



# Department of Homeland Security Office of Inspector General

## FEMA's Progress in Implementing the Remedial Action Management Program





Homeland  
Security

JAN 19 2011

## 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 prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the department.

This report addresses the strengths and weaknesses of the Federal Emergency Management Agency's Remedial Action Management Program. It is based on interviews with employees and officials of relevant agencies and institutions, direct observations, and a review of applicable documents.

The recommendations herein have been developed to the best knowledge available to our office, and have been discussed in draft with those responsible for implementation. We trust this report will result in more effective, efficient, and economical operations. We express our appreciation to all of those 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

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## Abbreviations

FEMA	Federal Emergency Management Agency
OIG	Office of Inspector General

# OIG

*Department of Homeland Security  
Office of Inspector General*

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## **Executive Summary**

The Federal Emergency Management Agency's (FEMA) Remedial Action Management Program is intended to: (1) identify operational and programmatic issues, lessons learned, and best practices encountered during federal disaster response and recovery operations and exercises; (2) manage the subsequent remediation of issues; and (3) distribute lessons learned and best practices. Our audit objective was to determine to what extent FEMA has implemented the Program to identify and distribute lessons learned and best practices to improve its incident management operations.

FEMA needs to improve its implementation of the Remedial Action Management Program to identify lessons learned and best practices. Specifically, FEMA officials should: (1) conduct an after-action review for every disaster to identify lessons learned and best practices; and (2) develop instructions or examples on how to develop clear and concise lesson learned and best practice statements.

Program officials distributed lessons learned and best practices to more personnel than what was required by program policy. However, distribution was still limited to the program's database users, averaging 70 users. Program officials told us that those users served as organizational points of contact and disseminated the information to others.

In May 2010, FEMA lost access to program data, including lessons learned and best practices, when the server which housed the program's database failed. In November 2010, program officials informed us that they were able to recover all of the data; however, the software necessary to read the data has not been restored. Therefore, historical data on lessons learned and best practices that was contained in the program's database is not available to all FEMA personnel.

We are making six recommendations that, when implemented, should improve FEMA's efforts to identify and distribute lessons learned and best practices.

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## Background

The Federal Emergency Management Agency (FEMA) launched the Remedial Action Management Program in July 2003. The program's purpose is to: (1) identify operational and programmatic issues, lessons learned, and best practices encountered during federal disaster response and recovery operations and exercises; (2) manage the subsequent remediation of issues; and (3) distribute lessons learned and best practices. The Program defines an issue as a problem that negatively impacts FEMA's ability to accomplish its mission or a systemic problem that cannot be resolved in the field and requires the attention of Program Managers or senior leadership to resolve. A lesson learned is a course of action that was either extremely successful or unsuccessful and should be shared with other FEMA personnel. A best practice is an innovative or unconventional course of action that proved particularly effective and should be repeated or considered under similar circumstances. It may also be a course of action that has met with repeated success.<sup>1</sup>

The Remedial Action Management Program is housed in the National Preparedness Directorate, National Preparedness Assessment Division, Corrective Actions and Lessons Learned Branch. It is responsible for:

- Developing policy and managing the Program;
- Maintaining the program's database, which houses issues, lessons learned, and best practices;
- Monitoring the resolution of and reporting the status of issues;
- Ensuring lessons learned and best practices are widely disseminated; and
- Preparing, publishing, and distributing a monthly Remedial Action Management Program report with newly identified lessons learned and best practices, and the status of issues.

It does not have oversight of the Regions' program responsibilities.

FEMA Regional Offices are responsible for coordinating and scheduling after-action reviews on site at operational venues with disaster response and recovery operations personnel at or near the conclusion of emergency or disaster operations to identify issues,

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<sup>1</sup> For the purposes of this audit, we limited the scope to focus only on lessons learned and smart practices.

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lessons learned, and best practices.<sup>2</sup> The after-action review is considered the foundation of the Program, as it provides participants with a forum to candidly discuss their views. The Regions are also responsible for collecting and transmitting to FEMA Headquarters issues, lessons learned, and best practices identified in after-action reviews. Until May 2010, lessons learned and best practices identified in after-action reviews were entered into the program's database to be distributed to database users. See Appendix C for a detailed description of the after-action review and distribution process.

