days for both the other jurisdictions and City departments. For the 2007 award, the Mayor's Office has sought to avoid past delays in disbursing funds to its partner jurisdictions by first submitting a transmittal to the City Council recommending award acceptance and funding disbursal to the City's partner jurisdictions, to be followed by a second transmittal to request the specific authorities necessary for the City of Los Angeles to implement approved projects and expend its allotted funds.

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[1] The LA Urban Area Approval Authority is an eleven member body that includes four City of Los Angeles representatives (Police, Fire, Airport and Port), two representatives from the City of Long Beach, three representatives from Los Angeles County agencies, and two representative from county-wide police and fire associations.

Following this new process, the transmittal for other jurisdictions was sent to the City Council 112 days after the State's announcement of the 2007 award. On May 23, 2008, 220 days after the 2007 award announcement, the Mayor's Office submitted the second transmittal to the CAO for preliminary review before presentation to the City Council.

This change resulted in a shortening in the funding delay for non-city sub-recipients of approximately two months, when compared with the previous grant cycle. However, for City departments, this has actually increased the delay in receiving funds. While funding approval for City departments took 175 days in 2006, funding approval for City departments in 2007 has already eclipsed 220 days (as of May 23, 2008) and several steps still remain before final City Council approval is finalized[2]. While consistent with findings of the Controller's December, 2007 Performance Audit of the City's Grant Seeking and Administration Processes, this performance is significantly slower than for acceptance of other grants by the city[3].

## CAO and CLA Review and the City Council hearing process comprise a significant although smaller portion of the delay in grant acceptance

Typically the UASI acceptance transmittal is referred to at least three City Council committees (Personnel, Budget and Finance, and Public Safety) and then submitted to the full City Council for a vote. Before being submitted to the City Council, the Chief Administrative Officer (CAO) conducts a preliminary review of the transmittal for technical correctness, after which the Mayor's staff prepares and sends the final transmittal to the CAO to assess the recommended actions before forwarding the report to the City Council. After submission to the City Council, the CAO and Chief Legislative Analyst (CLA) prepare a joint supplemental report on the recommended transmittal.

Some of the delay in accepting and disbursing the UASI grants has been attributable to the time necessary for the CAO and CLA to produce their reports and to the Council's legislative review process (including Committee hearings)[4]. However, these steps have comprised a relatively small portion of the total delay in initially developing and submitting the transmittal. In the 2006 UASI grant cycle, the time to develop and submit these reports was approximately one month in the case of the CAO and approximately a week for the CLA. For the 2007 UASI grant, the joint report took 52 days to complete.

Representatives of the CAO and CLA report that because the transmittal seeking authority to accept the UASI grant is presented to the Council late in the funding cycle, the Council is under pressure to accept the grant quickly in order to avoid further delays. Indeed, the timeline at

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[2] The Mayor's Office has indicated that approval of an additional $500,000 HSGP award for support of police department activities in March 5, 2008 is partly responsible for the delay in transmittal to the City Council.

[3] For the grants reviewed by the Controller's Office, time elapsed was an average 69 days from the award notification to departments submitting their reports to Council for approval, and 85 days for the Council and Mayor's Office to approve acceptance of the grant award. The Controller's analysis included a wide range of size and complexity of grants. Even for smaller grants, the Controller's audit found the time for transmittal excessive.

[4] In the past the CLA and CAO wrote separate supplemental reports for the City Council on the UASI grant. In 2007, the Council instructed the CLA and CAO to collaborate and submit a joint report.

Appendix 7.2 indicates that only two weeks elapsed between the date of the CLA's supplemental report and the City Council's vote to accept the UASI grant in 2006. In 2007 the Council approved the grant for other jurisdictions 25 days after the Mayor's transmittal.

The legislative process could be hastened without loss of oversight by creating either a dedicated grant committee or single joint committee (with representatives from Budget and Finance, Personnel and Public Safety) to expedite consideration of the UASI grant award. This would require a revision of the grants ordinance, consistent with recommendations in the Controller's audit.

## The delay in the acceptance of the UASI grant is a factor in frequent modifications and extensions and results in weak program management

The delay in accepting the UASI grant means that the disbursement of grants funds typically does not begin until after more than six months of the funding cycle have elapsed. In 2006, this represented over $1/4^{th}$ of the two-year grant cycle (the grant cycle was increased to approximately three years in 2007). This compromises the ability of sub-recipients to complete projects within the grant period. For example, of the total 2006 UASI grant funds, only 16% had been expended by the grant's expiration date of March 31, 2008. The delay in accepting the grant is compounded by the procurement difficulties discussed in Finding 8.

Thus, in 2006, extensions were requested for over 84% of the City's original UASI award, or nearly $25 million out of a total award of $29.8 million[5]. For example, $15 million in LAPD and $4.5 million in LAFD training and planning activities and equipment acquisitions are still incomplete, including equipment for the regional intelligence activities, planning for interoperable communications, regional planning for the Alliance (now under the auspices of EMD), and Hazardous Material training.

The vast majority of the UASI 2006 extension requests for the City of Los Angeles were granted by State OHS and federal DHS for between three and nine months, with the longest extension continuing until December 31, 2008. If these funds remain unexpended by the modified deadlines, they will be lost. This is likely to result in departments hurrying to expend funds in a "use it or lose it" approach that may not result in the optimal use of funds.

Since the Los Angeles Urban Area's goals and objectives are closely aligned with the state's (as seen in Attachment 7.3), the City's difficulties with efficiently processing acceptance of UASI awards in turn negatively impacts the State's achievement of its goals, as reflected in DHS's project monitoring and evaluation of UASI funded programs. The most recent federal Monitoring Report confirmed that the Investment Justification milestones were not being achieved in the Los Angeles/Long Beach Urban Area and that measuring progress was difficult due to delays in implementation. As DHS concluded: "…many milestones were ranked at 0%, despite the obvious effort put into the projects. … Failure to accurately establish milestones,

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[5] For the other jurisdictions in the urban area, extensions of over $20 million were granted.

goals and objectives renders sustainability planning in the near and medium terms and links between one year and the next extremely challenging."

Another result of the lengthy delay in accepting the UASI grant is the need to modify the amount of funding for particular projects. Modifications may entail minor changes in approach (e.g., using civilian instead of sworn analysts) or changes in responsible city entity (e.g., EMD instead of LAFD). They may also encompass more significant changes, such as between responsible jurisdiction (e.g., the Downey Fire Department in lieu of the LAFD). Larger "project swaps" involve moving funding from one year to another. To date, all modifications and program swaps have been managed by the Mayor's Office without input and policy direction from the Approval Authority or the Working Group (but allowing the original jurisdiction to first identify a replacement project).

The Mayor's Office reports that this is due to limited time available to identify replacement projects once sub recipients indicate they will be unable to complete an original project. Although most of these funding changes were made within the same discipline (e.g., fire, police) and Investment Justification, large modifications and swaps potentially alter the focus and policy direction established by the Approval Authority and the intent of the Working Group. In addition, more significant modifications and project swaps are indications that program objectives are either not being met or are delayed substantially. For the 2006 award, the Mayor's Office was unable to provide summary management information about large modifications that affect the original investment justification, solution area or jurisdiction.

In lieu of selecting projects once an originally approved project is found to be infeasible, the Mayor's Office could return to the list of projects originally requested through the Approval Authority but not funded. The Mayor's Office indicates that they will be instituting processes to utilize projects previously identified by the Approval Authority as replacement projects and to require sub recipients to identify projects unlikely to be completed earlier in the funding cycle.

Further, the Administrative Code could be modified to allow more efficient use of grant funds by providing the CAO with the authority to implement modifications that entail minor changes in approach or City entity. Similarly, the Mayor's Office should be granted authority to implement modifications that involve changes in jurisdiction, investment justification, solution area or financial years, up to an appropriate predetermined amount.

Although neither OHS nor the DHS has denied the Los Angeles/Long Beach Urban Area requests for extensions of the UASI 2005 or 2006 grant funding expiration dates, repeated extension requests and failure to disburse grant funding is a deficient administrative practice. The inability to accept and expend grant funds according to schedule suggests weak project and program management, an inability to establish and adhere to milestones, to accomplish program goals and objectives or to enforce programmatic discipline.

## The UASI process is delayed by the need to have all grant project funding details in place before City Council Approval

Under the current Administrative Code, the City Council cannot delegate grant acceptance and approval authority except in very limited circumstances. Since the amount, time period and recipient of funds must be approved by the Council for every grant sub-recipient, a single, un-finalized contract can delay the entire transmittal. Although the UASI projects are determined well before the acceptance transmittal is submitted to the City Council, City departments report that they cannot begin the process of soliciting bids and contracting for services because vendors may be reluctant to sign contracts until funding is assured[6]. Further, grant funded personnel cannot be hired until the City Council provides resolution authority to the departments for additional grant funded personnel.

The volume of information needed to prepare and submit an UASI transmittal for Council approval will always be substantial. In addition to budget information, hiring and contracting authorities, such information includes implementation plans, to be gathered from numerous City departments and other jurisdictions. The City Council could instead delegate contracting and hiring authorities and then require regular reporting through the CAO and CLA on the results of the delegated authority. Doing so would entail modifying the Administrative Code to permit the City Council to delegate authority to the Mayor to execute contracts with the sub-recipients and vendors, and implement personnel modifications, subject to parameters defined by the City Council after consideration of the award acceptance request (e.g., consistency with award intent, dollar limits, resolution authority for positions, etc.). This delegation of authority would permit some projects to move forward more quickly, instead of being delayed by circumstances arising from more complex or problematic projects.

In order to enhance the City Council's role in policy formulation and speed the Council's approval of the grants once projects are developed, the City Council should be made familiar with the region's and city's emergency preparedness approach during the "IJ" formulation stage through workshops or other educational mechanisms. Postponing all presentation to the Council until after all sub-recipient contracts, vendor contracts and personnel modifications are negotiated and/or prepared for consideration results in delays in the process and a focus on the details rather than the broad outlines of the region's and city's approach. This change in emphasis will be enhanced by the strategic planning effort called for in Finding 1.

City Council policy involvement could be maintained by requiring the CLA and CAO to report on either a fixed schedule, or by setting a threshold for modifications and other funding changes above which, the CAO or CLA would be required to report.

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[6] The Mayor's Office indicates that it plans to provide more training to sub recipients on the available processes for soliciting this information from vendors at the earliest possible opportunity.

## Other Possible Reasons for Delay

In the 2006 and prior grant cycles, delays in preparing the transmittal to the City Council occurred because the HSPS did not begin collecting implementation plans, budgets, necessary contractual and personnel authorizations when the UASI projects are initially selected by the Approval Authority but instead waited until final approval by the state and federal governments. The Mayor's Office reports that it has begun compiling this information at an earlier phase in order to expedite the transmittal.

As addressed more fully in Section 8, several staff interviewed in other City departments in the course of this audit stated that a factor delaying the preparation and submission of the 2006 UASI transmittal may have been the high turnover and inexperience in City administrative procedures on the part of staff in HSPS. These assertions could not be validated as part of this audit. However, the Mayor's Office reported that it has reorganized HSPS leadership to address structural deficiencies that have existed in the past, to raise grant management and financial management functional accountability. The Mayor's Office also indicates that the HSPS has recruited new personnel to better match staff to the skill sets necessary to administer complex multi million dollar grants.

Although the staff reorganization and the earlier initiation of the transmittal began in July, 2007, disbursement of funding for City departments has still not occurred after more than 220 days from grant award. The Mayor's Office has suggested that sub recipients are often the cause of delays because documentation is missing, incomplete or otherwise in need of revision for purposes of conformity with grant requirements. Regardless of the cause of delays, the Mayor's Office is responsible for insuring that transmittals are submitted in as timely a manner as possible. This includes identifying and rectifying departmental-level inefficiencies.

In April 2008, the Mayor's HSPS office created an Urban Area Efficiencies Working Group to address, among other issues, the delays in developing the UASI transmittal and grant acceptance. The group includes representatives from partner jurisdictions.

# Conclusion

Administration of a grant as large and complex as UASI is technically demanding and time consuming. Nonetheless, the administrative processes associated with application, acceptance, expenditure and monitoring of the grant should be conducted as efficiently as possible, while still providing sufficient controls over the authorization and expenditure of funds. Failure to do so may unreasonably delay the execution of the grant program and place significant grant resources at risk. Bifurcation of the transmittal and other improvements implemented recently by HSPS have not yet resulted in the substantial improvement in grant administration, especially those required for grant acceptance on behalf of city departments.

The UASI grant's complexity, long grant cycle, externally imposed fiscal management constraints (i.e. not coinciding with the City's budget cycle) and size and assignment of fiscal responsibility to the City were not anticipated by the City's administrative code or grants ordinance. The requirements of these two codes impede the efficient use of the UASI grants (and potentially other large grant revenues) but do not guarantee adequate involvement of the City Council in the policy development process and oversight. The Administrative Code could be revised to streamline the process without compromising the Council's policy and oversight roles.

# Recommendation

The Mayor should, subject to legal counsel received from the City Attorney, seek to:

7.1    Amend the Administrative Code to provide the City Council with the authority to delegate authority to the Mayor's Office and, as appropriate, to departments to enter into UASI sub-recipient agreements and vendor contracts, subject to the parameters defined in the grant award and other general restrictions defined in law.

7.2    Amend the Administrative Code to permit modifications of homeland security grants by the CAO which entail minor changes in approach or City entity and by the Mayor's Office for changes in jurisdiction, investment justification, solution area or financial years up to an appropriate amount.

The City Council should:

7.3    Require the CLA and CAO to report to the Council on the Investment Justification decisions made by the Approval Authority at the beginning of the UASI grant process, and at the project selection stage prior to submission of the projects to the state OHS, and to provide a quarterly summary report of UASI project modifications, focused on changes between investment justifications, solution areas or jurisdictions.

7.4    Consider establishing a grant committee, or a special joint committee with representatives from Budget and Finance, Personnel and Public Safety, to expedite consideration of the UASI grant award, consistent with recommendations made by the City Controller in her December 2007 report on City grant processes.

7.5    Require a full report from responsible City officials on actions taken using delegated authority at six month and 12 month intervals after acceptance of the grant, to ensure consistency with the Council's intentions.

The Mayor should:

7.6    Continue to begin collecting implementation plans, budgets, necessary contractual and personnel authorizations when the UASI projects are initially selected.
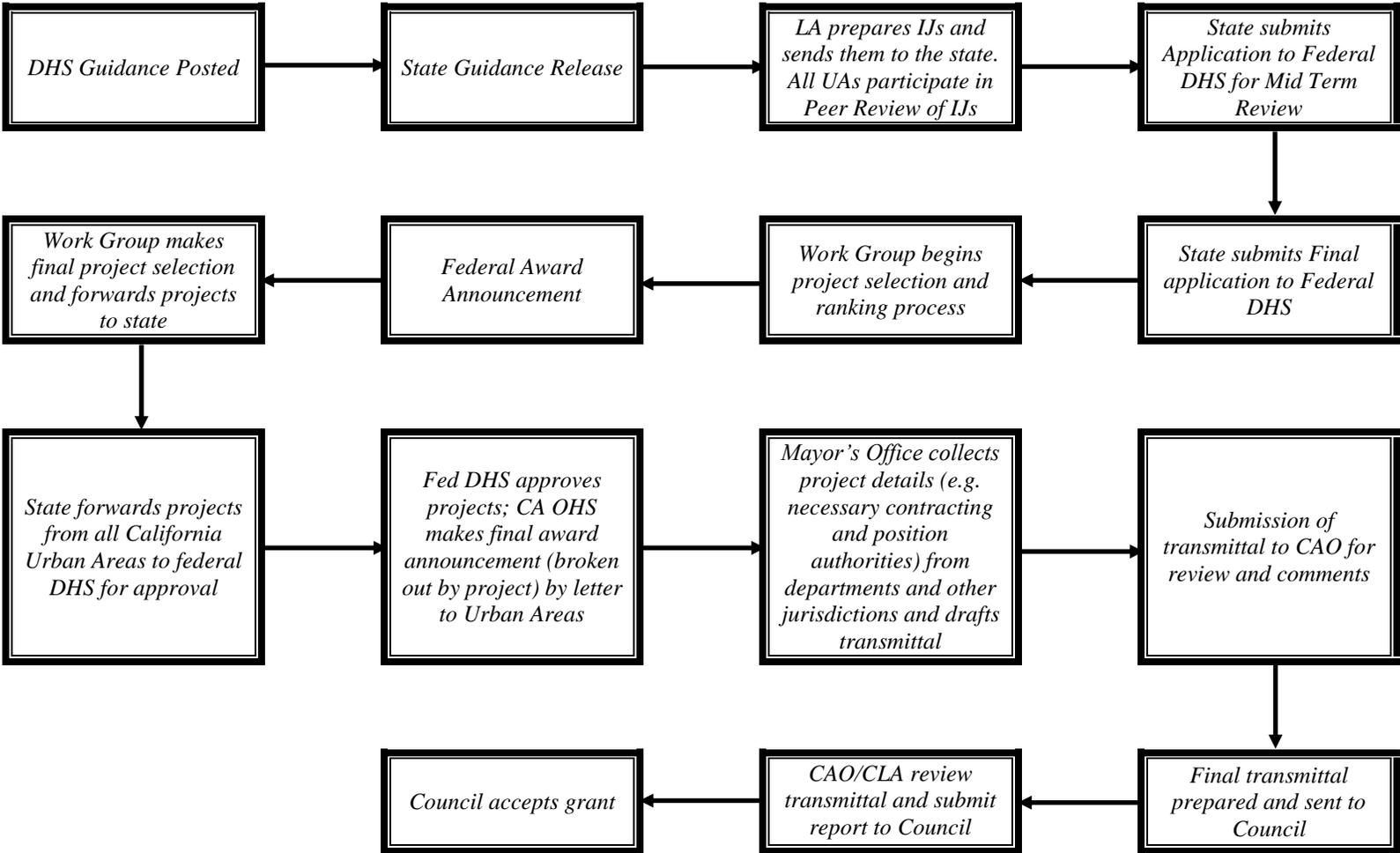
7.7     Expedite the implementation of the UASI grant by requesting contract and personnel approvals as they are completed rather than waiting for the entire package to be finalized, and/or requesting approval authority to execute sub recipient agreements, vendor contracts and personnel transactions, subject to restrictions defined by the approved award and the Administrative Code.

