

DEPARTMENT OF HOMELAND SECURITY
Office of Inspector General

**A Performance Review of FEMA's Disaster
Management Activities in Response to
Hurricane Katrina**



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

This report assesses the Federal Emergency Management Agency's (FEMA) performance as it conducted its disaster management responsibilities in response to Hurricane Katrina. We examined whether the laws, regulations, policies, procedures, plans, guidelines, and resources were adequate and operational, and whether FEMA's organizational structure enhanced or hindered its emergency management capabilities.

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. It is our hope that this report will result in more effective, efficient, and economical operations. We express our appreciation to all who contributed to the preparation of this report.

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Abbreviations

ADD	Automated Deployment Database
CORE	Cadre of On-Call Response Employees
DAE	Disaster Assistance Employee
DHS	Department of Homeland Security
EMAC	Emergency Management Assistance Compact
EMPG	Emergency Management Performance Grants
EOC	Emergency Operations Center
EP&R	Emergency Preparedness and Response
ESF	Emergency Support Function
FCO	Federal Coordinating Officer
FEMA	Federal Emergency Management Agency
FY	Fiscal Year
HSOC	Homeland Security Operations Center
HUD	Department of Housing and Urban Development
ICS	Incident Command System
IHP	Individuals and Households Program
IIMG	Interagency Incident Management Group
JFO	Joint Field Office
MERS	Mobile Emergency Response Support
MRE	Meal Ready-to-Eat
NDMS	National Disaster Medical System
NEMB-CAP	National Emergency Management Baseline Capabilities Assurance Program
NPSC	National Processing Service Center
NRCC	National Response Coordination Center
NIMS	National Incident Management System
NRP	National Response Plan
ODP	Office of Domestic Preparedness
OIG	Office of Inspector General
PFO	Principal Federal Official
RAMP	Remedial Action Management Program
RRCC	Regional Response Coordination Center
SBA	Small Business Administration
US&R	Urban Search and Rescue
VOAD	Voluntary Organizations Active in Disaster

Executive Summary

The federal government, in particular the Federal Emergency Management Agency (FEMA), received widespread criticism for a slow and ineffective response to Hurricane Katrina. Much of the criticism is warranted. Hurricane Katrina's high winds and storm surge caused devastating loss of life and substantial property damage in Mississippi and in Louisiana. In the city of New Orleans several breaches of the levee system compounded losses. The hurricane caused significant damage in Alabama also. Although FEMA and other agencies deployed emergency responders and resources in advance of the storm and supported state efforts to evacuate people and conduct other final preparations, most were overwhelmed the first week after landfall.

We conducted a review of FEMA's activities in response to Hurricane Katrina, which details FEMA's responsibilities for three of the four major phases of disaster management – preparedness, response, and recovery – during the first five weeks of the federal response. In addition, we evaluated FEMA's preparedness and readiness efforts over the past ten years to determine its organizational capability and posture prior to Hurricane Katrina.

Under the authorities of the *Robert T. Stafford Disaster Relief and Emergency Assistance Act* (the Stafford Act)¹ and the National Response Plan (NRP), FEMA provides disaster assistance to individuals and communities and coordinates emergency support functions for emergency management; mass care, housing, and human services; urban search and rescue; long-term recovery; and external affairs. We reviewed whether FEMA's authorities, plans and procedures, organizational structure, and resources were adequate and effective. Appendix R summarizes the scope and methodology of this review.

Within the past two years, the Department of Homeland Security (DHS) published two watershed planning documents – the National Incident Management System (NIMS) and the NRP – that restructure how federal,

¹ P.L. No. 93-288 (1974)(codified as amended at 42 U.S.C. §§5121–5206 and other scattered sections)

state, and local government agencies and emergency responders conduct disaster preparation, response, and recovery activities. Changes needed to implement both documents, however, were still underway when Hurricane Katrina made landfall. FEMA's initial response was significantly impeded by the adjustments it was making in implementing its responsibilities under the NRP.

The response demonstrated some positive features of the incident command structure under NIMS, which FEMA and state staff led in Mississippi and Alabama. It also highlighted severe deficiencies and multiple areas where FEMA and DHS headquarters must make adjustments to the NRP, such as the use of incident designations, the role of the Principal Federal Official (PFO), and the responsibilities of emergency support function coordinators.

When compared to other disasters, FEMA provided record levels of support to Hurricane Katrina victims, states, and emergency responders. However, a lack of visibility in the resource ordering process, difficulty deploying sufficient numbers of trained personnel, unreliable communication systems, and insufficient management controls for some assistance programs demonstrate a need for improved response support capabilities and more effective delivery mechanisms for assistance.

FEMA's efforts to support state emergency management and to prepare for federal response and recovery in natural disasters were insufficient for an event of Hurricane Katrina's magnitude. Difficulties experienced during the response directly correlate with weaknesses in FEMA's grant programs, staffing, training, catastrophic planning, and remediation of issues identified during previous disasters and exercises. As FEMA's role in administering grants and conducting exercises for natural hazards preparedness has diminished, new mechanisms are needed to enhance capability and sustain its relationships with states and first responders.

