



Department of Homeland Security Office of Inspector General

Opportunities to Improve FEMA's Mass Care and Emergency Assistance Activities





**Homeland
Security**

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Preface

The Department of Homeland Security (DHS) Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audit, inspection, and special reports published as part of our oversight responsibilities to promote economy, effectiveness, and efficiency within the department.

This report addresses opportunities to improve the Federal Emergency Management Agency's management and coordination of activities associated with providing mass care and emergency assistance during a major emergency or national disaster. We contracted with the independent public accounting firm of Foxx & Company to perform the audit. Foxx & Company is responsible for the attached auditor's report, dated April 1, 2011, and the conclusions expressed in the report.

The recommendations herein have been developed with the best knowledge available to our contractor. We trust that this report will result in more effective and efficient disaster response operations. We express our appreciation to all who contributed to the preparation of this report.

A handwritten signature in black ink, appearing to read "Matt Jadacki".

Matt Jadacki
Assistant Inspector General
Office of Emergency Management Oversight



April 1, 2010

Mr. Matt Jadacki
Assistant Inspector General for Emergency Management Oversight
Office of Inspector General
Department of Homeland Security
245 Murray Drive, SW, Building 410
Washington, DC 20528

Dear Mr. Jadacki:

Foxx & Company performed an audit of the Federal Emergency Management Agency's management and coordination of activities associated with providing mass care and emergency assistance during a major emergency or national disaster. The audit was performed according to Task Order No. TPDFIGBPA070007, Order No. 0002, dated September 29, 2009.

This report presents the results of the audit and includes recommendations to help improve FEMA's mass care and emergency assistance planning, oversight, and coordinating activities before and during a major incident.

Our audit was conducted according to applicable *Government Auditing Standards*, July 2007 revision. The audit was a performance audit as defined by Chapter 1 of the *Standards*, and included a review and report of program activities with a compliance element. We did not perform a financial audit, the purpose of which would be to render an opinion on the agency's financial statements.

We appreciate the opportunity to have conducted this audit. Should you have any questions, or if we can be of any further assistance, please call me at (513) 639-8843.

Sincerely,

Foxx & Company

Martin W. O'Neill
Partner

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Abbreviations

ARC	American Red Cross
DHS	Department of Homeland Security
ESF	Emergency Support Function
FEMA	Federal Emergency Management Agency
GAO	Government Accountability Office
JFO	Joint Field Office
OIG	Office of Inspector General
NRCC	National Response Coordination Center
RRCC	Regional Response Coordination Center
SOPs	Standard Operating Procedures

OIG

Department of Homeland Security
Office of Inspector General

Executive Summary

Since the 2005 hurricane season, the Federal Emergency Management Agency has made progress toward improving its mass care and emergency assistance program. It has coordinated more effectively with state and local governments and voluntary organizations; developed planning tools to build the mass care and emergency assistance capacities of these governments and organizations; and created an internal infrastructure to plan, coordinate, and provide direct mass care and emergency assistance, as needed.

However, additional actions are needed to ensure that the program is implemented effectively in future disasters. Mass care and emergency assistance Standard Operating Procedures have not been finalized, the effectiveness of planning tools or initiatives developed have not been evaluated, and mass care and emergency assistance activities have not always been tested during national and regional exercises. In addition, an opportunity exists for improved efficiency by creating interfaces between the Federal Emergency Management Agency and American Red Cross National Shelter System databases.

We are making seven recommendations to strengthen management and administration of the agency's mass care and emergency assistance coordination and management activities. A summary and evaluation of the agency's response is at the end of each section of the report. Appendix B contains the agency's full response.

Background

The Federal Emergency Management Agency's (FEMA) National Response Framework, issued in 2008, provides guidance for conducting response activities during emergencies and national disasters. The Framework includes 15 Emergency Support Function (ESF) annexes that describe the responsibilities of federal agencies and others during disaster response and recovery operations. Mass care and emergency assistance is part of ESF 6.

Following Hurricane Katrina in 2005, FEMA, the Department of Homeland Security Office of Inspector General (DHS OIG), and the White House, among others, reported that FEMA did not have effective Standard Operating Procedures (SOPs) and other guidance documents to ensure that all federal, state, local, and voluntary agencies understood their mass care and emergency assistance roles and responsibilities.

Two reports¹ said that during Hurricane Katrina, FEMA, the American Red Cross (ARC), and other federal and voluntary agency partners were confused about their mass care and emergency assistance roles and responsibilities. This confusion resulted in communication difficulties that led to service delays and an inability to determine the specific needs for sheltering and feeding operations. Both reports recommended that FEMA create an ESF 6 working group, consisting of FEMA, the Red Cross, and other primary and support mass care and emergency assistance partners, to develop standard operating procedures and other plans for response activities during a disaster.

Another report² discussed FEMA's difficulties in fulfilling its ESF 6 mass care responsibilities and attributed this condition to a need for effective operational plans, procedures, and capabilities that support the National Response Plan and its ESF annexes. This report recommended that each ESF lead agency develop SOPs and notification protocols that conform to the National Incident Management System. It also recommended that the procedures be exercised at either the national, departmental, or agency level.

¹ *2005 Hurricane Season After-Action Report* (FEMA, June 26, 2006) and *A Performance Review of FEMA's Disaster Management Activities in Response to Hurricane Katrina* (DHS/OIG 06-32, March 2006).

² *The Federal Response to Hurricane Katrina: Lessons Learned* (The White House, February 2006).

Results of Audit

To improve its effectiveness in managing and coordinating mass care and emergency assistance, FEMA needs to finalize SOPs, evaluate the effectiveness of the tools and initiatives that have been developed, and ensure that mass care and emergency assistance activities are tested during exercises. In addition, action is needed to link the FEMA and ARC National Shelter Systems databases.

Standard Operating Procedures Needed

FEMA needs to finalize ESF 6 SOPs for its headquarters and regional offices. Since 2005, FEMA has been in the process of developing ESF 6 SOPs for the National Response Coordination Center (NRCC), a FEMA headquarters emergency operations center that is responsible for coordinating disaster relief at the national level. But these procedures have not been finalized. Moreover, FEMA has not developed ESF 6 SOPs for its Regional Response Coordination Centers (RRCCs) or Joint Field Offices (JFOs), two organizations designed to be activated by FEMA to coordinate disaster relief at the state and local levels. As a result, confusion over roles and responsibilities may exist during future disasters.