7.8     Develop a summary management report of significant modifications in grant usage for periodic presentation to the City Council.

7.9     Utilize the list of projects originally requested through the Approval Authority, but not funded, as a starting point for replacement projects when originally funded projects become infeasible. Require sub recipients to identify projects unlikely to be completed earlier in the funding cycle.

# Cost and Benefits

No additional costs are anticipated from the recommended changes to UASI grant administration.

Revisions to the Administrative Code combined with changes in Council hearing process and an accelerated transmittal preparation process should lead to a more rapid and efficient disbursement of grant funds for city departments and other jurisdictions, earlier and more frequent reporting to Council on the policy and strategy involved in the UASI grant application and program goals and objectives, improved program evaluation and monitoring capabilities, and faster program implementation and more effective project execution

# UASI FUNDING PROCESS

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┌──────────────────┐     ┌──────────────────┐     ┌──────────────────────┐     ┌──────────────────────┐
│ DHS Guidance     │ →   │ State Guidance   │ →   │ LA prepares IJs and  │ →   │ State submits        │
│ Posted           │     │ Release          │     │ sends them to the    │     │ Application to       │
│                  │     │                  │     │ state. All UAs       │     │ Federal DHS for Mid  │
│                  │     │                  │     │ participate in Peer  │     │ Term Review          │
│                  │     │                  │     │ Review of IJs        │     │                      │
└──────────────────┘     └──────────────────┘     └──────────────────────┘     └──────────────────────┘
                                                                                          ↓
┌──────────────────────┐     ┌──────────────────┐     ┌──────────────────────┐     ┌──────────────────────┐
│ Work Group makes     │ ←   │ Federal Award    │ ←   │ Work Group begins    │ ←   │ State submits Final  │
│ final project        │     │ Announcement     │     │ project selection    │     │ application to       │
│ selection and        │     │                  │     │ and ranking process  │     │ Federal DHS          │
│ forwards projects    │     │                  │     │                      │     │                      │
│ to state             │     │                  │     │                      │     │                      │
└──────────────────────┘     └──────────────────┘     └──────────────────────┘     └──────────────────────┘
         ↓
┌──────────────────────┐     ┌──────────────────────┐     ┌──────────────────────┐     ┌──────────────────────┐
│ State forwards       │ →   │ Fed DHS approves     │ →   │ Mayor's Office       │ →   │ Submission of        │
│ projects from all    │     │ projects; CA OHS     │     │ collects project     │     │ transmittal to CAO   │
│ California Urban      │     │ makes final award    │     │ details (e.g.        │     │ for review and       │
│ Areas to federal     │     │ announcement (broken │     │ necessary contracting│     │ comments             │
│ DHS for approval     │     │ out by project) by   │     │ and position         │     │                      │
│                      │     │ letter to Urban Areas│     │ authorities) from    │     │                      │
│                      │     │                      │     │ departments and other│     │                      │
│                      │     │                      │     │ jurisdictions and    │     │                      │
│                      │     │                      │     │ drafts transmittal   │     │                      │
└──────────────────────┘     └──────────────────────┘     └──────────────────────┘     └──────────────────────┘
                                                                                                  ↓
┌──────────────────┐     ┌──────────────────────┐     ┌──────────────────────┐
│ Council accepts  │ ←   │ CAO/CLA review       │ ←   │ Final transmittal    │
│ grant            │     │ transmittal and      │     │ prepared and sent to │
│                  │     │ submit report to     │     │ Council              │
│                  │     │ Council              │     │                      │
└──────────────────┘     └──────────────────────┘     └──────────────────────┘
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**LA-LONG BEACH UASI**
**GRANT ACCEPTANCE TIMELINE - 2006**

| Task | Start Date | Duration (Days) | End Date |
|---|---|---|---|
| Federal Award Announcement (i) | 5/29/2006 | 2 | 5/31/2006 |
| CA OHS Award Announcement | 5/31/2006 | 89 | 8/28/2006 |
| Transmittal in Process in Mayor's Office | 8/28/2006 | 176 | 2/20/2007 |
| Ref to Public Safety, Personnel Budget and Finance  Committees | 2/23/2007 | 4 | 2/27/2007 |
| Analysis by City Administrative Officer (ii) | 2/27/2007 | 28 | 3/27/2007 |
| Analysis by Chief Legislative Analyst (iii) | 3/27/2007 | 9 | 4/5/2007 |
| Council Hearings to Accept | 4/5/2007 | 14 | 4/19/2007 |
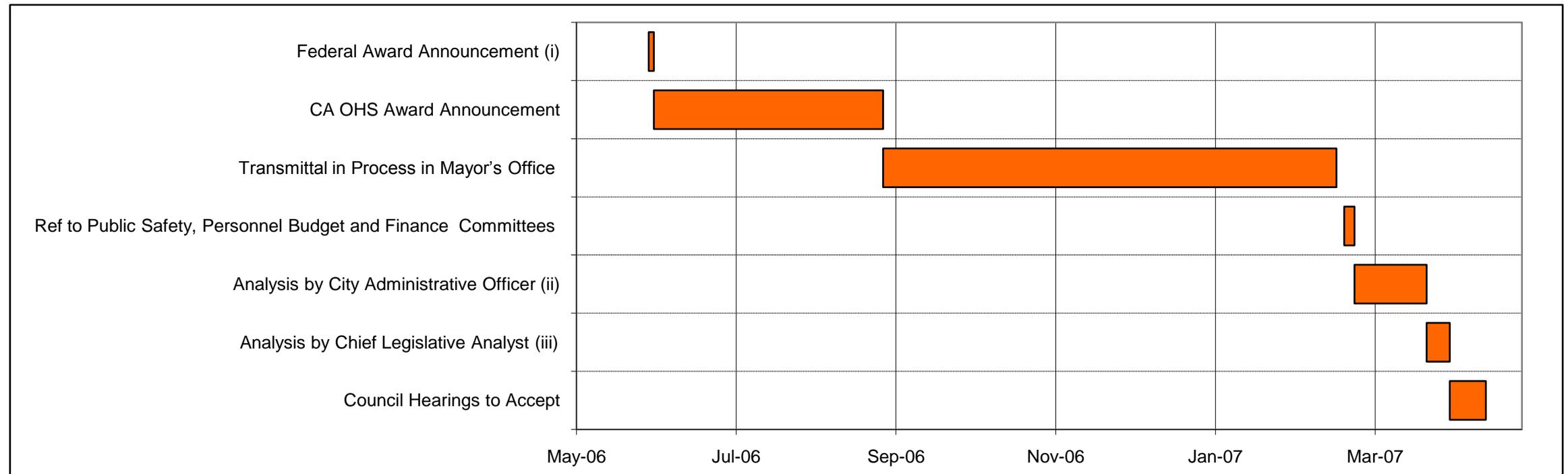
Source unless otherwise noted: www.cityclerk.lacity.org

i. www.house.gov/roybal-allard/press/2006/pr060531.html

ii. 3-27-07 - For ref - Communication from the City Administrative Officer 0220-03695-0046, dated March 27, 2007, relative to the authorization to accept the U.S. Department of Homeland Security (DHS) Fiscal Year 2006 uasi in the amount of $64,488,000 from the California Office of Homeland Security and to take various actions relating to its implementation.

iii. 4-5-07 - For ref - Communication from the Chief Legislative Analyst 07-04-0606, dated April 5, 2007, relative to the 2006 Urban Security Initiative (UASI) Grant

| Task | Start Date | Duration (Days) | End Date |
|---|---|---|---|
| Federal Award Announcement (i) | 7/16/2007 | 2 | 7/18/2007 |
| CA OHS Award Announcement | 7/18/2007 | 90 | 10/16/2007 |
| Transmittal for Other Jurisdictions | 10/16/2007 | 112 | 2/5/2008 |
| Transmittal for City Departments | 10/16/2007 | 220 | 5/23/2008 |
| Ref to Public Safety, Personnel Budget and Finance  Committees (ii) | 2/12/2008 | 2 | 2/14/2008 |
| Analysis by CAO/CLA of Other Jurisdictional Transmission (iii) | 2/12/2008 | 52 | 4/4/2008 |
| Council Accepts Grant | 4/4/2008 | 25 | 4/29/2008 |

Federal Award Announcement (i)

CA OHS Award Announcement

Transmittal for Other Jurisdictions — *Does not include transmittal to LA City Departments*

Transmittal for City Departments — *Still pending*

Ref to Public Safety, Personnel Budget and Finance  Committees (ii)

Analysis by CAO/CLA of Other Jurisdictional Transmission (iii)

Jun-07   Aug-07   Oct-07   Dec-07   Feb-08   Apr-08   Jun-08
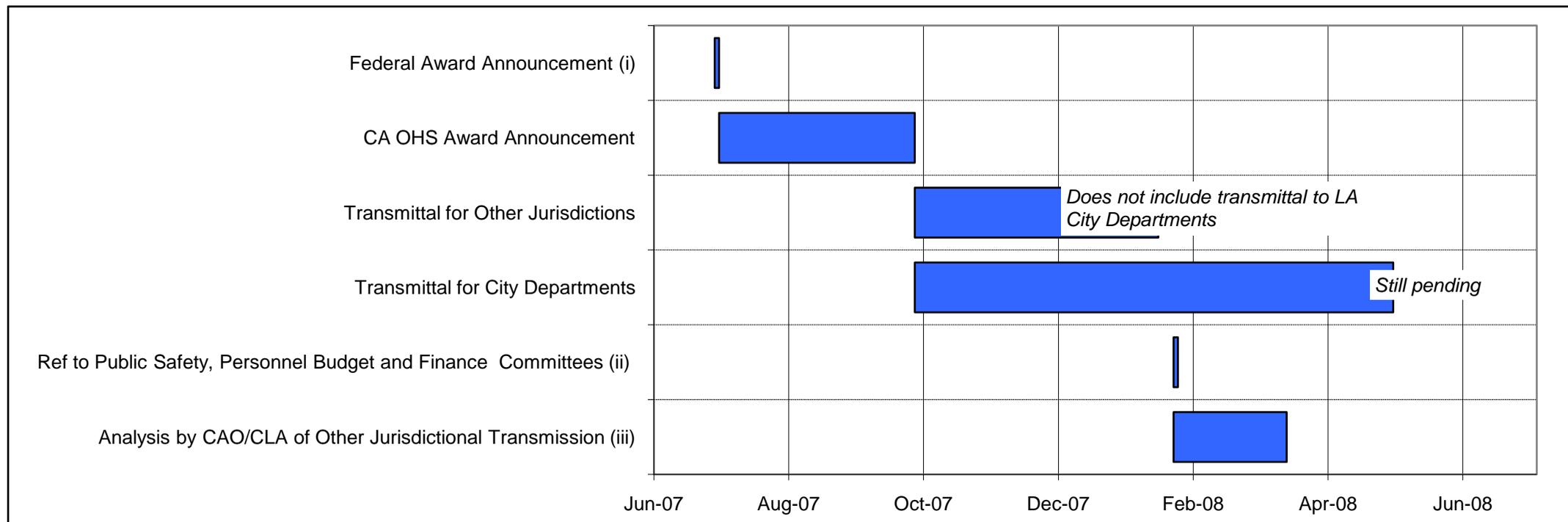
Source unless otherwise noted: www.cityclerk.lacity.org

i. July 19, 2007 Memo from County of LA CEO

ii. C.F. 07-0609 References Only Public Safety Committee

iii. Joint Report from CAO and CLA

## COMPARISON OF 2006-08 LA-LONG BEACH INVESTMENT JUSTIFICATIONS
## WITH 2007 STATE INVESTMENT JUSTIFICATIONS

| CA OHS 07 Investment Justifications[1] | LA Urban Area 2008 Investment Justifications | LA Urban Area 2007 Investment Justifications | LA Urban Area 2006 Investment Justifications |
|---|---|---|---|
| Strengthen Information Sharing, Collaboration Capabilities and Law Enforcement Investigations | Strengthen Information Sharing, Collaboration Capabilities and Law Enforcement Investigations (10% of award) | Strengthen Information and Intelligence Gathering, Analysis and Sharing | Strengthen Information and Intelligence Gathering, Analysis and Sharing |
| Strengthen Interoperable and Survivable Communications Capabilities | Strengthen Interoperable and Survivable Communications Capabilities (60-70% of award) | Strengthen Interoperability Communications Capabilities | Strengthen Flow and Security of Real-Time Communications |
| Strengthen Radiological And Nuclear Detection And Decontamination | | Strengthen Regional CBRNE Detection Response and Decontamination | Strengthen Regional CBRNE Detection, Response, Decontamination |
| Strengthen Public Health Preparedness | | Strengthen Medical Surge | Strengthen Medical Surge |
| | | Strengthen Mass Prophylaxis Delivery | Strengthen Mass Prophylaxis Delivery |
| Protection Of Critical Infrastructure And Key Resources | Protection Of Critical Infrastructure And Key Resources (20% of award) | Strengthen Regional Critical Infrastructure, Key Resources and Other Critical Assets | Protect Regional Critical Infrastructure, Key Resources And Other Critical Assets |
| Citizen Preparedness And Participation | | Strengthen Regional Public Awareness, Community Preparedness and Alert Warning | |
| Implement NIMS/NRP And Enhance Catastrophic Incident Planning, Response And Recovery Operations | | Strengthen Plans, Protocols, Training and Exercises to Enhance Preparedness | Strengthen Plans, Protocols, Training and Exercises to Enhance Preparedness |
| | | Emergency Management Mutual AID | |

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[1] Other State IJs for 2007 include enhancing Transportation And Maritime Security; Agriculture, Food Systems & Animal Health Preparedness; Border Security; Statewide Training Delivery Infrastructure and Exercise Programs and Alert And Warning Capabilities

# 8.  Grant Management Structure

- **The UASI and SHSGP grant programs are presently managed within the Mayor's Office of Homeland Security and Public Safety (HSPS). HSPS performs multiple complex duties related to these grants, including acting as the fiscal agent for the larger Los Angeles/Long Beach UASI region and overseeing cross-departmental grant activities within the City.**

- **The Mayor's Office was assigned grant management functions shortly after the UASI program was begun to ensure that responsibilities related to managing multi-jurisdictional and multi-departmental grants would be centrally coordinated.  Although this structure was initially appropriate, opportunities now exist to better integrate certain processes into the City's established management infrastructure.**

- **Grant management entails assessing the accomplishment of both programmatic goals as well as meeting financial targets. Monitoring and evaluating whether the City is achieving the intended goals of homeland security grants links naturally to the Emergency Management Department's role of coordinating area-wide training, planning and execution of emergency preparedness activities.**

- **Expenditure of grant funds is not occurring in a timely manner, for a variety of reasons. To expedite grant expenditures, some purchasing authority and expenditure tracking of grant funds could be devolved from the Mayor's Office to City operating departments, utilizing the City's existing financial systems.  This shift in responsibility will free up resources in the Mayor's Office to oversee the evaluation of outcomes, discussed above.**

- **Specific outcome performance measures for financial management (e.g. time needed to approve purchases) should be established and achievement of these standards should be monitored and evaluated on a continuous basis.  If performance standards are not met, the City should consider transferring the UASI and SHSGP financial management functions to another City department with experience administering multiple streams of complex funding, involving multiple stakeholders.**

- **Further, the Mayor's Office should explore alternatives for ensuring the continuity of financial management expertise within the Grants and Financial Management units.**

# UASI/SHSGP Grant Management Structure

For most City functions and services, the Mayor's Office serves in an executive capacity, establishing policy goals, ensuring that departments meet these policy goals, and coordinating activities between departments. Day-to-day operations, including routine financial management, is typically conducted by the operating departments.

The Mayor's Office currently manages approximately $200 million in homeland security and public safety grants. In the case of homeland security grants management, administrative as well as policy functions are performed by the Mayor's Office. Oversight and management of the UASI and SHSGP grants are provided by the Mayor's Office of Homeland Security and Public Safety (HSPS) through three units:

- The *Policy Unit* performs grant planning and policy setting functions,

- The *Grants Unit* performs grant management functions, including developing grant applications, facilitating acceptance of the grants and managing project modifications; and

- The *Fiscal Management Unit*, responsible for the fiscal management of the grants. In addition, Urban Area sub-recipients, comprising City departments and other jurisdictions within the urban area, are responsible for implementing individual projects and achieving program goals.

## Program management is hampered by the decoupling of program objectives and grants management

The ability to effectively monitor and measure grant program outcomes, both regionally and at a City level, is critical. For each of the last several years, the City has been responsible as the fiscal agent for the management of between $54 and $80 million in homeland security grant funds awarded to the region. Of this amount, over $25 million has been awarded to the City directly each year, either as the provider of services to the region (e.g., regional firefighter training) or to directly support City emergency preparedness activities.

While HSPS has established comprehensive methods for monitoring fiscal compliance with the conditions of the grants, the Mayor's office has not established metrics for formally assessing overall grant program performance. The Mayor's Office does not appear to prepare strategic summary information describing the City's UASI and SHSGP projects and linking them to overall strategic goals established for the City. For example, the document proffered as strategic planning guidance for the 2006 grant focuses almost exclusively on only one of the program initiatives (the issue of weapons of mass destruction), despite the fact that it was only one of several initiatives for that grant cycle. Further, there is no specific or broadly agreed-upon measurement to determine how successfully the City is meeting strategic goals, such as strengthening regional public awareness or enhancing the interoperability of the regional communication system. As reflected in the most recent federal monitoring report.

