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HOMELAND DEFENSE

Preliminary Observations on Defense Chemical, Biological, Radiological, Nuclear, and High-Yield Explosives Consequence Management Plans and Preparedness

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Highlights of [GAO-09-927T](#), testimony before the Subcommittee on Terrorism and Unconventional Threats and Capabilities, Committee on Armed Services, House of Representatives

Why GAO Did This Study

DOD plays a support role in managing Chemical, Biological, Radiological, Nuclear, and High-Yield Explosives (CBRNE) incidents, including providing capabilities needed to save lives, alleviate hardship or suffering, and minimize property damage. This testimony addresses GAO's preliminary observations on DOD's role in CBRNE consequence management efforts and addresses the extent to which (1) DOD's plans and capabilities are integrated with other federal government plans, (2) DOD has planned for and structured its force to provide CBRNE consequence management assistance, (3) DOD's CBRNE Consequence Management Response Forces (CCMRF) are prepared to perform their mission; and (4) DOD has funding plans for the CCMRF that are linked to requirements for specialized CBRNE capabilities.

GAO reviewed DOD's plans for CBRNE consequence management and documents from the Department of Homeland Security (DHS) and the Federal Emergency Management Agency. GAO also met with officials from the Undersecretary of Defense for Homeland Defense, U.S. Northern Command, U.S. Army Forces Command, U.S. Army North, the National Guard Bureau, and some CCMRF units.

What GAO Recommends

GAO has ongoing work on this issue and will report its complete evaluation along with any recommendations at a later date.

View [GAO-09-927T](#) or [key components](#). For more information, contact Davi D'Agostino at (202) 512-5431 or dagostinod@gao.gov.

HOMELAND DEFENSE

Preliminary Observations on Defense Chemical, Biological, Radiological, Nuclear, and High-Yield Explosives Consequence Management Plans and Preparedness

What GAO Found

DOD has its own CBRNE consequence management plans but has not integrated them with other federal government plans because all elements of the Integrated Planning System mandated by Presidential directive in December 2007 have not been completed. The system is to develop and link planning documents at the federal, state, and local levels. While the system's framework is established, the CBRNE concept and strategic plans that provide further guidance are incomplete. DOD has had operational plans in place and revises these plans regularly. However, until the Integrated Planning System and its associated plans are complete, DOD's plans and those of other federal and state entities will not be integrated, and it will remain unclear whether DOD's CCMRF will address potential gaps in capabilities.

With a goal to respond to multiple, near-simultaneous, catastrophic CBRNE incidents, DOD has plans to provide the needed capabilities, but its planned response times may not meet incident requirements, it may lack sufficient capacity in some capabilities, and it faces challenges to its strategy for sourcing all three CCMRFs with available units. Without assigned units and plans that integrate the active and reserve portions of the CCMRF, and agreements between DOD and the states on the availability of National Guard units and the duty status in which they would respond to an incident requiring federal forces, DOD's ability to train and deploy forces in a timely manner to assist civil authorities to respond to multiple CBRNE incidents is at risk.

DOD has taken a number of actions in the past year to improve the readiness of units assigned to the CCMRF, increasing both individual and collective training focused on the mission and identifying the mission as high priority. However, the CCMRF has not conducted realistic full force field training to confirm units' readiness to assume the mission or to deploy rapidly. Competing demands of overseas missions may distract from a unit's focus on the domestic mission, and some CCMRF units rotate more frequently than stated goals. These training and force rotation problems have prevented DOD from providing the kind of stability to the force that would allow units to build cohesiveness.

DOD is making progress in identifying and providing funding and equipment to meet CCMRF mission requirements; however, its efforts to identify total program requirements have not been completed, and funding responsibilities have been assigned across the department and are not subject to central oversight. When the CCMRF mission priority increased in the spring of 2008, more funding was provided. However, units did not have dedicated funding and thus purchased equipment with existing funding which is also used for other missions. DOD lacks visibility over the mission's total funding requirements. Without an overarching approach to developing requirements and providing funding and a centralized focal point to ensure that all requirements have been identified and funded, DOD's ability to ensure that its forces are prepared to carry out this high priority mission remains challenged.

Mr. Chairman and Members of the Subcommittee,

I am pleased to be here today to discuss preliminary results of our work on the Department of Defense's efforts to provide consequence management support to civilian authorities in the event of a catastrophic chemical, biological, radiological, nuclear and high-yield explosives (CBRNE) incident. The 2007 National Strategy for Homeland Security highlighted the continuing threat posed to the United States by the potential use of weapons of mass destruction by terrorist organizations.¹ In addition to efforts focused on preventing such attacks, the strategy highlights the need for a comprehensive capability to mitigate the consequences of an attack involving weapons of mass destruction. Such a capability is also a key pillar of the National Strategy to Combat Weapons of Mass Destruction.² The Department of Defense (DOD) characterizes weapons of mass destruction in terms of CBRNE materials. Incidents involving CBRNE could range in magnitude, from such things as accidents like chemical spills that likely could be addressed by local responders to catastrophic incidents such as terrorist attacks involving nuclear material that could result in extraordinary levels of casualties and property damage.

