

**OFFICE OF INSPECTOR GENERAL**

# **FEMA Should Implement Consistent Joint Field Office Guidance**



Homeland  
Security

**September 27, 2016**  
**OIG-16-139-D**



# DHS OIG HIGHLIGHTS

## *FEMA Should Implement Consistent Joint Field Office Guidance*

---

**September 27, 2016**

### **Why We Did This Audit**

Time is of the essence in establishing a Joint Field Office (JFO) as the nexus of disaster response and recovery efforts. FEMA needs to implement consistent JFO selection guidance so its disaster response is effective, efficient and economical. This audit was conducted as a follow up to our prior report on the JFO Selection in New Jersey and as part of our 2015 disaster deployment efforts in Texas and South Carolina.

### **What We Recommend**

The FEMA Associate Administrator, Response and Recovery (1) implement consistent JFO guidance; and (2) require FEMA regional officials to work with General Service Administration and requisite State officials to specify possible JFO locations to ensure timeliness response for future disasters.

#### **For Further Information:**

Contact our Office of Public Affairs at (202) 254-4100, or email us at [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov)

### **What We Found**

Since 2012, we have observed and reported on systemic challenges in FEMA's JFO selection process. These challenges occurred, in part, because FEMA has not sufficiently implemented our prior audit recommendation to collaborate with the General Services Administration in selecting potential JFO sites prior to a forecasted disaster.

In 2015, we identified regional implementation differences in the JFO selection process. During our 2015 Texas flood disaster Emergency Management Oversight Team (EMOT) deployment, we determined that FEMA Region VI did not implement a disaster pre-planning protocol that resulted in a more than \$380,000 increase in JFO administrative costs and delayed the JFO opening by 17 days. The delayed JFO opening negatively impacted FEMA's ability to rapidly equip and deploy disaster response personnel. In contrast, during our 2015 South Carolina EMOT deployment, we determined that FEMA Region IV JFO selection was efficient and effective.

### **FEMA Response**

FEMA concurred with our recommendations.



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

September 27, 2016

MEMORANDUM FOR: Elizabeth Zimmerman  
Associate Administrator, Response and Recovery  
Federal Emergency Management Agency  
*Thomas M. Salmon*

FROM: Thomas M. Salmon  
Assistant Inspector General (OIG)  
Emergency Management Oversight

SUBJECT: *FEMA Should Implement Consistent Joint Field Office  
Selection Guidance*

For your action is our final report, *FEMA Should Implement Consistent Joint Field Office Selection Guidance*. We incorporated the formal comments provided by your office.

The report contains two recommendations aimed at improving FEMA's disaster response. Your office concurred with both recommendations. Based on the information provided in your response to the draft report, we consider recommendations 1 and 2 resolved and open. 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 recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions. Please send your response or closure request to [OIGEMOFollowup@oig.dhs.gov](mailto:OIGEMOFollowup@oig.dhs.gov).

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to 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 at (202) 254-4100, or your staff may contact Paul Wood, Director, National Capital Regional Office at (202) 254-4283.

Attachment



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

---

### **Background**

A Joint Field Office (JFO) is a temporary Federal coordination center for field-level incident management activities related to disaster response and recovery. For large events, it is important the JFO be located close to the impacted area for efficient and effective delivery of the mission and for coordination with State and local officials.

When FEMA issues a mission assignment<sup>1</sup>, to acquire a JFO lease, it must ensure that it complies with 42 United States Code (USC) §§ 5170a, 5192 and 44 Code of Federal Regulations (CFR) §§ 206.2(a)(17), 206.3 which direct Federal agencies to utilize their authorities and resources granted under Federal law in support of State, local, tribal, and territorial government assistance.

FEMA issued two directives, FEMA Directive 125-2 and FEMA Directive 143-1 to provide FEMA Regional managers the latitude to make pre-disaster declaration decisions. FEMA Directive 125-2 authorizes FEMA to issue a Federal Operational Support Mission Assignment prior to a disaster to prepare for Federal assistance when a declaration is reasonably likely and imminent. FEMA Directive 143-1 establishes policy and procedures for the acquisition of leases that support FEMA response efforts to Federal disaster declarations.

