# Department of Homeland Security Office of Inspector General

FEMA's Progress in Implementing Employee Credentials



OIG-12-89 June 2012

Washington, DC 20528 / www.oig.dhs.gov

JUN 1 5 2012

MEMORANDUM FOR:

**Robert Fenton** 

Associate Administrator Response and Recovery

Federal Emergency Management Agency

FROM:

Anne L. Richards W

**Assistant Inspector General for Audits** 

SUBJECT:

FEMA's Progress in Implementing Employee Credentials

Attached for your action is our final report, *FEMA's Progress in Implementing Employee Credentials*. We incorporated the formal comments from FEMA's Office of Policy and Program Analysis in the final report.

The report contains three recommendations aimed at improving FEMA's credentialing program. Your office concurred with all three recommendations. Based on information provided in your response to the draft report, we consider the recommendation(s) resolved. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendation(s). The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions and the disposition of any monetary amounts.

Consistent with our responsibility under the *Inspector General Act*, we are providing copies of our report to appropriate congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact John E. McCoy II, Deputy Assistant Inspector General for Audits, at (202) 254-4100.

Attachment

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Abbreviations		
ADD	Automated Deployment Database	

CORE Cadre of On-Call Response/Recovery Employees

DHS Department of Homeland Security
DRWD Disaster Reserve Workforce Division
FEMA Federal Emergency Management Agency

FQS FEMA Qualification System

FY fiscal year

GAO Government Accountability Office

IT information technology
OIG Office of Inspector General

PKEMRA Post-Katrina Emergency Management Reform Act of 2006

PFT Permanent Full-Time

QRB Qualification Review Board

www.oig.dhs.gov

#### **Executive Summary**

The Federal Emergency Management Agency (FEMA) must have a trained, effective disaster workforce to carry out its mission. In 2006, Congress passed the *Post-Katrina Emergency Management Reform Act of 2006*, as amended, which created a basis for credentialing emergency response providers. FEMA defines credentialing as a system for qualification and certification of the agency workforce through experience, training, and demonstrated performance. We performed this review to determine the status of FEMA's credentialing program implementation.

In response to *Post-Katrina Emergency Management Reform Act of 2006* requirements, FEMA's Disaster Reserve Workforce Division launched an agency-wide credentialing effort in June 2008. That effort resulted in the creation of the agency's credentialing program. Since then, the program has been transferred to a different office, and the scope of the credentialing program has increased significantly.

FEMA has not completed implementation of the credentialing program. FEMA has not identified an information technology system to track the training, development, and deployment of disaster employees. It does not have a detailed information technology plan, documented costs, projected schedule, and capability and/or performance requirements to support the information technology implementation. Budget and staffing costs for system development have not been provided to us, and FEMA officials are still assessing training and curriculum needs. Once implemented, the credentialing program should strengthen FEMA's ability to deliver high-quality and efficient services during disaster response.

We made three recommendations that, when implemented, should assist FEMA in completing the credentialing process, as well as finalizing the information technology acquisition and training development necessary to track disaster employees. FEMA concurred with the recommendations.

#### **Background**

Hurricane Katrina severely tested disaster management at the Federal, State, and local levels and revealed weaknesses in the basic elements of preparing for, responding to, and recovering from a catastrophic disaster.<sup>1</sup> One weakness consistently mentioned was FEMA's need for a trained, effective disaster workforce. FEMA's disaster workforce consists mainly of Reservists, who are employed on an intermittent basis. FEMA struggled to provide enough staff in response to Hurricane Katrina and did not have an automated system to deploy more than 5,000 disaster personnel on short notice. New hires did not receive adequate training during FEMA's accelerated orientation process after Hurricane Katrina, and FEMA did not have a central training records management system. The shortage of qualified staff for key positions negatively impacted FEMA's response and recovery operation.<sup>2</sup>

The *Post-Katrina Emergency Management Reform Act of 2006* (PKEMRA) was enacted to address the agency's shortcomings. PKEMRA provides a guideline for rebuilding FEMA's permanent and reserve workforces through tools such as a strategic human capital plan, structured career paths, and recruitment and retention bonuses.