A catastrophic CBRNE-related incident occurring within the United States would require a unified, national response, including action by DOD. The Department of Homeland Security (DHS) is responsible for coordinating federal disaster response planning, with the Federal Emergency Management Agency (FEMA) serving as the primary federal agency under DHS for coordinating federal assistance in response to an incident. DOD would act in support of the primary federal agency. In addition to establishing CBRNE response units in the National Guard, including the Civil Support Teams and CBRNE Enhanced Response Force Packages, DOD is establishing CBRNE Consequence Management Response Forces (CCMRF). The CCMRF is intended to be roughly a brigade-sized force (approximately 4,500 troops) that provides the federal military assistance when a CBRNE incident exceeds local and state capabilities.

¹ Homeland Security Council, *National Strategy for Homeland Security* (Washington, D.C.: Oct. 2007), pp. 15-31.

² White House, *National Strategy to Combat Weapons of Mass Destruction* (Washington, D.C.: Dec. 2002).

In May 2006, we reported that the National Guard Civil Support Teams were generally organized and prepared for their mission, and we highlighted management challenges that needed to be addressed.³ In response to the request of this subcommittee and other Senate requesters that we assess DOD's federal role in CBRNE consequence management efforts, we initiated a review focusing on federal military planning and preparedness efforts and the CCMRF. This testimony is based on preliminary findings from this work and addresses the extent to which (1) DOD's plans and capabilities are integrated with other federal government plans to address capability requirements, (2) DOD has planned for and structured its force to provide CBRNE consequence management assistance, (3) DOD's CCMRF are prepared to perform their mission; and (4) DOD has funding plans for the CCMRF that are linked to requirements for specialized CBRNE capabilities.

To determine the extent to which DOD has planned for CBRNE consequence management operations and integrated plans with other federal government plans, we reviewed and compared current DOD operational and tactical level plans for civil support and CBRNE consequence management with existing FEMA and DHS planning efforts. We also met with officials of the Department of Homeland Security, the Office of the Undersecretary of Defense for Homeland Defense, and U.S. Northern Command. We reviewed prior GAO reports and worked with other GAO staff currently examining the overall domestic homeland security planning integration process. To determine how prepared the CCMRF is to perform the mission we compared existing DOD policy and practices on readiness with the current process used to prepare CCMRF units and report mission readiness. We also met with U.S. Joint Forces Command and U.S. Army Forces command—which are responsible for providing ready forces to the combatant commands—to discuss the manpower sourcing process followed for the CCMRF. We obtained readiness reports for CCMRF units from U.S. Northern Command and from judgmentally selected units that were part of task force operations—which contains most of the specialized capabilities. To determine CCMRF funding planning and the linkage of funding to mission requirements, we met with Army and U.S. Northern Command officials to obtain guidance on the topic and to discuss mission requirements, funding needs, and

³ GAO, Homeland Defense: *National Guard Bureau Needs to Clarify Civil Support Teams' Mission and Address Management Challenges*, [GAO-06-498](#) (Washington, D.C.: May 31, 2006).

sources. We compared funding sources to known CBRNE consequence management requirements and highlighted areas where funding was not identified for key activities or areas relevant to unit preparedness. We also met with the National Guard Bureau and some key units that were assigned to or soon to be assigned to the CCMRF to discuss their current capabilities, identified shortfalls, and their approach to mitigating any identified shortfalls. These units were selected because they belonged to the task force that would provide most of the specialized CBRNE capabilities that reside in the CCMRF.

We conducted this performance audit from February 2008 through July 2009 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We plan to report on our complete findings and any recommendations at a future date.

Background

DOD plays a support role in CBRNE consequence management, including providing those capabilities needed to save lives, alleviate hardship or suffering, and minimize property damage caused by the incident. DOD generally provides defense support of civil authorities only when (1) state, local, and other federal resources are overwhelmed or unique military capabilities are required; (2) assistance is requested by the primary federal agency; or (3) NORTHCOM is directed to do so by the President or the Secretary of Defense.⁴ DOD has designated U.S. Northern Command (NORTHCOM)⁵ to lead the federal military⁶ portion of such a support operation in direct support of another federal agency—most often the Federal Emergency Management Agency (FEMA). DOD would be the lead federal agency for CBRNE consequence management or any other civil

⁴ Department of Homeland Security, *National Response Framework* (Washington, D.C.: Jan. 2008), and Joint Chiefs of Staff, Joint Pub. 3-28, *Civil Support* (Washington, D.C.: Sept. 14, 2007)

⁵ United States Northern Command, established in 2002, has the dual mission of homeland defense and support of civil authorities.

⁶ This does not include U.S. Coast Guard forces, which is under DHS, or the National Guard, which, unless federalized by the President, would remain under the authority of the respective state and territory governors.

support mission only if so designated by the President.⁷ To be effective, DOD's efforts must be coordinated with a wide range of federal departments and agencies—including FEMA and the Departments of Health and Human Services and Justice—in order to support 50 states, the District of Columbia, six territories, and hundreds of city and county governments.