NRCC Standard Operating Procedures Development Efforts

On February 1, 2006, FEMA established an ESF 6 working group that included ESF 6 primary and support agencies, including ARC. By September 2006, the working group had developed drafts of an ESF 6 Concept of Operations and SOPs for the NRCC. FEMA did not approve these draft documents for use at the NRCC or as a guide for ESF 6 disaster activities. Since then, FEMA has made three additional attempts to develop NRCC procedures. According to FEMA officials, these attempts were not successful primarily because of recurring reorganizations and revisions to national response plans.

The most recent attempt included an effort to develop (1) an Individual Assistance Branch Concept of Operations, (2) ESF 6 SOPs, and (3) an ESF 6 Desk Guide. FEMA officials said that the most recent documents will likely remain in draft pending the results of the 2010 FEMA structural reorganization.

However, the latest procedural documents were not coordinated with any of the ESF 6 partners outside FEMA. A FEMA official told us that SOPs are considered internal management documents and outside groups do not have a role in how they are written. This view is inconsistent with the recommendations in FEMA's

post-Katrina after-action report³ and a DHS OIG audit.⁴ The involvement of other ESF 6 mass care partners in the process is still needed, because it provides FEMA with an outside perspective on the procedures and gives the partners a better understanding of FEMA's rationale for the procedures.

RRCC and JFO Standard Operating Procedures Development Efforts

FEMA headquarters officials said they have not attempted to develop mass care and emergency assistance SOPs for the RRCC and JFO. Under the Stafford Act, as amended, FEMA's 10 regional offices are responsible for organizing Federal response at the local level and responding to a state's request for disaster assistance. Under this authority each regional office is responsible for developing its own mass care and emergency assistance SOPs. A regional office expressed interest in developing region-wide SOPs, but was not aware of any coordinated effort.

Post-Katrina reports issued by FEMA and DHS OIG recommended that ESF 6 Concepts of Operations and SOPs be quickly developed through a working group that included ARC and other ESF 6 support agencies. FEMA has not yet finalized these procedures or included external partners in the process. As a result, the risk of confusion over mass care and emergency assistance roles and responsibilities persists.

Recommendations

We recommend that the Assistant Administrator, Recovery:

Recommendation #1: Develop and finalize the mass care and emergency assistance Standard Operating Procedures and other procedural documents for the National Response Coordination Center, Regional Response Coordination Centers, and Joint Field Offices.

Recommendation #2: Provide opportunities for FEMA's mass care and emergency assistance partners to review and comment on draft Standard Operating Procedures and other procedural documents.

³ *2005 Hurricane Season After-Action Report* (FEMA, June 26, 2006), Page 67.

⁴ *A Performance Review of FEMA's Disaster Management Activities in Response to Hurricane Katrina* (DHS/OIG 06-32, March 2006), Page 38.

Management Comments and Contractor Analysis

FEMA concurred with recommendation #1. However, FEMA pointed out that the new NRCC structure is not organized by Emergency Support Function. Instead, FEMA has developed a new doctrine based on a “National Incident Support Manual” which reflects the strategic role that FEMA Headquarters is assigned during response operations. Under this new doctrine, the NRCC (when activated during an event) will include three sections: Resource Support, Planning, and Reporting. In all three of these sections, the Individual Assistance Division is involved at the “group” level. FEMA said that the Individual Assistance Division will develop SOPs for its “group” responsibilities after the 2011 hurricane season.

It may be implied that the new SOPs would include applicable NRCC procedures for ESF 6 and mass care and emergency assistance. If FEMA follows through with this strategy, it would satisfy the intent of this recommendation at the headquarters response level. However, by waiting until the completion of the 2011 hurricane season to draft new SOPs, six years will have passed since Hurricane Katrina. Without some renewed management emphasis and sense of urgency, the SOPs relating to mass care and emergency assistance could be delayed again.

In its comments, FEMA reiterated that the Regional offices are responsible for developing their own support documents, including SOPs. FEMA also pointed out that it provides subject matter expertise and other assistance to the Regions when requested. For example, FEMA referred to the Region 2 Management Guide which it would provide to the OIG when completed. During our audit, we reviewed this Region 2 Management Guide along with a similar Management Guide which had been drafted by Region 6. In both cases, the Guides included relevant ESF 6 information, much of which was specific to mass care and emergency assistance. However, the Management Guide at Region 6 was still in draft form and had not been adopted by the regional management as its official SOPs for the RRCC or the JFO. Importantly, officials in both Region 2 and 6 told us that there were other regional SOPs relating to ESF 6 which are not complete and had not been updated recently. We believe that the ESF 6 Management Guide is a good first step in developing applicable ESF 6 SOPs for all the Regions. However, it will likely take leadership from FEMA headquarters and Regional management to convert the Management Guides into “officially approved” SOPs

at the regional level. During our review, we did not see any evidence that leadership was ready to take on this task.

FEMA pointed out that JFOs will continue to follow the ESF model and that FEMA already has a basis for developing further JFO support documents relating the mass care and emergency assistance. It specifically referred to four related courses, including the “Mass Care/Emergency Assistance for Field Operations” completed in January 2011. As FEMA points out, it provided information to us on this course during our review. We were impressed with information provided by the course and believe it is a good resource document for developing JFO mass care and emergency assistance SOPs. However, the question we asked, which was not adequately answered by FEMA, was which should come first: the training course or SOPs. Logically, we believe that SOPs should come first, with the training course developed to support the scope and intent of the SOPs. Otherwise, the course could be presenting concepts and ideas which have not been vetted and approved officially by legal, policy, and senior management personnel in headquarters and the regional offices. Therefore, we believe that FEMA should undertake immediate actions to develop mass care and emergency assistance SOPs for JFOs and, when completed, ensure that any related training classes are in compliance.

