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CONSUMER PRODUCT SAFETY COMMISSION
Washington, DC 20814

OFFICE OF THE INSPECTOR GENERAL

Audit Report

OCCUPANT EMERGENCY PROGRAM

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AUDIT OF OCCUPANT EMERGENCY PROGRAM

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**Office of the Inspector General
US Consumer Product Safety Commission
Washington, DC 20207**

**AUDIT OF CONSUMER PRODUCT SAFETY COMMISSION
OCCUPANT EMERGENCY PROGRAM**

EXECUTIVE SUMMARY

Background: The Federal Management Regulations specifically require that Federal agencies establish and maintain an Occupant Emergency Program (OEP). This program consists of policies and procedures designed to safeguard lives and property in federally owned or leased facilities during emergencies. The General Services Administration (GSA) requires that an OEP have two components, “. . . procedures to protect life and property in Federally occupied space . . .”, and, “. . .an Occupant Emergency Organization . . . comprised of employees designated to undertake certain responsibilities and perform the specific tasks outlined in their Occupancy Emergency Program.”

Although the GSA is ultimately responsible for the implementation of Occupant Emergency Programs across the Federal Government; the Consumer Product Safety Commission (CPSC) is responsible for implementing its own Occupant Emergency Program. The CPSC’s Directorate for Administration (EXAD) has implemented such a program.

Objective: The overall objective of the audit was to determine the adequacy of the CPSC’s Occupant Emergency Program.

Results and Conclusions: On the whole, the CPSC’s OEP does a good job of safeguarding the lives and property entrusted to the CPSC’s care. There are, however, certain areas where the CPSC’s OEP’s documentation could be improved.

The most important area for improvement is the documentation of the procedures to be followed in an emergency. For example, although observation revealed that the CPSC was currently training floor monitors in the procedures to be followed in evacuating the handicapped (and that these procedures were followed in a recent drill), these procedures are not set out in writing in the CPSC’s OEP handbook.

On a procedural note, both the Federal Property Management Regulations and the GSA Occupant Emergency Program Guide refer to the document that implements the Occupant Emergency Program as the “Occupant Emergency Plan”. The CPSC refers both to the program itself and the handbook that implements the program as the “Occupant Emergency Program.” For simplicities’ sake, this audit will refer to the program as a whole as the OEP and to the written documentation which implements the program as the OEP handbook.

Management Response: The management of EXAD either concurred with the need for the recommended changes set out in this report, or they concurred with the need for change, but recommended an alternate solution. Many of the recommended changes have already been implemented or are in the process of being implemented by EXAD. EXAD’s response has been incorporated into this report.

**Office of the Inspector General
US Consumer Product Safety Commission
Washington, DC 20207**

**AUDIT OF THE CONSUMER PRODUCT SAFETY COMMISSION
OCCUPANT EMERGENCY PROGRAM**

INTRODUCTION

Purpose: To provide an overview of the results obtained during the audit of the Consumer Product Safety Commission's (CPSC) Occupant Emergency Program (OEP).

Background: Hundreds of thousands of people work in Federally owned or leased facilities and thousands of visitors pass through these facilities each year. The tragedies that occurred on September 11, 2001 highlight the importance of having emergency procedures in place to evacuate personnel from Federally owned or leased facilities. The U.S. General Services Administration (GSA) is the agency responsible for ensuring the safety and security of Federal property.

The Federal Management Regulations (FMR) specifically require the GSA to assist Federal agencies in establishing and maintaining an Occupant Emergency Program (OEP). The FMR defines an OEP Program as "...a short-term emergency response program [that] establishes procedures for safeguarding lives and property during emergencies in particular facilities." The GSA requires that an OEP have two components, "... procedures to protect life and property in Federally occupied space . . .", and, "...an Occupant Emergency Organization . . . comprised of employees designated to undertake certain responsibilities and perform the specific tasks outlined in their Occupancy Emergency Program." In order to assist Federal Agencies in developing their own OEP, the GSA has produced an Occupant Emergency Program Guide.

Although the GSA is ultimately responsible for the implementation of Occupant Emergency Programs across the Federal Government, agencies that occupy leased facilities are responsible for implementing their own Occupant Emergency Programs. The headquarters of the CPSC is located in a leased facility. The CPSC leases office space in the Bethesda Towers from the Quadrangle Development Corporation, Inc (QDC).