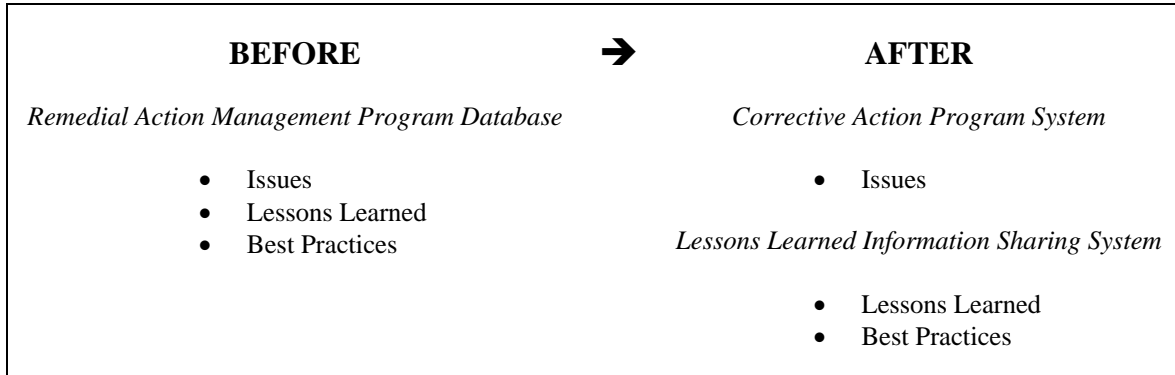
In May 2010, the Deputy Administrator for Protection and National Preparedness advised all FEMA employees to stop using the program's database because it was housed on a server that was no longer being supported by FEMA, and it could cease operating.<sup>3</sup> As a replacement, FEMA integrated the functions of the Remedial Action Management Program's database with the Corrective Action Program system. The system, which was launched in 2007, is a web-based application that enables users to prioritize, track, and analyze improvement plans developed from exercises and real-world events. Features of the system include improvement plan creation and maintenance, corrective action assignment and tracking, and reporting and analysis. For the Remedial Action Management Program, the newly integrated Corrective Action Program system will house data on issues, and FEMA personnel will be able to generate after action reports and improvement plans. FEMA began integrating the functionalities of the two systems in February 2009, and by July 2010, the new Corrective Action Program system was available to Remedial Action Management Program users.

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<sup>2</sup> During our review, program guidance referred to an "after-action review" as a "hotwash." To be consistent with new program guidance, we have changed our terminology to "after-action review."

<sup>3</sup> The server which housed the database failed in May 2010, a few days after employees were advised to stop using the database.

**Figure 1. Remedial Action Management Program Information Systems**



For lessons learned and best practices, program officials are advising regional personnel to use the Lessons Learned Information Sharing system. FEMA launched the Lessons Learned Information Sharing system in 2004. The system is an online library of lessons learned and best practices submitted by federal and state emergency response providers and homeland security officials. In November 2010, program officials stated that they have established a FEMA-only area in the Lessons Learned Information Sharing system for Remedial Action Management Program lessons learned and best practices. This area will be accessible to all FEMA personnel who obtain a user account for the Lessons Learned Information Sharing system. Program officials plan to conduct outreach for this new area, and they also plan to develop and disseminate a monthly newsletter tailored to FEMA personnel.

## **Results of Audit**

### **FEMA’s Implementation of the Remedial Action Management Program**

FEMA needs to improve its implementation of the Remedial Action Management Program to identify lessons learned and best practices. Specifically, FEMA officials should conduct after-action reviews for every disaster to identify lessons learned and best practices. In addition, FEMA needs to prepare better instructions or examples on how to develop clear and concise lesson learned and best practice statements. Although program officials distributed lessons learned and best practices to more personnel than required by program policy, distribution was still limited. FEMA should expand the distribution to the significant number of additional employees who would benefit from this information.