FEMA also concurred with recommendation #2. FEMA pointed out the significant efforts it has undertaken to collaborate with others, at all levels of government and the private sector, in the development and review of many types of related documents. During our review, we were impressed with the collaborative efforts to which FEMA refers. It is establishing the right policies and approaches in seeking the outside perspectives on emergency management issues. However, our specific objectives in this review were narrowly focused on development of mass care and emergency assistance SOPs and the degree to which FEMA had collaborated with others in that process. As we point out above, FEMA did not collaborate with any of its ESF 6 partners outside of FEMA as it attempted to develop ESF 6 SOPs. Also, FEMA does not believe it had a responsibility to do so. We encourage FEMA to revise its approach in this area.

The comments by FEMA are responsive to recommendations #1 and #2. However, headquarters and regional management leadership will be needed to ensure that the Management Guide is converted to regional SOPs. We also believe that FEMA should take immediate action to develop JFO Mass Care/Emergency

Assistance SOPs. The approval of SOPs would ensure that the training course adequately reflects FEMA's legal, policy, and management positions with respect to Mass Care/Emergency Assistance.

Except for the above caveats, the actions identified in FEMA's response should address the conditions addressed in this report. Within 90 days, the Assistant Administrator, Recovery, needs to provide a plan to ensure that the implementation of the proposed actions proceed, as intended.

Mass Care and Emergency Assistance Efforts Untested

FEMA has not evaluated the effectiveness of newly developed mass care and emergency assistance planning tools and other initiatives. As a result, the impact of FEMA's planning efforts remains untested.

As the National Response Framework was being developed, FEMA became the primary agency for coordinating mass care and emergency assistance during an emergency or national disaster. FEMA has worked extensively with state and local governments and voluntary agencies and developed a number of mass care and emergency assistance planning tools to help states and other stakeholders improve their ability to deal with a national incident. As these tools are adopted and used, FEMA officials hope that state and local governments will become more self sufficient and will only need FEMA assistance in the most severe emergencies or national disasters. These planning tools include items in Table 1.

**Table 1. Tools to Improve State and Local Government
Mass Care and Emergency Assistance Capabilities**

Tools	Purpose
Multiagency Feeding Plan Template	Completed in March 2010, this plan template is designed to help state and local governments develop a plan that identifies feeding assistance needed in advance of, during, and after a disaster.
Mass Evacuation Tracking System (Web-based database system)	Launched in June 2010, this system is designed to help states track the movement of transposition-assisted evacuees, their household pets, luggage, and medical equipment during evacuations.
Guidance in Support of Mass Care and Emergency Assistance Functions During a Pandemic Period	Finalized in January 2010, this guidance addresses how to shelter, feed, and evacuate people during emergency situations where the goal is to keep people separated rather than together in a typical mass care setting.
National Shelter System	Completed in June 2009, this system is designed to allow users to identify, track, analyze, and report on data for almost any facility associated with the sheltering and feeding of people and/or pets and service animals.
Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters	Released on November 1, 2010, this guidance assists emergency managers and shelter planners in understanding the requirements related to sheltering children and adults with functional support needs in general population shelters.
Donations and Volunteer Management System (Web-based system)	Operational in June 2007, this system includes individual state websites which the public can access to volunteer services and donate items during an incident. It also includes a national web portal allowing FEMA to coordinate donations if a state is overwhelmed.
National Emergency Family Registry and Locator System	Completed in 2007, this locator system provides a mechanism for displaced persons to register in a national database so they can be located and reunited with family and friends.
National Emergency Child Locator Center	Completed in February 2007, this center was established in collaboration with the National Center for Missing and Exploited Children to help track and locate children who have been separated from their families during a disaster.

Most of these planning tools were developed through multiagency/organization work groups. For example, development of the Multiagency Feeding Plan Template included 40 to 50 people from FEMA headquarters and regional offices, state and local governments, voluntary agencies, and other federal departments and agencies. Most of the other planning tools involved similar work groups.

FEMA also has direct support initiatives (e.g., units and task forces) to help states deliver needed mass care and emergency assistance during a presidentially declared disaster of emergency. If requested by a state, FEMA can deploy resources to a disaster location when a state's capacity to respond has been overwhelmed. According to FEMA, these resources can come from in-house capabilities, mission assignments, and/or contract capabilities. The resources can be in the form of special units or task forces which can be stand-alone entities within the Individual Assistance branch of the JFO or they can be integrated into existing state response organizations. These resources are as follows:

- Congregate Care Coordination Unit
 - Sheltering Support Task Force
 - Distribution of Emergency Supplies Task Force
 - Feeding Support Task Force
 - Functional needs Support Task Force
 - Household Pets and Service Animals Support Task Force
- Mass Evacuation Support Unit
- Reunification Services Unit

The development of the planning tools and direct support initiatives, along with FEMA's emphasis on coordination, appears to have increased the focus on the importance of mass care and emergency assistance preparedness. However, many of the planning tools and initiatives have been completed recently. Therefore, several of the tools and initiatives have not yet been tested in an operating environment or through a coordinated exercise program. It remains unclear whether states will adopt the new tools, some of which require a state's financial and staffing commitment to implement.

In future disasters, FEMA should track the use and effectiveness of the planning tools and initiatives to ensure that they provide a value-added service. FEMA should consider developing a coordinated exercise program at the state and regional levels to test the tools' effectiveness.

Recommendations

We recommend that the Deputy Assistant Administrator, Protection and National Preparedness:

Recommendation #3: Evaluate the effectiveness of the planning tools and initiatives through documented coordinated exercise programs at the state or regional level.

We recommend that the Deputy Assistant Administrator, Protection and National Preparedness and Assistant Administrator, Recovery:

Recommendation #4: Track and document the use and effectiveness of the tools and initiatives when adopted by state and local governments.

Management Comments and Contractor Analysis

FEMA concurred with recommendations #3. FEMA pointed out several instances where states and FEMA had exercised or were planning to exercise the planning tools. FEMA also said that its mass care and emergency assistance branch would (1) encourage FEMA regions and the states to use exercises to further evaluate the tools and initiatives relating to mass care and emergency assistance, (2) work with FEMA's Recovery Directorate's, National Planning Branch to identify opportunities to evaluate the mass care and emergency assistance tools and initiatives through exercises, and (3) ensure that lessons learned from exercises are implemented through monthly calls with FEMA regions and states that have agreed to use FEMA's National Shelter System. FEMA said that the calls to FEMA regions and states will help create a dialog that will identify successes, challenges, and ways to provide enhancements and technical assistance. Finally, FEMA said that its National Exercise Division, which provides direct support for regional, state, local, territorial, and tribal exercises, would continue to support exercises that focus on mass care and emergency assistance.