The Federal Management Regulations require that each Federal facility have one "primary" Federal occupant, who is responsible for creating and operating that facility's OEP. If there is more than one Federal agency located in the same leased facility, the agency with the largest presence in the facility is considered the "primary" Federal agency and is required to include any other Federal agencies in its OEP Program.

The CPSC is considered the primary Federal occupant agency in the Bethesda Towers. The Marine Mammal Commission (MMC) is another Federal agency housed in the Bethesda Towers. Thus, in accordance with 41 CFR 101-20.003, the CPSC is considered the "primary occupant agency" and must include the MMC in its Occupant Emergency Program.

Objective: The objective of the audit was to evaluate the CPSC's Occupant Emergency Program to determine if it: complied with applicable laws and regulations, managed and used resources in an economical and efficient manner, and achieved desired results and objectives in an effective manner.

Scope and Methodology: The audit was conducted from March to June, 2003. It was conducted in accordance with Government Auditing Standards. It included tests of internal controls as considered necessary. Laws, regulations, policies, and procedures applicable to the Occupant Emergency Program were reviewed. The Office of the Inspector General (OIG) held discussions with management officials and employees from throughout the CPSC, as well as with officials from the General Services Administration (GSA), Quadrangle Development Corporation (QDC), and the Marine Mammal Commission. Every member of the CPSC's Occupant Emergency Organization was contacted to ensure that they were aware of their responsibilities and adequately trained and equipped to carry them out.

The auditor inspected the CPSC headquarters facility, laboratory facility, and sample storage facilities. Although the three Regional Center Office facilities operated by the Directorate of Field Operations in New York, Oakland, and Chicago were not visited as part of this audit, they were inspected as part of an earlier audit dealing specifically with the Directorate of Field Operations. These three Regional Center Offices are located in Federal facilities and have Occupant Emergency Programs that were developed and implemented by the GSA. The Regional Center Offices are not covered by the CPSC OEP Program and are thus outside the scope of this audit.

FINDINGS

A – The Consumer Product Safety Commission's Occupant Emergency Plan

Summary: The CPSC's Occupant Emergency Program handbook (OEP handbook) is the single largest component of the CPSC's Occupant Emergency Program (OEP). The OEP handbook was revised during the course of this audit. The revised OEP handbook covers both the CPSC headquarters in Bethesda, MD; and the Marine Mammal Commission, which is located in the same facility as the CPSC headquarters. Appendices to the OEP handbook contain information regarding the CPSC Laboratory facility in Gaithersburg, MD, and the CPSC Sample Storage Facility in Rockville, MD, but these facilities are not covered by the OEP. The CPSC is in compliance with all mandatory GSA OEP standards. With the exception of the matters noted below, the CPSC's OEP is also in compliance with all GSA recommended OEP guidelines.

Procedural Requirements of the OEP Plan: The Federal Management Regulation (FMR), Section 101-20.103-4, requires Federal agencies to develop, implement and maintain an Occupant Emergency Plan. FMR, 101-20.003(w) defines the Occupant Emergency Plan (OEP Plan) as "procedures developed to protect life and property in a specific Federally-occupied space under stipulated emergency conditions." The GSA Occupant Emergency Program Guide states that the OEP Plan "should be published as a directive entitled 'Occupant Emergency Plan for (Name of Facility)' and copies distributed to all individuals responsible for action in the

event of an emergency.” The Occupant Emergency Plan should contain a “sign-off sheet” that shows “those responsible for managing and performing tasks during an emergency,” and, “ensure that those individuals are aware of their responsibilities.” (GSA OEP Guide pg. 4)

Although there currently is a CPSC OEP handbook that complies with all of the other procedural guidelines set out above, this handbook is titled “U.S. Consumer Product Safety Commission Occupant Emergency Program” rather than “. . . Occupant Emergency Plan” and has not yet been incorporated into a CPSC Directive, as recommended by the GSA OEP Guide. (A draft directive that does incorporate the OEP Plan is currently being finalized.)