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Furthermore, FEMA has lost access to program data, including lessons learned and best practices. Thus, FEMA should enhance its archiving procedures to prevent such incidents in the future.

### **Identification of Lessons Learned and Best Practices**

FEMA officials do not always conduct after-action reviews to identify lessons learned and best practices. Program policy dictates that after-action reviews will be scheduled at or near the conclusion of emergency or disaster operations. The Team Leader, e.g., the Federal Coordinating Officer, the Regional Operations Center Director, etc., is responsible for coordinating and scheduling after-action reviews. However, FEMA officials stated that in some cases, Federal Coordinating Officers and Planning Section Chiefs have decided to hold informal discussions with personnel instead of conducting formal Remedial Action Management Program after-action reviews. In other cases, FEMA officials noted that the magnitude of the disaster and circumstances, such as budget, timing, and personnel, could affect whether a Team Leader chose to conduct an after-action review.

FEMA officials largely conducted after-action reviews according to program policy. One exception we noted is in the appointment of after-action review facilitators. After-action review facilitators were not appointed according to a policy which prohibits facilitators from working in their own Regions or with their own Federal Coordinating Officers. For an after-action review we observed in July 2010, the facilitator was from the same FEMA Region where the disasters occurred. A regional official said facilitators from his Region conduct approximately 90% of the Region's after action reviews. Program officials said that, due to a lack of travel funds, using facilitators from other Regions has been abandoned unless there is an extraordinary reason, such as a catastrophic incident. However, assigning a facilitator from a different Region is a programmatic requirement, and according to a FEMA Headquarters official, traveling to another Region to facilitate an after-action review is not an overwhelming financial burden. Thus, there is no financial reason that outweighs not following program policy.

More than 20 individuals from FEMA and various federal and state agencies and departments participated in the July 2010 after-action review for several storm and flooding disasters in Region VIII. Participants identified and thoroughly discussed six lessons learned and seven best practices. Participants concluded that only one



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lesson learned and four best practices had national significance and would be forwarded to FEMA Headquarters for review and distribution.

FEMA officials stated that better instructions or examples on how to develop clear and concise lesson learned and best practice statements are needed because too much time is spent during the after-action review analyzing the statements and on “wordsmithing.” For example, at the July 2010 after-action review, a significant amount of time was spent discussing the lesson learned and best practice statements, and the group determined that two of the lessons learned were in fact issues. Better instructions and examples could speed the process.

#### **Lessons Learned and Best Practices**

☞ In order to open Disaster Recovery Centers within 24 hours of declaration, the Group Supervisor was deployed to the State Emergency Operations Center prior to the declaration.

☞ When a shelter was opened, a mass care specialist was deployed to assist with the coordination of obtaining critical situational information in order to fill the gaps and ensure the health and safety of shelter residents. He/she worked closely with the American Red Cross and other agencies responsible for the operation of shelters, including the state and the U.S. Department of Health and Human Services.

☞ The State of North Dakota set up a weekly conference call to allow local officials the opportunity to ask questions directly of state and FEMA program leads. This call was highly effective at facilitating communication between local officials and disaster recovery program staff.

Our review of lessons learned and best practices indicates that field personnel are identifying ways to improve future incident management operations (see text box). FEMA officials are also converting lessons learned and best practices into policy. One official said his Region has used information collected through the Program to “tweak” its policies and guidance. Officials also stated that lessons learned and best practices have been implemented in their Regions to improve FEMA’s incident management operations (see text box on next page).

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### **Implementation of Lessons Learned and Best Practices**

☞ A regional official reported that a lesson learned from several disaster response operations was that FEMA should deploy Mobile Disaster Registration Centers earlier in a disaster or make those units ready to respond earlier. In several disasters, this lesson learned was applied, and Mobile Disaster Registration Centers deployed earlier or were ready to deploy earlier. As a result, FEMA was better able to register and assist disaster survivors in areas where there was a long-term and widespread lack of electricity. FEMA was also better able to assist disabled and less technologically savvy survivors.