FEMA also concurred with recommendation #4. In its comments, FEMA committed to using the monthly calls to FEMA regions and states, which was discussed in its response to recommendation #3, to also document the use and effectiveness of the National Mass Evacuation Tracking System and other initiatives as the initiatives are completed and implemented.

FEMA said that it believes that these actions are sufficient to comply with the intent of the recommendation. We concur with this assessment. If FEMA follows through with its existing and planned actions, we believe FEMA will have a better understanding of the potential issues that could affect the delivery of mass care and emergency assistance services during a major event. In addition, FEMA will be in a better position to assess the relative value of the tools and initiatives it has developed to improve the delivery of those services.

The comments by FEMA are responsive to recommendations #3 and #4. If properly implemented, the actions identified should address the conditions identified during the audit. Within 90 days, the Deputy Assistant Administrator, Protection and National Preparedness and Assistant Administrator, Recovery, need to provide plans to ensure that the implementation of the proposed actions proceed, as intended.

Automated Interfaces Needed for Existing Shelter Systems

Further action is needed to link the FEMA and ARC National Shelter databases. FEMA is currently working on a data interface connection that will automatically transfer data between the two databases. Following Hurricane Katrina, FEMA and ARC initiated efforts to develop a shared National Shelter System. However, for contracting and other reasons the agencies abandoned the joint effort and developed separate National Shelter System databases with different capabilities and data requirements. To reduce duplication and enhance efficiency FEMA has undertaken efforts to develop automatic interfaces between the two Systems' databases and a prominent commercial system that provides shelter data to states during an incident. Until these interfaces are complete and operational, many states may opt to rely on other alternatives as a source of shelter data during an emergency or national disaster.

Two of the major post-Katrina reports determined that FEMA and others had trouble identifying temporary and long-term housing alternatives for Hurricane Katrina victims. A White House review titled "*The Federal Response to Hurricane Katrina: Lessons Learned, (February 2006)*" recommended that FEMA, the Department of Housing and Urban Development, and Red Cross strengthen their planning and operational relationships so that disaster victims could transition more seamlessly from short term sheltering to longer-term housing solutions. The review also recommended that the Department of Housing and Urban Development, along with other Federal departments, help state and local governments' inventory existing shelters and shelter sites. DHS OIG reported in "*A Performance Review of FEMA's Disaster Management Activities in Response to Hurricane Katrina (March 2006)*" that FEMA as the ESF 6 lead had difficulty identifying the number and location of evacuees and the need for shelters.

Efforts to Share the FEMA and Red Cross Sheltering Systems

In 2006, FEMA and ARC entered into a joint informal agreement to develop a National Shelter System database that would provide a nationwide inventory of possible shelters that could be used during an emergency or national disaster. A FEMA official said that according to the informal agreement, ARC would develop the first version of the National Shelter System and FEMA would be responsible for the second version. Both parties would then use the system and share shelter data.

An ARC official said that ARC completed the first version of the joint National Shelter System database in July 2006. However, in October 2006 FEMA informed ARC that it had decided to develop its own shelter system database. A FEMA official said that FEMA could not continue on the project due to legal and contractual issues that included the sole source nature of the ARC's contracting arrangement and issues associated with access to the shelter data.

Since that time, according to an ARC official, ARC has updated its National Shelter System several times and has the capability to track ARC and non-ARC general, functional needs, medical, and pet shelters. The database also has 519 registered state and federal users. According to the ARC official, ARC is still working to improve and simplify the System. For example, the ARC official said that the agency is working on a project that will allow users to update shelter counts with smart phones or other web-enabled mobile devices.

In June 2009, FEMA's National Shelter System database went on line. At the completion of our audit, FEMA had Memorandums of Understanding with six states to use the system. The FEMA system was designed to track any facility associated with the care of disaster survivors and displaced pets. The system, among other things, can also identify embarkation and disembarkation evacuation sites, location of food kitchens, numbers of meals served by shelters, food storage warehouses, and portable on-demand storage units. It also has a built-in Geographic Information System that shows shelter locations and contains information on critical infrastructure, river gauges, flood plains, live weather feeds, and seismic data. A FEMA official said that it will be a comprehensive tool for not only tracking shelter information but also for managing many mass care disaster operations.

Currently, FEMA must either manually load shelter data into its National Shelter System or rely on others (state and local governments, shelter operators, etc.) to do it for them. Moreover, according to mass care personnel in the two FEMA Regions we visited (Region IV and VI), they were of the opinion that the states in their Regions were not likely to adopt

or use FEMA's National Shelter System database in the near future. The regional officials stated that the states were waiting for FEMA to develop the capability to automatically share shelter data with the ARC National Shelter System and another, commercially available shelter system. Otherwise, ARC and state and local governments would have to manually enter the same shelter information multiple times to keep FEMA's National Shelter System database current. We were told by a regional official that the FEMA system required users to fill out a multitude of required fields before the information could be saved in the database. The FEMA official said it took him all day to transfer the required data on five shelters from a commercial system into the FEMA system. During a disaster the official did not think state and local officials would have the time to input data for a number of shelters.

At the time of our audit, FEMA was developing live data interfaces so that it can automatically upload and share shelter data with the ARC National Shelter System database and a commercially available shelter system. The completion of this effort appears to be necessary for FEMA's National Shelter System database to be a viable alternative for those states which currently depend on the ARC or other commercially available software system databases for critical shelter information before and during an emergency or national disaster.

The interfaces are intended to facilitate the dissemination of sheltering information to states for use during an emergency or national disaster. If successfully developed, the interfaces would be responsive to the findings following Katrina that users had trouble identifying temporary and long-term housing alternatives for Hurricane Katrina victims. However, until this effort is completed successfully, state and local officials may be reluctant to embrace the FEMA National Shelter System database.