Substantive Requirements of the OEP Plan: The CPSC is in compliance with the GSA’s substantive requirements for OEP Plans. The Commission’s OEP handbook contains specific procedures to effectively evacuate all CPSC personnel and visitors during a variety of emergency situations.

Occupant Emergency Organization (OEO): As required by the GSA, the CPSC’s OEP handbook sets out the organizational structure of the Occupant Emergency Organization (OEO). It is the responsibility of the Occupant Emergency Organization to coordinate emergency response procedures. The GSA recommends that the OEO be limited in size for maximum efficiency and be composed of, “officials who run the agency on a day-to-day basis.” The OEO set out in the CPSC OEP handbook meets these requirements. Additionally, since the headquarters of the CPSC is located in a leased facility an agent of the lessor, the leased facility’s Property Manager, is also a part of the CPSC OEO.

Designated Official: The most important member of the OEO is the Designated Official, CPSC Executive Director Patricia Semple. 41 CFR 101-20.003 states that a Designated Official (DO) should be, “the highest ranking official of the primary occupant agency of a Federal facility in charge of day-to-day operations of the agency.” Ms. Semple, as the Executive Director of the CPSC, is the highest-ranking official in charge of day-to-day operations of the agency. In her capacity as the Designated Official, Ms. Semple is responsible for making decisions regarding the evacuation of the building, and the appropriate responses to various emergency situations.

Responsibilities and Types of Emergencies: The GSA OEP Guide recommends that an Occupant Emergency Plan detail the responsibilities of each type of Occupant Emergency Organization (OEO) team member when faced with a variety of specific types of emergency situations. The CPSC OEP handbook fulfills this recommendation. It covers various types of emergencies from elevator entrapments to the detonations of various types of weapons of mass destruction. The specific procedures and the corresponding responsibilities of various CPSC OEP team members for each of these emergency situations are explained in an easily understood step-by-step manner. For example, in case of a fire the OEP handbook explains what employees should do upon “discovery of fire,” “hearing fire alarm,” and what tasks each member of the OEO team should carry out.

Emergency Telephone Numbers: The GSA OEP Guide recommends that, “all personnel in the building should know whom to contact in case of an emergency. A list of telephone numbers should be made available to everyone.” To meet this goal the GSA recommends that these

“emergency” telephone numbers be listed in the agency’s telephone directory and organizational listing. The telephone numbers of the Occupant Emergency Program officials are listed in the OEP handbook. Emergency telephone numbers for outside organizations such as: local police, bomb disposal units, local hospitals, etc., are also listed in the OEP handbook. The OEP handbook is posted on the CPSC Intranet site, and thus available to all CPSC employees. Additionally, the phone numbers of the medical “first responder” volunteers (who are trained in the provision of first aid, cardiopulmonary resuscitation (CPR), and use of automated external defibrillators (AED)) are listed in each of the lounge areas in the headquarters building. However, emergency telephone numbers, including the members of the OEO, are not listed in the CPSC’s telephone directory or organizational listing as recommended by the GSA. Currently, there are no procedures in place to ensure that the OEP handbook is regularly reviewed and updated. The OEP handbook should be reviewed, and if necessary updated, semi-annually to reflect possible changes in emergency telephone numbers and the telephone numbers of OEO members. Management has indicated that the next version of the OEP handbook will include procedures to ensure that the OEP handbook is reviewed and updated semiannually in conjunction with the semiannual fire drill.

Building/Occupant Information: This is an area where the CPSC’s OEP handbook does not comply with GSA guidance. The GSA OEP Guide states that the Occupant Emergency Plan should, “contain specific information about the buildings construction and its occupants in narrative form or on a Building Information Sheet and Occupant Information Sheet. Floor plans should be included, with evacuation routes clearly marked.” The CPSC OEP handbook does not contain specific information about the building's construction and its occupants. Floor plans, with or without evacuation routes, are not currently included in the OEP handbook. Management has indicated that this will be corrected.