☞ A regional official reported that his Region adopted External Affairs best practices from another Region.

### **Distribution of Lessons Learned and Best Practices**

Program officials have distributed lessons learned and best practices beyond what was required by program policy, but distribution was still relatively limited. According to the Program's Database User Guide, once the Program Manager approves lessons learned and best practices, the database generates an e-mail notification with a link to the lesson learned or best practice to all Remedial Action Managers – the primary point of contact for program activities for a division, office, or Region. The Program Manager stated that she actually forwarded lessons learned and best practices to all database users, which at the height of its use averaged 70 users. FEMA has over 7,000 employees in Headquarters and the Regions and approximately 9,000 Disaster Assistance Employees. Many of these employees could benefit from a wider distribution of lessons learned and best practices.

Lessons learned and best practices were further distributed by regional officials. Several regional officials said they forward lessons learned and best practices to Regional Administrators, Branch Chiefs, and Division Directors. One Region shares lessons learned and best practices at Regional Interagency Steering Committee meetings. A regional official said that lessons learned and best practices must be distributed in a more effective manner because “in the heat of battle” emergency personnel do not have the time to research previously identified lessons learned and best practices – he believes that they must be made a part of the training curriculum, or they will not be implemented.

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Program officials also initially followed policy regarding the distribution of Remedial Action Management Program reports to senior FEMA leadership. These monthly status reports included newly identified best practices and lessons learned and were posted on the FEMA intranet. However, program officials stated that in 2007 a senior FEMA official made the decision to discontinue the monthly reports. According to regional officials, this decision sent a message to the Regions that the Remedial Action Management Program is not a priority, leading personnel to not take the Program seriously. Program officials stated that current senior FEMA leadership supports the Program, which is evidenced by the resources that have been dedicated to the new system.

In May 2010, FEMA lost access to program data, including lessons learned and best practices, when the server which housed the program's database failed. The Program Manager was working with FEMA's Information Technology department to implement a data archiving plan. However, the plan was not implemented before the server failed. In November 2010, program officials informed us that they were able to recover all of the data; however, the software necessary to read the data has not been restored. Therefore, historical data on lessons learned and best practices are not available to all FEMA personnel.

### **Conclusion**

By not effectively implementing the Remedial Action Management Program to identify and more fully distribute lessons learned and best practices, FEMA has missed opportunities to learn from the experiences of its personnel and improve its incident management operations. Specifically, FEMA officials have not conducted after-action reviews for every disaster to identify lessons learned and best practices. Furthermore, although program officials distributed lessons learned and best practices beyond what was required by program policy, they were not distributed to all response and recovery personnel or to senior leadership. Finally, FEMA lost access to program data when the server which housed the program's database failed before data could be archived. Therefore, historical data on lessons learned and best practices are no longer available to all FEMA personnel.

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## Recommendations

We recommend that the Director, National Preparedness Assessment Division:

**Recommendation #1:** Enforce the Remedial Action Management Program's policy to conduct after-action reviews for all disasters.

**Recommendation #2:** Require that Division Directors appoint after-action review facilitators according to program policy.

**Recommendation #3:** Develop instructions with examples on how to develop clear and concise lesson learned and best practice statements.

**Recommendation #4:** Disseminate lessons learned and best practices more widely.

**Recommendation #5:** Develop and implement a process for archiving Remedial Action Management Program data so that data loss does not recur.

**Recommendation #6:** Develop and distribute a Remedial Action Management Program status report to senior FEMA leadership according to program policy.

## Management Comments and OIG Analysis

**Recommendation 1:** FEMA's Office of Policy and Program Analysis concurred with this recommendation. FEMA has drafted new program guidance on after-action reviews based on feedback from a working group that included Headquarters and regional personnel.

We consider this recommendation resolved because steps are being taken to implement it; however, it will remain open until the new program guidance that details FEMA's plan for implementing and enforcing the after-action review policy is finalized.