### **Results of Audit**

Since 2012, we have observed and reported on FEMA's systemic challenges in its JFO selection process. These challenges occurred, in part, because FEMA has not sufficiently implemented our prior audit recommendation to collaborate with the General Services Administration (GSA) in selecting potential JFO sites prior to a forecasted disaster.

In 2015, we identified regional implementation differences in the JFO selection process. During our 2015 Texas flood disaster Emergency Management Oversight Team (EMOT) deployment, we determined that FEMA Region VI did not implement a pre-disaster planning protocol that resulted in more than \$380,000 increase in JFO administrative costs and delayed the JFO opening by 17 days. The delayed JFO opening negatively impacted FEMA's ability to rapidly equip and deploy disaster response personnel. In contrast, during our

---

<sup>1</sup> A mission assignment is a work order issued by FEMA that, with or without reimbursement, directs another Federal agency to utilize its authorities and the resources granted to it under Federal law in support of State, local, tribal, and territorial government assistance.



**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

---

2015 South Carolina EMOT deployment, we determined that the FEMA Region IV JFO selection was efficient and effective.

**Prior Audits Show JFO Selection Guidance Inconsistently Implemented**

In August 2015, we issued an audit, *FEMA’s Process for Selecting Joint Field Offices Needs Improvement*, OIG-15-128-D, in which we recommended FEMA “[c]ollaborate with GSA to select a potential JFO location when a disaster is forecasted, as was Hurricane Sandy in New Jersey.” However, based on our recent EMOT deployments, we are unable to determine whether FEMA’s corrective actions were sufficiently implemented. For example, in 2016, we reported that FEMA faced challenges in its Texas JFO lease acquisition process. Conversely, our audit report—*FEMA’s Initial Response to the Severe Storms and Flooding in South Carolina*, OIG-16-53-D, noted that FEMA’s JFO selection was efficient and effective. Our assessments of these FEMA JFO selections demonstrate systemic challenges in implementing JFO selection guidance and ineffective implementation of pre-planning guidance.

**Ineffective Implementation of JFO Pre-Planning Guidance (DR 4223 TX)**

For example, in 2015, FEMA moved into its Texas Joint Field Office 17 days after the Presidential disaster declaration. This time period was far in excess of the optimal 72-hour window outlined in the *Joint Field Office Activation and Operations* guidance. As a result, JFO administrative cost increased by more than \$380,000 and FEMA’s ability to rapidly equip and deploy negatively affected disaster response personnel.

Based on our analysis of FEMA’s guidance and interviews with FEMA and GSA officials, a key reason for the 17-day Texas JFO opening delay occurred because FEMA Region VI did not develop and implement an effective and efficient pre-disaster plan to acquire a lease. This lack of planning demonstrates that FEMA has not fully implemented guidance to provide for pre-disaster planning including procurement of a JFO lease when conditions are reasonably likely and imminent, but does not specify how FEMA officials should effectively execute that guidance.

For instance, FEMA Directive 143-1 authorizes the FEMA Regional Administrator to search for a JFO, prior to a disaster declaration, under two conditions:—

1. A JFO must be necessary.
2. A JFO must support an efficient and timely response.

In addition, according to FEMA Directive 125-2, “Disaster Relief Fund (DRF) Pre-Disaster Declaration (Surge) funding, authorizes FEMA to issue



## OFFICE OF INSPECTOR GENERAL

### Department of Homeland Security

---

a Federal Operational Support Mission Assignment prior to a disaster to prepare for Federal assistance when a declaration is reasonably likely and imminent. GSA officials confirmed that they can deploy ahead of a presidential disaster declaration and assist a FEMA-led survey team to conduct a market survey of the commercial real estate market in anticipation of a JFO site lease. FEMA officials noted that they normally proceed with caution if a JFO lease is needed prior to a disaster, because they do not want to set up a false expectation of Federal assistance to a State.