The National Response Framework establishes the principles that guide all response partners in preparing for and providing a unified national response to disasters.⁸ Under the Framework, disaster response is tiered; local government and agencies typically respond immediately after an incident. When additional resources are required, states may provide assistance with their own resources or may request assistance from other states through interstate mutual agreements or the Emergency Management Assistance Compact.⁹ Localities and states usually respond within the first several hours of a major incident. The federal government provides assistance to states if they require additional capabilities and request assistance. In the event of a catastrophic incident, such as one involving CBRNE, the framework also calls for federal response partners to anticipate the need for their capabilities before their assistance is requested. The framework lists 15 emergency support functions and designates federal lead agencies in areas such as search and rescue, public health and medical services, and transportation. DOD is a supporting agency for all 15 emergency support functions but is the primary agency only for search and rescue and public works and engineering.¹⁰ Additional

⁷ Under DOD's immediate response provision, local commanders are authorized to take the necessary actions to respond to local civil authorities without higher headquarter approval when a civil emergency may require immediate action to save lives, prevent human suffering or mitigate property damage.

⁸ Department of Homeland Security, *National Response Framework* (Washington, D.C.: Jan. 2008). The *National Response Framework*—previously known as the *National Response Plan*—is the plan that guides how federal, state, local, and tribal governments, along with nongovernmental and private sector entities, will collectively respond to and recover from all hazards, including catastrophic disasters, such as Hurricane Katrina.

⁹ Emergency Management Assistance Compact is a mutual aid agreement among member states and is administered by the National Emergency Management Association. States affected by disasters have increasingly relied on the compact as a means to access resources from other states, including emergency managers, National Guard assets, and first responders. GAO, *Emergency Management Assistance Compact: Enhancing EMAC's Collaborative and Administrative Capacity Should Improve National Disaster Response*, [GAO-07-854](#) (Washington, D.C.: June 29, 2007).

¹⁰ The U.S. Army Corps of Engineers is the DOD agent responsible for public works and engineering.

tools to guide response efforts are provided by The National Preparedness Guidelines, including National Planning Scenarios, Target Capability and Universal Target Lists, and national priorities.

DOD has created significant capabilities that could be used to augment a federal CBRNE response. It also contributes to the organization, training, and equipping of several other state military units focused on consequence management. These include the 22-person National Guard Weapons of Mass Destruction Civil Support Teams that are located in each state and territory); the larger National Guard CBRNE Enhanced Response Force Packages of about 200 soldiers each that are located in 17 states for more expansive response; and the DOD's CBRNE Consequence Management Response Forces (CCMRF).

The Civil Support Teams and CBRNE Emergency Response Force Packages are intended to be part of the state response to an incident and therefore remain under the control of the respective governors, unless they are mobilized into federal service. The CCMRF is intended to be a roughly brigade-sized force (approximately 4,500 troops) that provides the federal military assistance when a CBRNE incident exceeds local and state capabilities—including the Civil Support Teams and CBRNE Enhanced Response Force Packages. The CCMRFs are not whole units by themselves. They are a collection of geographically separated DOD capabilities and units across the military services and consist of such existing specialized capabilities as the U.S. Marine Corps' Chemical Biological Incident Response Force as well as general capabilities, such as transportation units. Although the CCMRF is intended to be about 4,500 personnel in size, the size of the force that would deploy in support of an actual incident could be modified based on the size of the incident. DOD ultimately plans to have three fully functional CCMRFs. DOD would, if necessary, draw on additional general military forces over and above the CCMRF to provide assistance in the event of one or more major CBRNE incidents.

DOD CBRNE Consequence Management Plans and Integration with Other Federal Plans

DOD has operational plans for CBRNE consequence management. However, DOD has not integrated its plans with other federal government plans, because the concept and strategic plans associated with the Integrated Planning System mandated by Presidential directive in December 2007 have not been completed.

DOD Has Developed Plans for CBRNE Consequence Management

Unlike most federal agencies, DOD has had CBRNE consequence management operational plans for over 10 years. DOD, NORTHCOM, and its components have prepared individual plans that address CBRNE consequence management following DOD's well-established joint operation planning process.¹¹ This process establishes objectives, assesses threats, identifies capabilities needed to achieve the objectives in a given environment, and ensures that capabilities (and the military forces to deliver those capabilities) are distributed to ensure mission success. Joint operation planning also includes assessing and monitoring the readiness of those units providing the capabilities for the missions they are assigned. DOD and NORTHCOM routinely review and update their plans as part of DOD's joint planning system. For example, the most recent NORTHCOM CBRNE consequence management plan was completed in October 2008. DOD and NORTHCOM have also developed such planning documents as execute orders that are key to linking immediate action to those plans, as well as scenario-based playbooks to guide the planning, operations, and command and control of military forces for CBRNE efforts.

Governmentwide Integrated Planning System Is under Development but Not Yet Complete

The Department of Homeland Security (DHS) is leading a governmentwide effort to develop an Integrated Planning System that would link the plans of all federal agencies involved in incident response, including DOD's; however, this effort is not yet complete.¹² While much in the way of federal guidance has been developed, to be most effective, policy documents must be operationalized by further detailing roles and responsibilities for each entity that may be involved in responding to high-risk or catastrophic incidents.