Finally, the integration of FEMA, all hazards preparedness, and disaster response and recovery capabilities within DHS requires additional attention. After the terrorist attacks of September 11, 2001, DHS' prevention and preparedness for terrorism have overshadowed that for natural hazards, both in perception and in application. Although an "all-hazards" approach can address preparedness needs common to both man-made and natural events, DHS must ensure that all four phases of emergency management – preparedness, response, recovery, and mitigation – are managed throughout the department on an all-hazards basis. Coordination and consultation among

DHS components and with the states is essential to guide, advise, develop, and monitor all-hazards capability and responder effectiveness.

We make 38 recommendations to the Director of FEMA, Under Secretary for Preparedness, Assistant Secretary of Public Affairs, and Director of the Office of Operations Coordination. We are recommending that DHS headquarters and FEMA establish measurable expectations of FEMA's response; provide the necessary financial, technical, and staff support to meet them; and assess FEMA's readiness. In addition, we make recommendations aimed at clarifying how DHS headquarters, FEMA, and other DHS components will implement aspects of the NRP, and address improvements to FEMA's infrastructure for resource ordering and tracking; personnel deployment; disaster communications; and disaster application handling. To improve disaster preparedness, we are recommending that FEMA complete catastrophic, surge, and workforce plans; add training; strengthen its remedial action program; and, build relationships with the states in concert with the Preparedness Directorate and DHS Public Affairs. Finally, we are recommending several modifications to how FEMA manages disaster assistance, including testing programs before their use and housing displaced persons.

Background

Hurricane Katrina's Devastation

After first making landfall in Florida as a Category 1 hurricane on August 25, 2005, Hurricane Katrina crossed the Gulf of Mexico and grew in intensity before making a second landfall in Louisiana as a strong Category 3 hurricane on August 29, 2005.² As the storm passed and assistance started moving into the area, New Orleans' levee system sustained several breaches, failed, and submerged much of the city under water, exacerbating what was already a major disaster.

While FEMA and other federal, state, and local entities pre-staged commodities and personnel in and around the region to respond to Hurricane Katrina, the magnitude of the storm and its catastrophic effects completely overwhelmed FEMA's disaster response system and resources, and those of state and local governments. In addition, differences in disaster response and emergency management capabilities across states resulted in varied levels of response success.

Hurricane Katrina left damage in catastrophic proportions along the Gulf Coast in Louisiana, Mississippi, and Alabama. The hardest hit communities lost all infrastructure: electricity; water and sewer; roads and bridges; communication systems including telephone lines, cell phone towers, radio capabilities, and many satellite antennae; and, in some instances, basic governmental operations including law enforcement. Many local first responders were also victims.

Hurricane Katrina caused 1,326 deaths – 1,096 in Louisiana, 228 in Mississippi, and 2 in Alabama.³ More than 700,000 people were displaced

² The Saffir-Simpson Hurricane Scale classifies hurricanes by wind intensity in order to predict the damage and flooding the storm will likely cause upon landfall. A Category 3 hurricane has sustained winds of 111–130 miles per hour and a predicted storm surge of 9–12 feet, causing flooding and some structural damage. A Category 4 hurricane has sustained winds of 131–155 miles per hour and a predicted storm surge of 13–18 feet. The most intense hurricane, Category 5, has sustained winds over 156 miles per hour and a predicted storm surge over 19 feet. A Category 5 hurricane can cause complete roof failure, building failure, utility loss, and major flooding damage. Initial reports indicated that Hurricane Katrina made landfall as a Category 4 storm, particularly due to the level of damage left by the storm; however, on December 20, 2005, the National Hurricane Center reported that aircraft data showed Hurricane Katrina actually made landfall in Louisiana as a high-end Category 3 hurricane.

³ Data from www.firstgov.gov, Frequently Asked Questions – Hurricane Katrina's effects, accessed January 30, 2006.

from the Gulf Coast region as a result of Hurricane Katrina. More than 273,000 people were displaced and evacuated to shelters. An estimated 300,000 homes were destroyed, or received major or minor damage in Louisiana, Mississippi, and Alabama. In Mississippi alone, 780 homes and 413 mobile homes were reported destroyed; 6,482 homes and 808 mobile homes sustained major damage; and 42,444 homes and 18,243 mobile homes had minor damage as of September 17, 2005.⁴ Major disaster declarations covered over 90,000 square miles of the affected Gulf Coast area.

Preparing for the Storm

The National Hurricane Center tracked Hurricane Katrina as it gained intensity and crossed the Gulf of Mexico, and issued multiple dire warnings regarding its severity. By 5:00 PM eastern daylight time on August 26, 2005, the National Hurricane Center predicted that Hurricane Katrina's track had shifted and was headed for southeast Louisiana and New Orleans, where landfall was expected as a Category 4 storm. Eleven members of FEMA's Hurricane Liaison Team were at the National Hurricane Center in Miami, Florida, to monitor the storm and storm advisories by August 27, 2005.⁵ In addition, federal emergency declarations were issued for Louisiana on August 27, 2005, and for Mississippi and Alabama on August 28, 2005, authorizing FEMA to begin pre-positioning commodities and emergency management personnel.

Even before the storm shifted, FEMA activated its National Response Coordination Center (NRCC) in Washington, DC, and Regional Response Coordination Centers (RRCC) in Atlanta, Georgia, and Denton, Texas.⁶ They tracked the storm and began preparations to coordinate the response. State emergency management officials in Alabama, Mississippi, and Louisiana also activated their Emergency Operations Centers (EOC) and began preparing for a second landfall. In addition, the NRCC, RRCCs, and state EOCs activated all 15 Emergency Support Functions (ESFs) plus the Defense Coordinating Officer (a military liaison) specified in the NRP.