> "Another major challenge in scoring milestone completion was the impact of the LA/LB emphasis on a decentralized agency specific funding mechanism. Individual agencies and jurisdictions reported out about the specific progress they achieved in a specific part of a milestone. This tended to create a microscopic view of progress and did not reflect system wide understanding of progress… Consequently, agency representatives are reporting varying degrees of progress based on their own individual grant."[1]

A project implementation plan template has recently been developed with the assistance of an outside consultant[2] to assess progress in individual projects. While a valuable tool to insure project completion, this instrument does not assess cross-project accomplishment of overarching goals. In addition, the decision to use a consultant for basic project management support, rather than performing such duties in-house, suggests that there may have been difficulties experienced by operating departments and the Mayor's Office in developing systematic methods for monitoring grant project implementation. This is due, in large part, to the Mayor's Office's focus on grant application, acceptance and modification processes which consume a significant amount of time due to the complexities caused by the multi-jurisdictional, multi-agency and multi-year nature of the UASI grant program. As discussed in Finding 7, the grant unit has struggled to manage both the initial acceptance of grant awards by the City Council and the subsequent modifications to these grants in a timely manner, with delays continuing into the currently active 2007 grant cycle. Thus, the HSPS has historically focused its resources on technical grant administration activities, and has not established robust program monitoring or evaluation mechanisms.

The HSPS has recognized some of the weaknesses in its operations and in 2007 implemented an organizational restructuring, which included establishing the three units described previously, recruiting new staff with more appropriate skill sets to manage the grants, and implementing new systems to track grant activity (e.g., "GrantStat"). These are positive first steps. The HSPS has also recently created a "Los Angeles/Long Beach UASI Efficiencies Working Group" in April 2008. This group is tasked with identifying and resolving grant processing difficulties reportedly experienced by UASI sub-recipients. Improvements in those processes should allow program management to become a focus of the unit.

## EMD is not being utilized to support evaluation of grant-funded program outcomes

Opportunities also exist to capitalize on expertise garnered and authorities granted to EMD. The Administrative Code requires that the General Manager of the Emergency Management Department (EMD) coordinate emergency management activities for the City under the direction

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[1] Los Angeles/Long Beach Urban Area, FY 2007 Monitoring Report, 7/13/2007.

[2] The consulting firm was initially hired to facilitate the development and submission of the City's UASI grant application, but its role was expanded to assist the Mayor's Office with the development of the evaluation tool. In 2007, the City spent approximately $20,000 for these implementation planning consulting services.

of the Mayor.[3] However, EMD does not participate directly in assessing homeland security grant program outcomes for the city.

The EMD Assistant General Manager has been appointed as a Co-Chairperson of the UASI Working Group, but she describes her role as one of "meeting coordination." This function is secondary to the broader responsibilities intended for EMD by the Administrative Code, and is focused on the region as a whole, rather than on how the City is specifically meeting its grant funded program goals. There is, thus, little linkage between the City-wide training, exercises, planning and program development coordination role already assigned to EMD and management of the purposes of the grants received by the City. This is exacerbated by the lack of strategic planning discussed in Section 1.

The Mayor's Office should focus on the development of City policy regarding homeland security program goals; ensuring that the City's policies strategically interface with the annual objectives defined through the UASI and SHSGP regional bodies; and, coordinating intergovernmental relations efforts with the City's regional partners. This activity should continue to include the responsibility for the preparation of the regional UASI grant application and the transmittal to the City Council requesting acceptance of the grant. The Mayor's Office should also establish the metrics by which program accomplishment is judged.

However, on-going project monitoring and evaluation of the outcomes of City grant projects and measuring departmental performance toward grant objectives should be assigned to the Emergency Management Department, as part of its broader responsibility to coordinate emergency preparedness activities for the City. This would enhance oversight and ensure that a process is established to closely monitor departmental efforts to accomplish intended grant objectives. Further, the involvement of EMD in this function would better integrate grant activities with Citywide emergency preparedness planning, training and community preparedness activities; strengthen analytical objectivity by separating the policy development function from the program evaluation function; and, create clearer lines of authority and responsibility for ensuring that program objectives are accomplished in a timely manner.

## Other functional realignments

The Mayor's HSPS Office plays an important role ensuring that grant funds are expended in accordance with grant requirements. However, performing this oversight role does not necessarily require that the Mayor's Office manage each financial transaction under the grant. Many such activities can be delegated to City operating departments or integrated with the City's other business processes.

For example, among the primary responsibilities of the Mayor's grant unit is pre-approving purchases under the grant while the FSU twelve person staff is responsible for preparing and processing disbursements, maintaining expenditure records and performing other ministerial

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[3] See the *Introduction* to this report for a full description of the Emergency Operations Organization, the Emergency Operations Board and the powers and duties of the EMD General Manager and other City officials.

financial management functions. Rather than allowing departments to purchase equipment within the very defined limits of the UASI program, all purchases are approved by the Mayor's Office after checking the acquisition against the intent, requirements and approved equipment lists of the grant. Purchases are approved by both the grants unit and the FMU. Only the Los Angeles Fire Department submits its own purchase orders through the system. For all other agencies, the FMU is directly responsible for managing procurement under the grants. The FMU and large grantees such as the Los Angeles Fire and Police Departments also maintain duplicative expenditure records for tracking expenditures, rather than using the same tracking system.

Over the last decade, the Controller's Office has delegated purchasing to operating departments subject to post-audit, after setting explicit expectations for departments and evaluating whether they were able to conform with those expectations. A similar devolvement to operating departments should be considered for homeland security grants, beginning with the operating departments with existing grant staffs, namely the Police and Fire Departments.

The Mayor's Office indicates that devolving these functions to operating departments would not result in significant time savings. However, operating departments report long delays in procurement and in processing purchase orders by the Mayor's Office. In concert with delays in finalizing the grant transmittal to the Council, procurement delays have played a role in the need to request extensions for nearly $25.0 million out of a total 2006 grant award of $29.8 million for City departments beyond the March, 2008 expenditure deadline. Although the HSPS states that many delays in processing occur because sub-recipients and departments do not conform with established procedures, the financial unit responsible for managing grants of this size should define the causes of delays and devise strategies for correcting processing deficiencies.

The linkage of programmatic and financial management has distinct advantages. Pursuant to a recommendation made by the City Controller in a blueprint for improving Anti-Gang related activities in the City, the City Council recently chose to consolidate Anti-Gang functions - including gang reduction grant management and grant accounting - within the Mayor's Office, so that the City is able to enhance the "visibility, authority, and accountability" of the function. The City should continuously evaluate the efficiency and effectiveness of financial management for the UASI and SHSGP grant programs. This will ensure that the HSPS is able to successfully implement the process improvements necessary to expedite and enhance the implementation of these important grants, particularly through devolving financial management and improving integration of financial record keeping by the departments and HSPS.. More efficient financial management processes will free time for staff of HSPS to enhance program outcome evaluation, as discussed above. If such improvements are not accomplished within an appropriate timeframe determined to be appropriate for the complexity of the function, the City should consider reassigning responsibilities to another City department with experience administering multiple streams of complex funding, involving multiple stakeholders, with appropriate personnel resources.

Finally, the employees in the HSPS are exempt from Civil Service rules, increasing the risk that gains made from this reorganization could dissipate with a change in mayoral administrations. This instability could result in a future loss of experienced personnel, based on the priorities and perspectives of new administrations. Several individuals interviewed during the course of this

audit noted that high staff turnover and inexperience with City administrative procedures in the Mayor's Office may have been a significant factor delaying execution of purchase orders. While we could not confirm these assertions, this may be an area of concern. Therefore, the possibility of converting these positions to civil service should be examined by the City along with other strategies that would ensure the continuity of financial management expertise within the Grants and Financial Management units.

# Conclusions

The UASI and SHSGP grant policy function is appropriately located in the office of the Mayor. However, the evaluation of grant outcomes is weak and fiscal management of these grants not sufficiently devolved to operating departments. These conditions have a negative impact on the achievement of grant program goals and objectives and the efficient use of grant funding.

# Recommendations

The Mayor should:

8.1    Prioritize program management. Assign the responsibility to monitor and evaluate outcomes of programs funded by the UASI and SHSGP grant programs to EMD, to ensure grant activities are fully integrated with the defined emergency management goals of the City.

8.2    Structure and staff the grants administrative function with consideration toward the continuity and development of expertise in City financial processes that would carry on regardless of changes in mayoral administrations.

8.3    Develop performance standards for evaluating the efficiency of financial management of these grant funds. Efficiency outcomes should be continuously monitored, and if they are not met, consider transferring the UASI and SHSGP financial management functions to another City department with experience administering multiple streams of complex funding involving multiple stakeholders.

# Costs and Benefits

Implementing these recommendations would result in a more efficient and logical distribution of strategic planning, program management and financial management of major emergency preparedness grant sources. This realignment would capitalize on EMD's existing program coordination function and the financial management expertise of the Controller and operating departments. Benefits would include:

- Enhanced program management.

- Expedited expenditure of grant funds.

- Reduced duplication of effort between operational departments and the HSPS fiscal unit.

- Efficiencies gained from using financial staff and organizational units with the training, stability and systems for financial management of grants.

# 9. Sustaining Commitments to Grant Activities

- **The City of Los Angeles has not developed management reports detailing the total cost required to maintain emergency preparedness programs in the City of Los Angeles, including those funded with significant grant funds. While the Administrative Code requires that EMD report to the Emergency Operations Board prior to the beginning of the fiscal year on recommended budgetary items relating to the emergency services activities, this is not being done.**

- **Homeland security grant funding does not coincide with the budget cycle and these funds are not programmed in the budget, as is the case in other jurisdictions. Nor are general fund amounts required to fulfill the purposes of the grant clearly identified as such in the City's budget. A thorough analysis of the fiscal impact of grant acceptance, beyond the period of grant funding, is essential to policy makers and the public when making long term strategic planning decisions and to analysts in calculating the feasibility, viability and benefit of grant funded activities and equipment acquisition. This type of analysis allows policy makers and analysts to determine whether grant funded activities can and will be sustained beyond the period of the grant.**

- **While a formal local match to UASI and SHSGP funding has not been required to date, it is likely to be required in the future. Analysis of City funds to be utilized in furtherance of emergency preparedness will then be required.**

- **The City has not prioritized reductions in grant funded activities in the event these grants decline or their focus changes. Some programs begun in past grant cycles have had to be discontinued because of changes in federal, State or urban area priorities.**

The City does not analyze or account for City funds required to provide emergency preparedness services. Some of these costs, such as the $10.8 million per year in funds for dedicated emergency preparedness personnel in the twelve departments with the greatest responsibilities in this area, would be incurred by the City even without the presence of UASI or SHSGP funding. In addition, there are significant additional unaccounted costs resulting from acceptance of the UASI and SHSGP awards. These grants necessarily entail the expenditure of City resources to maintain equipment purchased with the grant, to continue training and to implement plans initiated with grant funds. Despite this potential impact on general and proprietary funds, the amount of City General Fund and proprietary fund contributions that would be necessary to sustain these activities at current levels is unknown. Because it does not program these funds in the budget, as is the case in other jurisdictions such as San Francisco, the city lacks a formal process for conducting this analysis.

UASI grants have provided nearly $178,496,662[1] in security related funding for jurisdictions in the Los Angeles Long Beach Urban Area (UA) between 2005 and 2007. Although both grant programs emphasize a regional approach to emergency preparedness and management, the awards are made at the project level, and funding is distributed to 16 individual jurisdictions in the Los Angeles area, including the County of Los Angeles and the City for individual projects within five solution areas: training, planning, equipment, exercises, and organization. The City of Los Angeles received $86,512,938 in the three grant awards from 2005 to 2007.[2] The City has also received a total of $15,465.980[3] in State Homeland Security Grant Program (SHSGP) funding since the inception of that program in 2003.

The bulk of the UASI and SHSGP funding that the City of Los Angeles has received has funded training, equipment and planning carried out by the LAPD and LAFD. These two departments collectively accounted for 90% of UASI funding received by the City for 2006 and 67% of the 2007 funding. In 2007, the City of Los Angeles was awarded UASI funding totaling approximately $36.8 million, comprised of $18,500,000 for equipment, $13,000,000 for planning and $5,800,000 for training,[4] plus an additional 5% ($1.8 million) for grant management and administration[5]. In order to maintain this equipment and continue training and planning in future years, the City will be required to support these activities from general fund or proprietary fund sources.

The Urban Area's 2008 UASI application has reduced the number of Investment Justifications from seven in 2007 to three (as shown in Attachment 7.3)[6]. Thus, the city will need to determine which of the activities to sustain that were funded by UASI in past grant cycles, but were not continued in the 2008 application.

## Significant Personnel, Equipment Maintenance and Planning Costs are Possible in the Event of an UASI Funding Reduction

An examination of the broad categories of emergency preparedness related activities that UASI currently funds, but which the City may eventually be forced to contemplate funding with local dollars, reveals potential for substantial outlays from proprietary or general fund sources. These categories are described in detail in Attachment 9.1 General Fund Contributions and Sustainability – 2007, and include:

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1 UASI 08 Homeland Security Grant PowerPoint Presentation from Mayor's HSPS Office.

2 CAO Supplemental Reports October 20, 2005 and March 27, 2007; and Mayor's Office 07 UASI Transmittal, February 5, 2008

3 Office of the Mayor Transmittals March 11, 2005, November 22, 2005 and June 7, 2007.

4 FY 2007 UASI Approved Budget in Mayor's Transmittal dated February 5, 2008

5 U.S. Department of Homeland Security 2007 Urban Areas Security Initiative (UASI) Grant Award - Partner Jurisdiction Allocations; CAO Report dated April 4, 2008.

6 A fourth Investment Justification, limited to 10% of the grant funding, is directed toward completing projects begun in earlier grant cycles.

- Training and exercises, such as Chemical, Biological, Radiological/Nuclear, and Explosive - CBRNE), Mass Evacuation and WMD exercises. Training activities also entail maintenance of acquired training and exercise equipment.

- Regional Public Awareness activities, such as production and dissemination of outreach and training materials and equipment, and identification and outreach to specific sub populations.

- Interoperable Communications systems, including steering committee participation, and salaries and benefits for staff dedicated to the planning phase of the Los Angeles-Regional Interoperability Communication System (LARICS) project and the costs of implementing the system.

- Information and Intelligence Gathering and related technology and equipment

- Medical Surge equipment maintenance

- Regional Critical Infrastructure technology, equipment and training

While the UASI grant limits expenditures on personnel to 15% of the grant, within these three areas, substantial funding has been used for salaries and benefits.[7] This includes, in 2006 for example, $424,995 as partial reimbursement for four positions in the LAPD and nearly $1.2 million for LAFD participation in the Los Angeles/Long Beach Urban Area Critical Incident Planning and Training Alliance (Alliance). The Alliance is a regional planning effort with 2008 goals that include developing mass evacuation processes for the region. Similarly, five Emergency Preparedness Coordinators and six positions in the Information Technology Agency were funded from the 2006 UASI grant.

The Philadelphia Urban Area has determined that the risk of incurring future staffing costs outweighs the benefit of funding positions with UASI monies. Philadelphia thus does not use UASI grant funding to pay salaries.

In addition, the 15% restriction does not apply to overtime. Significant overtime is devoted to training funded by UASI particularly for the Police and Fire Department, which have 24 hour operations that rely on overtime to backfill officers attending training. For example, in 2006, Fire Department training for Hazardous Materials and USAR teams, including WMD response training, involved 645 firefighters that were backfilled with overtime costs of $1,340,500.

The City of Los Angeles has also acquired significant amounts of equipment with UASI funding. This has included equipment for Hazardous Material training courses, vehicles such as trucks and casualty collection trailers, video equipment for intelligence gathering and analysis, personal protective equipment, and CBRNE detection and monitoring equipment. It is not clear whether the City has budgeted funds for on-going operational or replacement costs for this equipment.

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[7] Fiscal Year 2008 Homeland Security Grant Program Guidance and Application Kit, p.22.

*Harvey M. Rose Associates, LLC*

Substantial UASI funding has supported LAFD and LAPD emergency preparedness planning activities, in some cases without rigorous identification of the future development costs of planned systems. The largest portion of funding for planning has been dedicated to the Los Angeles Regional Interoperable Communication System (LA-RICS). The 2008 UASI application seeks over $70,000,000 for the planning stage of the system. General funds of $540,000 are now being requested for four positions for the remainder of the 2007-08 fiscal year and again in 2008-09[8] to develop technical specifications and evaluate and select bidders for the planning phase of the project. It is anticipated that the system itself will be funded by a combination of grant funds, license fees from other jurisdictions, cost savings resulting from elimination of existing, stand alone systems and some amount of General Fund resource. The share of funding from each of these sources is unknown at this time. The CAO's Office is  conducting an analysis of "how the City can best achieve interoperability, and whether the LA-RICS project presents the best option for doing so,"[9] requested by the City Council.

The UASI application requires that grantees explain "the long-term approach to sustaining the capabilities developed" using grant funds. In addition, Section III.A. Funding Plan asks grant recipients to identify any other funding sources and provide a brief summary of how those funds will be applied. The application submitted was imprecise, failing to specify how the Urban Area (or City) has contributed to or will sustain UASI funded activities.  For example, for the LA-RICS system, the UASI Region indicated that it has expended $18,000,000 in General Fund monies and $5.5 million in in-kind salaries. There is no explanation in the Investment Justification of how these contributions were derived and neither the grants management team in the office of the Mayor's Homeland Security and Public Safety nor the grants' staff of lead emergency preparedness agencies were able to confirm how these figures were estimated. However, it appears that the $18,000,000 figure is the amount that the LA County Fire Department has spent to date for interoperable radio equipment, not proposed expenditures to accompany the 2008 UASI award.  Other portions of the 2008 IJs provide insights into other questions that will need to be answered as the City and urban area move forward:

- For IJ 2 (Intelligence Information Sharing), the application indicates that 80% of the current cost of the system is borne by individual jurisdictions via the assignment of liaisons and analysts. A schedule of general fund and grant support for an additional 35 positions to provide 24/7 operations and strategies for migration to greater general fund contributions as the grant declines need to be developed.