In December 2007, Homeland Security Presidential Directive 8, Annex 1, mandated that the Secretary of Homeland Security, in coordination with the heads of other federal agencies with roles in homeland security,

¹¹ One of the primary joint doctrine documents that lays out DOD guidance for joint operation planning is Joint Chiefs of Staff, Joint Pub. 5-0, *Joint Operation Planning* (Dec. 26, 2006).

¹² The full *National Response Framework* is also not yet completed. Partner guides, incident annexes for terrorism and cyber incidents, and the incident annex supplement for catastrophic disasters remain incomplete.

develop an Integrated Planning System to provide common processes for all of the entities developing response plans.¹³ The directive also called for the development of strategic plans, concepts of operations plans, and operations plans that would be integrated at the federal, regional, state, and local levels. DHS has grouped the 15 national planning scenarios on which preparedness plans are to be based into 8 scenario sets, of which 5 are CBRNE-related. Each of the scenarios, listed in table 1, includes a description, assumptions, and likely impacts, so that entities at all levels can use them to guide planning.¹⁴

Table 1: Fifteen National Planning Scenarios Grouped into Eight Scenario Sets

Scenario Set	National Planning Scenarios
Explosives Attack – Bombing Using Improvised Explosive Device	Scenario 12: Explosives Attack – Bombing Using Improvised Explosive Device
Nuclear Attack	Scenario 1: Nuclear Detonation – Improvised Nuclear Device
Radiological Attack – Radiological Dispersal Device	Scenario 11: Radiological Attack – Radiological Dispersal Device
Biological Attack – With annexes for different pathogens	Scenario 2: Biological Attack – Aerosol Anthrax Scenario 4: Biological Attack – Plague Scenario 13: Biological Attack – Food Contamination Scenario 14: Biological Attack – Foreign Animal Disease
Chemical Attack – With annexes for different agents	Scenario 5: Chemical Attack – Blister Agent Scenario 6: Chemical Attack – Toxic Industrial Chemicals Scenario 7: Chemical Attack – Nerve Agent Scenario 8: Chemical Attack – Chlorine Tank Explosion
Natural Disaster – With annexes for different disasters	Scenario 9: Natural Disaster – Major Earthquake Scenario 10: Natural Disaster – Major Hurricane
Cyber Attack	Scenario 15: Cyber Attack
Pandemic Influenza	Scenario 3: Biological Disease Outbreak – Pandemic Influenza

Source: Department of Homeland Security

¹³ White House, Homeland Security Presidential Directive 8, Annex 1, *National Planning* (Washington, D.C.: Dec. 2007).

¹⁴ The 15 National Planning Scenarios have been grouped in 8 scenario sets of similar characteristics. For example, the 4 National Planning Scenarios related to chemical incidents have been grouped together. Concept and operation plans are being developed for the 8 scenario sets.

The directive required that the Integrated Planning System be submitted to the President for approval within 2 months of the directive's issuance in December 2007. As we have reported, the Integrated Planning System was approved in January 2009 by former President Bush, but is currently under review by the new administration, and no time frame for its publication has been announced.¹⁵ The approval of the CBRNE plans required under the directive (see table 2 below) would be a step toward unifying and integrating the nation's planning efforts. For example, for each National Planning Scenario, a strategic guidance statement is intended to establish the nation's strategic priorities and national objectives and to describe an envisioned end-state. Strategic guidance statements will have corresponding strategic plans, which are intended to define roles, authorities, responsibilities, and mission-essential tasks. Under each strategic plan, a concept of operations plan will be developed, and federal agencies are further required to develop operations plans to execute their roles and responsibilities under the concept of operations plan.

As of today, strategic guidance statements have been approved for all 5 CBRNE-related scenario sets. Four of the 5 required strategic plans have also been completed. The remaining strategic plan (chemical attack) was begun in June 2009 upon the approval of the strategic guidance statement for that scenario. One of the 5 required overall federal concept plans—that for terrorist use of explosives attack—has been completed. As we have previously reported, apart from the sequential timelines required in HSPD Annex 1, FEMA and DHS have no schedule or project plan for completing the guidance and plans.¹⁶ Table 2 shows the status of federal CBRNE strategy and plans called for under HSPD 8 Annex 1.

¹⁵ GAO, *National Preparedness: FEMA Has Made Progress, but Needs to Complete and Integrate Planning, Exercise, and Assessment Efforts*, [GAO-09-369](#) (Washington, D.C.: April 30, 2009).

¹⁶ [GAO-09-369](#).