**Recommendation 2:** FEMA's Office of Policy and Program Analysis concurred with this recommendation. FEMA is revising its program guidance, recommending that a representative from outside the assigned component guide the data collection effort in

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close coordination with a representative from within the component.

We consider this recommendation resolved because steps are being taken to implement it; however, it will remain open until the new program guidance is finalized.

Recommendation 3: FEMA's Office of Policy and Program Analysis concurred with this recommendation. FEMA is developing instructions and plans to issue them in the second quarter of Fiscal Year 2011.

We consider this recommendation resolved because steps are being taken to implement it; however, it will remain open until the instructions are finalized and issued.

Recommendation 4: FEMA's Office of Policy and Program Analysis concurred with this recommendation. FEMA is developing a monthly Lessons Learned Information Sharing system newsletter tailored for FEMA personnel.

We consider this recommendation resolved because steps are being taken to implement it; however, it will remain open until the first newsletter is developed and disseminated.

Recommendation 5: FEMA's Office of Policy and Program Analysis concurred with this recommendation. FEMA reports that the newly integrated Corrective Action Program system and the Lessons Learned Information Sharing system are backed up daily and the servers are backed up weekly. These backups are routinely stored offsite.

We consider this recommendation resolved and closed because it has been fully implemented.

Recommendation 6: FEMA's Office of Policy and Program Analysis concurred with this recommendation. FEMA has drafted new program guidance regarding status reports to senior FEMA leadership.

We consider this recommendation resolved because steps are being taken to implement it; however, it will remain open until the new program guidance is finalized.

## **Appendix A**

### **Purpose, Scope, and Methodology**

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The objective of our audit was to determine to what extent FEMA has implemented its Remedial Action Management Program and is identifying and distributing lessons learned and best practices to improve incident management operations.

We conducted interviews with FEMA Headquarters and regional officials and examined documentation related to the Remedial Action Management Program, including the Program Manual, Facilitator Handbook, and Program Reports for specific disasters. We also observed an after-action review conducted in July 2010.

We conducted this performance audit between May 2010 and August 2010 pursuant to the *Inspector General Act of 1978*, as amended, and according to 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 upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

## Appendix B Management Comments to the Draft Report

U.S. Department of Homeland Security  
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**FEMA**

DEC 17 2010

MEMORANDUM FOR: Matt Jadacki  
Assistant Inspector General  
Office of Emergency Management Oversight  
Office of Inspector General

FROM:   
David J. Kaufman  
Director  
Office of Policy and Program Analysis

SUBJECT: Comments on OIG Draft Report, *FEMA's Progress in Implementing the Remedial Action Management Program*

Thank you for the opportunity to review and comment on the Office of Inspector General's (OIG's) subject draft audit report. As the Federal Emergency Management Agency (FEMA) works toward refining its programs, the OIG's independent analysis of program performance greatly benefits our ability to continuously improve our activities. Technical comments have been provided under separate cover.

This OIG audit focused on the legacy Remedial Action Management Program (RAMP) in place between January 2004 and May 2010. At the time of this review, May 2010 through August 2010, FEMA was already in the process of reviewing the program, updating the policy and guidance, and consolidating the software with the Corrective Action Program (CAP) and the Lessons Learned Information Sharing system (LLIS.gov). That effort began in February 2009 and is ongoing. FEMA has made progress in implementing the newly combined RAMP/CAP system and has been implementing some of the recommendations contained in this report as the review moved forward.

On page 1 of the draft report, paragraph 3, please revise as follows, for accuracy: "Program officials distributed lessons learned and best practices to the Program's database users, which averaged about 70 users. Per program policy, those users served as organizational points of contact and disseminated the information to others as appropriate."

[www.fema.gov](http://www.fema.gov)

## Appendix B Management Comments to the Draft Report

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On page 4, first paragraph, FEMA suggests that the draft be revised to include the following: "The program office reports that outreach for the new FEMA channel within LLIS will be conducted as part of the launch of the new RAMP/CAP program directive and manual. They will also develop and disseminate a monthly LLIS.gov newsletter tailored to FEMA personnel."