FEMA has a diverse workforce composed of permanent, temporary, and intermittent employee categories such as Permanent Full-Time (PFT),<sup>3</sup> Cadre of On-Call Response/Recovery Employees (CORE),<sup>4</sup> and Disaster Assistance Employees—also known as Reservists.<sup>5</sup> Each category has different structures and includes occupational specialties. Currently, FEMA's disaster workforce uses the cadre structure to identify employees who perform a specific operational program or function in support of agency-wide disaster operations.

<sup>&</sup>lt;sup>1</sup> GAO-09-59R, Actions to Implement the Post-Katrina Act.

 $<sup>^{2}</sup>$  DHS-OIG-10-123, FEMA's Preparedness for the Next Catastrophic Disaster—An Update.

<sup>&</sup>lt;sup>3</sup> PFT positions are full-time civil service jobs in the competitive service, filled according to a merit system where the best qualified candidates are chosen based on application and interview processes.

<sup>&</sup>lt;sup>4</sup> CORE employees are hired under the authority and provisions of the *Robert T. Stafford Disaster Relief* and *Emergency Assistance Act*, as amended, which allows Federal agencies to appoint and fix the compensation of such personnel without regard to the competitive service provisions of title 5 of the Code of Federal Regulations. CORE positions are temporary, excepted service appointments with specific "not to exceed" dates.

<sup>&</sup>lt;sup>5</sup> Disaster Assistance Employees (Reservists) are Federal employees who work on an on-call, intermittent basis. Reservists form the major workforce for FEMA in times of emergency or disaster.

Table 1 displays the functional capabilities of FEMA's cadres.

#### Table 1.

#### **25 Functional Capabilities of FEMA's Cadres**

- Administration
- Alternate Dispute Resolution
- Attorney
- Community Relations
- Comptroller
- Congressional
- Contracting/Acquisitions
- Environmental/Historic Preservation
- Equal Rights
- Federal Coordinating Officer
- Finance
- Human Capital
- Individual Assistance

- Information Technology
- Logistics
- Long Term Community Recovery
- Mitigation
- Operation
- Planning
- Public Affairs
- Public Assistance
- Safety
- Security
- Training
- Disaster Generalist

Source: FEMA Web site 11/15/2011.

FEMA defines credentialing as a system for qualification and certification of the FEMA workforce through experience, training, and demonstrated performance. The FEMA Qualification System will define levels of proficiency for all workforce position titles; then monitor and evaluate whether individuals meet the professional work performance standards required to execute the tasks associated within a position's proficiency level. FEMA's credentialing will not result in a certification, license, or badge, but will document that a person meets the requirements for a specific position.

FEMA developed the National Incident Management System Guideline for the Credentialing of Personnel to describe national credentialing standards and to provide written guidance regarding the use of those standards. The guidelines seek to leverage the Federal Government's investments in creating a credentialing infrastructure so that nonfederal entities can achieve interoperability more economically and efficiently.

Historically, FEMA's credentialing programs were focused on the Disaster Assistance Employees and lacked consistency between cadres and Regions. Each of FEMA's cadres and Regions had its own approach to reviewing the proficiency of Disaster Assistance Employees. Our audit of FEMA's Public Assistance Program Policies and Procedures

identified that FEMA's workforce generally did not have sufficient experience and training to perform the responsibilities of FEMA's Public Assistance program efficiently. Some employees did not receive formal training until after a disaster had occurred. FEMA officials anticipated that the credentialing implementation would help correct this problem.<sup>6</sup>

#### **Results of Review**

#### **Developing a Credentialing Program**

FEMA began the first credentialing effort in 2008, and followed this program with the FEMA Qualification System (FQS) in 2010. The FQS program was designed to define standards of qualification and certification of the FEMA workforce through experience, training, and demonstrated performance. However, several program implementation dates have not been met, temporary information systems are not integrated, and a comprehensive information technology (IT) plan is needed.