In commenting on this report, FEMA pointed out that the FEMA National Shelter System only had seven "required fields" and that once the data bridge is completed, uploads will occur automatically.

Recommendation

We recommend that the Assistant Administrator, Recovery:

Recommendation #5: Complete efforts to develop automatic data interfaces between FEMA's National Shelter System database, the ARC National Shelter System database, and other commercially available sheltering system databases that state and local governments depend on for shelter-related information during an emergency or national disaster.

Management Comments and Contractor Analysis

FEMA concurred with recommendation #5. FEMA said that the automatic interface between the FEMA and Red Cross National Shelter Systems will be completed by the end of March 2011. According to FEMA, completion of the system interface with the other commercially available shelter system (which we discuss in the report) will be completed by July 2011. Moreover, FEMA noted that it is also in discussions with representatives from other commercially available shelter systems and may develop data interfaces with some of those systems.

In addition, FEMA stated that 10 states had signed Memorandums of Understanding to use FEMA's National Shelter System (rather than the six which had signed when completed our work). The System currently had 220 Federal, state, and voluntary agency users. FEMA also expected more states to sign Memorandums of Understanding once the data bridges with the Red Cross and the other commercially available system are complete.

The comments by FEMA are responsive to recommendations #5. If properly implemented, the actions identified should address the conditions identified during the audit. Within 90 days, the Assistant Administrator, Recovery, needs to provide a plan to ensure that the implementation of the proposed actions proceed, as intended.

National and Regional Exercise Programs Should Include Mass Care and Emergency Assistance

Mass care and emergency assistance operations are seldom included in FEMA's national and regional exercise programs. As a result, FEMA's mass care and emergency assistance workforce has not had the opportunity to coordinate its skills and identify strengths and weaknesses in a simulated national emergency.

Mass Care and Emergency Assistance Operational Plans and Procedures Are Not Exercised

FEMA has annual National Level Exercise involving an event of national significance, and a regional exercise program that provides contractor support and funding for states or groups of states involved in collaborative exercise efforts. These programs are designed to test the validity of operational plans and procedures and provide emergency management personnel with a greater

understanding of how the plans and procedures might work in an operational environment.

However, mass care and emergency assistance-related disaster activities and operating procedures have seldom been included in national and regional exercise programs. According to FEMA officials, most exercise programs focus on “response” activities during the first 72 hours during a disaster. These response activities include determining and reporting on situational awareness, emergency power generation, search and rescue missions, and other activities designed to protect the immediate health and safety of the public. Mass care and emergency assistance also typically becomes operational during the first 72 hours of a national incident. However, because mass care and emergency assistance is organizationally included in FEMA’s Recovery Directorate, headquarters recovery and regional officials said that mass care activities are typically overlooked during the design and implementation of exercise programs.

Mass care and emergency assistance activities are beginning to be included in the national-level exercises. The Recovery Directorate has exerted some influence over the design of the national program. For example, National Level Exercise 2010 process (focusing on the National response to an improvised nuclear device detonation), dedicated a full day to “recovery” issues, including mass care and emergency assistance”. According to a FEMA official, planning for National Level Exercise 2011 (involving a large earthquake along the New Madrid fault) will also include an evaluation of mass care and emergency assistance and other recovery issues.

We discussed mass care and emergency assistance exercises with officials in Regions IV and VI. In Region IV, officials pointed out that Florida, with FEMA’s participation, reviewed its Mass Care Feeding Plan as part of Florida’s 2009 Hurricane Exercise. A Florida mass care official said that Florida may also review mass evacuation procedures as part of its 2011 Hurricane Exercise. In Region VI, FEMA officials told us that mass care and emergency assistance activities were not part of its regional exercise programs. However, they were aware of the Florida exercise and the planned 2011 New Madrid Exercise.

Risks of Limited Mass Care and Emergency Assistance Exercises

Mass care and emergency assistance are among the most important public safety activities undertaken during the early stages of a major emergency or national disaster. Limited inclusion of these activities in FEMA's national or regional exercise programs increases the risk that FEMA will make mistakes similar to those that occurred during Hurricane Katrina.

Moreover, with such limited inclusion, FEMA reduces its ability to identify new mass care and emergency assistance issues. For example, FEMA's Region IV participated in Florida's 2009 Hurricane Exercise program by activating the region's RRCC and sending regional staff to participate in the exercise. During this exercise, Florida identified a number of issues, such as a critical shortage of insulated food containers and a shortage of nationally identified and trained mass care staff. These shortages would limit Florida's or FEMA's ability to deliver an estimated 1.6 million meals daily to the affected population. Florida's after-action report commented on the need for a national inventory of insulated food containers for mass care planners and noted that very few states have dedicated ESF 6 personnel to coordinate mass care activities in the event of a disaster.

National and regional exercise programs should include, as appropriate, mass care and emergency assistance operational plans and procedures evaluations. These evaluations would enable FEMA to assess the efficacy of its mass care and emergency assistance operational plans and procedures. The evaluations would also provide FEMA staff opportunities to interact with state and local governments and voluntary agencies to identify potential gaps in service coverage and areas where FEMA can provide value-added services to disaster survivors.

Recommendations

We recommend that the Deputy Administrator, Protection and National Preparedness:

Recommendation #6: Revise internal policies and procedures to ensure that mass care and emergency assistance plans and procedures are included, as appropriate, in FEMA's national and regional exercise programs.

We recommend that the Assistant Administrator, Recovery:

Recommendation #7: Develop and implement procedures to track, accumulate, and disseminate mass care and emergency assistance-related lessons learned from exercises that include mass care and emergency assistance support and operating procedures.

Management Comments and Contractor Analysis

FEMA concurred with recommendation #6. FEMA said that mass care and emergency assistance is a major focus of its preparedness activities. It noted that FEMA's response, recovery, and preparedness components had begun to include mass care and emergency assistance in their "Thunderbolt" table top exercises, National Level Exercises, and other exercise programs. FEMA also noted instances where FEMA regions had supported the states in efforts to include mass care and emergency assistance activities in state exercise programs. FEMA said that in February 2011, FEMA's Recovery and Logistics Directorates streamlined internal procedures to provide mass care support for infants, seniors, and persons with disabilities. Also, it had developed infant and toddler shelter kits which will be included as inventory in FEMA's distribution centers. According to FEMA, these and other mass care-related procedures will be among those tested in the 2011 National Level Exercise. Finally, FEMA committed to the development of new training programs and workshops that will help facilitate the inclusion of mass care and emergency assistance plans into various exercises, exercise plans, and respective evaluation processes.