Table 2: Status of Development for CBRNE Related Plans Called for under HSPD 8 Annex 1, Utilizing the Integrated Planning System (As of July 2009)

Planning Scenario	DHS and Interagency Incident Management Planning Team		FEMA	Federal Departments and Agencies
	Strategic Guidance Statement Status	Strategic Plan Status	Overall Federal Concept Plan Status	Agency Operational Plans Status
Terrorist Use of Explosives Attack	Approved by Secretary of Homeland Security, August 2008	Approved by Secretary of Homeland Security, November 2008	Approved by Secretary of Homeland Security, May 2009	DOD has approved plans. Other agencies started January 2009
Improvised Nuclear Device Attack	Approved by Secretary of Homeland Security, September 2008	Approved by Secretary of Homeland Security, January 2009	Under development: interagency review/adjudication	DOD has approved plans. Other agencies awaiting development; due 120 days after Concept Plan
Biological Attack	Approved by Secretary of Homeland Security, January 2009	Approved by Secretary of Homeland Security, July 2009	Under development: interagency review/adjudication; due 180 days after Strategic Plan	DOD has approved plans. Other agencies awaiting development; due 120 days after Concept Plan
Radiological Dispersion Device Attack	Approved by Secretary of Homeland Security, January 2009	Approved by Secretary of Homeland Security, July 2009	Awaiting development; due 180 days after Strategic Plan	DOD has approved plans. Other agencies awaiting development; due 120 days after Concept Plan
Chemical Attack	Approved by Secretary of Homeland Security, June 2009	Under development; started in June 2009	Awaiting development; due 180 days after Strategic Plan	DOD has approved plans. Other agencies awaiting development ; due 120 days after Concept Plan

Source: GAO analysis of Department of Homeland Security data

DOD's plans and those of other federal and state entities cannot be fully integrated until the supporting strategic and concept plans are completed.

Current Capability Assessments at Local, State, and Federal Levels May Provide Insufficient Data for DOD to Shape Its Response to CBRNE Incidents

A number of efforts to develop capability assessments are under way at local, state, and federal levels, but these efforts may not yet be sufficiently mature to provide DOD with complete data that it can use to shape its response plans for CBRNE-related incidents. For example, FEMA has begun to catalog state capabilities in its preparedness reports and is working on a capability gap analysis. However, DHS faces challenges in developing its approach to assessing capabilities and preparedness. As noted in DHS's January 2009 Federal Preparedness Report, several key components of the national preparedness system are still works in

progress, and not all data required for the federal government to assess its preparedness are available. We have previously reported¹⁷ that state capability data developed by individual states cannot be used to determine capability gaps across states, because the states do not use common metrics to assess capabilities and do not always have the data available that they need to complete their reports. In addition, according to DOD and FEMA, even to the extent that these data are available, states may limit their sharing of sensitive information on capability gaps with DOD entities responsible for developing DOD's plans and related capabilities.

DOD's Planned Response to CBRNE Incidents

DOD has had plans to provide CBRNE consequence management support to civil authorities since before 9/11 and in the last few years has set higher goals in the expectation of being able to provide expanded capabilities through its 3 CCMRFs. However, its ability to respond effectively may be compromised because (1) its planned response times may not meet the requirements of a particular incident, (2) it may lack sufficient capacity in some key capabilities, and (3) it faces challenges in adhering to its strategy for sourcing the CCMRFs with available units.

DOD's Planned Response Times May Be Too Long

In 2005, DOD established a standard for itself that called for the ability to respond to multiple, simultaneous catastrophic incidents,¹⁸ and it initiated efforts to create 3 CCMRFs. For the first 3 years, DOD did not regularly assign units to the CCMRF mission, and this decreased DOD's ability to actually field any of the CCMRFs within the timelines it had established. In October 2008 DOD sourced the first CCMRF, primarily with active force units. A second CCMRF, comprised primarily of reserve units, will assume the mission in October 2009 and a third in October 2010. In the absence of national guidance suggesting what level of response capability DOD should have available within a specified time frame, DOD's plans use a phased deployment to allow the CCMRF to be able to provide consequence management support to civilian authorities within 48-96 hours of being notified of an CBRNE incident. The earlier phases of the

¹⁷ [GAO-09-369](#).

¹⁸ Department of Defense, *Strategy for Homeland Defense and Civil Support* (Washington, D.C.: June 2005), p. 3. DOD has since refined that standard to "prepare for and mitigate the effects of multiple, near-simultaneous CBRNE events." U.S. Northern Command, *Department of Defense Homeland Defense and Civil Support Joint Operating Concept*, Version 2.0 (October 2007), p. 43.

deployment will provide the lifesaving capabilities. However, multiple DOD estimates for some of the more catastrophic scenarios, such as a nuclear detonation, have identified significant gaps between the time certain life saving and other capabilities would be needed and DOD's planned response times. For example, victims of a nuclear attack would require decontamination, which medical experts have established must be provided within as soon as possible after exposure. If DOD adheres to its planned response times in such a scenario, the capabilities of early responders such as local police and fire departments would likely be overwhelmed before DOD arrived at the incident site. NORTHCOM's assessment¹⁹ and other DOD estimates demonstrated that, for a number of capabilities, DOD's response would not be timely. Table 3 shows one estimate of the potential shortfall in decontamination capabilities that could result.

Table 3: Estimate of Potential Lifesaving Decontamination Requirements Compared With Likely Capabilities for a 10 Kiloton Nuclear Detonation in Major Metropolitan City in the First 72 Hours After Incident

Source of Decontamination Capability	Estimated Capability by Timeframe (persons)		
	1st 24 hours	24-48 hours	48-72 hours
Local	14,640	14,640	14,640
State	1,350	5,400	10,800
CCMRF Package 1	1,350	5,400	5,400
CCMRF Package 2	0	0	2,880
Self Decontamination	8,000	8,000	8,000
Other Federal Decontamination Capabilities	270	1,080	1,080
Total Decontamination Capabilities by Timeframe	25,610	34,520	42,800
Total Decontamination Requirement	138,000	112,390	77,870
Unmet Decontamination Requirement	112,390	77,870	35,070

Source: GAO analysis of DOD information.