Although FEMA deployed an Incident Management Assistant Team to Texas on May 12, 2015, to assist in Texas' initial incident response. We were unable to determine whether FEMA conducted enough pre-disaster planning to implement an effective response and recovery effort. Given the advanced warning of a large-scale disaster and the legitimate and immediate need for a JFO, we determined FEMA guidance does not provide for a sufficient and prompt JFO setup.

### **Conclusion**

During our EMOT deployments, we observed that FEMA does not implement its JFO selection guidance in a consistent manner. If FEMA develops a disaster pre-planning protocol that includes potential strategies for JFO leasing, FEMA can respond in a more timely manner and ensure its disaster response is effective, efficient, and economical.

### **Recommendations**

We recommend that the Federal Emergency Management Agency, Associate Administrator, Response and Recovery:

**Recommendation 1:** Develop and implement consistent and specific JFO procedural guidance to facilitate a timely and successful joint Federal-state response and recovery operation.

**Recommendation 2:** Require FEMA regional officials to develop a JFO selection strategy that includes working annually with General Services Administration and State governments to specify an acceptable selection of Primary Metropolitan Statistical Areas where a JFO could be located and determining the conditions needed for a timely opening of a JFO.



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

---

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

We discussed the results of this audit with FEMA officials during our audit and included their comments in this report, as appropriate. We provided a draft report to FEMA officials and held an exit conference on July 21, 2016. FEMA officials generally agreed with our findings. On August 26, 2016, FEMA provided its Management Response to our draft report. FEMA concurred with both recommendations and anticipates these recommendations will be resolved by June 30, 2017.

The Office of Emergency Management Oversight's major contributors to this report are Thomas Salmon, Assistant Inspector General, Emergency Management Oversight; Paul Wood, Director, National Capital Regional Office; Nigel R. Gardner, Audit Manager; D. Kaye McTighe, Emergency Management Oversight Operations Director; Judy Martinez, Emergency Management Oversight Team Coordinator; Dwight McClendon, Auditor; and Patricia Epperly, Program Analyst.

Please call me with any questions at (202) 254-4100, or your staff may contact Paul Wood, Director, National Capital Region Office (202) 254-4283.

### **Objective, Scope, and Methodology**

Our initial audit objective was to identify the opportunities and challenges with FEMA's Joint Field Office lease acquisition process in Texas and to determine the most important areas on which FEMA should focus its efforts. We reviewed whether the JFO acquisition followed Federal guidelines and identified common themes between Emergency Management Oversight Team (EMOT) deployments conducted in Texas and South Carolina. As a result of our review of these deployments and to follow up on our JFO Section Process report in New Jersey, we adjusted the audit objective to identify FEMA's systemic challenges in implementing a consistent JFO selection process.

We interviewed Texas Department of Public Safety, Texas Division of Emergency Management; FEMA JFO officials and GSA Lease Contracting Officers. We observed operations at FEMA's Initial Operation Facilities and JFO in Austin, Texas. We reviewed Federal guidance and lease contracts. We also notified our Office of Investigations to determine whether the contractors were debarred or whether there were any indications of other issues related to those contractors that would indicate fraud, waste, or abuse. Currently, there are no ongoing investigations of contractors associated with this audit.



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

---

We conducted this audit between June 2015 and August 2016 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objective. We did not assess the adequacy of FEMA's internal controls applicable to disaster response because it was not necessary to accomplish our audit objective.





**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

**Appendix A**  
**FEMA Comments to the Draft Report**



AUG 26 2016

MEMORANDUM FOR: Thomas Salmon  
Assistant Inspector General  
Office of Emergency Management Oversight  
Office of Inspector General

FROM: *David Bibo*  
David Bibo *G. J. J. J. J.*  
Associate Administrator (Acting)  
Office of Policy & Program Analysis

SUBJECT: Management's Response to OIG Draft Report "FEMA  
Should Develop Joint Field Office Pre-Planning Guidance"  
(Project No. 15-115-EMO-FEMA)

Thank you for the opportunity to review and comment on this Draft Report. The Federal Emergency Management Agency (FEMA) appreciates the Office of Inspector General's (OIG) work in planning and conducting its review and issuing this report.