FEMA partially concurred with recommendation #7. FEMA said that the Homeland Security Information Network Mass Care/Emergency Assistance Community of Interest website is under construction. Once completed, FEMA said that the share site will be a forum that will allow FEMA and its mass care and emergency assistance partners to submit, share, and exchange information. The type of information on the share site will include lessons learned, plans, policies, doctrine, guidance and other resource documents. The site will also be designed to provide a primary location for vetting documents under review with a broad range of government and voluntary agency partners.

We believe that the shared website is an important undertaking that should help FEMA track, accumulate, and disseminate mass care and emergency assistance-related lessons learned. However, having such a website does not always mean that the lessons

learned are implemented or that positive improvements result. Therefore, we believe that it is also important that FEMA evaluate the importance of the lessons learned, track their implementation through performance-based metrics, and periodically report on the impact of the shared website program.

The comments by FEMA are responsive to recommendations #6 and #7. If properly implemented, the actions identified should address the conditions identified during the audit. Within 90 days, the Deputy Administrator, National Preparedness Directorate, and the Assistant Administrator, Recovery, need to provide plans to ensure that the implementation of the proposed actions proceed, as intended.

Appendix A

Purpose, Scope, and Methodology

Foxx & Company audited FEMA’s mass care and emergency assistance program. The overall objective of the audit was to determine if FEMA completed effective mass care and emergency assistance operational plans and procedures following Hurricane Katrina and adequately coordinated with and considered the views of others outside of FEMA. Specific audit objectives were to—

1. Determine if FEMA’s mass care and emergency assistance operational plans and procedures provide an effective framework for guiding, directing, and coordinating related services during presidentially declared emergencies and national disasters; and
2. Evaluate the extent to which FEMA coordinated with applicable federal, state, tribal, local, and voluntary agencies in developing mass care and emergency assistance operational plans and procedures.

The scope of the audit included interviews of FEMA headquarters officials who managed the mass care and emergency assistance functions and developed and coordinated various operational plans and procedures. Foxx & Company discussed mass care and emergency assistance issues with other officials within the Recovery Directorate. We did extensive research on past mass care and emergency assistance problems that occurred during Hurricane Katrina and FEMA efforts to correct the problems. This research included reviews of Katrina-related reports prepared after the incident to document problems and recommend solutions. Our primary focus was on gaining an understanding of the recent mass care and emergency assistance changes that FEMA has made to address the documented shortcomings during the response to Hurricane Katrina. We also visited or talked with officials in the following locations:

- FEMA Regional Offices in Atlanta, GA, and Denton, TX
- State emergency management offices in Austin, TX and Tallahassee, FL
- National Individual Assistance ESF 6 Conference in San Diego, CA
- Washington, DC, offices of the following mass care and emergency assistance designated support agencies:
 - U.S. Department of Health and Human Services
 - U.S. Department of Agriculture
 - American Red Cross
 - National Voluntary Organizations Active in Disaster

At these locations, the audit team collected related documents and solicited the views of officials on FEMA’s coordination process and the effectiveness of various initiatives undertaken by FEMA to improve mass

Appendix A

Purpose, Scope, and Methodology

care and emergency assistance operating procedures following Hurricane Katrina.

This performance audit was conducted in accordance with *Government Auditing Standards*, July 2007 Revision. The 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. The evidence obtained supports the findings and conclusions based on our audit objectives.

Appendix B Management Comments on the Draft Report

U.S. Department of Homeland Security
500 C Street, SW
Washington, DC 20472



FEMA

MAR 14 2011

Mr. Matt Jadacki
Assistant Inspector General
Office of Emergency Management Oversight
Office of Inspector General
U.S. Department of Homeland Security
Washington, DC 20528

Re: *OIG Draft Report, Opportunities to Improve FEMA's Mass Care and Emergency Assistance Activities*, OIG Project No. 09-214-EMO-FEMA

Dear Mr. Jadacki:

The Department of Homeland Security's Federal Emergency Management Agency (FEMA) appreciates the opportunity to review and respond to the Office of Inspector General (OIG) draft report, *Opportunities to Improve FEMA's Mass Care and Emergency Assistance Activities*, OIG Project No. 09-214-EMO-FEMA. FEMA is actively resolving the issues identified in the audit.

The draft report highlights many improvements FEMA has made since the 2005 hurricane season, but some portions do not accurately characterize FEMA's responsibilities in relation to mass care and emergency assistance. The report notes that FEMA is coordinating more effectively with state and local governments and voluntary organizations and has developed planning tools to build mass care and emergency assistance capabilities at the state and local level. While the OIG's audit concluded that additional actions are needed to ensure that the program is effectively implemented in future disasters, it pointed out that FEMA has created an internal infrastructure to plan, coordinate, and provide direct mass care and emergency assistance during and following disasters. The report inaccurately characterizes FEMA's responsibilities in relation to mass care and emergency assistance by overstating FEMA's role in state and local exercises and guidance implementation. It bears emphasis that FEMA is only one member of a broad national emergency management team—one that includes all levels of government, the private sector, nongovernmental organizations, and the American public.

FEMA has already begun to take remedial action in shortcomings identified in the report. FEMA's Mass Care/Emergency Assistance Branch in the Recovery Directorate's Individual Assistance (IA) Division has made great strides in developing guidance and tools to help develop mass care and emergency assistance capabilities at the state and local level. Additionally, the Mass Care/Emergency Assistance Branch is working closely with the Recovery Directorate's National Planning Branch and the National Preparedness Directorate's (NPD) National Exercise Division (NED) to ensure that mass care and emergency assistance are included in FEMA's

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exercise programs. FEMA response, recovery, and preparedness components have begun to include mass care and emergency assistance in their “Thunderbolt” and other table-top exercises. Moreover, mass care will be tested as one of the thirteen core capabilities in catastrophic planning during the 2011 National Level Exercise (NLE). To support the NLE, NED is presenting workshops in preparation for the NLE and mass care is one of the courses included on NED’s schedule. FEMA will continue with these programs, and others discussed below, to properly address the OIG’s recommendations.