Communications, Command, and Control: The GSA OEP Guide recommends that the OEP Plan establish both “primary and alternate means of communication that will be used to: (1) activate the organization, (2) inform building occupants of the nature of an emergency and what action to take, and (3) coordinate activities during the emergency.” The CPSC OEP handbook includes procedures to activate the OEO, inform building occupants of the nature of an emergency and what action to take, and coordinate activities during the emergency. OEO members communicate with each other and the outside world through landlines and cellular telephones. The “walkie-talkie” function contained in the cellular phones used by the senior team members provides an alternate means of communication between OEO members. The facility’s intercom system is the primary means of communicating with the building's occupants. However, the CPSC OEP handbook does not contain any provision for “alternate” means of communication with the occupants of the building. If there was a malfunction in the intercom system, or the building lost power, there would be no way to communicate with the building’s occupants and inform them of the nature of the emergency.

The GSA OEP Guide also recommends the creation of a command center. Specifically, the GSA guidance states that, “Emergency operations are directed from a command center. The command center should be centrally located and easily accessible for effective communication and control. The command center should have good communications capability, including at least two telephones and, if possible, portable radios and pagers.” The OEP handbook contains

provisions regarding the creation of a command center, but does not detail the communications capability that the command center will be provided. The OEP handbook also fails to mention the use of the “walkie-talkie” function on team members’ cellular telephones (the method of communication that team members were observed using during a recent evacuation exercise). The CPSC’s OEP handbook sets out three potential locations for the command center (Executive Director’s Office, the Building Manager’s Office, or the Bethesda-Chevy Chase High School, Vice Principal’s office), but provides no guidance about which of the three should be used for any given situation. The OEP handbook should include the factors used in determining where the command center will be located, perhaps in a checklist format to facilitate decision making during an emergency situation.

Procedures for the Evacuation of the Handicapped: The GSA’s OEP Guide clearly contemplates the creation of special procedures to facilitate the evacuation of the handicapped. Specifically, the GSA OEP Guide states that it is important to know, “which elevators may be used for evacuation of handicapped persons. Assist handicapped persons from their workplaces to the elevator, down and out of the building. If elevator cannot be used, assist person to an area adjacent to the nearest safe stairway and get or await help.”

Other than the phrase, “In all emergencies be prepared to help the handicapped.” There are no provisions or special procedures for the evacuation of the handicapped in the current CPSC OEP handbook. There are “employee assistance monitors” that have been briefed of their responsibility to assist designated employees (one hearing impaired and two blind CPSC employees). However, although the OEP handbook does state that special assistance monitors should, “assure the safe evacuation of employees in need of assistance,” there are no written instructions regarding how they are suppose to accomplish this or how they are to identify those who need their help. The OEP handbook does not specify how special needs employees who can not use the stairs will be evacuated. The OEP handbook also contains no provision for providing assistance to handicapped individuals who come to the CPSC as visitors.

Although GSA guidance refers to the use of certain elevators that will remain in operation during the evacuation procedures for use in evacuating the handicapped, that is not possible in the CPSC headquarters. In the Bethesda Towers, where the CPSC headquarters is located, the elevators automatically shut down once the fire alarm is activated, and do not resume operations until after the Fire Department arrives and uses their manual override keys. Written procedures should be developed stating: what options are available to evacuate the handicapped (wait for Fire Department to reactivate elevators, manually carry handicapped down stairs, etc); what factors will be considered in determining how the handicapped will be evacuated (whether a fire has started on one or both towers, whether the fire is above or below floors with handicapped individuals waiting for evacuation, etc); and who will make these crucial decisions (Designated Official, Floor Monitor, etc). Based on observations made during the recent fire drill, it appears that these procedures exist, but have not been included in the CPSC OEP handbook.

The Marine Mammal Commission: The CPSC is the primary Federal Occupant Agency in the Bethesda Towers. The MMC is a Federal agency also located in the Bethesda Towers. As detailed in the “Background” section above, by regulation the MMC must be, and has been, included in the CPSC OEP.

The MMC falls under the CPSC Designated Official’s authority in the event of an emergency situation. Two MMC employees have been trained by the CPSC staff and facilitate communications between the two agencies. They will participate as members of the CPSC’s Occupant Emergency Organization in the event of an emergency.

B – Facilities

Summary: Generally, the facilities at all locations (CPSC headquarters in the Bethesda Towers, CPSC Laboratory facilities in Gaithersburg, CPSC Sample Storage Facility in Rockville, and the Marine Mammal Commission in the Bethesda Towers) were found to be safe and adequately equipped with emergency evacuation equipment and systems. All these facilities were inspected by the OIG.