⁴ Mississippi Defense Coordinating Element Situation Report 17, September 17, 2005. These totals do not include numbers from two of the hardest hit counties in Mississippi.

⁵ See Appendix A for a timeline of Hurricane Katrina's storm track and key decisions and events of the response.

⁶ For a discussion of FEMA's headquarters and regional structure, see the FEMA's Organization and Capacity to Respond to Disasters section of this report.

FEMA deployed its Emergency Response Team-National to Louisiana's EOC in Baton Rouge, and Emergency Response Teams-Advanced to the state EOCs in Jackson, Mississippi, and Clanton, Alabama. FEMA Emergency Response Teams began coordinating with the states to preposition both commodities and personnel in the area to respond as soon as storm conditions subsided and it was safe for responders to enter the affected area. In addition, FEMA activated and pre-positioned multiple response teams to locations near the forecasted affected areas. It pre-staged three Urban Search and Rescue (US&R) task forces in Louisiana and two in Mississippi. Mobile emergency operations vehicles and Mobile Emergency Response Support (MERS) personnel, who are capable of providing communications equipment and other support, were deployed and pre-staged near each state's EOC. In addition, many National Disaster Medical System (NDMS) teams, including Disaster Medical Assistance Teams, Disaster Mortuary Operational Response Teams, and Veterinary Medical Assistance Teams were activated and pre-staged in the region for deployment as soon as conditions permitted.

FEMA activated federal operational staging areas and mobilization centers to accept delivery of commodities and dispense them to local distribution points within the affected areas. Quantities of ice, water, meals ready-to-eat (MREs), and other commodities were pre-staged at Meridian Naval Air Station in Mississippi; Maxwell Air Force Base and Craig Field in Alabama; and Camp Beauregard, Barksdale Air Force Base, and the New Orleans Superdome in Louisiana, in addition to staging areas in Florida, Georgia, and Texas. Also, the three affected states identified pre-staged commodities, particularly ice, left over from the Hurricane Dennis response.⁷

Initial Response

As soon as conditions permitted, life saving and life sustaining efforts began, and Rapid Needs Assessment teams assessed damage in the affected areas. In many areas, roads and bridges were destroyed, making air or water the only means available to reach stranded victims, conduct initial damage assessments, and get emergency management response personnel into the area.

The communications infrastructure – phone lines, cell phone towers, and radio and satellite antennae – was destroyed in many areas. This significantly

⁷ Hurricane Dennis was declared a major disaster in Alabama on July 10, 2005.

impacted the ability of emergency responders to get situational and operational information to state or federal personnel outside the affected areas. It took days to establish an accurate picture of the disaster's magnitude and devastation.

FEMA's national US&R task forces, the U.S. Coast Guard, National Guard troops, active duty federal troops, and state and local first responders performed search and rescue missions, and rescued an estimated 50,000 victims. U.S. Coast Guard personnel conducted over 30,000 rescues during the first week after landfall – more rescues than it performed in all of 2004.

NDMS activated and deployed over 80 teams to support response efforts. Medical Needs Assessment Teams from FEMA Regions IV and VI were deployed to assess medical needs in the affected area. Over 50 Disaster Medical Assistance Teams were deployed. All 11 Disaster Mortuary Operational Response Teams plus 2 Disaster Portable Mortuary Units deployed to assist in body recovery and identification operations. Three National Medical Response Teams, five Veterinary Medical Assistance Teams, and three International Medical Surgical Response Teams were activated also. In addition, four Management Support Teams provided logistical, managerial, and operational support for NDMS teams in the affected area. NDMS also supported search and rescue operations by evacuating over 2,500 people with special needs.

In addition, FEMA began moving pre-staged trucks of water, ice, and MREs from federal operational staging areas into the disaster area and to various points of distribution. Additional commodities were ordered for daily delivery; however, it took time to establish an operational delivery system to supply adequate quantities of commodities to support victims and first responders. Also, FEMA personnel and state and local responders expressed confusion and frustration because FEMA's logistics system lacks an asset visibility program. As a result, FEMA personnel and state and local responders did not know what type or quantity of commodities was on the way or even when resources would arrive.

Alabama

FEMA's Emergency Response Team-Advanced was on the ground and operating at the EOC in Clanton, Alabama by August 26, 2005. In Alabama, FEMA had the benefit of existing pre-positioned assets, commodities, and an operational Joint Field Office (JFO) because of Hurricane Dennis, which

struck Alabama earlier in the summer. As a result, FEMA was able to mobilize operations quickly at the JFO in response to Hurricane Katrina.

Alabama's two most southern counties were the hardest hit and sustained major damage. Communications infrastructure was destroyed and officials in these counties experienced difficulty communicating their needs to the JFO for the first two days after landfall. The state sent a communications vehicle, and FEMA sent a MERS unit to the area to provide communications support and other response assistance.

FEMA and state officials told us the response went well in Alabama. Both conducted joint integrated action planning to coordinate and manage Alabama's response efforts. In addition, Alabama was able to release its Defense Coordinating Officer on August 31, 2005, because Department of Defense support was not needed in Alabama. This allowed additional Department of Defense resources to shift into Mississippi.

Mississippi

Mississippi's six southern most counties were left with catastrophic damage. Winds and storm surge from Hurricane Katrina destroyed basic infrastructure along approximately 26 miles of Mississippi's coast from Biloxi to Waveland. Neighborhoods, schools, and business districts in the three coastal counties were destroyed as well.