The OIG makes seven recommendations in its draft report. FEMA’s responses to those recommendations follow:

Recommendation #1: Develop and finalize the mass care and emergency assistance SOPs and other procedural documents for the National Response Coordinating Center, Regional Response Coordinating Centers, and Joint Field Offices.

FEMA concurs with this recommendation.

Moving forward the procedural documents for the National Response Coordination Center (NRCC) the Regional Response Coordination Centers, and the Joint Field Offices will be the National Incident Support Manual, the Regional Incident Support Manual, and the Incident Management Manual respectively. The Response Directorate’s Doctrine Unit has created and updated these base documents. The new NRCC doctrine is being finalized and training for NRCC Activation Team members is being implemented in February/March 2011.

The new NRCC structure is not organized by Emergency Support Function (ESF). Instead, it reflects the strategic role that FEMA Headquarters is assigned during response operations. The new doctrine includes a national resource support structure with a Resources Support Section, under which FEMA’s IA Division participates at the group level. IA also is involved in the planning and reporting sections of the new NRCC. IA anticipates drafting the NRCC IA Group SOPs after hurricane season 2011. Development and implementation of the next iteration of the SOPs will include input from ESF #6 partners. The ESF 6 structure will no longer be applicable under the new doctrine. The new structure will be tested during 2011 NLE.

Regions are responsible for developing their own support documents, including SOPs, with guidance and technical assistance from FEMA Headquarters, which provides subject matter expertise and other assistance to the regional offices when requested. An example of the type of collaborative effort in which FEMA HQ engages with requesting regions is the *Region 2 ESF #6 Management Guide* (currently in draft form, will be provided to the OIG upon completion).

As Joint Field Offices (JFOs) will continue to be tactical, coordinating services through the traditional ESF model, FEMA already has a basis for developing further JFO support documents. In the document submission phase of the OIG audit of mass care and emergency assistance, FEMA provided information on four courses that were under development. In January 2011, the FEMA Emergency Management Institute completed the *Mass Care/Emergency Assistance for Field Operations* training course. This course establishes the JFO structure for mass care and emergency assistance, defines activities, identifies resources and provides information on

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processes, and can serve as the basis for an SOP for field staff. A pilot of the new training course validated that the curriculum effectively addresses field requirements and operations for mass care and emergency assistance activities.

Recommendation #2: Provide opportunities for FEMA’s mass care and emergency assistance partners to review and comment on draft SOPs and other procedural documents.

FEMA concurs with this recommendation.

In coordination with the Emergency Support Function Leadership Group (ESFLG), comments have been solicited and incorporated into the National Incident Support Manual, the Regional Incident Support Manual, and the Incident Management Manual respectively.

With respect to other documents, the Mass Care/Emergency Assistance Branch typically includes its partners when developing guidance, hazard-specific plans, and other function-specific documents. An example of our collaborative document development process is the FEMA/American Red Cross (ARC) Shelter Field Guide. This guide provides practical operational instruction on all phases of shelter operations for non-ARC-managed facilities. This guide is currently in draft form and will be forwarded once it has been finalized.

Additionally, ARC is involved in the development of four training courses mentioned in our response to recommendation #1. The Mass Care/Emergency Assistance Branch also routinely collaborates with ESF #6 stakeholders in the development of national guidance, including the *Multi-Agency Feeding Plan Template and Task Force Guidance* (attached) and the *Pandemic Planning Guide for Mass Care/Emergency Assistance Functions* (currently in draft form, will be provided to the OIG upon completion), with the participation of fifty stakeholders from Federal, State and local government, voluntary organizations, and the private sector. Another example of successful collaboration is the *Guidance on Planning for Integration of Functional Needs Support Services (FNSS) in General Population Shelters*, which included Federal, State and local government, and voluntary organizations with a focus on access and functional needs.

FEMA created the FNSS in collaboration with the Office of Disability Integration and Coordination (ODIC), and Regions I, VI, and X. Other Federal involvement came from the Departments of Justice and Health and Human Services, the National Council on Disability, and the DHS Office of Civil Rights and Civil Liberties. Nonprofit partner representatives included the American Red Cross, National Disability Rights Network, and the National Council on Independent Living. State representatives from Florida, Rhode Island, and California were also involved in the development process. A copy of the FNSS Guidance document is attached.

The Mass Care/Emergency Assistance Branch has embarked on the development of a *National Mass Care Strategy* in collaboration with ARC, National Voluntary Organizations Active in Disaster (National VOAD) and its members, National Emergency Management Association, county emergency management associations, the private sector, academia, and others. This effort brings together representatives from a broad spectrum of mass care service providers with the

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intention of developing guidelines and initiatives to establish a national strategy for providing mass care services.

Not only are these individual efforts reaching out to important stakeholders, the Administrator's Whole Community initiative is encouraging the agency and members of the emergency management team to reconsider our approach to emergency management and engage the full spectrum of community residents and members. Working with Federal, state, tribal and local governments, voluntary organizations, and private sector stakeholders, the emergency management team is encouraging the public participate in the development of innovative, out-of-the-box solutions to large-scale events—including those that require a mass care and emergency assistance response. Initiative 1 in *FEMA's Strategic Plan for Fiscal Years 2011–2014* details this effort.

FEMA believes we have complied with this OIG recommendation, and remains committed to engaging our partners in future activities.

Recommendation #3: Evaluate the effectiveness of the planning tools and initiatives through a documented coordinated exercise programs at the state or regional level.

FEMA concurs with this recommendation. The agency has begun to encourage exercise of these programs at the state or regional level and will continue to do so moving forward.

In 2009, the *Multi-Agency Feeding Plan Template* was exercised by the State of Florida. In 2010, the Mass Care/Emergency Assistance Branch had the opportunity to test two of its systems: the National Shelter System (NSS) during an exercise in the State of Maine and the National Mass Evacuation Tracking Systems during an exercise in the State of Maryland. In February 2011, the State of Washington exercised the NSS and in May 2011, the NLE will include mass care and emergency assistance injects. During the NLE, FEMA Individual Assistance Technical Assistance Contract capabilities for sheltering and feeding will be tested.