- For IJ3 (Infrastructure), the application indicates that $14.6 m in general fund contributions has or will be made, and that an estimated $100 m in contributions has been made by involved entities since 9/11. How these figures were derived and whether they represent the maximum contribution the City can make is unclear, and should be assessed so that needs are fully understood by policy makers.

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[8] Los Angeles Regional Interoperable Communications System Staffing Plan; Report from the CAO dated April 17, 2008.

[9] Ibid.

## CLA/CAO Supplemental Reporting on UASI Funding Pertains to the Current Grant Cycle, Not Future Fiscal Implications

The CAO's fiscal impact analysis of UASI funding has to date been limited to implications for funding within the grant period. Its reports enumerate and summarize current positions funded with grant funds, but do not provide a separate calculation of the City resources that will be necessary on a recurring yearly basis to sustain all grant funded activities, if UASI funds decline or if a matching requirement is required. For example, the CAO's report concerning the 2006 UASI transmittal was limited to an analysis of the $850,000 in employee benefits that were ineligible for reimbursement from the federal government. CAO officials report that the 2007 analysis will be completed in a similar manner. As directed by the City Council, for UASI funding requests for 2007 and subsequent years, the CLA and CAO will provide a joint report to the City Council to accompany transmittals for grant awards of significant amounts. These analyses would be strengthened by a fiscal analysis of the cost of sustaining activities to be funded by these grants. Understanding of the ongoing programmatic needs to sustain the grants would be best provided by EMD, with its knowledge of the overall emergency preparedness program, assisted by the CAO's Office in analyzing the cost implications of ongoing programs.

## Future Cost Sharing

To date, neither the grantor (the federal Department of Homeland Security) nor the Governor's Office of Homeland Security, which coordinates DHS' UASI grants for all of California's Urban Areas, has required either an in kind or cash match as a condition of UASI or SHSGP grant funding. However, the 2008 UASI guidance indicates that a cost sharing requirement is likely in the future and that "grantees should anticipate and plan for future homeland security programs to require cash or in-kind matches at cost-share levels comparable to other FEMA-administered grant programs.[10]" A potential move towards cost sharing is also indicated by DHS's recently announced Regional Catastrophic Preparedness Grant which requires a 25% match. The General Manager of EMD reports that all available in-kind City funding was utilized to meet this requirement. Future matches will thus need to be met by expanding city expenditures on emergency preparedness and management activities.

If future federal and State grant programs begin to require some form of matching contributions or the granted amounts decline significantly, the region and the City of Los Angeles could incur significant obligations against operating budgets. For example, imposition of a 25% match, such as that which is required by DHS' Regional Catastrophic Preparedness Grant, would require the region to demonstrate that a minimum of $30,775,000 in general and proprietary funds (based on the 2008 grant request of $105.3 million) would be spent on these activities during the grant period. Since the matching fund requirement is likely to be required for each specific grant funded project (rather than on an across-the-board basis), a more discrete analysis of the required match would likely be needed.

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[10] Page iii, 2008 Homeland Security Program Guidance and Application Kit, February 2008,

In discussions with city officials and from the audit's survey of six other jurisdictions receiving UASI funding, it is evident that at least preliminary planning for the eventuality of cost sharing through local matches has begun. However, it is not clear which entity within the Los Angeles/Long Beach Urban Area is responsible for planning for cost sharing. EMD significantly contributed to completion of the Regional Catastrophic Preparedness Grant, including working with operating departments to calculate the required 25% match. The analysis of how to address future match requirements would be best conducted by EMD, on the program side, and the CAO, for the fiscal analysis.

Once a match is required, UASI and SHSGP grant funds would need to be integrated into the City budget to facilitate planning. Although some City officials state that this would be difficult due to differences in the budget and grant funding cycles, the practice is successfully followed in other jurisdictions. Budgeting these resources should not be technically difficult since these grants have generally not been released until well into the City's budget development process. Many jurisdictions – including Los Angeles – commonly budget multiple year financial commitments through the operating budget (e.g., personnel costs with a fixed duration spanning multiple years, authorized by resolution authority), internal service fund budgets and/or operating plans (e.g., equipment and other fixed asset acquisitions that are lease purchased or financed over multiple years from user contributions, etc.), or capital program budgets. In these circumstances, the funding to finance these activities and acquisitions are often drawn from multiple sources, including general revenues, grants, bond funds and various borrowings.

In building these grants into the budget, supplantation of general funds with grants funds must be avoided. The grant guidance specifies that homeland security funds may not be used to replace State or locally budgeted positions with full-time employees or contracts supported by federal funds. The guidance specifically indicates that hiring any personnel for the purposes of fulfilling traditional public safety duties or to supplant traditional public safety positions and responsibilities is not allowed.

## Conclusions

Homeland Security grant applications have not required a match, but will likely be required in the future. However, the City does not presently calculate discretionary fund contributions that grant funded activities require. Therefore, the City cannot easily identify resources that could be provided as matching contributions or estimate the cost to maintain grant funded activities in the event funding decreases. No City department or office is clearly responsible for determining the current or future General Fund obligation implied by acceptance of these grant funds. Acceptance of the UASI award takes almost a year which leaves little time for the CAO to conduct a full analysis of the long term fiscal impact beyond the grant period and inhibits the City Council from requiring that this analysis be conducted.

There is no analysis of the current or multiyear effect on the city budget of this grant funding. The absence of rigorous sustainability planning compounds the problem presented by the absence of citywide emergency preparedness programmatic budgeting, and diminishes the ability of the city to prioritize disaster preparedness activities and set funding priorities. The absence of this analysis means the City does not know the full or future cost of some of the disaster preparedness activities that it conducts that are partially funded by homeland security grants.

# Recommendations

The Mayor should:

9.1    Assign responsibility for assessing the ongoing commitments by the City that are not funded by the UASI or SHSGP grants but result from grant activities to the Emergency Management Department, with the CAO providing supporting fiscal analysis.

9.2    Assign routine analysis of general fund and proprietary fund monies necessary to sustain or complete emergency preparedness and homeland security projects to the Emergency Management Department in coordination with the CAO.

9.3    Assign the Emergency Management Department with the responsibility to assess general fund or proprietary fund amounts necessary, if the federal Department of Homeland Security requires a 25% match for the UASI grant, in coordination with the CAO.

9.4    Direct the CAO to study the feasibility of programming UASI and SHSGP funding in the City budget, with direction to avoid supplantation of existing general funds with grant funds.

# Costs and Benefits

City staff in the CAO and EMD with the knowledge skills and abilities to conduct the analyses enumerated above is already in place. Combined with the organizational changes recommended in other sections of this report, this recommendation should be attainable with no additional costs to the City.

In kind or cash matches are a means that grantors use to determine that policy makers and decision makers are informed and committed to project completion and success and that the public has been informed of the commitment of public resources and is aware of the full costs of a project. A thorough fiscal impact analysis of grant acceptance beyond the period of grant funding is essential to policy makers and the public in making long term strategic planning decisions and to analysts in calculating feasibility, viability and benefit of grant funded activities and equipment acquisition. This type of analysis is necessary to determine whether grant funded activities can and will be sustained beyond the period of the grant.

**GENERAL FUND CONTRIBUTIONS AND SUSTAINABILITY – 2007**

| Investment Justification | Current General Fund Contributions | Other Contributions | Sustainability – Examples of Future General Fund Needs |
|---|---|---|---|
| **IJ 1:  Strengthen plans, protocols, training and exercise to enhance preparedness** | Training personnel and facilities | Unspecified contributions to support regional training from CDC and State Department of Health Services | (1) Participation in WMD, Mass Evacuation, CBRNE, Alliance and other training and exercises including regional training and exercises; (2) Planning and development of training and exercises e.g. staffing "Alliance"; (3) Maintenance of acquired training and exercise equipment. |
| **IJ 2:  Strengthen regional public awareness, community preparedness, and alert/warning** | Local jurisdictions fund public education, outreach, community education, CERT programs and preparedness for specific needs populations; | | (1) Production and dissemination of outreach and training materials and equipment; (2) LAFD delivery of CERT training; (4) Training of subsections of population including CBOs, faith-based, schools etc.; (5) Training for specific needs populations e.g. deaf/blind by LA Depts. on Disability, Aging etc; (5) Conduct of regional focus groups for development of public education strategic plan and formation of regional oversight committee; (6) Equipment maintenance, e.g. signage. |
| **IJ 3: Interoperable Communications** | Current staff participation in Regional Interoperability Steering Committee; | | (1) Salaries for four full time staff dedicated to the planning phase of project per recommendation in report from CAO dated April 17, 2008; (2) Maintenance of interoperable equipment for LAPD Air support division;  (3) Participation on interoperability governance board Regional Interoperability Steering Committee (RISC) |
| **IJ 4: Information and Intelligence Gathering** | LAPD co manages JRIC with FBI and LA Sheriff | | (1) Equipment maintenance costs, e.g. Automated License Plate Recognition equipment and other "Terrorism Incident Prevention Equipment; (2) Training seminar and conference |

**GENERAL FUND CONTRIBUTIONS AND SUSTAINABILITY – 2007**

| Investment Justification | Current General Fund Contributions | Other Contributions | Sustainability – Examples of Future General Fund Needs |
|---|---|---|---|
| | | | attendance and contracts for training vendors; (3) Scenario exercises; (4) JRIC Management, staffing and supplies. |
| **IJ 5: Strengthen Regional CBRNE Detection, Response, and Decontamination Capabilities** | Not specified | USAR/HazMat teams of respective jurisdictions; | (1) Annual testing, repair, support, maintenance of Regional Standard CBRNE SCBA; (2) Periodic training on SCBA (3) Maintenance of Detection and Logistical Support Equipment; (4) Maintenance of Mobile Trailers and Personal Protective Equipment; |
| **IJ6: Strengthen Medical Surge** | Current paramedic and EMT staffing | Funding from HHS Hospital Preparedness Program related to strengthening medical surge activities; Unspecified private hospital resources | (1) Equipment maintenance, e.g. Multi Casualty Incident Trailers |
| **IJ7: Strengthening mass prophylaxis delivery** | | Local health depts.' current prophylaxis sites; local public health depts.' equipment and staff | All projects under this Investment Justification were for jurisdictions other than the City of Los Angeles |
| **IJ8: Regional Critical infrastructure** | None Specified | None specified | (1)Maintenance/Replacement/Operation/Training on PSTF equipment, video equipment and detection equipment; (2) Protective Security Task Force training; (3) Maintenance and operation of "Trapwire" web-based reporting network; (4) Staffing of Response Teams |
| **IJ9: Emergency Management Mutual Aid** | None specified | None specified | (1) Design, provision and participation in regional training. |

# 10. Emergency Operations Fund

- The Emergency Operations Fund (EOF) is a trust fund created in 1980 by the Mayor and City Council to provide City departments with a ready resource for obtaining funding for specialized equipment and training necessary related to the Emergency Operations Organization (EOO) mission. The City Council has routinely allocated funding to the EOF, which was appropriated $183,100 in FY 2007-08. As of January 2008, the EOF had an uncommitted balance of approximately $530,000, which can be expended by the General Manager of the Emergency Management Department subject to approval of the Chairman of the Emergency Operations Board.

- A review of EOF charges made between FY 2003-04 and FY 2007-08 found that some items charged against this trust fund may not have conformed with the original intended purpose defined in the Administrative Code. For example, numerous event catering expenses, DVD/VCR and printer/copier purchases, monthly cable service fees, software renewal fees, and membership fees were charged against the EOF. Assuming that such expenditure items were approved by the Emergency Operations Board (and hence, may all have been appropriately authorized), using EOF monies for items that do not meet the definition of specialized equipment or training for the preparation for, response to, mitigation of, and recovery from local emergencies is questionable.

- Weaknesses in the controls over EOF administration and management exist. For example, it is not clear (a) what types of expenditure items City departments are allowed or not allowed to charge against the EOF; (b) what specific criteria and procedures are used by the EOB in its decision-making process related to prioritizing and approving departmental requests for EOF funding; (c) what steps are taken by EMD when processing claims, reimbursements, and various types of expenses against the EOF; and, (d) what measures are taken to ensure the appropriateness and accountability of EOF expenditures. The only policies and procedures that currently exist pertaining to EOF management are very general in nature and have not been updated since 1987. Establishing and actively implementing clear and up-to-date EOF policies and procedures are necessary to ensure the appropriateness and accountability of expenditures funded through the EOF.

- No portion of the EOF allocation is currently set-aside or designated as a contingency reserve to be used during a disaster or an emergency situation, which is one of the original intended purposes for the fund. The City should ensure that a portion of the EOF balance is set-aside to be available during a disaster or an emergency situation, when emergency funds are most needed.

# EOF Purpose and Uses

The Emergency Operations Fund (EOF) was created in 1980 by the Mayor and City Council to provide City departments with a ready resource to obtain funding for specialized equipment and training necessary for fulfilling the Emergency Operations Organization (EOO) mission. The EOF budget provides specific resources to assist various City departments to prepare for, respond to, mitigate, and recover from local emergencies such as terrorist attacks, earthquakes, fires, and other disasters. Section 8.72 of the City of Los Angeles Administrative Code (LAAC) establishes the EOF and provides that money in the EOF can be expended by the Coordinator of the Emergency Operations Organization (i.e., General Manager of the Emergency Management Department), subject to the approval of the Chairman of the Emergency Operations Board (the Chief of Police). This section of the City's Administrative Code also provides that since the EOF is a trust fund, unused amounts remain in the fund and do not automatically revert to the General Fund at the end of the fiscal year. However, in recent years, given the fiscal needs of the City, funds have been transferred from the EOF into the General Fund.

The City Council has routinely allocated funding to the EOF each year, allocating $183,100[1] in FY 2007-08. As of January 2008, the EOF had an uncommitted fund balance of approximately $530,000. By Emergency Operations Board policy, departments have two fiscal years to expend approved EOF monies. At the end of the second fiscal year, any remaining monies are treated as available EOF balance for use at the EOB's direction.

The annual EOF proposed budget begins with requests for funding generated by City departments to the Emergency Management Committee (EMC) Budget Subcommittee. Each year, more than $1.0 million in EOF project requests are received, which are then screened, reviewed, and prioritized by the EMC Budget Subcommittee for consideration by the Mayor. In FY 2007-08, some of the proposed projects for EOF funding included the purchase of trailers and vehicles for emergency purposes, emergency preparedness public outreach projects, the purchase of Community Emergency Response Team (CERT) equipment and supplies, and the purchase of portable lights and generators.

In essence, City departments use the EOF as another source of funds (i.e., in addition to their departmental budgets) for various types of emergency preparedness-related expenses, including travel, training, equipment items, public outreach, printing, supplies, and contractual services. Some examples of EOF costs incurred between FY 2003-04 and FY 2007-08 that relate to the preparation for local emergencies include:

- A field command post vehicle and truck for the Fire Department;

- Manuals on post-earthquake and post-windstorm building evaluations, street maps, and safety guidebooks;

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[1] This $183,100 allocated amount was the same annual allocation amount in FY 2006-07 and in FY 2005-06.

- Reimbursements for airfare, hotel room, registration, and per diem expenses related to emergency preparedness training, conferences, and meetings; and,

- Rental costs for event space, furniture, portable toilets, and canopies for special events related to emergency and disaster preparedness.

Further review of EOF charges made between FY 2003-04 and FY 2007-08 found that some items charged against this special fund may not have conformed with the original intended purpose defined in the Administrative Code, such as:

- Food catering expenses for events;

- Monthly cable service fees;

- T-shirt, balloon, and giveaway item (e.g., pad folios, lanyards, pencils) expenses for events;

- Software renewal fees;

- DVD/VCR and printer/copier purchases;

- Office supply purchases (e.g., printing paper, easel pads, Sharpies, etc.); and,

- Membership fees.

Assuming that such expenditure items were formally approved by the Emergency Operations Board (and hence, may all have been appropriately authorized expenses for various emergency preparedness-related efforts and events), using EOF monies for items that are not directly related to the preparation for, response to, mitigation for, and recovery from local emergencies may be questionable.

The City does not have explicit definitions or guidelines for the EOF purpose and intended uses. Section 8.72 of the Los Angeles Administrative Code is generally vague in terms of providing definitions for appropriate EOF charges, and the Emergency Management Department, which is the primary organization in charge of the day-to-day oversight and administration of the EOF, does not have policies and procedures that define appropriate EOF charges. As such, the potential for questionable uses of EOF monies exists. The City should revise Section 8.72 of the Los Angeles Administrative Code to provide a more clear description of the EOF's purpose and intended uses. Consistent with this revision, the Emergency Management Department and the Emergency Operations Organization should establish and implement policies and procedures that provide clear descriptions of allowable/not allowable expenditure items to be charged against the EOF in order to ensure appropriate fund accountability.

## EOF Internal Controls

In addition to the absence of a clear definition for what constitutes appropriate EOF charges and expenditures are, weaknesses in certain controls over the EOF's administration and management. For example, the Emergency Management Department does not have complete and up-to-date policies and procedures specifically for the administration and management of the Emergency

Operations Fund. As previously discussed, the preparation of the annual EOF budget and its day-to-day oversight (e.g., tracking and coordination of EOF expenditures) are the responsibility of the Emergency Management Department. The Emergency Operations Organization currently has budget policies and procedures, which are the main guidelines used by EMD when administering and managing the EOF. However, these guidelines are incomplete and have not been revised since 1987, even though certain EOF details, criteria and guidelines have changed over the years.

For example, the EOO budget policies and procedures manual does not have specific references to the EOF, nor does it identify the EMD as the administrator of the EOF. In addition, the policies and procedures manual does not include a complete list of criteria (e.g., general funds required to support a requested project) used by the EOB in its decision to prioritize and fund departmental proposals. Further, the policies and procedures manual from 1987 does not include specific guidelines for processing claims, reimbursements, and various types of expenses against the EOF. These policies and procedures also do not include the processes to be used by EMD to ensure the accountability of EOF expenditures, including a central, formal, and regularly maintained current inventory of emergency preparedness-related equipment, devices, and supplies purchased by City departments through the EOF. Lastly, no provisions currently exist to audit/review EOF expenditures on a regular basis in order to ensure proper fund use. As a result of these weaknesses, the City's ability to effectively monitor EOF expenditures and to ensure sufficient fund oversight and accountability is compromised.