The NORTHCOM capability-based assessment similarly suggests that without a national, risk-based determination of DOD's share of the federal capability requirements, DOD will be unable to determine whether its planned response times should be adjusted.

¹⁹ U.S. Northern Command, *Homeland Defense and Civil Support Capabilities Based Assessment* (Colorado Springs, CO: Mar. 2009).

DOD's Planned Force May Lack Sufficient Capacity in Some Key Capabilities Needed for Catastrophic Incidents

In addition to timeliness issues, DOD's planned force has limited quantities of some of the needed life saving capabilities, such as medical and decontamination services. For example, some nuclear detonation scenarios project that hundreds of thousands could be killed, injured, displaced, contaminated, or in need of medical care. The CCMRF would be able to provide only a small portion of the necessary capability. Although a CCMRF is estimated, under optimal circumstances, to be capable of decontaminating several thousand people per day, some estimates project that the gap between needed decontamination capabilities and what local, state, and other entities could provide would be tens of thousands. DOD recognizes that it may need additional units to augment the CCMRF, and it has made some tentative estimates. However, DOD has not developed contingency plans designating specific units to augment the CCMRF. Unless these units are identified in advance and trained for the mission, they may be unable to deploy rapidly. Without clear plans aligning CCMRF objectives with the projected need for response capabilities and clearly delineating national expectations for timely response, neither DOD nor other entities involved in incident response can be certain that the CCMRFs will be able to respond adequately to mitigate the consequences of a catastrophic CBRNE incident.

DOD Faces Challenges in Adhering to Its Strategy for Sourcing the CCMRFS with Available Units

In sourcing its 3 CCMRFs, DOD has encountered challenges in implementing an approach that could enhance unit availability and training and readiness oversight for forces that are not assigned to NORTHCOM. DOD originally intended the CCMRF to be comprised entirely of federal active military forces, but the two follow-on CCMRFs will be sourced with large numbers of National Guard and Army Reserve units. The demands of ongoing overseas operations have led DOD to draw more and more heavily on Guard and Reserve forces to fulfill civil support functions. Because National Guard units have responsibilities in their respective states, a competition for resources issue may arise between DOD and the states. For example, while governors may need the same capabilities within the state or to support mutual assistance agreements with other states as would be needed to support a CCMRF, there is no clear understanding between the governors and DOD to ensure that these units will be available if they are needed for a federal mission. Moreover, elements from a single unit can be spread over many states, further complicating the task of coordinating between DOD and each of the states. For example, one Army National Guard aviation company belonging to the CCMRF has elements in Arkansas, Florida, and Alabama. Three different states would be required to make these elements available to form the company. The potential rapid deployment mission of the CCMRF makes it

imperative that specific agreements be reached. However, the agreements that have been reached to date are general in nature and do not specify how states are to ensure that Guard units will be available for a CCMRF deployment.

Similar issues arise with the Army Reserve. The training demands of the CCMRF mission have caused DOD to authorize additional training days, but according to Army Reserve officials, reservists cannot be compelled to attend training events beyond their annual training requirement. They stated that, as a result, units must rely on the voluntary participation of their personnel for training beyond the requirement, which reduces their assurance that these personnel will be available for other necessary CCMRF training. For example, one reserve company was unable to fulfill all aspects of its mission requirements because of low participation at a training event. Unit officials stated that some of the unit's members had school or work obligations that conflicted with this training. Moreover, reserve unit officials stated that, unlike active unit officials, they cannot restrict the personal travel of unit members to ensure that they will be available if they are needed to support an unexpected federal CBRNE incident response. These challenges to sourcing the CCMRF increase the risk that DOD's ability to effectively respond to one or more major domestic CBRNE incidents will be compromised. That risk can be mitigated by plans that integrate the active and reserve component portions of the CCMRF and agreements between DOD and the states on the availability of National Guard units and the duty status under which they would respond to a major incident requiring federal forces.

DOD's decision to change its approach to how NORTHCOM will routinely interact with units designated for the CCMRF will present additional challenges. In 2008, DOD's sourcing approach was to assign the first CCMRF (primarily active forces) to NORTHCOM and allocate the remaining two CCMRFs (mix of Guard and Army Reserve) to NORTHCOM.²⁰ Beginning in October 2009, DOD will allocate the units from all three CCMRFs to NORTHCOM, rather than assigning them to the NORTHCOM commander outright. As a result, despite the fact that NORTHCOM's commander is responsible for commanding the federal military domestic CBRNE response in the continental United States,

²⁰ Assigned forces are under the direct command of their unified command, such as NORTHCOM. Allocated forces are transferred from their assigned unified command to another command for employment for a period of time.