CPSC headquarters, Bethesda, MD: The CPSC’s headquarters is located in a multistory twin tower facility. The CPSC’s offices take up all of the 5th, 6th, and 7th floors of both towers and part of the 4th Floor of one of the towers. Approximately 350 employees work in the CPSC’s headquarters. There is a police station located within one block of the headquarters. Generally, the Bethesda Towers complex has adequate occupant emergency evacuation equipment and systems. Every stairwell in the Bethesda Towers has fire alarms, fire extinguishers, flasher or strobe lights (visual alarm systems that generate rapid light flashes to get the attention of employees, especially the hearing impaired), and emergency phone jacks for use by Fire Department personnel in the event of an emergency. “EXIT” signs are adequately placed at every stairwell and where elevators are located. All elevator areas have smoke detectors, strobe lights, and additional fire department emergency phone jacks. The entire facility is equipped with a sprinkler system. All office areas are equipped with strobe lights and every major office area has properly marked “EXIT” signs. There is an emergency public address system located in the main corridors throughout the facility for emergency announcements and warnings. Some inner office areas have additional fire alarms and smoke detectors. Each floor of each tower has a lounge area equipped with a fire extinguisher and an automated external defibrillator (a medical device used to treat people suffering from cardiac ailments). In a few office areas, such as those on the 6th floor, it would be beneficial to install additional “EXIT” signs.

The traditional smoke detectors are augmented by the buildings’ ventilation system. The ventilation system has a built in smoke detection system that will activate if smoke is drawn into the ventilation system.

The sprinkler system is heat activated and can be triggered even when there is inadequate smoke to activate the smoke detection system.

The activation of any emergency system, fire alarm, smoke detection, or sprinkler system will automatically shut down the elevators and activate the fire alarm systems. None of these systems, however, connects directly with the local fire department. The fire department needs to be called directly. After being contacted, the estimated response time for the Fire Department is three minutes. The elevators are automatically shut down when the fire alarm is activated. Once the elevators are “shut down”, only Fire Department personnel can put them back into motion, by using their “firemen’s bypass” key.

Sample Storage Facility: The Sample Storage Facility, at Coakley Circle in Rockville, has two employees. There are several exits in the front and rear of the building. All exits are properly marked. There are fire alarms and extinguishers at every exit. The facility is only one story high, so there are no elevators or stairwells. The facility is equipped with a sprinkler system. The two individuals that work there are very familiar with the facility, i.e. they know where the exits, fire alarms, and extinguishers are, etc..

Household chemicals are stored at the Sample Storage Facility. However, as required by regulation, they are stored in fireproof yellow containers and pose no undue safety risk. Due to space limitations, some samples are stacked too high along the aisles, which could pose a potential problem for the effectiveness of the sprinkler system and obstruct visibility of exit signs. A new sample storage facility, with more storage space, is currently under construction and will be completed in November of 2003. This should alleviate the problems related to stacking samples too high.

Laboratory Facility: The CPSC’s Laboratory facility, with 39 employees, is located in Gaithersburg, MD. All eight buildings in the facility have smoke detection systems and are equipped with sprinkler systems, which are electronically connected to the alarm system. Fire alarms, extinguishers, and sprinkler valves are located at the exit doors of every laboratory building. There are first aid stations, with fire blankets in the various buildings. There are two AEDs (defibrillators) located in the lab buildings – one in Bldg. H and one in Bldg. C.

Marine Mammal Commission: Twelve MMC employees occupy the ninth floor of the South Bethesda Tower. The MMC office space is near the elevator and stairwell on the ninth floor. The MMC’s offices have appropriately posted “EXIT” signs, a sprinkler system, fire alarms, and strobe lights similar to those described above in the section on the CPSC headquarters. Two MMC employees are designated to assist in the evacuation of their office space, and as mentioned above, the MMC has been incorporated into the CPSC OEP.