In addition to these weaknesses, existing policies and procedures regarding the EOF funding application process are not always followed. For example, the EOO budget policies and procedures require that each funding request should include the following attachments:

1. A statement on the proposed item's compliance with the EOO budget policy;

2. A discussion of why the item is being requested through the EOO rather than a departmental budget; and

3. A full and detailed description of the item requested, including sites of installation, channels of interdivisional use or access, training required, and communications services and alterations and improvements required.

Even though such detailed requirements are explained in the policies and procedures, these EOF request details are currently presented to the EMC's Budget Subcommittee as part of the EOF funding request review process. According to EMD, the EMC Budget Subcommittee develops the EOF spreadsheet containing priority projects, which is then sent to the EMC annually for review as a stand-alone action item. Other than the number of departments submitting EOF funding requests and the list of final line-item recommendations, the details for proposed projects and items are not currently collected, as required in the policies and procedures. Actively implementing all EOF policies and procedures is crucial in order to ensure the appropriateness and accountability of all projects and efforts funded through the EOF.

Furthermore, EMD does not have specific policies and procedures to ensure that charges made against the EOF allocation are appropriate charges and that an audit of the EOF is conducted by

an external entity on a regular basis. Establishing and implementing such formal guidelines would help identify inappropriate or questionable charges against the EOF and ensure that City funds and resources are spent appropriately, wisely and effectively.

Overall, the Emergency Management Department and the Emergency Operations Organization should establish and implement policies and procedures specifically for the administration and management of the EOF to ensure sufficient fund oversight and accountability. At a minimum, these policies and procedures should: (1) establish standardized procedures and list of required documentation for City departments as part of the EOF funding application process; (2) establish standardized procedures for reviewing EOF funding requests, including establishing clear, relevant, and complete criteria as part of the EOF funding request review and approval process; (3) establish a system that would ensure that charges made against the EOF allocation are appropriate charges and that an audit of EOF charges is conducted on a regular basis to ensure proper fund use; (4) include provisions that these policies and procedures will be revised as frequently as necessary to reflect all relevant and up-to-date guidelines; and (5) include provisions that would allow an external entity (e.g., the Controller's Office) to conduct a periodic compliance review or audit of the EOF and that the results of this review or audit be made public. Such improved internal controls could vastly improve the oversight and accountability of Emergency Operations Fund expenditures

## EOF as an Emergency Reserve

Section 8.72 of the Los Angeles Administrative Code does not include a provision that sets aside or designates a portion of the EOF allocation/reserves as contingency funds to be used specifically during a disaster or an emergency situation, even though the EOF is the only emergency reserve fund that is readily available to directly support Citywide emergency response and recovery functions. This fund provides a ready resource that can be immediately accessed in the event of an emergency. One of the most critical uses of this fund is the capability to make immediate related purchases necessary to accomplish disaster-specific missions. However, because the City's Administrative Code does not address the need to reserve a portion of the EOF balance as a reserve for disaster or emergency situations, there are no guarantees that sufficient funds will be available during such times, when emergency funds are most needed.

The City of Los Angeles should, therefore, revise Section 8.72 of the Los Angeles Administrative Code by including language in the Code that would ensure that a portion of the EOF balance is reserved or designated as a contingency to be used specifically during a disaster or an emergency situation.

# Conclusions

The EOF budget provides specific resources to assist various City departments within the Emergency Operations Organization to prepare for, respond to, mitigate, or recover from local emergencies such as terrorist attacks, earthquakes, fires, and other disasters. Currently, City departments use the EOF as a source of funds for various types of emergency preparedness-related expenses, including travel, training, equipment items, public outreach, supplies, and

contractual services. A review of EOF charges found that some items charged against this special fund may not meet the intended purpose of the fund, including food catering expenses for events, monthly cable service fees, and software renewal fees. Establishing and actively implementing EOF policies and procedures are necessary in order to ensure the appropriateness and accountability of all projects and efforts that are funded through the EOF. In addition, the City should ensure that a portion of the annual EOF balance is set-aside as contingency to be used during a disaster or an emergency situation, when emergency funds are most needed.

# Recommendations

The Mayor should seek to:

10.1.   Revise Section 8.72 of the Los Angeles Administrative Code to:

   a) Provide a clearer description of the Emergency Operations Fund's purpose and intended uses; and

   b) Require that a portion of the annual EOF balance is reserved as contingency to be used during a disaster or an emergency situation.

The Emergency Management Department and the Emergency Operations Organization should strengthen EOF's oversight and internal controls by:

10.2.   Establishing and implementing policies and procedures specifically for the administration and management of the Emergency Operations Fund that would ensure sufficient fund oversight and accountability. At a minimum, these policies and procedures should:

   a) Consistent with the revision to the Administrative Code (see recommendation 10.1.a), provide clear descriptions of allowable/not allowable expenditure items to be charged against the EOF;

   b) Establish standardized procedures and a list of required documentation (e.g., statement of compliance with the EOF budget policy, discussion of why the item is being requested through the EOO rather than departmental budget, detailed description of the requested item, etc.) for City departments as part of the EOF funding application/request process;

   c) Establish standardized procedures for reviewing EOF funding requests, including establishing clear, relevant, and up-to-date criteria as part of the EOF funding request review and approval process;

   d) Include provisions to centrally, formally, and regularly maintain an up-to-date inventory of all emergency preparedness-related equipment, devices, and supplies purchased by City departments through the EOF;

e) Establish a system that would ensure that charges made against the EOF allocation are appropriate and that an audit of the EOF is conducted on a regular basis to ensure proper fund use;

f) Include provisions that an external entity (e.g., the Controller's Office) may conduct a periodic compliance review or audit of the EOF and that the results of this review or audit be made public; and,

g) Include provisions that these policies and procedures will be revised as frequently as necessary to reflect all relevant and up-to-date guidelines.

# Costs and Benefits

Implementation of all recommendations should be accomplished using existing resources. The benefits include improved oversight, accountability, and control mechanisms for Emergency Operations Fund expenditures, which have the potential to identify inappropriate or questionable charges against the EOF and to ensure that City funds and resources are spent wisely and effectively. Systematically and regularly tracking and monitoring emergency preparedness efforts that are funded by EOF monies would result in a reduced risk of duplication of efforts and resources. In addition, establishing and implementing formal policies and procedures for reviewing, prioritizing, and funding emergency preparedness projects would assist the City in making better and more informed funding and resource allocation decisions. Further, reserving a portion of the EOF would ensure that emergency funds are available during emergency and disaster situations, when emergency funds are most needed.

# 11. National Peer Review

- **At the time of the National Peer Review in 2006, the City of Los Angeles was ahead of other cities in the condition of its emergency planning and disaster preparedness system, ranking first in compliance with national standards in both California and among the 10 largest metropolitan areas in the country. Yet, the City was found to be deficient in 34, or approximately 60 percent of the 46 plan areas assessed as part of the review.**

- **In the 34 plan areas found to be deficient, the City had made substantial progress implementing recommendations in only seven, or 20.6 percent of the planning areas at the time of this report. Some progress was made implementing recommendations in an additional 13 planning areas (38.2%), while limited progress, or no progress, was made in the remainder (14, or 41.2 percent of the areas considered deficient).**

- **For example, limited progress has been made with the development of a feedback and tracking mechanism for implementing corrective actions that are identified in After Action Reports (AARs) prepared to assess outcomes from training exercises and other events. In another example, planning reports have not been updated, even though a schedule for doing so was established. In a third example, the City has not implemented a system for identifying persons with special needs, due - in part - to insufficient funding and a breakdown in collaboration with the County and UCLA on an initiative begun in 2005.**

- **Self assessments, peer reviews and performance audits are intended to provide recommendations and identify other opportunities for improvement that should be acted upon in a timely manner. To the extent weaknesses in emergency planning and disaster preparedness activities continue to exist, the City's capacity to respond to community needs during an emergency will be compromised.**

Following hurricanes Katrina and Rita in 2005, the President and the Congress directed the federal Department of Homeland Security (DHS) to conduct an immediate review of emergency operations plans in all States and Territories, and in the 75 largest urban areas, including the City of Los Angeles. To carry out this task, the DHS required each urban area to self-assess the status of this plan, and then conducted peer-led site visits to validate the self-assessment and to help City officials identify specific needs for federal assistance, the sufficiency of the City's plans, and specific areas for plan improvement. According to the DHS report for the City of Los Angeles, the purpose of the project was to "identify, prioritize and correct 'execution-critical' deficiencies (i.e. those issues that may prevent the execution of the plan)."

As part of this audit, findings contained in a 2006 *National Peer Review* were researched to (a) determine the extent to which the City has addressed each major finding, (b) identify the status of activities to resolve or improve upon major and/or ongoing deficiencies, and (c) assess efforts to remove barriers to successful implementation of report recommendations.

## Scope of Audit Activities

This section of the audit report addresses the City's progress to date in responding to the recommendations of the 2006 Peer Review. Specifically, the audit reviewed the Peer Review report to determine which areas were found by the DHS to be sufficient or partially sufficient, and noted areas where either the City, in its self-assessment, or the federal reviewers determined additional steps should be taken to improve the City's plans. This included all areas determined by the reviewers to be partially sufficient, as well as selected areas that were determined to be sufficient, but where the reviewers made recommendations for improvements. Our review included 34 of the 46 areas assessed by the peer reviewers.

Using interviews with City staff and other knowledgeable individuals, review of minutes of the Emergency Operations Board and Emergency Management Committee, review of the Emergency Operations Master Plan and its annexes, and internal documents provided by the Emergency Management Department and other sources, we assessed the progress the City has made in responding to the Peer Review report. We characterized the City qualitatively as making substantial progress, some progress, limited progress or no progress, described as follows:

**Substantial Progress** includes, for example, completion or near completion of additional Emergency Operations Plan annexes that address needed improvements cited in the Peer Review, completion of new procedures that address needed improvements, addition of new emergency operations technologies that address needed improvements, and completion of exercises and/or training that address needed improvements.

**Some Progress** includes, for example, Emergency Operations Plan annexes that are in the draft preparation stage, annexes that have been completed, but don't fully address needed improvements cited in the Peer Review, and other procedural or technological initiatives that are planned but not yet completed.

**Limited Progress** includes, for example, Emergency Operations Plan annexes that are being prepared, but have not yet reached a draft plan stage; procedural or technological initiatives that are in the early stages of implementation; and, exercises and/or training that are being considered, but have not yet been scheduled and for which planning has not yet begun.

**No Progress** reflects areas of the Peer Review where no additional activity appears to have occurred since the Peer Review report was issued in 2006. This also may include areas where City staff reported that implementation is the responsibility of non-City agencies, even though the Peer Review recommendations apply to the City.

These qualitative assessments of the City's progress are admittedly subjective, and are based on information available from City staff and other identified sources, discussed above.

# Peer Review Results

The federal peer review report for the City of Los Angeles was completed and provided to the City in April 2006. It assessed whether the City's plans were sufficient, partially sufficient or not sufficient to meet emergency operations needs in 46 areas. In 19 areas, or 41 percent of the total, the City's plans were determined to be sufficient. In 27 areas, or 59 percent of the total, the review determined that the City's plans were partially sufficient. No areas were determined to be not sufficient.

In assessing these reported results for Los Angeles, it should be noted that the National Peer Review results indicated that Los Angeles was ahead of other California cities and other metropolitan areas in the status of its emergency planning at the time of the Peer Review. The following tables compares the City's percentage of the 46 assessed plan areas that were determined to be sufficient, partially sufficient or not sufficient, relative to other cities assessed.

## Table 11.1

### National Peer Review Results on Plan Sufficiency
### Los Angeles Compared with Other California Cities

| City | % Sufficient | % Partially Sufficient | % Not Sufficient |
|------|--------------|------------------------|------------------|
| Los Angeles | 40% | 60% | 0% |
| San Jose | 36% | 64% | 0% |
| Sacramento | 36% | 62% | 2% |
| Anaheim | 33% | 67% | 0% |
| San Francisco | 33% | 67% | 0% |
| Long Beach | 31% | 69% | 0% |
| Riverside | 29% | 71% | 0% |
| Oakland | 27% | 73% | 0% |
| Santa Ana | 27% | 73% | 0% |
| San Diego | 22% | 78% | 0% |
| Fresno | 20% | 76% | 2% |
| **Average Excl. LA** | **29%** | **70%** | **1%** |

## Table 11.2

## National Peer Review Results on Plan Sufficiency for
## Los Angeles and 10 of the Largest Non-California Metropolitan Areas

| City | % Sufficient | % Partially Sufficient | % Not Sufficient |
|---|---|---|---|
| Los Angeles | 40% | 60% | 0% |
| San Antonio | 40% | 51% | 9% |
| Houston | 36% | 60% | 4% |
| Jacksonville | 33% | 64% | 2% |
| Indianapolis | 33% | 58% | 9% |
| New York City | 29% | 71% | 0% |
| Detroit | 24% | 53% | 22% |
| Chicago | 20% | 67% | 13% |
| Dallas | 16% | 49% | 36% |
| Phoenix | 13% | 67% | 20% |
| Philadelphia | 11% | 80% | 9% |
| **Average Excl. LA** | **26%** | **62%** | **12%** |

As the tables show, at 40 percent, Los Angeles' percentage of plan elements determined to be sufficient through the Peer Review was the highest among California cities, and was matched among major non-California cities only by San Antonio. Furthermore, among the major non-California cities, only Los Angeles and New York City had no plan elements that were determined to be not sufficient. By contrast, among the 11 largest non-California cities, an average of 12 percent of plan elements were determined by the Peer Review to be not sufficient. This comparison indicates that Los Angeles was more responsive to Peer Review criteria, demonstrated from the relatively high level of initial compliance in its emergency plans.

## The Los Angeles Peer Review Response

As indicated earlier in this section, we evaluated the progress of the City's response to the *National Peer Review* recommendations in 34 of the 46 areas assessed, including all areas where the City's plans were determined to be partially sufficient, and selected areas where the City's plans were deemed sufficient, but peer reviewers nevertheless suggested areas for improvement. Using the standardized review methodology described previously, the evaluation determined whether the City had achieved Substantial Progress, Some Progress, Limited Progress or No Progress implementing the recommendations made through the *National Peer Review*.

The following table provides the result of our analysis.

## Table 11.3

## City of Los Angeles Progress of Response to
## National Peer Review Recommendations

| Level of Progress Made | Number | Percentage |
|---|---|---|
| Substantial progress | 7 | 20.6% |
| Some progress | 13 | 38.2% |
| Limited progress | 8 | 23.5% |
| No progress | 6 | 17.7% |
| **Total** | **34** | **100.0%** |

As the table shows, substantial progress or some progress has been made in nearly 60 percent of the areas reviewed (58.8%), whereas limited progress has been made in nearly one fourth (23.5%) and no progress has been made in approximately 17.7% of the recommendations for improvement, based on information obtained from staff interviews and public and internal City documents. Combined, limited or no progress therefore has been made in approximately 41.2% of the recommendations for improvement.

Some broad observations from our review include the following:

- Perhaps one of the most significant areas where limited progress was identified involved the lack of a feedback mechanism to make sure recommendations for improvements in emergency procedures that come from After Action Reports for emergency exercises or events are, in fact, implemented. Emergency Management Department staff reported that AARs are prepared and discussed at meetings of both the Emergency Management Committee and the Emergency Operations Board, but there is no formal follow-up process, such as a time certain report back as to how recommendations were implemented, or a preparation and periodic review of a matrix of recommendations derived from previous exercises or events. Our independent assessment, discussed in Section 5 of this report, suggests that without a formal mechanism and central authority with enforcement powers to ensure completion of AARs and implementation of corrective action, the City's ability to effectively identify and implement improvements is compromised.

- In some cases, work on Emergency Operations Master Plan annexes or other initiatives that would have responded to peer review recommendations was set aside in favor of higher priorities established by the City. For example, work on both the Communications Annex and the Logistics Annex was delayed by direction from the Mayor and the City Council to expeditiously update annexes related to tsunami response and to respond to periods of extremely high or low temperatures. These priorities were based on events elsewhere in the world, specifically the 2004 Sumatra tsunami or, in Los Angeles, where a severe heat emergency due to power outages occurred in 2005. These annexes were also delayed by the need to complete a Local Hazard Mitigation Plan, which City staff determined was required in order for the City to remain eligible for certain types of disaster-planning grants. As with other *National Peer Review* findings, these issues were independently validated through this audit and are discussed elsewhere in this report.

- In some cases, initiatives that respond to Peer Review recommendations are the responsibility of non-City agencies over whom the City has minimal control. For example, the Special Needs Population database is being developed by UCLA via a contract with Los Angeles County (i.e., the "SNAP" project). Funding and contract problems have delayed that project, although additional funding was recently approved in the 2007 UASI grant. A dispute has also developed between UCLA, the City and the County regarding access to the current database. Further, the City has initiated a separate project through the Department on Disability that will provide emergency preparedness strategies that can be used by persons with special needs. To date, approximately three years after the SNAP project was begun, the City still has not implemented any mechanisms for identifying or serving persons with special needs, Similarly, the need to develop methods to quickly credential out-of-State medical personnel to respond to a Los Angeles event was identified as an area for improvement in the *National Peer Review*, but City staff reports that County health staff have specifically claimed County responsibility in this area.

- A key stumbling block to implementing initiatives to respond to peer review recommendations is the perceived lack of authority by implementing City agencies over other City agencies whose participation is needed. For example, the Communications Annex and the Logistics Plan are the responsibility of the Information Technology Agency and the General Services Department, respectively. However, Emergency Management Department staff report being asked by both those departments to serve as co-chairs of subcommittees that are developing the plans, because it was felt that EMD's support from the Mayor's Office would provide more authority to get other City departments to participate. Other departments must assist in the development of a resource management inventory for the Logistics Plan by providing lists of assets in a form that can be entered into a modern database, and some departments have been unable or unwilling to do so, because of the time required, and because of a concern about losing access to departmental resources during emergency events.