FEMA’s Federal Coordinating Officer (FCO) and Mississippi’s State Coordinating Officer immediately established joint integrated operations. FEMA and state or local counterparts integrated, worked side-by-side, and addressed issues as they occurred. Pre-existing relationships, established by federal, state, and local entities during the response to Hurricane Dennis and preparedness exercises, facilitated the integration of Hurricane Katrina response personnel.

FEMA, state, and local emergency management responders operated jointly at an interim operating facility in Biloxi, which later became the Area Field Office, and at the JFO in Jackson. FEMA established branches and divisions within its Operations Section. Division supervisors were empowered to act and, in conjunction with local counterparts, determined needs for their division. Those needs were reported to the branch director, who determined what the branch could meet, and then unmet needs were forwarded to the Operations Section Chief at the JFO. Needs that could not be filled by the JFO were mission assigned or contracted to other federal agencies.

FEMA and state officials expressed frustration with the rate and quantity of commodities delivered to Mississippi as well as with the lack of asset

visibility for the logistics process. Officials indicated they had ordered water, ice, and MREs in quantities far greater than what was delivered, yet when they attempted to determine where additional quantities were in the process, they were told the commodities were “in the pipeline.” According to FEMA field officials, on average, Mississippi received less than 50 percent of the commodities it requested between August 27, 2005, and September 5, 2005. While FEMA should address asset visibility, a number of factors outside of FEMA’s control affect its ability to deliver requested commodities, including the reasonableness of field requests, supplier inventories, and the availability of transportation resources. Even so, the effectiveness of a response is dependent upon the ability to anticipate and address potential shortfalls through adequate contingency planning.

The communications infrastructure was destroyed in areas of Mississippi. FEMA deployed a MERS detachment to the Gulfport area, containing satellite equipment and a satellite link, to establish communications and provide support. We were told that without MERS, there would have been no communications in the area. FEMA officials said it took about three days after landfall to fully grasp the magnitude of the destruction.

Louisiana

Hurricane Katrina’s winds and storm surge caused severe damage in a number of Louisiana parishes; however, the majority of the damage in the city of New Orleans was a result of several breaches in the city’s levee system after landfall. Because of the breaches much of the city was submerged, and dewatering efforts placed Louisiana’s response and recovery behind Mississippi.



The Superdome in New Orleans was designated as a shelter of last resort. Louisiana state officials told us that its use as a shelter was intended only for citizens who had special needs and were medically unable to evacuate the city prior to Katrina’s landfall. After the levees breached, additional victims began appearing at the Superdome, the Convention Center, and other locations around the city.

Prior to landfall, FEMA pre-staged five trucks of water and two trucks of MREs at the Superdome. In addition, we were told, a few trucks of commodities were delivered to the Superdome after landfall. However, the unexpected large number of evacuees arriving at the Superdome and other locations within the city was not anticipated nor adequately planned for by state and local authorities. The limited commodities quickly became depleted, people with special needs were not addressed, various stages of civil unrest ensued, and FEMA responders pulled out of the Superdome until order and security could be restored.

Under mission assignments from FEMA, the Departments of Defense and Transportation provided support for the evacuation of victims from New Orleans. Over four days beginning August 31, 2005, more than 22,000

evacuees were transported from the Superdome, the Convention Center, and other locations in the city to shelters in Texas and other states.

FEMA officials experienced difficulty establishing joint, integrated operations with Louisiana's emergency management personnel. Limited space at Louisiana's EOC prevented some FEMA and state personnel from co-locating, and FEMA established an interim operating facility at a separate location where most FEMA personnel operated until the JFO was established. FEMA's FCO and Louisiana's State Coordinating Officer did not establish joint operational objectives and priorities until September 11, 2005. In addition, Louisiana's limited number of trained emergency managers impacted the integration of FEMA with state and local counterparts.

New Orleans: A Uniquely Vulnerable City

Because the greater New Orleans metropolitan area sits in the tidal lowlands of Lake Pontchartrain and is generally bordered on its southern side by the Mississippi River, its near sea level elevation makes it uniquely susceptible to flooding. Levees and floodwalls built around the city were expected to greatly reduce the threat of flooding from hurricane-induced storm surges, waves, and rainfalls. However, the levees kept natural silt deposits from the Mississippi River from replenishing the delta, causing Louisiana's coastal wetlands to wash away and the city of New Orleans to sink even deeper, which when combined with rising sea levels, increased the region's vulnerability to flooding.

New Orleans' location also creates unique evacuation issues. For example, only two main highways provide evacuation routes inland and out of the New Orleans area; one route leads through Mississippi. Should both Mississippi and Louisiana need to evacuate simultaneously, significant congestion problems would occur, and shelters in Mississippi would become overwhelmed in trying to care for evacuees from two states. While Louisiana and Mississippi had an agreement in place to convert all traffic lanes to a northbound direction on specified evacuation routes, the plan's effectiveness was dependent on Louisiana beginning to evacuate a day before Mississippi. Both states began evacuating on the same day prior to Hurricane Katrina's landfall.

Initial Recovery

FEMA's primary programs to assist individuals and states recover from the effects of a disaster are the Individual and Public Assistance programs.