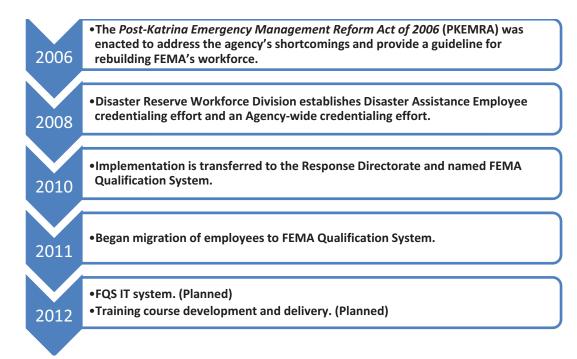
#### **Project Planning**

In response to PKEMRA's requirements, FEMA's Disaster Reserve Workforce Division (DRWD) launched an agency-wide credentialing effort in June 2008, which resulted in the creation of FEMA's credentialing program. The program was responsible for the design and implementation of a plan to standardize the recruiting, training, and credentialing of FEMA's Disaster Reserve Workforce. This effort was modified in April 2009, as FEMA began implementing the Agency-Wide Disaster Workforce Credentialing Plan, which identified the processes that all cadres must implement in order to ensure that FEMA applies a consistent and fair process to credential each cadre member.

FEMA initially estimated that half of the Disaster Reserve Workforce would be credentialed by the second quarter of fiscal year (FY) 2012, with the remainder being fully credentialed by FY 2013. Half of the full-time workforce would be credentialed by FY 2013 and the rest by FY 2014. However, the DRWD stopped work on the program in September 2010, and the implementation was transferred to the Response Directorate and renamed the FEMA Qualification System (see figure 1).

<sup>&</sup>lt;sup>6</sup> DHS-OIG-10-26, Assessment of FEMA's Public Assistance Program Policies and Procedures.

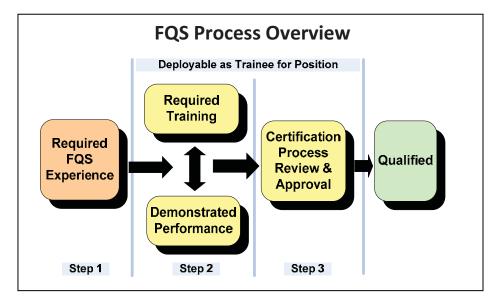
## Figure 1. FEMA Credentialing Timeline 2006–2012 (Actual and Planned)



Source: DHS-OIG, based on FEMA information.

FEMA defines the FQS as a system for qualification and certification of the FEMA workforce. FEMA leadership intends for the FQS to build on earlier credentialing initiatives, as well as best practices from other credentialing systems. According to FEMA, the FQS was modeled on the National Wildfire Coordinating Group credentialing system. The FQS defines the standards of qualification and certification of the FEMA workforce through experience, training, and demonstrated performance. Although FEMA's credentialing will not result in a certification, license, or badge, it is designed to evaluate task performance and use qualification progression flowcharts to demonstrate skill development. As employees are evaluated, based on experience and training, they will be identified as "Trainee" or "Qualified" with a specific job title. Figure 2 presents an overview of the FQS process.

Figure 2.



Source: FEMA Qualification System Guide for Incident Management and Incident Support Positions; March 2011.

New PFT and CORE employees will attend the FEMA Employee Readiness Program, where they will be briefed on FQS and allowed to choose a cadre and a disaster title. All newly hired Disaster Assistance Employees will adhere to FQS requirements for training, experience, and demonstrated performance.

FEMA Qualification Review Boards (QRBs) will be established in each Region. The FEMA Regional Administrator will select the QRB members. The QRBs will determine employees' credentialing qualification status. As of the end of our fieldwork, no QRBs had been established.

FEMA began the migration of employees to the FQS on June 19, 2011, with the transition scheduled to end on August 30, 2011. FEMA has separated all employees into two categories for the migration period: Incident Management and Incident Support. Approximately 9,000 employees are categorized as Incident Management; approximately 8,000 are categorized as Incident Support.