On page 5, first paragraph, with respect to the discussion regarding using facilitators for after-action reviews (or hotwashes as the draft report calls them), please delete that paragraph and include the information in our response to Recommendation 2 below.

FEMA concurs or conditionally concurs with the draft report's six recommendations. For the two recommendations with which we conditionally concur, we provide suggested revisions to the wording of the recommendation. FEMA believes adequate actions have been taken to close Recommendations 2 and 5.

The following are FEMA's comments regarding the six recommendations contained in the draft report:

**Recommendation #1:** Enforce the Remedial Action Management Program's policy to conduct hotwashes for all disasters.

**FEMA Response:** FEMA conditionally concurs with this recommendation as currently written. In order to fully concur, FEMA requests that the IG replace the term 'hotwashes' with 'after-action reviews.' Based on feedback from a FEMA working group, which included headquarters and regional representatives, new draft program guidance states that an after-action review (vice hotwash) is required for every exercise and real-world event managed or supported by FEMA; the scope and content of the review is scalable based on the scope and complexity of the event and reviews can be combined as appropriate for an event series (e.g., an exercise series or multiple related disasters occurring in a short time frame). The new draft program guidance emphasizes the process; hotwashes have been redefined as short events to collect raw input and after-action conferences have been added (consistent with the Homeland Security Exercise and Evaluation Program) as the primary mechanism to bring participants together to review observations, corrective actions, and lessons learned for the after-action report and improvement plan.

**Recommendation #2:** Require that Division Directors appoint hotwash facilitators according to program policy.

**FEMA Response:** FEMA concurs with this recommendation. Based on feedback from a FEMA working group, which included headquarters and regional representatives, new draft program guidance removes the restriction on facilitators/data collectors working in their home component. The new draft guidance states: "To conduct an impartial data collection effort, it is recommended that a representative from outside of the assigned



## Appendix B

### Management Comments to the Draft Report

Page 3

component guide the data collection effort in close coordination with a representative from within the component, to provide the necessary local perspective.”

FEMA asks that this recommendation be considered closed.

**Recommendation #3:** Develop instructions with examples on how to develop clear and concise lesson learned and best practice statements.

**FEMA Response:** FEMA concurs with this recommendation. Efforts are underway to develop and issue instructions, with a target date for completion in second quarter fiscal year 2011.

**Recommendation #4:** Disseminate lessons learned and best practices more widely.

**FEMA Response:** FEMA concurs with this recommendation. Efforts are underway to develop and disseminate a monthly LLIS.gov newsletter tailored for FEMA personnel, with a target date for completion within 90 days of issuance of the new FEMA RAMP/CAP manual.

**Recommendation #5:** Develop and implement a process for archiving Remedial Action Management Program data so that data loss does not recur.

**FEMA Response:** FEMA concurs with this recommendation. This issue has been resolved. We have confirmed with IT support that the CAP and LLIS databases are backed up every night and the servers are backed up weekly. We also have the ability to implement a complete restoration of all systems within 72 hours in the case of catastrophic disaster; backups are routinely stored offsite.

FEMA asks that this recommendation be considered closed.

**Recommendation #6:** Develop and distribute the monthly Remedial Action Management Program status report to senior FEMA leadership according to program policy.