NORTHCOM will have no CBRNE forces under its direct control. There are advantages to assigning forces directly to NORTHCOM. For example, the command would have direct authority over the units' day-to-day activities, including training and exercise schedules, and would be better able to monitor readiness. Additionally, there would be fewer administrative steps required for the NORTHCOM commander to activate and deploy the CCMRF in the event of an incident. This would be crucial for deploying the critical initial response elements of the overall force. Under allocation, while DOD's current approach would provide NORTHCOM with authority over units while they are participating in scheduled NORTHCOM training events, NORTHCOM would have to coordinate with multiple commands to obtain participation from these units. Current guidance states that other commands should make their units available for scheduled NORTHCOM exercises "to the greatest extent possible." However, NORTHCOM cannot always be assured that units will be available for these exercises. In addition, NORTHCOM remains uncertain about the extent to which it will have oversight of CCMRF units' day-to-day training activities and be able to confirm that these units are ready to perform their mission even when they are under the authority of another command.

DOD Actions on CCMRF Readiness and Training and the Impact of Current Deployments

DOD has taken a number of actions in the past year to improve the readiness of its CCMRF units. However, our ongoing work shows that the CCMRF may be limited in its ability to successfully conduct consequence management operations because (1) it does not conduct realistic full force field training to confirm units' readiness to assume the mission or to deploy rapidly, and (2) conflicting priorities between the CCMRF mission and overseas deployments impact some units' mission preparation and unit cohesion.

DOD Has Taken Actions to Improve CCMRF Readiness

The initial assignment of the CCMRF to NORTHCOM in October 2008 and the increased priority DOD has placed on the CBRNE mission have resulted in a number of improvements in unit preparation for the first fielded CCMRF. The Army, in coordination with NORTHCOM and its subordinate commands, has established guidance for both individual and collective training—including joint mission essential task lists—for units designated for the CCMRF. Therefore, for the first time, identified units are conducting individual and collective training focused on the CCMRF mission. For example, key leaders such as brigade task force headquarters personnel and battalion commanders are required to participate in a number of command and control training events to provide them with an

understanding of how to organize and conduct operations in a complex interagency environment under catastrophic disaster conditions. Moreover, the increased priority given to the mission in the spring of 2008 has led to units receiving personnel and equipment before they assume the mission and ahead of many other units that do not participate in the CBRNE mission.

Extent of Realistic Field Training Impacts CCMRF's Ability to Perform Effectively

Despite units being certified as ready prior to assuming the mission in October 2008, it is unclear whether the CCMRF can effectively perform CBRNE consequence management operations throughout the 1-year mission period to which it is assigned, because the readiness of the entire CCMRF is not confirmed through a realistic field training exercise before the force assumes the mission, nor have its rapid deployment capabilities been fully assessed. Before designated units assume the CBRNE mission, they must be certified by the military services to be trained to perform that mission. However, there is no requirement to provide these units with a full force tactical field training exercise. While units conduct this type of training prior to an overseas deployment, and NORTHCOM and Joint Force Land Component Command (JFLCC) training officials have discussed the desirability of such an exercise, the first CCMRF units have not received this kind of training. Although some CCMRF units have participated in joint field exercises, critical units often did not participate. In addition, the exercises were conducted several months after units had been certified as trained to perform the mission.

Units also must demonstrate that they will be able to meet the required response times once they assume the mission. A key aspect of the CCMRF mission is to be able to rapidly deploy each of the three force packages that comprise each CCMRF within a specified response time. One of the primary challenges to a timely response is that CCMRF packages may have to deploy rapidly from their home stations. Deployment readiness exercises are important, because they test units' abilities to ascertain how quickly staff can be notified and assembled, equipment prepared and loaded, and both staff and equipment moved to the designated point of departure. DOD has provided general guidance that supported commands, such as NORTHCOM, should verify the ability of CCMRF units to activate and deploy. However, DOD has not yet conducted deployment exercises for the entire CCMRF, and it is not clear if its plans for future CCMRFs will include such exercises. In the absence of such exercises, NORTHCOM and DOD will continue to be unable to verify the ability of CCMRF units to deploy.

Units' Preparation for the CCMRF Mission and Efforts to Achieve Unit Cohesion Are Impacted by Other Missions

The demands that overseas missions are placing on the Army also may put the effectiveness of the CCMRF mission at risk. While DOD has identified CCMRF as a high priority mission, competing demands associated with follow-on missions may distract from a unit's focus on the domestic mission. For example, Army units are frequently given the CCMRF mission when they return from an overseas deployment. Because these units are at the beginning of the "reset" phase of the Army Force Generation (ARFORGEN) cycle, they often lack personnel and equipment. Although the Army attempts to accelerate the fill of personnel and equipment to these units, some units may not have received their personnel and equipment in sufficient time to allow them to meet all of the requirements of the CBRNE mission before they assume it. These training and force rotation issues have prevented DOD from providing the kind of stability to the force that would allow units to build cohesiveness. While DOD's goal has been to assign units for at least 12 months and to set standard start and end dates for each rotation, several critical units have been unable to complete their 1-year CCMRF rotations for fiscal year 2009. As a result, the replacement units who have finished out these rotations have missed important training. For example, the headquarters units for the aviation and medical task forces rotated out of the mission after only 4 and 6 months, respectively, because of competing priorities. Because key leaders from units of the entire force attend a mission rehearsal exercise prior to mission assumption, the replacement of these units after only a few months negated much of the value that was gained from these three task forces working together and precluded the replacement task force leaders from having the same opportunity.