Qualifications and evaluations were ongoing through June, July, and August 2011. During the initial review, each employee was defined as "Qualified" or "Trainee." FEMA describes trainees as personnel who have not completed the required training and experience for a job title. FEMA describes qualified personnel as those who have met the training and experience requirements. Once all qualifications and evaluations were completed, FEMA planned to send

out notification letters in August and September 2011. Full implementation of the program was scheduled for October 1, 2011.

FEMA reported that 6,675 Incident Management employees had been identified as "Qualified" in their current position, and 2,620 had been identified as "Trainee." However, at the end of fieldwork, no qualification notification letters had been distributed. Incident Support employees are to be identified as in the "Qualified" or "Trainee" categories by December 2012.

#### **Information Technology**

FEMA faces challenges in implementing the IT systems that will support the FQS' maintenance and tracking of the training, qualifications, and availability of Incident Management employees. FEMA staff said that the Automated Deployment Database (ADD), FEMA's Employee Knowledge Center, and the Training Information Access System will serve as temporary solutions during the implementation of the FQS. The original DRWD credentialing implementation used the ADD and Web-ADD to identify and maintain a record of the personnel deployed during disasters. However, FEMA suspended the use of Web-ADD because it could not adequately monitor employee deployment readiness, length of deployment, or location data.<sup>7</sup>

FEMA officials said that they are currently looking at all functional and program requirements to help refine the path forward. They confirmed that a system analysis is being conducted on options for an FQS credentialing/tracking system. FQS program officials acknowledge that there is a great deal of work still to be done to develop the FQS.

FEMA has not updated its IT systems with employee job title or qualification information (identifying them as "Qualified" or "Trainee"). We identified similar challenges in a prior audit report. We concluded that the agency's automated deployment system needed updates to allow managers to supervise Disaster Assistance Employees and monitor deployment readiness, length of deployment, and employee location.<sup>8</sup>

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<sup>&</sup>lt;sup>7</sup> DHS-OIG-10-123, FEMA's Preparedness for the Next Catastrophic Disaster—An Update.

<sup>&</sup>lt;sup>8</sup> DHS-OIG-10-115, FEMA's Management of Disaster Assistance Employee Deployment and Payroll Processes.

#### **Budget and Curriculum**

FQS program officials said that all 322 FQS Position Task Books<sup>9</sup> have been developed, laying out specific performance requirements for every job title or position in the incident management structure. Each of these Position Task Books has a Position Qualification Sheet detailing the training and experience required for that position. In addition, each job title has a Qualification Progression Flowchart, which lays out the training and/or experience necessary to progress to the next level.

FQS Program officials said that they are evaluating feedback from their cadres on the types of courses needed for the 322 positions. Currently, 79 courses need to be revised or developed. Training development is set to be completed by September 2013.

FEMA requested a budget of \$18.9 million for FY 2012, largely in support of training class development and revision. The budget is predicted to decrease by \$6 million for FY 2013 as the credentialing program moves into the maintenance phase. FEMA will revise the classes offered every 3 years. The FQS program does not have an approved budget. Once funding levels are established, however, FQS program officials said they would be able to determine which training courses can be developed, piloted, and implemented across cadres. Implementation of an IT system will enable FQS and cadre management leadership to track the following:

- Employee work experience,
- Demonstrated performance, and
- FQS training status.

#### Conclusion

Building essential response capabilities across FEMA requires a systematic program to train staff and to meet a common baseline of performance and certification standards. Rigorous, ongoing training and credentialing are imperative. FEMA has not completed implementation of the credentialing program. FEMA was unable to provide us with a detailed IT project plan, budget and staffing costs for system development, a projected schedule, or required

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<sup>&</sup>lt;sup>9</sup> The FQS Position Task Books contain all the critical behaviors, activities, and tasks required to become credentialed for an Incident Management or Incident Support position.

capability and/or performance requirements to support the FQS IT implementation.