For Hurricane Katrina, an individual or household could receive a maximum of \$26,200 of Individual and Household Program (IHP) assistance from FEMA. IHP has two major components: housing assistance and other needs assistance.⁸ Housing assistance is 100 percent federally funded and administered and provides assistance for temporary rental lodging, home repairs, and home replacement. Other needs assistance is a cost-shared partnership between FEMA and the states. It assists with the reimbursement of medical and dental costs, funeral and burial costs, transportation, and personal property items. As of September 30, 2005, FEMA had received 1,557,937 registrations for IHP assistance from residents of the three affected states. It made 1,380,564 applicant referrals for assistance under the housing assistance component and awarded \$2,401,735,486. It also made 784,887 referrals under the other needs assistance component and awarded \$68,793,970.

FEMA's Public Assistance program provides supplemental federal disaster grants for the repair, replacement, or restoration of disaster-damaged, publicly owned facilities and the facilities of certain private non-profit organizations.⁹ The program reimburses eligible emergency related activities such as debris removal and emergency protective measures. As of October 1, 2005, FEMA had received a total of 430 projects and obligated more than \$962 million to the three affected states.

Framework for Federal Disaster Response

The terrorist attacks of September 11, 2001, resulted in substantial changes to how the federal government prepares for, responds to, and recovers from natural disasters. The *Homeland Security Act of 2002*¹⁰ created DHS and realigned FEMA, previously independent, as part of the department within the

⁸ See Appendix B for a description of FEMA's Individual Assistance Programs.

⁹ See Appendix C for a description of FEMA's Public Assistance Program and eligible work under the program.

¹⁰ P.L. 107-296 (November 25, 2002).

Emergency Preparedness and Response Directorate.¹¹ FEMA gained some capabilities, such as the NDMS from the Department of Health and Human Services, but did not retain others, such as the administration of selected preparedness grants. Further, the *Homeland Security Act* and Homeland Security Presidential Directive-5, “Management of Domestic Incidents,” called for a new, unified, all-hazards framework and plan for responding to terrorism, natural disasters, special events, and emergencies.

As required by Homeland Security Presidential Directive-5, DHS developed NIMS as a framework to help emergency managers and responders from different jurisdictions and disciplines work together more effectively during disasters and emergencies. To the extent possible, disasters are managed locally; as most responses do not exceed the capabilities of the local government. However, some incidents require multiple jurisdictions or levels of government to provide an adequate response. To aid cooperation, the NIMS standardizes the concepts and processes for incident command and management, resource management, training and certification, and communications. Appendix D provides greater detail on the command and management aspects of NIMS, including Incident Command Structure. DHS published NIMS on March 1, 2004. Jurisdictions are required to comply fully with its guidelines by September 30, 2006, in order to remain eligible for DHS preparedness grants.

DHS designed the NRP to fit the NIMS framework and to synthesize previous federal plans including those for natural hazards, biological and radiological hazards, and terrorist events.¹² The NRP addresses events such as Hurricane Katrina – events that involve multiple geographic areas; cause casualties and displace persons; disrupt critical infrastructure and essential public services;

¹¹ A DHS reorganization that took effect after Hurricane Katrina eliminated the Emergency Preparedness & Response Directorate, organizationally placing FEMA directly under the DHS Secretary. The reorganization created a DHS Preparedness Directorate distinct from FEMA, which absorbed some of FEMA’s Preparedness Division. These and other organizational changes were planned as part of the Second Stage Review. The review examined elements of DHS in order to recommend ways to better manage risk in terms of threat, vulnerability, and consequence; prioritize policies and operational missions according to this risk-based approach; and establish a series of preventive and protective steps that would increase security at multiple levels. The results of the review were announced on July 13, 2005, and were reflected in the *Department of Homeland Security Appropriations Act, 2006*, P.L. No. 109-90 (October 18, 2005). FEMA’s Preparedness Division remained intact at the time of Hurricane Katrina, and is therefore referred to as such in this report.

¹² The NRP superseded the Initial National Response Plan, the Federal Response Plan, the Domestic Terrorism Concept of Operations Plan, and the Federal Radiological Emergency Response Plan on April 14, 2005. The NRP outlines the authorities and responsibilities for coordinating domestic incident management based on 70 statutes, regulations, executive orders, and presidential directives.

overwhelm the response capabilities of state, local, tribal, and private-sector officials; and require a short or no-notice federal response. The NRP consists of a base plan plus 31 annexes describing ESFs, incident-specific response, and administrative support processes. For further background on the NRP, see Appendix E.

FEMA has or shares lead responsibility for 9 of the 31 annexes and has supporting roles for many others. These assign FEMA responsibility for overall coordination of disaster relief efforts across federal, state, and volunteer organizations. Specific responsibilities FEMA fulfills under the NRP include:

- Federal Coordinating Officers: For disasters declared under the Stafford Act, the President appoints an FCO from FEMA's cadre to act on his behalf in orchestrating the federal response effort in the affected state. The FCO manages and coordinates the application of programs and funds under the Stafford Act, including mission assignments and resource allocation.
- ESF-5: Emergency Management: As ESF-5 coordinator and its primary agency, FEMA staffs the core management and administrative functions in support of the JFO, RRCC, NRCC, and Emergency Response Teams. FEMA staffs incident command functions including the section chiefs for operations, logistics, planning, and finance and administration. FEMA also provides the staff and information technology support to process federal mission assignments.
- ESF-6: Mass Care, Housing, and Human Services: FEMA coordinates ESF-6 and serves as its primary agency jointly with the American Red Cross (Red Cross). ESF-6 supports disaster victims with feeding, sheltering, Disaster Welfare Inquiry, and first aid; short and long-term housing; implementation of the Individuals and Households Program; Crisis Counseling; Disaster Unemployment Assistance; Disaster Legal Services; and voluntary agency coordination and donations management.
- ESF-9: Urban Search and Rescue: FEMA's National US&R Response System provides specialized collapsed structure search and rescue operations and life-saving assistance to victims.