C - Emergency Equipment

The testing requirements for emergency equipment are detailed in 29 CFR 1910.159, which states that, “The employer shall properly maintain an automated sprinkler system....The employer shall assure that a main drain flow test is performed on each system annually. The inspector’s test valve shall be opened at least every two years to assure that the sprinkler system operates properly.....The employer shall assure that only approved sprinklers are used on

systems . . . The sprinkler system should have an audible signal on the premises upon water flow through the system.” QDC, the property managers, conduct an annual Emergency Equipment systems test that meets these requirements.

D – Emergency Procedures, Implementation, and Training

Summary: Emergency evacuation procedures were observed on April 8, 2003 during a fire evacuation drill. During the course of the drill, it was observed that members of the OEO performed their duties in an orderly and effective manner. Based on their performance during the drill, members of the CPSC Occupant Emergency Organization have received adequate training regarding their duties and responsibilities during an emergency evacuation. The American Heart Association has provided adequate training in administering CPR and the use of automated defibrillator technology to the appropriate CPSC employees. Emergency drills are scheduled to be conducted semiannually.

Emergency Procedures: The CPSC OEP handbook outlines the procedures to be followed for a variety of emergency situations. Internal communications during an emergency situation will be maintained through the use of the “walkie-talkie” function on OEO team members’ cellular phones. The CPSC OEP handbook is available to all CPSC employees. It is published on the CPSCNET (a local intranet). Its location and the importance of being familiar with it were stressed to all CPSC employees in an advisory that was e-mailed to all employees.

Training: Training is a key component of the CPSC’s Occupant Emergency Program (OEP). The Designated Official is required to, “. . . supervise the development of the OEP and the staffing and training of the Occupant Emergency Organization (OEO).” (41 CFR 101-20.103-4) Training was provided to all OEO team members on April 1, 2003. Along with the training, a hardcopy of the OEP handbook was distributed to all Occupant Emergency Organization members and volunteers. Safety vests, flashlights, and whistles were distributed in accordance with GSA guidelines, which state that “organizational personnel should be provided with visual identifiers such as colored safety hats and or armbands.”

Evacuation Drill: On April 8, 2003, the CPSC held a fire (evacuation) drill utilizing the current OEP handbook. This was not only the first fire drill to use the new plan, but was the first fire drill to be held in over a year. The drill, with very few exceptions, went smoothly and in accordance with the CPSC OEP Plan. Stairwell monitors (with one exception who was late getting to his post) were in place in a timely manner. They directed occupants down the stairwells in a calm and orderly fashion. All OEO personnel were adequately identified with orange vests and properly equipped with flashlights and whistles. Senior officials were equipped with cellular phones. QDC provided extra safety monitors. These individuals were posted at the outside exits of the facility.

Communications, Command, and Control: The fire alarm system worked appropriately and provided adequate warning to the occupants of the headquarters facility. The fire alarm system activated the public address system, resulting in an announcement being made to all employees that “an emergency has been reported in the building,” and announcing the need to evacuate the facility. The audio and visual (strobe light) alarm systems worked properly.

The Designated Official and the other members of the OEO quickly moved into position and began supervising and directing the evacuation of the facility. CPSC and QDC emergency personnel quickly moved into place and began performing their assigned duties.

The Designated Official and other members of the command center team (the leadership contingent of the OEO) were visible and located at the designated command center team (CCT) location outside the Bethesda Towers. From this location, they were both able to maintain line of sight with the evacuation operation yet were still far enough removed from the building that they did not impede access to or from the building. CCT officials were equipped with cellular phones and communications between both OEO members and outside agencies appeared to go smoothly. Evacuating occupants were properly directed by OEO members to move away from the facilities towards the locations cited in the CPSC OEP handbook.

Evacuation of Handicapped Personnel: During the evacuation drill, handicapped personnel were gathered in a central location (in the North Tower on the 5th floor) where they waited to be escorted out of the facility by the special assistance monitors. Although GSA guidelines recommend that at least one elevator continue to operate during an emergency evacuation, as previously described (see “Facilities” above) this is not possible at the CPSC headquarters.

GSA Evaluation of CPSC OEP Program: The GSA has established an OEP Guidelines Checklist of general questions that address the effectiveness of a typical Occupant Emergency Program. The checklist consists of 38 questions that address all of the major areas that a successful OEP should address. Based on the GSA questionnaire, GSA would evaluate the CPSC Occupant Emergency Program as strong and as being overwhelmingly in compliance with GSA standards.