Prior reports have identified the need to expedite the implementation of the credentialing program. Until the program is completely implemented, FEMA will continue to be challenged to deliver services that are consistent in quality and efficiency during a disaster response.

#### Recommendations

We recommend that the Federal Emergency Management Agency's Director, Incident Workforce Management Office:

#### Recommendation #1:

Establish and implement an approved FEMA Qualification System project plan, with defined metrics and timeframes that ensure adequate project planning and program transparency.

#### Recommendation #2:

Implement a comprehensive information technology system to track credentialing, training, and deployment information. In doing so, consider using commercial off-the-shelf systems.

#### Recommendation #3:

Develop a detailed plan and budget for the training and course development needed to implement the FEMA Qualification System.

#### **Management Comments and OIG Analysis**

FEMA submitted formal comments to our report. A copy of the FEMA response in included as appendix B. FEMA concurred with all recommendations. Our analysis of the FEMA response to the recommendations follows.

**Recommendation #1:** Establish and implement an approved FEMA Qualification System project plan, with defined metrics and timeframes that ensure adequate project planning and program transparency.

**Management Response:** FEMA concurred with this recommendation. FEMA stated that it will develop a project plan in FY 2012. FEMA also reported that it is

finalizing the following three FQS documents that will provide the doctrine and overarching guidance to enable FEMA to formulate the recommended plan above and define metrics and timelines: (1) the FQS Guidance Document that will govern the FQS Program, (2) the FQS Evaluator's Guide, and (3) the Qualification Review Board Guide.

**OIG Analysis:** We consider FEMA's actions responsive and consider the recommendation resolved, but it will remain open until a formal closeout letter and supporting documentation are provided.

**Recommendation #2:** Implement a comprehensive information technology system to track credentialing, training, and deployment information. In doing so, consider using commercial off-the-shelf systems.

Management Response: FEMA concurred with this recommendation and stated that it has identified and committed to using the Bureau of Land Management's Incident Qualifications and Certification System (IQCS). FEMA reported that it will be joining other Federal departments and agencies already using the system to credential their own personnel. FEMA plans to implement IQCS by October 1, 2012.

**OIG Analysis:** We consider FEMA's actions responsive and consider the recommendation resolved, but it will remain open until a formal closeout letter and supporting documentation are provided.

**Recommendation #3:** Develop a detailed plan and budget for the training and course development needed to implement the FEMA Qualification System.

Management Response: FEMA concurred with this recommendation and reported that it plans to (1) develop needed FQS-related courses in FYs 2012–2013 and (2) develop, revise, and consolidate future coursework as needed. FEMA also stated that a budget for training and course development has been developed, but approval has not yet been received.

**OIG Analysis:** We consider FEMA's actions responsive and consider the recommendation resolved, but it will remain open until a formal closeout letter and supporting documentation are provided.

## Appendix A Purpose, Scope, and Methodology

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.

The purpose of our review was to determine the status of FEMA's implementation of the FQS program. We focused on the implementation timeframes, curriculum development, and supporting documentation. We interviewed officials from the FQS program, and collected and reviewed documents and plans relevant to the FQS and prior credentialing efforts. We also reviewed FEMA policies, memorandums, and organization charts. We reviewed prior Federal audit reports. Our fieldwork was performed in Washington, DC.

Relevant criteria included the Post-Katrina Emergency Management Reform Act of 2006.

We conducted this review between July and November 2011.

We conducted this review under the authority of the *Inspector General Act of 1978*, as amended, and according to the Quality Standards for Inspections issued by the Council of the Inspectors General on Integrity and Efficiency.

#### **Appendix B** Management Comments to the Draft Report

U.S. Department of Homeland Security Washington, DC 20528



APR 2 7 2012

MEMORANDUM FOR:

Anne L. Richards

Assistant Inspector General for Audits

Office of the Inspector General

FROM:

SUBJECT:

David J. Kaufman Kalla Dex Director

FEMA's Response to OIG Draft Report, FEMA's Progress in

Implementing Employee Credentials

Office of Policy and Program Analysis

The Federal Emergency Management Agency (FEMA) appreciates the opportunity to review and respond to the Department of Homeland Security (DHS) Office of Inspector General (OIG) Draft Report, FEMA's Progress in Implementing Employee Credentials. The report focused on the implementation status of the FEMA Qualification System (FQS) and identified measures that can be taken to enhance the FQS program's overall effectiveness. As FEMA works towards refining its programs, the OIG's analysis of program implementation benefits our ability to continuously improve our activities. As requested, we have provided written comments on the draft report as well as specific responses to each recommendation.