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- ESF-14: Long-term Community Recovery and Mitigation: This ESF applies available federal programs to support disaster mitigation and permanent restoration of infrastructure, housing, and the local economy.¹³
 - ESF-15: External Affairs: DHS Public Affairs coordinates ESF-15, and FEMA serves as its primary agency. ESF-15 works to provide accurate, coordinated, and timely information to the public, the government, the media, and the private sector.

Like the NRP, the Stafford Act determines FEMA's role in disaster preparedness, response, and recovery. The provisions of the Stafford Act establish processes and programs for providing federal assistance to state, local, and tribal governments; individuals; and qualified private nonprofit organizations. Federal assistance may include technical assistance, the provision of goods and services, and financial assistance including direct payments, grants, loans, and insurance. FEMA coordinates and issues much of the assistance under the Stafford Act, but other federal agencies also provide assistance. For example, the Small Business Administration (SBA) manages and funds the Disaster Loan Program for renters, homeowners, and businesses.

In order for FEMA to make federal assistance under the Stafford Act available, states initiate a request for an emergency or major disaster declaration that is reviewed by FEMA for approval of the President. Emergency declarations typically authorize federal programs for emergency-type assistance, such as debris removal, while major disaster declarations afford a broader range of federal assistance. Funding is capped at \$5 million per emergency declaration; this restriction does not apply to major disaster declarations. The Stafford Act also permits FEMA to anticipate declarations and pre-stage federal personnel and resources when a disaster that threatens human health and safety is imminent but not yet declared. However, FEMA cannot provide federal assistance until an emergency or major disaster declaration is made.

States are required to activate their emergency plans as a prerequisite to requesting federal assistance under the Stafford Act. Authority to declare evacuations and enforce state and local laws are state and local concerns.

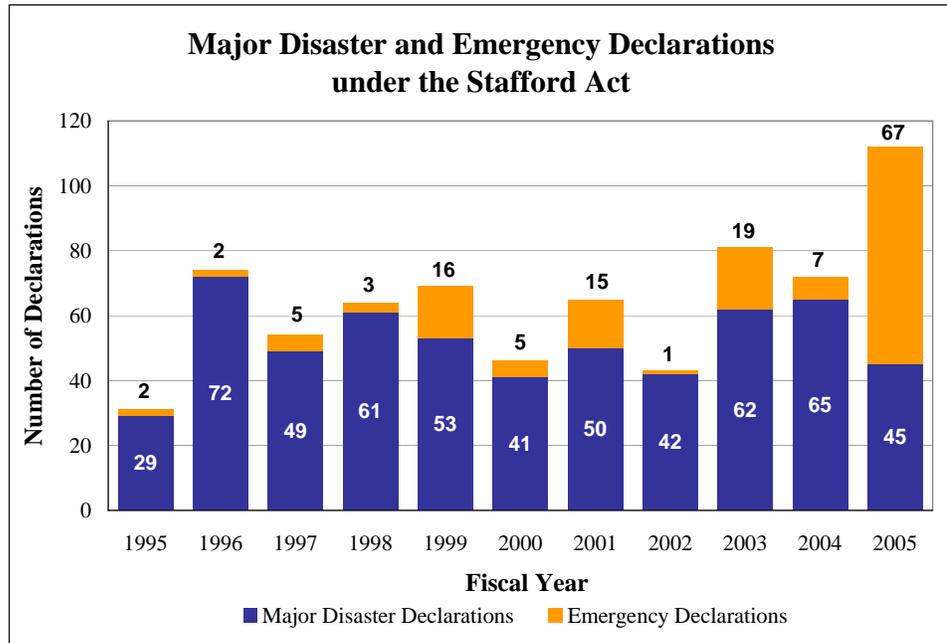
¹³ Because our scope focuses on the period of August 24 to September 30, 2005, and prior, we did not conduct a performance review of FEMA's long-term recovery and mitigation efforts for Hurricane Katrina.

During Hurricane Katrina, all three governors deployed their National Guard units and emergency management staff – the Alabama Emergency Management Agency, Mississippi Emergency Management Agency, and the Louisiana Office of Homeland Security and Emergency Preparedness. Additional state and local resources include police, fire, public health and medical and other personnel; private sector support, and state mutual aid agreements. For example, Alabama, Mississippi, and Louisiana are all signatories to the Emergency Management Assistance Compact (EMAC), which allows each to request, receive, and reimburse other states for resources such as personnel and commodities.¹⁴ During Hurricane Katrina, the majority of assistance requested through EMAC was for National Guard resources and law enforcement personnel. Other types of requests included medical team support, search and rescue resources and commodities such as ice and water.