During the course of this audit, some City officials indicated that technical non-compliance with planning standards identified in the *Peer Review* may have minimal impact on the City's emergency planning and disaster preparedness system. While we concur that in some instances this may be correct and that strictly technical violations of the standards may have less impact if not corrected, the *National Peer Review* document included many findings of deficiency that are important for the City to address if it is to ensure the safety and well-being of the community. Some examples are provided below:

- In several topical assessment areas, the *National Peer Review* noted that the City has not described "in specific and measurable terms" how a successful mass evacuation could be conducted with "current capabilities." This condition continues, although the City has adopted mass evacuation plans in component areas since the *National Peer Review* report was published (e.g., the Port Evacuation Plan, Brushfire Evacuation Plan, Tsunami Response Plan, etc.). Nonetheless, significant additional planning effort is required in this area.

▪ The *National Peer Review* recommended that there be increased involvement of the private sector as a supplier of resources in the event of an emergency. As discussed in Section 6 of this report, considerable additional work is required in this area to ensure that the participation of private sector organizations is well defined, and that formal agreements are established regarding the roles and responsibilities of the City and private sector partners during an emergency.

While the EMD and other departments have initiated corrective action in many areas, other *national Peer Review* findings continue to receive lower priority, and/or efforts toward implementation have slowed or stalled in many instances. Under the direction of the Emergency Operations Board, the EMD should develop a report with recommendations regarding those unimplemented peer review findings that represent high, medium and low importance, and develop a formal plan for implementation of corrective action on the highest priority recommendations. A matrix describing each of the Peer Review findings, recommendations and the status of implementation is included with this report as Attachment 11.1.

# Conclusions

Although substantial progress has been made in some areas, the City has not successfully implemented many recommendations for improvement that were identified as a result of a substantial evaluation effort made in 2006. Recommendations have not been implemented for a variety of reasons, including lack of a strategic direction from City officials and clear authorities for EMD, weaknesses in centralized planning and management, an ineffective system for collaborating with external entities at the policy level, as well as other factors.

# Recommendations

The Mayor should:

11.1    Direct the Emergency Operations Board to adopt a plan for implementing National Peer Review recommendations.

11.2    Ensure that the plan includes a report on implementation status for each identified deficiency and recommendations for the specific corrective action to be employed by the City, with estimates of costs that might impact implementation success.

# Costs and Benefits

Costs associated with implementation of the recommendations contained in the National Peer Review report vary. Some can be accomplished at little or no cost using existing City staff and other resources. Depending on the project, others may require funding that has presently not been evaluated. As recommended above, EMD should prepare a report for the Mayor and City Council on continuing deficiencies with recommendations for funding priority.

Implementation of outstanding peer review recommendations would result in various improvements to the City's emergency preparedness program. Some of these would have significant impacts, such as moving rapidly toward the implementation of a Special Needs Population database and plan for serving this vulnerable population in the event of an emergency.

# Los Angeles City Emergency Management Progress Since 2006 Federal Peer Review Report

| Self Assessment Topic | Peer Assessment | Peer Review Recommendations | Status | City Responses to Recommendations |
|---|---|---|---|---|
| **VALIDATION OF THE SELF-ASSESSMENT** | | | | |
| **Current Capability for Mass Evacuation** | | | | |
| Does the narrative describe in specific and measurable terms how a successful mass evacuation could be conducted with current capability in the State/urban area (i.e. how many people in total, including what percentage with what types of special needs, over what time period, using what evacuation and shelter options)? | Partially Sufficient | Updating Master Plan with evacuation specific annexes, including Tsunami Plan, Harbor/Port Evacuation Plan & Health Emergency Response Plan. Transportation resources & routes for specific areas. Sheltering agreements. UCLA Database of special needs, disabled, non-English populations | Substantial progress made | 1. Tsunami Plan approved, 2/08 2. Mass Care Plan-ETA 12/07-in process, Shelter & Welfare subcommittee 3. The port evacuation plan, developed by Area Maritime Security Committee, was last updated in 2003. A new update is under way, carried out by six task forces staffed by representatives from that committee. A draft plan is expected in June, to be revised following a Coast Guard-sponsored evacuation exercise in the summer. 4. Health Emergency Response Plan completed 6/30/06 5. Debris management plan completed 1/08 6. Work on the UCLA database has been delayed by funding and contract issues, and by the County's refusal to give the City a copy of the database, once developed, as opposed to providing Web-based access only. Additional UASI 2007 funding has been approved. If operational dispute can't be resolved, City to develop own database. |

# Los Angeles City Emergency Management Progress Since 2006 Federal Peer Review Report

| Self Assessment Topic | Peer Assessment | Peer Review Recommendations | Status | City Responses to Recommendations |
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## VALIDATION OF THE SELF-ASSESSMENT

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| **Catastrophic Event Planning** | | | | |
| What actions are being taken to ensure the resiliency of your social services and to ease enrollment processes in the event of a catastrophic event? | Partially Sufficient | Draft COOP and COG plans prepared for 20 major City Departments, including social services agencies. | No progress | 1. COOP/COG Plan ETA-3/09. Because the draft plan revealed gaps in the City's ability to develop alternate facility locations, and vital records back-up for certain departments, completion of the plan was delayed to address those gaps. The 3/09 deadline is to address those gaps. |

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| Self Assessment Topic | Peer Assessment | Peer Review Recommendations | Status | City Responses to Recommendations |
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| | | **VALIDATION OF THE SELF-ASSESSMENT** | | |
| **Current Capability for Mass Evacuation** | | | | |
| What actions are being taken to fully address requirements for populations with special needs, particularly persons with disabilities? | Partially Sufficient | Section 3, Public Health Emergency Response Plan- Special Needs Pop.<br>  Dept. of Disabilities Emergency Prep. Manual<br>  Emergency Alert System- Dept. of Aging<br>  Working with UCLA on special needs database<br>  Developing special needs shelters w. Red Cross | Some progress made | 1.  Pub. Health Emer. Resp. Plan defines pop., but does not address how its needs will specifically be met.<br>2.  Plan states health facility evac. is responsibility of County Emergency Medical Services Agency and Los Angeles City Fire Department, with Rec & Park providing shelters.<br>3.  Department of Disability emergency preparedness manual developed in 2001. Now under revision. Also have prepared series of PSAs for the deaf and other special needs populations. Copies of this document can be prepared in Braille, large print, audio as requested.<br>4.  Emergency Alert System available through Department of Aging.<br>5.  Work on the UCLA database has been delayed by funding and contract issues, and by the County's refusal to give the City a copy of the database, once developed, as opposed to providing Web-based access only. Additional UASI 2007 funding has been approved. If operational dispute can't be resolved, City to develop own database.<br>6. Mass care plan in process by Welfare and Shelter Subcommittee. |

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| | | **VALIDATION OF THE SELF-ASSESSMENT** | | |
| What actions are being taken to ensure prompt evacuation of patients (ambulatory and non-ambulatory) from health care facilities? | Partially Sufficient | City relies on County DHS. Facilities must exercise evacuation annually<br>No agreement for LAFD to transport patients in evacuation<br>City working on City Health Emergency Response Plan<br>City wants public education program for health care facilities | Substantial progress made | 1.  Public Health Emergency Response Plan states health facility evac. is responsibility of County Emergency Medical Services Agency and Los Angeles City Fire Department, with Rec & Park providing shelters.<br>2.  Mass Evacuation Plan-ETA-12/08. The Tsunami Plan, which included evacuation elements for that type of disaster, is considered a stepping-stone to a broader regional Mass Evacuation Plan for the City. Approximately $120,000 has been authorized for a new EMD staff person to help write that plan. A scope of work for the plan and the position has been prepared.<br>3.  A tabletop exercise, Operation Relocate, was conducted in June 2007, and included in the scenario evacuation of patients from three different hospitals due to earthquake damage.<br>4. As part of developing the Tsunami Plan, LAFD agreed to be responsible for special needs population evacuations, when Police are responsible for general public evacuations. |

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| Self Assessment Topic | Peer Assessment | Peer Review Recommendations | Status | City Responses to Recommendations |
|---|---|---|---|---|
| | | **VALIDATION OF THE SELF-ASSESSMENT** | | |
| Coordination of evacuation planning with other jurisdictions, use of transit modes, identify destinations and shelter options | Partially Sufficient | Working with Phoenix on task force for mass evacuation. Harbor Port Evacuation Plan Tsunami Plan Update City EOO Master Plan for Mass Evacuation | Some progress made | 1. Per EMD, no activity has occurred with Phoenix task force. 2. Tsunami Plan complete 2/08, including specific evacuation routes and specific procedures for staffing and equipment at shelters, and said Recreation & Park would identify specific shelter sites using a database it maintains at the Griffith Park Ranger Station. 3. Mass Evac. Plan ETA-12/08. Tsunami Plan was a first step to this plan, to be prepared by a full-time staff person, working with the Planning Subcommittee, and paid using $120,000 in UASI funds. 4. The port evacuation plan, developed by Area Maritime Security Committee, was last updated in 2003. A new update is under way, carried out by six task forces staffed by representatives from that committee. A draft plan is expected in June, to be revised following a Coast Guard-sponsored evacuation exercise in the summer. |
| **Operational Solutions** | | | | |
| Has the City identified short-term actions to correct the critical issues/constraints identified in prior sections of the Peer Review Report, including work arounds that will be employed as interim measures pending longer-term | Partially Sufficient | Pursuing updates to Department Plans. | Some progress made | 1. Short-term actions have included identification of incident specific evacuation routes in Tsunami Plan and Fire Department Brushfire Evacuation Plan, in advance of broader Mass Evacuation Plan. 2. Fire Department has agreed to accept responsibility for special needs population evacuations. 3. City has begun discussing alternatives to UCLA database of special needs populations, but has not implemented any as yet. |

# Los Angeles City Emergency Management Progress Since 2006 Federal Peer Review Report

| Self Assessment Topic | Peer Assessment | Peer Review Recommendations | Status | City Responses to Recommendations |
|---|---|---|---|---|
| **VALIDATION OF THE SELF-ASSESSMENT** | | | | |
| solutions? | | | | |
| Has the City identified long-term actions to build capability to address the issues/constraints identified in prior sections of the Peer Review Report? | Partially Sufficient | Response capacity increase is a priority City has committees addressing these issues | Substantial progress made | 1.  A formal schedule of target dates for revising and/or adding annexes to Emergency Operations Master Plan has been developed. Since Peer Review, annexes completed include Tsunami Plan, Hot & Cold Emergency Response Plan and Debris Removal Plan. A Mass Care Plan is in process. 2.  Resource Mgt. Plan ETA-1/09. Work on this plan started in 2006, and was stopped at 60 percent completion to complete Extreme Weather, Local Hazard Mitigation and Tsunami Plans, which were higher City priorities. 3.  Through November 2006, about 500 resource items had been individually entered into the WebEOC Resource Management module. Plan is to figure out how to get information into that system from department asset systems. |
| **IN-DEPTH ANALYSIS OF THE EMERGENCY PLAN AND SUPPORTING MATERIALS** | | | | |
| **Questions Common to All Functional Annexes** | | | | |

# Los Angeles City Emergency Management Progress Since 2006 Federal Peer Review Report

| Self Assessment Topic | Peer Assessment | Peer Review Recommendations | Status | City Responses to Recommendations |
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## VALIDATION OF THE SELF-ASSESSMENT

| Self Assessment Topic | Peer Assessment | Peer Review Recommendations | Status | City Responses to Recommendations |
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| Does the Annex identify personnel (including volunteers)., equipment, facilities, and resources available within a jurisdiction (including non-governmental)? Are there MOUs or stand-by contracts in place to facilitate immediate deployment? | Partially Sufficient | Continue integration of NIMS/SEMS. Complete work on WEB-EOC system. | Substantial progress made | 1. Web-EOC installed and in use. Installation pending on next Web-EOC version with improved resource management module. EMD is spearheading a Citywide Logistics Plan for emergency services. Main problem is getting resource information from department legacy systems into Web-EOC or other modern database. <br> 2. Developing Daily Status report on Web-EOC. Web-EOC information available through mobile devices. <br> 3. City hosts Alhambra, El Segundo, Los Angeles Unified School District, California State University, Long Beach and County Mental Health to use Web-EOC through connection to City computers. <br> 4. City self-certified 2006 NIMS compliance through adoption of NIMS by City Council, and revision of Master Plan for NIMS compliance. 2007 compliance plans: <br>   a. Reviewed Department emergency plans by consultant for NIMS compliance. <br>   b. Provided advanced ICS 300 & 400 training to more than 2,000 City staff using Fire Department and Homeland Security trainers,. <br>   c. Citywide Logistics Plan to include resource typing is in progress. |

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| Self Assessment Topic | Peer Assessment | Peer Review Recommendations | Status | City Responses to Recommendations |
|---|---|---|---|---|
| | | **VALIDATION OF THE SELF-ASSESSMENT** | | |
| Does the Annex compare quantified and listed resource base to projected needs for an effective emergency response and identify shortfalls? | Partially Sufficient | NIMS compliance.   Develop a system for typing of resources   Increase involvement of private sector in planning | Limited progress made | 1.  EMD is spearheading a Citywide Logistics Plan for emergency services. Main problem is getting resource information from department legacy systems into Web-EOC or other modern database.   2.  Three tabletop exercises for the private sector were held in May 2006, but focused on roles of the individual businesses as receivers of emergency services, rather than as suppliers of resources. EMD staff indicate there is little work with the private sector as a resource supplier, and information from the Business and Industry Council for Emergency Planning and Preparedness also indicates little such interchange. |

# Los Angeles City Emergency Management Progress Since 2006 Federal Peer Review Report

| Self Assessment Topic | Peer Assessment | Peer Review Recommendations | Status | City Responses to Recommendations |
|---|---|---|---|---|
| **VALIDATION OF THE SELF-ASSESSMENT** | | | | |
| Does the annex account for special needs cases within its jurisdiction, including the economically disadvantaged, those with physical or cognitive disabilities, and those with language barriers? Have different special needs populations been pre-identified by type and number, and are there systems in place to address their needs before, during and immediately after a catastrophic event? | Partially Sufficient | UCLA database project is to do this | Some progress made | 1. Work on the UCLA special needs populations database delayed by funding and contract issues, and by the County's refusal to give the City a copy of the database, once developed, as opposed to providing Web-based access only. Additional UASI 2007 funding has been approved. If operational dispute can't be resolved, City to develop own database. 2. Public Health Emergency Response Plan defines special needs populations, and Tsunami Plan specifically identifies Fire Department responsibility for evacuations of such populations during an event, a step toward broader Citywide Mass Evacuation Plan in 12/08. Hiring of staff to write that plan is in progress. 3. Community Preparedness Subcommittee has developed public service announcements for hearing impaired and other special populations. Some materials have been translated into Korean. Department of Disability materials can be reprinted in Braille, large type and audio if requested by residents. |

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| Self Assessment Topic | Peer Assessment | Peer Review Recommendations | Status | City Responses to Recommendations |
|---|---|---|---|---|
| **VALIDATION OF THE SELF-ASSESSMENT** | | | | |
| Does the Annex incorporate the private sector capabilities and resources? | Partially Sufficient | More outreach to private sector needed.<br>Need exercises to include private sector and its resource logistics capability. | Limited progress made | 1. Three tabletop exercises for the private sector were held in May 2006, but focused on roles of the individual businesses as emergency services receivers, not as resource suppliers. EMD staff indicate there is minimal work with the private sector as a resource supplier, and information from the Business and Industry Council for Emergency Planning and Preparedness confirms little such interchange.<br>2. BICEPP or other private sector groups did not participate in recent tsunami warning exercise. |
| Does the Annex incorporate security measures to protect resources, response personnel & the public. | Partially sufficient | Continue to provide training programs and conduct exercises to test force protection plans & procedures.<br>Formalize and reference all security plans in the EOO. | Some progress made | 1. An exercise is being considered for summer 2008 for a gunman shooting people at Topanga Mall. The exercise includes table-top, command post and full-scale exercise events, and would test force protection aspects of the City's emergency planning.<br>2. The Tsunami Response Plan Annex of the Emergency Operations Master Plan includes a public safety section which identifies the LAPD divisions responsible for security in a tsunami, including their duties, and potential command posts/staging area sites. The plan also identifies the General Services Police Department as assisting LAPD with security in shelter facilities. |

# Los Angeles City Emergency Management Progress Since 2006 Federal Peer Review Report

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## VALIDATION OF THE SELF-ASSESSMENT

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| **Direction and Control Annex** | | | | |
| Does the Annex describe coordination mechanisms between all the jurisdictions and agencies that may be involved? | Partially Sufficient | Develop a plan with supporting procedures to allow for integration of federal resources with the City's. | Limited progress made | 1.  EMD staff reported that the Emergency Operations Master Plan will probably be revised to reflect the National Response Plan, which groups capabilities of Federal departments and agencies into an array of Emergency Support Functions, and will then reflect the City's emergency operations capabilities as part of that framework, making it easier to integrate federal resources into the City emergency response system. Work began in November 2007, with formation of a Task Force. |
| Does the Annex address a system to provide situational awareness to the incident commander? | Partially Sufficient | Concern by City to be able to stay current on latest technology.  City and County to provide training. | Some progress made | 1.  EMD staff reports communication with incident commanders by the Emergency Operations Center  is through police and fire Department Operations Centers, not directly to field incident commanders. Staff said communication between command posts and the EOC is an issue. While WebEOC information is available to field incident commanders, it is not often used at command posts. 2.  The Los Angeles Police Department has established, with the Sheriff's Department and other emergency responder agencies, the Los Angeles Regional Common Operational Picture Program (LARCOPP), which allows information from an incident scene, including pictures, GIS information and other data, to be transmitted to responder Operations Centers and/or a centralized Emergency Operations Center via a secure Web-based platform. 3.  The City and County agreed last year to collaborate more often on training and exercises, but this has occurred only in a limited way so far. |