#### **Overall Comments**

FEMA notes that the audit team conducted research on this project between July and November 2011. Since November 2011, FEMA has made significant progress in our efforts to implement employee credentialing. Specifically:

- FEMA issued qualification letters to its current disaster workforce employees on January 3, 2012. At present, 75 percent of the disaster reserve workforce is credentialed as qualified and 25 percent are under trainee status.
- FEMA leadership has identified an information technology system to track the training, development, and deployment of its disaster workforce. FEMA has committed to use the Bureau of Land Management's Incident Qualifications and Certification System (IQCS) and is scheduled to implement IQCS by October 1, 2012. Further, once the FQS Guidance Document is approved, FEMA will begin the migration of employee job titles and qualification information into FEMA IT Systems by cadre.
- FEMA's force structure requirements will inform disaster assignments for all employees, including Permanent Full-Time (PFT), Cadre of On-Call Response/Recovery Employees (CORE), and Reservists. The force structure identifies the appropriate size, grades, demographics, locations, functions, structure,

and composition of the workforce needed to address current and future disaster workload requirements. It will allow FEMA to identify and address skill gaps or deficiencies in mission critical occupations.

 Of 136 courses requiring modification or development under FQS, 83 have been completed and are in various stages of pilot testing.

#### Response to Recommendations

OIG Recommendation #1: Establish and implement an approved FEMA Qualification System project plan, with defined metrics and timeframes that ensure adequate documentation of project planning and program transparency.

**FEMA Response to Recommendation #1:** FEMA concurs with this recommendation. FEMA is currently finalizing the following three FQS documents that will provide the doctrine and overarching guidance to enable FEMA to formulate the recommended plan above and define metrics and timelines: 1) the FQS Guidance Document that will govern the FQS Program; 2) the FQS Evaluator's Guide; and 3) the Qualification Review Board Guide. A project plan will be developed in Fiscal Year 2012.

**OIG Recommendation #2:** Implement a comprehensive information technology system to track credentialing, training, and deployment information. Consider commercial off-the-shelf systems used by other public or private organizations.

FEMA Response to Recommendation #2: FEMA concurs with this recommendation. After a review of the various options to track credentialing, training, and deployment information, FEMA leadership has identified and committed to use the Bureau of Land Management's Incident Qualifications and Certification System (IQCS) and will be joining other Federal Departments and Agencies already using the system to credential their own personnel. FEMA is scheduled to implement IQCS by October 1, 2012.

OIG Recommendation #3: Develop a detailed plan and budget for the training and course development needed to implement the FEMA Qualification System.

FEMA Response to Recommendation #3: FEMA concurs with this recommendation. The plan for course development and revision is as follows:

- During FY 12 and 13, disaster courses will be developed, revised, and consolidated as needed.
- After FY 13, courses will be revised or developed every three years <u>or</u> when the Agency
  doctrine changes <u>or</u> if there are legislative changes (e.g., Equal Rights Office and Alternative
  Dispute Resolution (ADR) have annual legislative changes requiring updates to their
  courses).

A budget for training and course development has been developed, but approval has not yet been received.

Once again, thank you for the opportunity to comment on the findings and recommendations of the OIG Draft Report on FEMA's Progress in Implementing Employee Credentials prior to its publication. We look forward to working with you on future homeland security emergency management engagements to improve FEMA programs and initiatives. Please feel free to provide any comments/concerns to our Chief Audit Liaison, Mr. Brad Shefka, 202-646-1308.

## Appendix C Major Contributors to this Report

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## Appendix D Report Distribution

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