Before Hurricane Katrina's landfall, FEMA was providing assistance to states for 38 previously declared disasters. In preparation for Hurricane Katrina, the President signed emergency declarations authorizing federal public assistance for emergency protective measures and debris removal for Louisiana on August 27, 2005, and for Alabama and Mississippi on August 28, 2005. On August 29, 2005, Hurricane Katrina's landfall, the President signed major disaster declarations for all three states to provide Individual Assistance and Public Assistance to selected parishes and counties. The declarations were revised multiple times to expand the number of declared localities and types of assistance available, and to reduce the percent of assistance funded by state cost sharing. As of September 30, 2005, 44 states and the District of Columbia also received emergency declarations to support Hurricane Katrina evacuees.

The chart below illustrates the number of major disaster and emergency declarations issued under the Stafford Act from fiscal year (FY) 1995 to FY 2005.

¹⁴ EMAC is a mutual aid agreement between states, which enables assistance between states during times of disaster or emergency.



Results of Review

Difficulty Adapting to New Response Plans

In the past two years, DHS published two watershed planning documents – the NIMS and the NRP – that restructure how federal, state, and local government agencies and emergency responders conduct disaster preparation, response, and recovery activities. Changes needed to implement both documents, including developing specific procedures and plans, training, and testing, were still underway when Hurricane Katrina made landfall. The response to Hurricane Katrina demonstrated some positive effects from implementing the incident command structure under NIMS, which FEMA and state staff led in Mississippi and Alabama. It also highlighted severe deficiencies and multiple areas where FEMA and DHS headquarters must make adjustments to the NRP, such as the use of incident designations, the role of the PFO, and the responsibilities of ESF coordinators.

States Had Varied Success Implementing Incident Command System Structures and Establishing Unified Command

Incident command system (ICS) structures and unified command were implemented with varying levels of success in Mississippi, Alabama, and Louisiana during the response to Hurricane Katrina. Mississippi immediately implemented a comprehensive ICS structure and integrated federal, state, and local personnel at all levels in a unified command. Alabama implemented an ICS structure, but at a smaller scale because Hurricane Katrina did not cause the level of damage in Alabama that it did in Mississippi and Louisiana. Louisiana experienced difficulty with fully implementing an ICS structure and establishing a unified command with federal, state, and local officials.

Mississippi

FEMA's FCO and Mississippi's State Coordinating Officer immediately established a unified command with a comprehensive ICS structure. Prior to landfall, FEMA's Emergency Response Team-Advanced arrived at the state's EOC and began coordinating commodities and personnel for the response.

FEMA and state officials told us that after landfall, federal, state, and local counterparts integrated and worked side-by-side to manage the response. As issues occurred, all were able to immediately address the issue and recommend solutions. Joint incident action planning meetings with federal and state counterparts from all response sections facilitated planning objectives, priorities, and operations for each operational period.

Due to the magnitude of the damage, the Operations Section established three geographic branches, each containing multiple divisions, within Mississippi. Branch I included the six most severely damaged coastal counties. Within Branch I, each county was a separate division. Branches II and III consisted of divisions covering two or more counties each. Because FEMA did not have enough personnel to staff all division supervisor positions, personnel from the U.S. Forest Service filled some division supervisor positions. In addition, FEMA established a federal operational staging area in each branch to facilitate the distribution of commodities and other resources in the affected area.

FEMA and state emergency management officials in Mississippi recognized early on that a forward location in the disaster area would be necessary so an

Area Field Office was established in Biloxi. Federal, state, and local personnel were pushed forward into the disaster area, and they were empowered to act. Division supervisors within the affected area determined their requirements and requests that could not be filled by the state were passed to the Branch. The requests were then passed to the JFO if they could not be filled at the Branch level, and sent forward within the ICS structure until filled.

The ICS structure established in Mississippi included geographic branches and divisions, and authority was delegated to personnel at the division level. In addition to establishing a unified command with federal, state, and local response personnel, the structure allowed FEMA, state, and local emergency management officials to manage Hurricane Katrina response efforts even though existing resources were overwhelmed according to FEMA and state officials.

Alabama

In comparison to Mississippi, Alabama's ICS structure was much smaller, showing the flexibility and scalability of the ICS system. Only two coastal counties in Alabama received significant damage from Hurricane Katrina. Damage to other counties was not as severe as Mississippi's. As a result, Alabama's ICS structure was much less complex. For example, Alabama did not have a need to establish branches or divisions in order to adequately coordinate a response.

In addition, FEMA and Alabama Emergency Management Agency personnel worked from the beginning to establish joint objectives and priorities. Joint incident action plans were developed also. Alabama's FCO recognized that Department of Defense assistance would not be required and, two days after landfall, released the Defense Coordinating Element so it could move to Mississippi for future support operations.

Louisiana

Louisiana had great difficulty establishing an integrated command structure, and never fully achieved a unified command with FEMA. FEMA's Emergency Response Team-National arrived at Louisiana's EOC in Baton Rouge before landfall and attempted to integrate with Louisiana's Office of Homeland Security and Emergency Preparedness personnel. However, extremely limited space at Louisiana's EOC prevented some FEMA and state

personnel from co-locating. Instead, FEMA established an interim operating facility at a separate location, where most FEMA personnel operated until the JFO was established on September 12, 2005. Although the JFO was operational, state operations personnel continued working at the state EOC rather than co-locating with FEMA at the JFO. Therefore, a few FEMA Operations Section personnel continued to work out of the EOC to facilitate and pre-screen Louisiana's requests for assistance until state operations personnel moved to the JFO.