The Mass Care/Emergency Assistance Branch strongly encourages regions and states to use exercises to evaluate tools and initiatives mass care and emergency assistance will continue working closely with the Recovery Directorate's National Planning Branch to identify opportunities to evaluate mass care and emergency assistance tools and initiatives through exercises. Moreover the NED's Regional Exercise Support Program—which provides direct support for regional, state, local, territorial, and tribal exercises—continues to support exercises that focus on mass case and emergency assistance.

To ensure lessons learned from exercises are implemented, the Mass Care/Emergency Assistance Branch has instituted monthly calls with FEMA regions and states that have signed the Memorandum of Agreement (MOA) to adopt the FEMA NSS. These meetings provide an opportunity for regions and states to discuss successes, challenges, request requirements for future versions of the software and ask questions, as well as an opportunity for Mass Care/Emergency Assistance Branch staff to update participants on enhancements, answer questions, and provide technical assistance.

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FEMA believes we have complied with this OIG recommendation, and remains committed to encouraging exercise programs at the state and regional levels.

Recommendation #4: Track and document the use and effectiveness of the tools and initiatives when adopted by state and local governments.

FEMA concurs with this recommendation. As stated in the response to recommendation three, the Mass Care/Emergency Assistance Branch holds monthly calls with regions and states that have adopted the NSS. These calls encourage feedback and dialog with system users. The branch has also begun to roll out the National Mass Evacuation Tracking System. Once states have implemented the system, the branch will begin to document the use and effectiveness of the tool. We will look for opportunities in collaboration with regional offices to document and evaluate the effectiveness of tools as they are developed and implemented.

Recommendation #5: Complete efforts to develop automatic data interfaces between FEMA's National Shelter System database, the Red Cross National Shelter System database, and other commercially available sheltering system databases that state and local governments depend on for shelter-related information during an emergency or national disaster.

FEMA concurs with this recommendation.

Development of the automatic data bridge between the FEMA and ARC NSS's is slated to be completed by the end of March 2011. The Mass Care/Emergency Assistance Branch is also in discussions with representatives from other commercial systems and may develop data interfaces with some of those other systems. Completion of system integration with the other commercially available sheltering system will be completed by July 2011.

As of February 1, 2011, the FEMA NSS had MOUs with ten states. Additional states are expected to sign an MOU with FEMA when the data bridges are implemented. The system currently has 220 Federal, State, and voluntary organization users.

Additionally, FEMA's implementation of Disaster Management and Support Environment (DMSE) and the Situational Awareness Viewer for Emergency Response and Recovery (SAVER2) will allow "real time" or "near real time" informational capabilities that will equip decision makers with the best available information. Detailed information such as critical shelter and demographic data will assist in the proper allocation of government resources and investments associated with assisting the disaster survivor.

Recommendation #6: Revise internal policies and procedures to ensure that mass care and emergency assistance plans and procedures are included, as appropriate, in FEMA's national and regional exercise programs.

FEMA concurs with this recommendation.

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Mass care and emergency assistance activities are and have been very important areas of focus for FEMA's preparedness activities. FEMA response, recovery, and preparedness components have begun to include mass care and emergency assistance in their "Thunderbolt" table top exercises, NLEs, and other exercise programs. In 2010, Mass Care was included in several "no notice" and announced exercises, as well as the NLE Resource Allocation Workshop held in November. FEMA has also included the participation of mass care non-government, private sector, and voluntary agency partners in national thunderbolt exercises. In 2009 national and regional FEMA mass care/emergency assistance program offices supported the State of Florida in exercising mass care during its annual hurricane exercise, with similar involvement begin planned for 2011. In 2010, Region IV alone supported North Carolina, South Carolina, Kentucky, and Tennessee in the mass care portions of state tabletop exercises.

In February 2011, FEMA's Recovery and Logistics Directorates streamlined internal procedures to provide mass care support for infants, seniors, and persons with disabilities consistent with the Administrator's Whole Community Initiative. Infant and toddler shelter kits (itemized list attached) will be included inventory in FEMA distribution centers and the directorates are in the process of transitioning cot inventories to a "universal/accessible" standard. In 2011, these mass care procedures will be among those tested in the NLE. In addition, the National Exercise Division (NED) is presenting workshops in preparation for NLE and Mass Care is one of the courses included on NED's schedule. Materials are currently under development and will be rolled out in March 2011.

The Mass Care/Emergency Assistance Branch is working closely with the Recovery Directorate's National Planning Branch and NED to ensure that Mass Care/Emergency Assistance is included in other exercise programs by working collaboratively with interagency partners at all levels of government and non-governmental organizations. These efforts will be primarily undertaken through the implementation of the National Exercise Program (NEP) and close coordination with Training and Exercise Planning Workshops (TEPW) that occur at regional, state, and local levels. Within the NEP and regular TEPW process, FEMA will help facilitate the inclusion of mass care and emergency assistance plans into various exercises, exercise plans, and respective evaluation processes.

Recommendation #7: Develop and implement procedures to track, accumulate, and disseminate mass care and emergency assistance-related lessons learned from exercises that include mass care and emergency assistance support and operating procedures.

FEMA concurs with this recommendation in part. The Homeland Security Information Network Mass Care/Emergency Assistance Community of Interest website is under construction. This shared site will be a forum that will allow FEMA and its Mass Care/Emergency Assistance partners to submit, share and exchange information, including lessons learned, plans, policies, doctrine, guidance and other resource documents. It will also provide a primary location for vetting documents under review with a broad range of government (at all levels) and voluntary organization partners.

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Once again, thank you for the opportunity to comment on the draft report. In addition to the above comments, a list of technical comments is included in the attached Addendum. I look forward to working with you on future homeland security and emergency management engagements.

Sincerely,



David J. Kaufman
Director, Office of Policy and Program Analysis

Addendum: Technical Comments

Attachments:

Multi-Agency Feeding Plan Template and Task Force Guidance
Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters

Appendix C

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