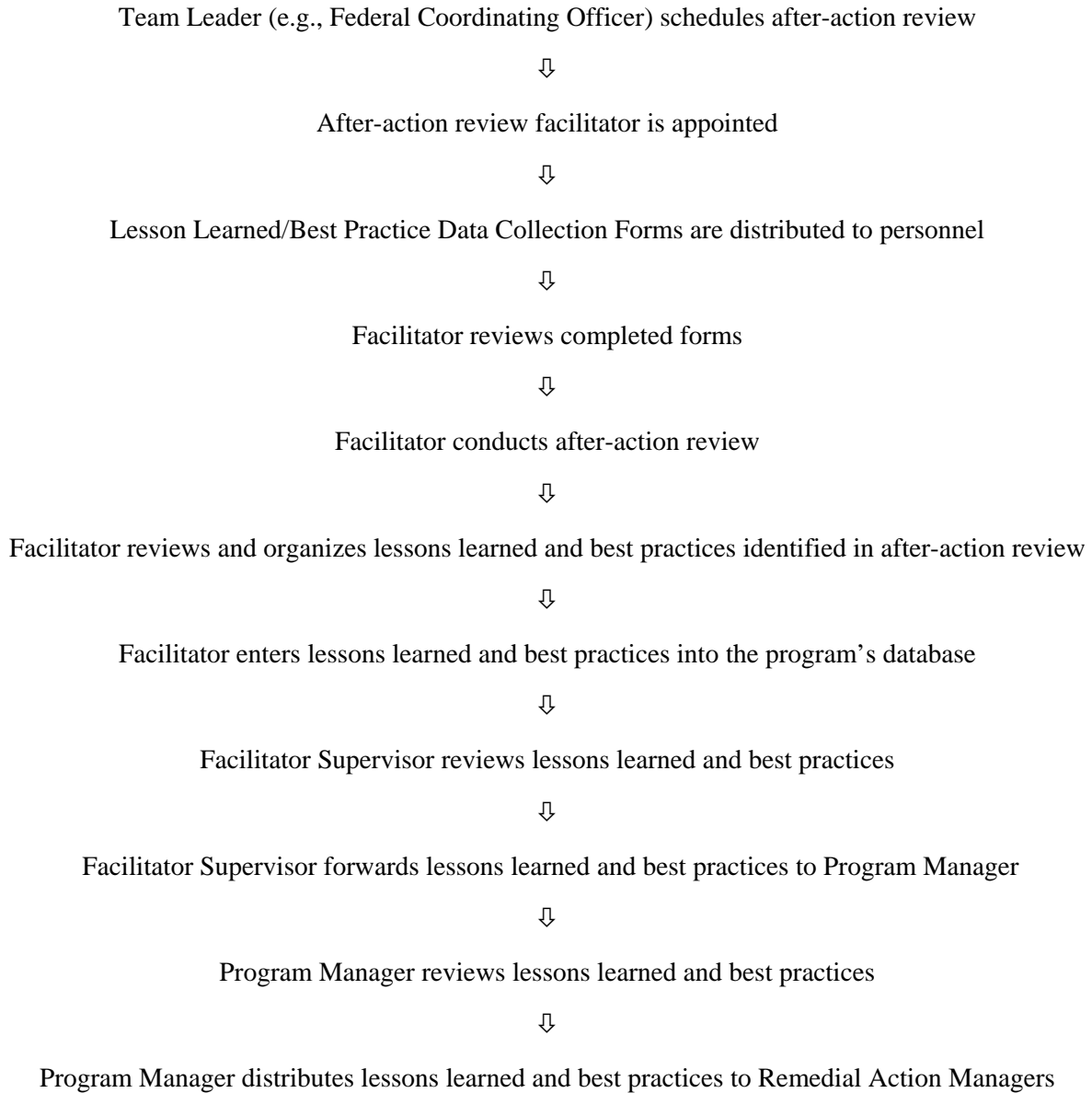
**FEMA Response:** FEMA conditionally concurs with this recommendation as currently written. In order to fully concur, FEMA requests that the OIG delete the word ‘monthly.’ Based on feedback from a FEMA working group, it is important to provide meaningful reports at the proper frequency; under the new RAMP/CAP, new draft program guidance states that we will provide quarterly reports.

Thank you again for the opportunity to comment on this draft report and we look forward to working with you on other issues as we both strive to improve FEMA.

**Appendix C**  
**Remedial Action Management Program Lessons Learned and Best Practices**  
**Process**

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**Remedial Action Management Program Lessons Learned and Best Practices Process<sup>4</sup>**



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<sup>4</sup> This graphic is based on the Facilitator Handbook and original Remedial Action Management Program Manual and Database User Guide. FEMA is updating both to incorporate the business processes associated with the new database.

**Appendix D**  
**Major Contributors to this Report**

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**Appendix E**  
**Report Distribution**

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