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## VALIDATION OF THE SELF-ASSESSMENT

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| **Communications Annex** | | | | |
| Does the Annex describe systems and procedures used to communicate between the Emergency Operations Center, emergency response units, control centers, mass care facilities, media, medical facilities and units, amateur communications networks, other jurisdictions, military installations and all State and Federal organizations, as appropriate, with primary, secondary and tertiary means? | Partially Sufficient | Complete study conducted by RCC Consultants to develop total interoperable radio system for all emergency agencies. Modernize systems and stay current with technologies.; | Substantial progress made | 1. RCC study completed in 2006 and implemented through the Los Angeles Regional Interoperability Communications System, a $600 million to $800 million project new communications system linking Los Angeles County, Los Angeles City, and other cities and agencies. System oversight is via a joint powers authority. JPA agreement is expected to go to the City Council in about a month, followed by issuing a request for proposals to develop the new system. LAFD is the point on this project. 2. Work on Communications Annex was suspended in November 2007 due to City Council and mayoral requests expedite Extreme Weather, Local Hazard Mitigation and Tsunami plans. It has since been determined that the draft plan prepared by the Information Technology Agency should be broadened, with involvement from other city departments. This will be done by an Emergency Management Committee Task Force, with a June 2008 deadline. 3. Design of a new Emergency Operations Center provided opportunity to review communication technologies. For example, the new Center includes satellite telephone access via a rooftop dish antenna. |

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|---|---|---|---|---|
| | | **VALIDATION OF THE SELF-ASSESSMENT** | | |
| **Warning Annex** | | | | |
| Does the Annex describe means to give expedited warning to custodial institutions (nursing homes, prisons, mental institutions, etc.)? | Partially Sufficient | Upgrade warning system to provide for expedited warning and notification to nursing homes, health care and board & cares. County is also reviewing this capability. | Limited progress made | 1.  Warning system not addressed in Public Health Emergency Response Plan. 2.  Development of a warning system requires a current list of facilities to be warned, which is the first phase of the UCLA special needs populations database project. Work on the database has been delayed by funding and contract issues, and by the County's refusal to give the City a copy of the database, once developed, as opposed to providing Web-based access. Additional UASI 2007 funding has been approved. If operational dispute can't be resolved, City to develop own database. 3.  A tabletop exercise, Operation Relocate, was conducted in June 2007, and included in the scenario evacuation of patients from three different hospitals due to earthquake damage. |
| Do pre-scripted, hazard specific warning messages exist for use with the initial warning? | Partially Sufficient | Enhance warning and notification procedures for prescript messages in other languages, particularly Korean & Russian. | No progress | 1.  Warning messages are provided in English and Spanish. Although a Korean Fellow has translated some EMD materials into Korean, this does not include warning messages, which also have not been translated into other key languages. |
| **Evacuation Annex** | | | | |
| Are time estimates identified for people located in different risk area zones? | Partially Sufficient | Develop scenario-based evacuation plans with appropriate time estimates. | No progress | 1.  While Tsunami Plan and Fire Department brushfire evacuation plans identify specific evacuation routes, these plans do not include time estimates for evacuation under various scenarios. |

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|---|---|---|---|---|
| **VALIDATION OF THE SELF-ASSESSMENT** | | | | |
| How well does the Annex incorporate all available modes of transportation? | Partially Sufficient | Need to formalize relationship and agreements with commercial rail services & the maritime industry to prepare for mass evacuations. | No progress | 1.  Tsunami Plan does not include use of these modes for evacuation. |
| **Mass Care Annex** | | | | |
| Does the Annex describe conditions under which mass care services will be provided and methods to activate and manage facilities? | Partially Sufficient | City should update and improve existing plans for housing and mass care.   Formalize personal property retrieval program and more fully involve the private sector. | Some progress made | 1.  Work on a revised Mass Care Plan is in process, spearheaded by the Recreation and Parks Department through the Shelter and Welfare Subcommittee. Information gathering is to be completed by early April, to be followed by development of a draft plan. 2.  Information from Fire Department, Police Department and Building and Safety Department field operations guides on property retrieval will be incorporated into Mass Care plan. According to EMD staff, liability concerns raised by City Attorney prevent a comprehensive policy from being developed. |
| Does the Annex describe procedures for daily reporting the number of people staying at facilities, status of supplies, conditions at facilities and requests for specific types of support? | Partially Sufficient | Develop specific plans for using large facilities such as the Staples Center for emergency shelters and reception centers. | Some progress made | 1. To be addressed in Mass Care Plan, which is pending. |

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| Self Assessment Topic | Peer Assessment | Peer Review Recommendations | Status | City Responses to Recommendations |
|---|---|---|---|---|
| **VALIDATION OF THE SELF-ASSESSMENT** | | | | |
| **Health and Medical Annex** | | | | |
| Does the Annex outline processes to maintain a patient tracking system? | Partially Sufficient | Health Emergency Plan has to better track self-presenters and patients transported out-of-State. Patient tracking system has to be created to better cover Urgent Care Facilities. | Limited progress made | 1. Not addressed in Public Health Emergency Response Plan. 2. In December 2006, Training Subcommittee reported that the Department of Health and Human Services had software to estimate transportation resources for evacuation, and would like to address the issues of tracking patients, and the ability of local and federal agencies to coordinate in an emergency. June 2007 tabletop on this was planned, and held, but status of patient tracking aspect is not clear. |
| Does the Annex describe procedures for licensing of out-of-state medical personnel to facilitate their rapid deployment? | Partially Sufficient | Health Resources and Services Administration committee working on identifying sharing of medical personnel. More training for programs managers on the EMAC system for requesting and managing resources. | Limited progress made | 1. City staff reports that its role is to credential volunteers for non-medical purposes, and that credentialing of medical staff is a County responsibility, and that the County has told the City it should not credential medical staff. 2. Joint UASI funding of $500,000 has been received by the City and County to provide additional training on the Emergency Management Mutual Aid System, which provides aid from other states through a federal compact. The training may be provided through a recently-formed UASI Regional Training Alliance, in which several agencies have agreed to do collaborative training. |

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## VALIDATION OF THE SELF-ASSESSMENT

| Resource Management Annex | | | | |
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| Does the Annex describe the means, organization and processes by which a jurisdiction will find, obtain, and distribute resources to satisfy generated needs? | Partially sufficient | City must fully integrate NIMS into EOO Master Plan, and continue with resource typing project. Keep up with new technologies in this area. Include the entire Urban Area into the WEB-EOC Software Project | Substantial progress made | 1. Resource Mgt. Plan ETA-1/09. Started in 2006, delayed by Extreme Weather, Local Hazard Mitigation and Tsunami plans, which were higher City priorities. EMD is spearheading a Citywide Logistics Plan for emergency services. Main problem is getting resource information from department legacy systems into Web-EOC or other modern database. 2. Through January 2008, about 500 resource items had been individually entered into the existing WebEOC Resource Management module. 3. Through a Fusion Switch system, the cities of El Segundo and Alhambra, the Los Angeles Unified School District, the Los Angeles County Department of Mental Health and California State University, Long Beach have access to the City's WebEOC system. Other cities have been offered access, and are figuring out how to provide staff to participate in installing the system. |

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### VALIDATION OF THE SELF-ASSESSMENT

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|---|---|---|---|---|
| Does the Annex address resource priorities, supplier of last resort, costs, notification, activation and employment of resources? | Partially Sufficient | Maintain training in this area and continue to include private sector.    Train personnel with the State on EMAC deployment. | Limited progress made | What training has been done on the EMAC system by the City? 1.  Three tabletop exercises for the private sector were held in May 2006, but focused on roles of the individual businesses as service receiver, rather than as suppliers of resources. EMD staff indicate there is minimal work with the private sector as a resource supplier, and information from the Business and Industry Council for Emergency Planning and Preparedness also indicates little such interchange. 2.  BICEPP or other private sector representatives did not participate in recent tsunami warning exercise. 3.  Joint UASI funding of $500,000 received by the City and County for additional training on the Statewide Emergency Management Mutual Aid System, which provides aid from other parts of California, and to the EMAC system, permitting the State to seek aid from other states through a federal compact. Training may be provided through a new UASI Regional Training Alliance. It is not yet clear what the State's participation will be. |

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|---|---|---|---|---|
| | | **VALIDATION OF THE SELF-ASSESSMENT** | | |
| **Overall Questions** | | | | |
| Is the Plan feasible? A plan is considered feasible if critical tasks can be accomplished with resources available internally or through mutual aid, immediate needs for additional resources through State and/or Federal assistance are identified, and procedures describe how to integrate and employ resources from all potential sources. | Partially sufficient | Shortfalls in mass evacuation and sheltering. Plan would be enhanced by a multi-agency mass evacuation plan containing specific procedures outlining integration and employment of resources from all the various related agencies. | Some progress made | 1. Mass Evacuation Plan-ETA-12/08. The Tsunami Plan, which included evacuation elements for that type of disaster, is considered a stepping-stone to a broader regional Mass Evacuation Plan for the City. Approximately $120,000 has been authorized for a new EMD staff person to help write that plan. A scope of work for the plan and the position has been prepared. |

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|---|---|---|---|---|
| | | **VALIDATION OF THE SELF-ASSESSMENT** | | |
| Is the Plan acceptable? A plan is considered acceptable if it can meet the requirements of a catastrophic event, if it can be implemented within costs and timeframes that senior officials and the public can support, and it is consistent with the law. | Partially Sufficient | Address mass evacuation time-lines and sheltering, especially special-needs populations in a catastrophic event. | No progress | 1.  Mass Evacuation Plan-ETA-12/08. The Tsunami Plan, which included evacuation elements, is a stepping-stone to a broader City Mass Evacuation Plan. About $120,000 has been authorized for a new EMD staff person to write it. A scope of work for the plan and the position has been prepared. 2.  Tsunami Plan and Fire Department brushfire evacuation plans identify specific evacuation routes, but do not include time estimates for evacuation under various scenarios. 3.  Mass Care Plan is in process, spearheaded by the Recreation and Parks Department through the Shelter and Welfare Subcommittee. Information gathering to be completed by early April, to be followed by a draft plan. 4.  UCLA special needs population database delayed by funding and contract issues, and by the County's refusal to give the City a copy of the database, once developed, as opposed to providing Web-based access only. Additional UASI 2007 funding has been approved. If operational dispute can't be resolved, City to develop own database. |

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## VALIDATION OF THE SELF-ASSESSMENT

| Self-Assessment or Plan Review Areas Deemed Sufficient, with Areas for Improvement Identified | | | | |
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| **Basic Plan** | | | | |
| Does the Concept of Operations describe general sequence of actions before, during and after a catastrophic incident? | Sufficient | City may change EOO plan to use Emergency Support Function (ESF) concept. City to be NIMS-compliant by 9/30/06 | Substantial progress made | 1. EMD staff reported that it was likely that the Emergency Operations Master Plan will probably be revised to reflect the National Response Plan, which groups the capabilities of Federal departments and agencies into an array of Emergency Support Functions, and then will then reflect the City's emergency operations capabilities as part of that framework, making it easier to integrate federal resources into the City emergency response system when necessary. Work began on this in November 2007, with formation of a Task Force. 2. City self-certified 2006 NIMS compliance through adoption of NIMS by City Council, and revision of Master Plan for NIMS compliance. 2007 compliance plans: a. Reviewed Department emergency plans by consultant for NIMS compliance. b. Provided advanced ICS 300 & 400 training to more than 2,000 City staff using Fire Department and Homeland Security trainers,. c. Citywide Logistics Plan to include resource typing is in progress. |

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|---|---|---|---|---|
| | | **VALIDATION OF THE SELF-ASSESSMENT** | | |
| Does the Plan outline procedures for line-of-succession, alternate location, continuity of government, continuity of operations, etc.? | Sufficient | Mayor has ordered all departments to update COOP/COG plans. These should be tested and exercised. | Some progress made | 1. COOP/COG Plan ETA-3/09. Because the draft plan revealed gaps in the City's ability to develop alternate facility locations, and vital records back-up for certain departments, completion of the plan was delayed to address those gaps. The 3/09 deadline is to address those gaps. |
| Has the Plan, including all annexes, been exercised or used in actual operations? Is there an after-action reporting/improvement planning process in place that has resulted in specific changes to the Plan in the last two years? If so, what changes have been made or are currently in progress? | Sufficient | City should continue to test and exercise the plan to make sure all AAR recommendations and corrective actions have been instituted. | Some progress made | 1. As of July 2006, a Master Calendar of Training and Exercises for emergency management and preparedness within the City is maintained on the Emergency Operations Organization website.<br>2. Although After Action Reports are prepared for all exercises and events in which the Emergency Operations Center is activated, including recommendations for corrections and improvements to the system, the process for following-up to make sure recommendations are implemented is not well defined, according to EMD staff. This lack of follow-up is also reflected in recommendations that have been repeated in a number of AAR's particularly the need for additional training of officials working in the Emergency Operations Center in the software systems used there. |

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| | | **VALIDATION OF THE SELF-ASSESSMENT** | | |
| Is the Plan scoped for increasing levels of incident intensity (below Federal declaration, Federal declaration, catastrophic)? | Sufficient | Additional training needed on the National Response Plan and federal response time-lines following a disaster declaration.  Continue work on communications interoperability. | Some progress made | 1.  EMD staff reported that it was likely that the Emergency Operations Master Plan will probably be revised to reflect the National Response Plan, which groups the capabilities of Federal departments and agencies into an array of Emergency Support Functions, and then will then reflect the City's emergency operations capabilities as part of that framework, making it easier to integrate federal resources into the City emergency response system when necessary. Work began on this in November 2007, with formation of a Task Force. |

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| **VALIDATION OF THE SELF-ASSESSMENT** | | | | |
| **Questions Common to All Functional Annexes** | | | | |
| Does the Annex incorporate secondary and tertiary response processes in case primary means are unavailable? | Sufficient | Strengthen and set timelines for COOP/COG compliance for City Departments. | No progress | 1.  COOP/COG Plan ETA-3/09. Because the draft plan revealed gaps in the City's ability to develop alternate facility locations, and vital records back-up for certain departments, completion of the plan was delayed to address those gaps. The 3/09 deadline is to address those gaps. No separate deadlines have been given to departments. |
| **Health and Medical Annex** | | | | |
| Does the Annex provide for the collection, identification and care of human remains, determining the cause of death, inventorying personal effects and locating/notifying next of kin? | Sufficient | Provide additional training and exercises on mass fatality incident management with Coroner's office, Funeral Directors Association & emergency responders. | Limited progress made | The Coroner's Office participated in the 2007 Operation Relocate exercise, which included in the scenario removal of casualties from an earthquake. |

# Los Angeles City Emergency Management Progress Since 2006 Federal Peer Review Report

| Self Assessment Topic | Peer Assessment | Peer Review Recommendations | Status | City Responses to Recommendations |
|---|---|---|---|---|
| | | | | |

## VALIDATION OF THE SELF-ASSESSMENT

| Overall Questions | | | | |
|---|---|---|---|---|
| Is the plan adequate? A plan is considered adequate when it complies with applicable guidance, the planning assumptions are valid, and the concept of operations identifies and addresses critical tasks effectively. | Sufficient | Continue to enhance planning for mass evacuation and sheltering following a catastrophic event. Continue to provide outreach for planning, training and exercising for special needs populations. | Some progress made | 1. Mass Evacuation Plan-ETA-12/08. Public Health Emergency Response Plan defines special needs populations, and Tsunami Plan identifies responsibility for evacuating them during an event. About $120,000 has been authorized for a new EMD staff person to write a broader Citywide Mass Evacuation Plan. A scope of work for the plan and position has been prepared.<br>2. Mass Care Plan is in process, spearheaded by the Recreation and Parks Department through the Shelter and Welfare Subcommittee. Information gathering to be completed by early April, followed by a draft plan.<br>3. UCLA special needs population database delayed by funding and contract issues, and by County refusal to give the City a copy of the database, as opposed to providing Web-based access. Additional UASI 2007 funding approved.<br>4. Community Preparedness Subcommittee developed public service announcements for deaf and other special populations. Some materials translated into Korean. Department of Disability materials available in Braille, large type and audio as needed. |

# Office of the Controller

## Audit of the
## City of Los Angeles' Emergency Planning and Disaster Preparedness Efforts

### <u>Ranking of Recommendations</u>

| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
|---|---|---|---|
| 1 | The City has not articulated a strategic vision or developed a strategic plan for accomplishing critical emergency preparedness goals and objectives. | U | The Mayor should:<br><br>1.1 Seek modifications to the Administrative Code to designate the Emergency Management Department as the strategic planning coordinating entity, charged with supporting the EOB and coordinating the involvement of City departments with its development and maintenance.<br><br>1.2 Seek modifications to the Administrative Code to require EOO member departments, through the EOB, to perform an annual update to the strategic plan that would be submitted to the Mayor and City Council for review and approval on a calendar year basis.<br><br>1.3 Direct the EOO, through the EOB, to initiate a strategic planning process that integrates locally defined priorities, goals, objectives and strategies with:<br><br>  a) Federal and State mandates, defined by the federal Department of Homeland Security, the State Office of Emergency Services and other departmental oversight bodies and partners;<br>  b) National Incident Management System and Standardized Emergency Management System standards and requirements; and,<br>  c) UASI, SHSGP and other homeland security and disaster preparedness grant programs.<br><br>1.4 Ensure that the strategic planning process appropriately addresses community preparedness with the locally defined priorities of City departments. |

| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
|---|---|---|---|
| | | | 1.5    Integrate the goals, objectives and strategies defined by the strategic plan into the annual City budget process, along with the UASI and SHSGP grant application processes. |
| 2 | There is no formal role for the Fire Chief on the EOB; and, the EMD does not fulfill a top leadership role on the Board, or have the institutional authority to ensure consistent coordination of and cooperation from City departments. | U | The Mayor should:<br><br>2.1    Seek modifications to the Administrative Code to:<br><br>a)   Elevate the role of the Fire Chief and the General Manager of the EMD on the Emergency Operations Board;<br><br>b)   Establish an EOB Executive Committee consisting of the Police Chief, Fire Chief and EMD General Manager, with rotating responsibilities as the EOB chair; and,<br><br>c)   Assign specific responsibilities to the EOB, under the authority of the Executive Committee, such as directing activities related to the development and ongoing maintenance of a strategic plan, evaluating staffing and resource allocation requests for emergency management services across all City departments, also providing recommendations to the Mayor regarding UASI and other major homeland security and disaster assistance grant programs, and directing the emergency planning and disaster preparedness activities of the departments.<br><br>2.2    Request the CAO to update its evaluation of the EMD reorganization plan with a goal toward stabilizing staffing.<br><br>2.3    Request the CAO to develop a profile of all dedicated emergency planning and disaster preparedness resources in the City departments, linked to the scope of responsibilities assigned to each. Use the information to assign dedicated staff to EMD and City departments in a manner that more closely aligns with priorities and responsibilities. |