CCMRF Requirements Development, Funding, and Oversight

DOD is making progress in identifying and providing funding and equipment to meet CCMRF mission requirements; however, its efforts to identify total program requirements have not been completed, and its approach to providing program funding has been fragmented, because funding responsibilities for CCMRF-related costs are dispersed throughout DOD and are not subject to central oversight.

CCMRF Mission Requirements Have Not Been Fully Developed

The units initially designated for the CCMRF mission did not have fully developed funding and equipment requirements. In addition, the recent NORTHCOM Homeland Defense and Civil Support Capabilities-Based Assessment highlighted a number of systemic capability gaps that need to

be addressed and may generate additional funding requirements.²¹ Moreover, other important requirements for this mission have not been identified and funded. The Joint Forces Land Component Commander (U.S. Army North—ARNORTH) and the Joint Task Force Civil Support²² are responsible for developing and approving service-specific equipment unique to the CCMRF's Joint Mission Essential Tasks. However, to date, mission essential equipment requirements have not been fully developed. While some equipment requirement lists have been developed and are being reviewed by NORTHCOM, equipping officials said that lists have not been developed for non-standard equipment that units may need in order to support civil authorities in a CBRNE environment. As a result, some fiscal year 2008 units have determined requirements based on their own independent mission analyses. Unit officials stated that filling some of the needs they identified—such as the need for non-standard communications equipment that is compatible with civilian equipment—was difficult because the units lacked a documented requirement for their planned acquisition. In addition, the review process did not always include the command organizations that are responsible for the mission. Thus, decisions on what to buy and in what quantity were not consistently vetted to ensure standardization in equipping various units. ARNORTH officials stated that they were in the process of developing mission essential equipment lists and hope to have them completed in time for the next rotation, which begins in October 2009.

Extent of Dedicated Funds for Some CCMRF Training Impacts Mission

In the spring of 2008, sourcing priority for the CCMRF mission increased substantially within the department, and funding was provided for specific aspects of the mission. For example, funding was provided for NORTHCOM's training program—which totals more than \$21 million annually—for three major exercises associated with the CCMRFs for fiscal year 2010 and beyond, and the Army Reserve has planned funds of more than \$37 million for fiscal years 2009 and 2010 to support additional full-time personnel and training days that have been authorized to support the CCMRF mission. In addition, while the military services have not planned funds for equipment specifically for the CCMRF mission, equipment has been purchased with funds left over from past Global War on Terrorism deployments. In other cases, purchase requests for certain equipment

²¹ *Homeland Defense and Civil Support Capabilities Based Assessment.*

²² U.S. Army North and Joint Task Force Civil Support are subordinate commands of NORTHCOM.

were denied by administrative parent commands because, unit officials believed, the equipment was considered non-critical by reviewing officials. Moreover, units must fund their CCMRF training activities from their operations and maintenance accounts, which were developed and approved months before units knew they would be assigned to the CCMRF. According to unit officials, because they do not have dedicated funds for CCMRF in their budgets, they sometimes must take money from other sources to meet what they believe are their highest priorities for the CCMRF mission. Also according to these officials, while the lack of planned funds for the CCMRF has been mitigated to some extent by the mission's high priority level, they have found it necessary to curtail or cancel some desirable training because funding was unavailable. Army officials told us that if funding shortfalls develop because units lack sufficient funds to conduct both CCMRF and follow-on mission training, units can request additional funds from the Army. However, unless units assess their total funding requirement for the CCMRF and their other designated mission and receive funding based on both missions, CCMRF units may be at risk of not having enough funding to conduct all of their CCMRF training. This, in turn, puts units at risk of not being fully prepared if they are needed to respond to an incident.

CCMRF units may face more acute funding issues as the United States begins drawing down in Iraq and as military supplemental funding, such as funding for Global War on Terrorism, is reduced. Because DOD has assigned funding responsibilities across the department and because much of the funding for the CCMRF is coming from existing operations and maintenance accounts, DOD lacks visibility across the department over the total funding requirements for this mission. Without an overarching approach to developing requirements and providing funding, and a centralized focal point to ensure that all requirements have been identified and fully funded, DOD's ability to carry out this high-priority homeland security mission in an efficient and effective manner is at risk.

Agency Comments

We provided the Departments of Defense and of Homeland Security an extensive briefing on our preliminary findings. We also provided them a draft of this statement. Neither DOD nor DHS had formal comments, but both provided technical comments, which we incorporated into the statement, as appropriate.

We plan to provide this subcommittee and our other congressional requesters with our final report on DOD's CBRNE consequence

management efforts in September 2009. We expect to make a number of recommendations for DOD action at that time. Mr. Chairman, this concludes my prepared statement. I would be happy to respond to any questions that you or other Members of the Subcommittee might have.

Contacts and Acknowledgements

For questions about this statement, please contact me at (202) 512-5431 or daogostinod@gao.gov. Individuals who made key contributions to this testimony include Joseph Kirschbaum, Assistant Director; Rodell Anderson; Joanne Landesman; Robert Poetta; and Jason Porter.

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