RECOMMENDATIONS

The OIG recommends that the CPSC Chairman direct the CPSC Executive Director to:

Ensure that the Directorate for Administration takes steps to:

1. Cause the following changes to be made in the CPSC Occupant Emergency Program:

a. The current “stand alone” Consumer Product Safety Commission Occupant Emergency Program handbook should be incorporated into an existing CPSC Order. A draft copy of such an order, CPSC Order 880.1, which includes the CPSC OEP handbook as an appendix, has been drafted, but has not yet been adopted.

b. Add specific information about the CPSC headquarters facility’s construction and its occupants in narrative form or on a Building Information Sheet and Occupant Information Sheet, as recommended by the GSA. Floor plans should be included, with evacuation routes clearly marked, as recommended in the GSA Occupant Emergency Guide at page 5. Management has concurred and indicated that this will be accomplished.

c. Add the phone numbers for each of the alternate command centers to the OEP handbook. Currently the addresses of the alternate command centers are given, but not the phone numbers. Management has concurred and indicated that this will be accomplished.

d. Add provisions to the OEP handbook stating explicitly how the evacuation of handicapped individuals is to be accomplished. Based on the results of the recent fire evacuation drill, these procedures exist, but are not documented in the current edition of the OEP handbook.

e. Modify the CPSC OEP handbook to include an alternate means of communicating with building occupants in the event that the buildings intercom system is disabled. This method could be the designation of employees to act as messengers. Management has indicated that alternate communication procedures are being developed and will be documented in the next version of the CPSC OEP handbook.

f. Create procedures to ensure that the OEP handbook is reviewed, and if necessary updated, semi-annually. Management has indicated that procedures are being developed to ensure that the OEP handbook is reviewed and updated semiannually in conjunction with the semiannual fire drill.

g. The Occupant Emergency Organization officials should be listed by job title or position in the Commission first, then by name. This automatically allows for continuity since someone normally fills positions when the incumbent is absent. The acting official assumes the incumbent's role in the emergency organization as well. This methodology is recommended on page six of the GSA's "Occupant Emergency Program Guide." Management has concurred and indicated that this will be accomplished.

2. Establish written procedures to maintain a list of all employees and visitors who would need special assistance to evacuate the facility. Procedures should be developed to allow this list to be transmitted to members of the OEO in a timely manner to allow for its use during an emergency. Management has indicated that these procedures have now been developed, are in use, and will be incorporated into the next version of the OEP handbook.

3. Inquire into the feasibility of increasing the CPSC's capability to evacuate handicapped individuals. Document in the OEP handbook the method ultimately selected. The procedures currently being used are not documented in the current edition of the OEP handbook.

4. Add the list of emergency telephone numbers currently posted on page 1 of the OEP Plan, the telephone numbers of the OEO members, and the telephone numbers for the alternate command posts to the CPSC telephone directory and organizational listing; as recommended by the GSA's Occupant Emergency Program Guide at page 5.

5. Conduct in-place or "table top" exercises to practice for emergencies other than the evacuation of the building due to fire. For example, exercises involving outside-the-building biological or chemical attacks or the discovery of an explosive device within the building. Although procedures for this type of emergency are covered in the OEP handbook, a drill or

exercise requiring the senior leadership of the OEO to work through a hypothetical scenario would increase the likelihood of the CPSC reacting quickly and effectively to a real world emergency situation.

Memorandum for Record, Management's Response

Management interviews were conducted throughout the month of July. Management representatives elected to not file a formal written response to the draft audit. Instead, two annotated copies of the draft audit report (one complete, one only containing pages with comments) were provided. The annotations indicate the comments raised during the discussions. These documents have been included in the audit working papers.

Management, after discussions, concurred with all of the proposed findings and recommendations set out in the final audit report. Because Management concurred with all of the findings and recommendations of the final audit report, Management elected not to file a formal written Management Response.



Christopher W. Dentel
Acting Inspector General
Consumer Product Safety Commission

AUDIT OF OCCUPANT EMERGENCY PROGRAM

CONTRIBUTING STAFF

Christopher W. Dentel, Acting Inspector General

Frank Giordano, Auditor

APPENDIX

Report Distribution

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