FEMA is committed to selecting Joint Field Offices (JFOs) that comply with all legal and statutory requirements, are safe and accessible to those who access the facility, and meet operational needs. FEMA's recently-established Field Operations Directorate (FOD), within the Office of Response and Recovery (ORR), is working with Federal Coordinating Officers, Regional Offices, and other Agency components to develop consistent procedures for establishing JFOs. A review of the current process is underway by FOD and the Office of the Chief Administrative Officer (OCAO).

The Draft Report contains two recommendations with which FEMA concurs. Detailed responses to each recommendation are included in the attachment. Technical comments were previously provided under a separate cover.

Again, thank you for the opportunity to review and comment on this Draft Report. Please feel free to contact Gary Mckee, FEMA's Audit Liaison Office Director at 202-646-1308 if you have any questions. We look forward to working with you again in the future.



## OFFICE OF INSPECTOR GENERAL

### Department of Homeland Security

---

#### **Attachment: DHS Management Response to Recommendations Contained in 15-115-EMO-FEMA**

**Recommendation 1:** Develop and implement specific JFO pre-planning guidance for a timely JFO setup that will facilitate a successful joint Federal/state response and recovery operation.

**Response:** Concur. Currently, in establishing JFOs, ORR works closely with multiple internal FEMA components, the General Services Administration, State/Local/Tribal/Territorial (SLTT) partners, and other stakeholders to ensure the facility selected complies with all legal and statutory requirements, is safe and accessible to those who access the facility, and meets operational needs. This process is codified in FEMA Directive 143-1 *Disaster Leasing Process* and includes a checklist of operational requirements as well as those for safety, security, IT, and accessibility. A review of the current process is underway by FOD and OCAO to ensure that this policy and process continues to meet the needs of the Agency and, if not, to provide recommendations for improvements.

Estimated Completion Date (ECD): June 30, 2017

**Recommendation 2:** Require FEMA regional officials to work annually with State governments to identify possible JFO locations.

**Response:** Concur. FEMA's Regional Offices regularly work with SLTT partners to identify suitable locations for JFOs. In the past, each Region has approached this effort individually, working with each SLTT in the Region to determine their preferences on such issues as proximity of the facility to Capital centers or to other operating locations. Going forward, FEMA will work with the Regions to develop a facilities strategy that documents SLTT concerns, identifies potential JFO locations based on an analysis of threats, and outlines a regular coordination cycle with SLTT partners. FOD and OCAO are also considering this step in their overall review of the JFO selection process.

ECD: June 30, 2017



**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

---

**Appendix B**  
**Report Distribution**

**Department of Homeland Security**

Secretary  
Deputy Secretary  
Chief of Staff  
Deputy Chiefs of Staff  
General Counsel  
Executive Secretary  
Director, GAO/OIG Liaison Office  
Assistant Secretary for Office of Policy  
Assistant Secretary for Office of Public Affairs  
Assistant Secretary for Office of Legislative Affairs

**Federal Emergency Management Agency**

Administrator  
Chief of Staff  
Associate Administrator, Response and Recovery  
Chief Financial Officer  
Deputy Chief Financial Officer  
Associate Administrator for Policy, Program Analysis and International Affairs  
Director, Risk Management and Compliance  
FEMA GAO/OIG Liaison

**Office of Management and Budget**

Chief, Homeland Security Branch  
DHS OIG Budget Examiner

**Congress**

Congressional Oversight and Appropriations Committees

## ADDITIONAL INFORMATION AND COPIES

To view this and any of our other reports, please visit our website at: [www.oig.dhs.gov](http://www.oig.dhs.gov).

For further information or questions, please contact Office of Inspector General Public Affairs at: [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov). Follow us on Twitter at: @dhsoig.



## OIG HOTLINE

To report fraud, waste, or abuse, visit our website at [www.oig.dhs.gov](http://www.oig.dhs.gov) and click on the red "Hotline" tab. If you cannot access our website, call our hotline at (800) 323-8603, fax our hotline at (202) 254-4297, or write to us at:

Department of Homeland Security  
Office of Inspector General, Mail Stop 0305  
Attention: Hotline  
245 Murray Drive, SW  
Washington, DC 20528-0305