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| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
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| 3 | There is no up-to-date or complete inventory of all of the City's emergency plans. In addition, emergency plans are not timely, and the content of such plans is not consistent or of high quality in all cases. | N | The Emergency Management Department should:<br><br>3.1 Maintain an up-to-date and complete master list of all completed and planned emergency plans (e.g., Departmental Plans, Master Plan Annexes, and Division Plans). At minimum, this master list should be:<br><br>a) Inclusive of detailed information such as the plan's last revision date, next revision date, and contact name and information;<br><br>b) Revised on an on-going and as-needed basis throughout the calendar year;<br><br>c) Readily available from the Emergency Management Department; and<br><br>d) Used by the City as a tool for emergency management strategic planning.<br><br>3.2 Establish and implement clear policies and procedures that ensure the systematic and on-going review by Emergency Management Department staff of all emergency plans. At minimum, these policies and procedures should include:<br><br>a) Procedures for systematically reviewing plans for timeliness, completeness, consistency with existing guidelines, and overall quality and usefulness;<br><br>b) A system that holds Emergency Management Department staff accountable for conducting and documenting such emergency plan reviews on a regular basis; and<br><br>c) A system that assigns specific Emergency Management Department staff with oversight of and responsibility for tracking and monitoring emergency plans for a group of City departments. |

| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
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| | | | 3.3    In collaboration with the Mayor and other City departments, establish and implement policies and procedures that provide clear, practical, and proactive guidelines to facilitate collaboration and communication (i.e., beyond the Emergency Operations Board structure) between Emergency Management Department staff and other City departmental staff in drafting, revising, and reviewing emergency plans on an ongoing basis. |
| | | | 3.4    Regularly revise its "Guidelines for Department Emergency Plans" to include all relevant and up-to-date standards and protocols (e.g., NIMS requirements). |
| | | | 3.5    Proactively communicate and explain the Emergency Management Department's "Guidelines for Department Emergency Plans" to City department staff to ensure consistency, clarity, and usefulness of all emergency plans. |
| | | | 3.6    Establish and implement a systematic approach for ensuring that the emergency plans are effective and useful during an emergency or disaster situation. At minimum, this process should include: <br><br> a) Establishing a requirement for City departments to provide consistent and detailed information on departmental staff's emergency training and exercise needs, requirements and plans as part of the departmental emergency plans; <br><br> b) When applicable, incorporating the corrective actions and recommendations that are included in After Action Reports into appropriate emergency plans; and <br><br> c) Conducting systematic and on-going assessments of all emergency plans for their overall quality and usefulness. |

| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
|---|---|---|---|
| | | | 3.7 Lead the effort to ensure that all City departments' emergency plans and efforts comply with relevant standards and guidelines, including those pertaining to COOP/COG and NIMS guidelines and provisions. At a minimum, EMD should ensure that:<br><br>a) The formal review of the departmental emergency plans' compliance with the standard elements of the Continuity of Operations (COOP) and Continuity of Government (COG) planning guidelines is completed and that the results are implemented;<br><br>b) Relevant City departmental emergency plans comply with appropriate COOP/COG standards; and<br><br>c) All recommendations contained in the report provided by ICF International to the City regarding NIMS compliance are implemented. |
| 4 | Emergency preparedness exercises and training are not well coordinated or planned. | N | The Emergency Management Department, in collaboration with other departments, should:<br><br>4.1 Establish and maintain a central database containing all emergency preparedness-related exercises, including all department-specific exercises, that City staff have participated in. At a minimum, this database should include the following:<br><br>a) Exercise title;<br><br>b) Exercise type (e.g., tabletop, full-scale, functional, etc.);<br><br>c) Exercise date(s);<br><br>d) Exercise location;<br><br>e) Exercise description/scenario;<br><br>f) Exercise's lead entity/organizer;<br><br>g) Exercise contact information; and<br><br>h) Information that indicates whether an after action report exists for the exercise, and if so, a link to the final after action report. |

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| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
|---|---|---|---|
| | | | 4.2   Establish and maintain a central database containing all emergency preparedness-related training, including all department-specific training and those that are non-EOF funded, that City staff have participated in. At a minimum, this database should include the following:<br><br>a)   Training title;<br>b)   Training date(s);<br>c)   Training type (e.g., NIMS-requirement, department-specific, etc.);<br>d)   Training location;<br>e)   Training description/scenario, including the training goals and objectives and how these goals and objectives relate to the City's overall exercise/training priorities;<br>f)   Total number of participants (including a breakdown of City employees vs. non-City employees);<br>g)   Training lead entity/organizer. |
| | | | 4.3   Revise the exercises and training master lists to ensure their completeness and accuracy on an on-going basis. |
| | | | 4.4   Use the exercise and training master lists as a key tool in its emergency management strategic planning. |
| | | | 4.5   Identify the gaps and deficiencies in the City's emergency exercise plans on an ongoing basis. |
| | | | 4.6   Conduct a formal assessment of the emergency exercise needs of City staff on an ongoing basis. |
| | | | 4.7   Identify the gaps and deficiencies in the City's emergency training plans on an ongoing basis. |
| | | | 4.8   Conduct a formal assessment of the emergency training needs of City staff on an ongoing basis. |
| | | | 4.9   Revise the City Master Plan's Training Annex to reflect current training requirements and standards. |

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| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
|---|---|---|---|
| | | | 4.10 Ensure that exercise and training functions and activities are not duplicated or overlapping, that specific gaps are addressed, and that activities are modified or enhanced, accordingly. |
| | | | The Mayor should: |
| | | | 4.11 As part of the strategic planning efforts, work with the Emergency Operations Board and the Emergency Management Department in drafting and implementing a multi-year exercise and training plan/program to provide a roadmap for the City in accomplishing its emergency preparedness priorities. |
| | | | 4.12 Ensure that the multi-year exercise and training plan/program is a living document that is updated and refined annually. |
| | | | 4.13 Ensure that the exercise and training plan/program includes a multi-year training and exercise schedule that represents natural progression of training and exercises that should take place. |
| 5 | After Action Reports corrective actions are not tracked or systematically followed for implementation. | N | The Emergency Operations Organization should: |
| | | | 5.1 Establish formal policies and procedures that require the full completion of an After Action Report and Improvement Plan after each exercise. At minimum, these policies and procedures should: |
| | | | a) Require the completion of AARs and improvement plans for all emergency exercises (i.e., for both discussion-based and operations-based exercises) in the City; |
| | | | b) Identify the specific parties or agencies responsible for the drafting, completion, and finalizing of the AARs; |
| | | | c) Explicitly specify when (e.g., after 30 days) an after action report and improvement plan should be completed and |

| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
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| | | | submitted to the Emergency Operations Board; and, |
| | | | d) Require that the Emergency Management Department work with other City departments to compile and maintain a comprehensive list of after action reports. |
| | | | 5.2 Ensure the quality and completeness of each AAR/IP by: |
| | | | a) Establishing a standard format to be followed when drafting After Action Reports. In doing so, The EOB should consider using the standard format suggested by the U.S. Department of Homeland Security's Exercise and Evaluation Program (HSEEP); and |
| | | | b) Making the Improvement Plan Matrix a mandatory component of each AAR. At minimum, this Improvement Plan Matrix should include specific tasks, recommendations, improvement actions, the party/agency responsible for the implementation of the recommendations, and a full implementation date. |
| | | | 5.3 Establish a formal accountability mechanism for prioritizing, tracking, monitoring, and following-up on the implementation status of all corrective actions and areas for improvement that are identified in each AAR. Such a process should include: |
| | | | a) Establishing a master database containing all recommendations, improvement actions, the party/agency responsible for the implementation, and a full implementation date; |
| | | | b) Identifying the party/agency responsible for monitoring and following-up on the implementation status of all corrective actions and areas for improvement; and, |

| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
|---|---|---|---|
| | | | d) Requiring relevant parties/agencies to provide formal reports on the implementation status of pending corrective actions and areas for improvement on an ongoing basis. |
| 6 | Comprehensive and collaborative strategies have not been developed with external public- and private-sector entities. | N | The Mayor should seek to:<br><br>6.1 Modify the Administrative Code to require that other public, business and non-profit leaders in the emergency management field be integrated into the Emergency Operations Board through a Disaster Council structure, so that information is consistently shared with all players.<br><br>6.2 Modify the Administrative Code to designate the Emergency Management Department as the lead agency for community preparedness responsibilities, to insure a continuing collaborative approach among departments and other partners.<br><br>The Emergency Management Department should:<br><br>6.3 Identify emergency preparedness public outreach and training programs and collaboratively work with City departments, County agencies, business groups and nonprofit organizations to coordinate participant groups, outreach strategies, training content and curriculum, calendars and locations of events.<br><br>6.4 As part of the strategic planning process, described in Section 1 of this report, (a) identify specifically how other public agencies, private businesses and nonprofit organizations can be systematically included in the emergency planning and preparedness in Los Angeles, and (b) address the goals and objectives for emergency preparedness and response for the special needs population, in order to identify short and long-term coordinated strategies for achieving these objectives. |

| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
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| | | | 6.5    Develop mutual public campaigns with other public agencies, nonprofit organizations and businesses to insure consistent emergency preparedness messages are disseminated which will maximize the limited resources and the effectiveness of such preparedness campaigns. |
| | | | 6.6    Work with the City Attorney and other relevant City departments (e.g., Recreation and Park Department) to develop Memorandum of Understanding (MOUs) with key external participants, such as the American Red Cross, to clarify general and specific responsibilities in emergency preparedness, training, response and recovery. |
| | | | 6.7    Develop an inventory of outside organizations and contact persons with whom the City and the Emergency Management Department maintains ongoing emergency relations. Initially review to insure that all major sectors of the private economy and non-profit organizations are included and annually contact individuals to maintain an updated, emergency list. |
| | | | 6.8    Develop guidelines and standards for City departments to include contingency plans for activating private resources in the event of a disaster or emergency, as required by the City's Emergency Operations Plan. Annually review such City department plans to ensure that their private sector contingency plans are incorporated, and consistent with the City's Emergency Operations Plan. |
| 7 | The Homeland Security grant administration processes have inefficiencies that impact program timeliness and effectiveness | N | The Mayor should, subject to legal counsel received from the City Attorney, seek to:<br><br>7.1    Amend the Administrative Code to provide the City Council with the authority to delegate authority to the Mayor's Office and, as appropriate, to departments to enter into UASI sub-recipient agreements and vendor contracts, subject to the parameters |

| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
|---|---|---|---|
| | | | defined in the grant award and other general restrictions defined in law. |
| | | | 7.2 Amend the Administrative Code to permit modifications of homeland security grants by the CAO which entail minor changes in approach or City entity and by the Mayor's Office for changes in jurisdiction, investment justification, solution area or financial years up to an appropriate amount. |
| | | | The City Council should: |
| | | | 7.3 Require the CLA and CAO to report to the Council on the Investment Justification decisions made by the Approval Authority at the beginning of the UASI grant process, and at the project selection stage prior to submission of the projects to the state OHS, and to provide a quarterly summary report of UASI project modifications, focused on changes between investment justifications, solution areas or jurisdictions. |
| | | | 7.4 Consider establishing a grant committee, or a special joint committee with representatives from Budget and Finance, Personnel and Public Safety, to expedite consideration of the UASI grant award, consistent with recommendations made by the City Controller in her December 2007 report on City grant processes. |
| | | | 7.5 Require a full report from responsible City officials on actions taken using delegated authority at six month and 12 month intervals after acceptance of the grant, to ensure consistency with the Council's intentions. |
| | | | The Mayor should: |
| | | | 7.6 Continue to begin collecting implementation plans, budgets, necessary contractual and personnel authorizations when the UASI projects are initially selected. |
| | | | 7.7 Expedite the implementation of the UASI grant by requesting contract and personnel approvals as they are completed rather than waiting for the |

| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
|---|---|---|---|
| | | | entire package to be finalized, and/or requesting approval authority to execute sub recipient agreements, vendor contracts and personnel transactions, subject to restrictions defined by the approved award and the Administrative Code. |
| | | | 7.8   Develop a summary management report of significant modifications in grant usage for periodic presentation to the City Council. |
| | | | 7.9   Utilize the list of projects originally requested through the Approval Authority but not funded as a starting point for replacement projects when originally funded projects become infeasible. Require subrecipients to identify projects unlikely to be completed earlier in the funding cycle. |
| 8 | The Emergency Management Department does not perform substantial Homeland Security grant monitoring or program evaluation functions. | N | The Mayor should: |
| | | | 8.1   Prioritize program management. Assign the responsibility to monitor and evaluate outcomes of programs funded by the UASI and SHSGP grant programs to EMD, to ensure grant activities are fully integrated with the defined emergency management goals of the City. |
| | | | 8.2   Structure and staff the grants administrative function with consideration toward the continuity and development of expertise in City financial processes that would carry on regardless of changes in mayoral administrations. |
| | | | 8.3   Develop performance standards for evaluating the efficiency of financial management of these grant funds. Efficiency outcomes should be continuously monitored, and if they are not met, consider transferring the UASI and SHSGP financial management functions to another City department with experience administering multiple streams of complex funding involving multiple stakeholders. |

| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
|---|---|---|---|
| 9 | Mechanisms have not been developed for ensuring that Homeland Security grant activities can be sustained and cost impacts are known. | N | The Mayor should:<br><br>9.1 Assign responsibility for assessing the ongoing commitments by the City that are not funded by the UASI or SHSGP grants but result from grant activities to the Emergency Management Department, in coordination with the CAO providing supporting fiscal analysis.<br><br>9.2 Assign routine analysis of general fund and proprietary fund monies necessary to sustain or complete emergency preparedness and homeland security projects to the Emergency Management Department in coordination with the CAO.<br><br>9.3 Assign the Emergency Management Department with the responsibility to assess general fund or proprietary fund amounts necessary, if the federal Department of Homeland Security requires a 25% match for the UASI grant, in coordination with the CAO.<br><br>9.4 Direct the CAO to study the feasibility of programming UASI and SHSGP funding in the City budget, with direction to avoid supplantation of existing general funds with grant funds. |
| 10 | Control procedures do not provide sufficient assurances that Emergency Operations Fund expenditures are consistent with intended purposes. | N | The Mayor should seek to:<br><br>10.1 Revise Section 8.72 of the Los Angeles Administrative Code to:<br><br>a) Provide a clearer description of the Emergency Operations Fund's purpose and intended uses; and<br><br>b) Require that a portion of the annual EOF balance is reserved as contingency to be used during a disaster or an emergency situation.<br><br>The Emergency Management Department and the Emergency Operations Organization should strengthen EOF's oversight and internal controls by: |

| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
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| | | | 10.2 Establishing and implementing policies and procedures specifically for the administration and management of the Emergency Operations Fund that would ensure sufficient fund oversight and accountability. At a minimum, these policies and procedures should:<br><br>a) Consistent with the revision to the Administrative Code (see recommendation 10.1.a), provide clear descriptions of allowable/not allowable expenditure items to be charged against the EOF;<br><br>b) Establish standardized procedures and a list of required documentation (e.g., statement of compliance with the EOF budget policy, discussion of why the item is being requested through the EOO rather than departmental budget, detailed description of the requested item, etc.) for City departments as part of the EOF funding application/request process;<br><br>c) Establish standardized procedures for reviewing EOF funding requests, including establishing clear, relevant, and up-to-date criteria as part of the EOF funding request review and approval process;<br><br>d) Include provisions to centrally, formally, and regularly maintain an up-to-date inventory of all emergency preparedness-related equipment, devices, and supplies purchased by City departments through the EOF;<br><br>e) Establish a system that would ensure that charges made against the EOF allocation are appropriate and that an audit of the EOF is conducted on a regular basis to ensure proper fund use;<br><br>f) Include provisions that an external entity (e.g., the |

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| Section Number | Summary Description of Findings | Ranking Code | Recommendations |
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| | | | Controller's Office) may conduct a regular compliance review or audit of the EOF and that the results of this review or audit are made public; and, <br><br> g) Include provisions that these policies and procedures will be revised as frequently as necessary to reflect all relevant and up-to-date guidelines. |
| 11 | Implementing recommendations from a 2006 *National Peer Review* of the City's emergency planning has been slow or stalled in some cases. | N | The Mayor should: <br><br> 11.1 Direct the Emergency Operations Board to adopt a plan for implementing National Peer Review recommendations. <br><br> 11.2 Ensure that the plan includes a report on implementation status for each identified deficiency and recommendations for the specific corrective action to be employed by the City, with estimates of costs that might impact implementation success. |

## Description of Recommendation Ranking Codes

**U - Urgent** - The recommendation pertains to a serious or materially significant audit finding or control weakness. Due to the seriousness or significance of the matter, immediate management attention and appropriate corrective action is warranted.

**N - Necessary** - The recommendation pertains to a moderately significant or potentially serious audit finding or control weakness. Reasonably prompt corrective action should be taken by management to address the matter. Recommendation should be implemented no later than six months.

**D - Desirable** - The recommendation pertains to an audit finding or control weakness of relatively minor significance or concern. The timing of any corrective action is left to management's discretion.

**N/A** - Not Applicable