FEMA immediately established positions based on an ICS structure; however, FEMA and state officials told us that because Louisiana had a limited number of trained emergency management staff, the state was not able to provide a counterpart to all federal positions. FEMA officials in Louisiana told us that state emergency management personnel were concerned exclusively with evacuations and did not assign staff to work with FEMA to plan initial response efforts for Louisiana. FEMA officials indicated that its personnel prepared initial plans for commodity and medical needs, and they had to pull a state employee to begin US&R planning. While FEMA does not usually coordinate with local officials, FEMA sent liaisons into the affected Louisiana parishes and attempted to establish a unified command with local officials and the National Guard. However, at the local level in the affected parishes, federal and local counterparts did not coordinate to establish a unified command in most cases according to FEMA officials in Louisiana. In addition, FEMA's FCO and Louisiana's State Coordinating Officer did not establish joint priorities and objectives for the response until September 11, 2005.¹⁵

Louisiana's ICS structure did not include geographic branches or divisions within the Operations Section. A forward operational area was not established in New Orleans until September 5, 2005, when the Deputy PFO arrived in Louisiana. According to FEMA officials, the PFO cell, which later became an Area Field Office, operated as a satellite of the JFO in Baton Rouge. While the Area Field Office was assigned an area of responsibility covering several parishes in the New Orleans area, personnel on the ground there were not delegated authority, as was the case with division supervisors in Mississippi. In contrast to Mississippi, the New Orleans Area Field Office received its action plans and operations from Baton Rouge rather than determining the needs for the area and sending requests for assistance through the JFO. The

¹⁵ Louisiana Defense Coordinating Officer Situation Report, September 11, 2005, at 1900 hrs.

limited ICS structure and lack of unified command in Louisiana significantly undercut its response efforts.

Multiagency Coordination Entities Duplicated Support Efforts

FEMA's NRCC in Washington, DC, and RRCCs at FEMA Regional Offices in Atlanta, Georgia, and Denton, Texas, acted as multiagency coordination entities during the Hurricane Katrina response. In addition to FEMA personnel, the NRCC and RRCCs included personnel from other components within DHS plus personnel from other federal agencies, all performing functions in support of the various emergency support functions.

Each entity coordinated policy and provided strategic guidance and situational information to personnel operating in the incident area. Each also worked to locate sources for needed resources and determine how best to allocate limited resources to address and balance requirements across Mississippi, Alabama, and Louisiana. Often these efforts were duplicative.

Emergency Response Teams-National and Advanced also acted as multiagency coordination entities during the initial Hurricane Katrina response. These teams deployed to each state prior to landfall and began coordination efforts for the response. After landfall, the teams were in place and could immediately begin addressing issues and coordinating the response.

The NRCC, RRCCs, and Emergency Response Teams have the same organizational structure. However, as issues developed, all three entities began working to resolve the issue rather than allowing the issue to be worked at the field level first by the Emergency Response Teams-National and Advanced, and then elevated to the regional or national level as necessary. Instead efforts were duplicated, resulting in the need for multiple conference calls among the three entities to resolve an issue.

Given the complexity of the response effort and issues presented by Hurricane Katrina, DHS headquarters and FEMA must establish a defined use for multiagency coordination entities that expedites the resolution of issues, facilitates incident management, coordinates policy, and provides strategic guidance and direction to support incident management activities at the most appropriate operation level. Doing so will avoid the unnecessary and time consuming coordination and posturing that resulted in response to Hurricane Katrina.

FEMA and DHS Were Adjusting to the National Response Plan

During the response, several significant departures from NRP protocols occurred: (1) DHS' actions to apply NRP protocols for Incidents of National Significance and catastrophic incidents were ambiguous; (2) DHS defined a new, operational role for the PFO by assigning the PFO both FCO and Disaster Recovery Manager authorities; and, (3) the Interagency Incident Management Group (IIMG) took an operational role not prescribed in the NRP. As a backdrop to these changes, FEMA had not yet developed or implemented policies and training for roles and responsibilities necessary to supplement the NRP. Further, a number of agencies that were assigned emergency support functions under existing NRP authorities believed it was necessary to revise their operational protocols and procedures during the response.

The implementation of the NRP occurred on an aggressive schedule. DHS' Secretary officially released the NRP for implementation on January 6, 2005. The plan phased in training and plan modification requirements over 120 days, superseding its predecessor response plans on April 14, 2005. However, some training and plan modifications were not complete when Hurricane Katrina occurred. For the remainder of the NRP's first year, DHS planned to assess NRP coordinating structures, processes, and protocols. The assessments will culminate in a one-year review and recommendations to the Secretary on necessary NRP revisions. An initial review of the NRP, scheduled for December 2005, is not yet complete. We would anticipate that lessons learned from Hurricane Katrina would be used to make necessary revisions to the NRP.

The NRP made significant changes to the Federal Response Plan, the plan that had shaped FEMA's and the federal government's response to most disasters. We received mixed reaction to how the NRP affected the federal response to Hurricane Katrina. Some senior officials at FEMA and DHS headquarters commented the NRP was used to the greatest extent possible since its implementation, and that training to transition to the NRP was well conducted. Other FEMA headquarters officials disagreed, stating that the NRP contained unrealistic requirements and unclear language, and asserted that executing the plan's new concepts and components created confusion. State officials also told us the NRP was unclear and not well understood; but overall, their consensus was that it did not have a positive or negative effect on the state and

local response because most were familiar with the NRP's predecessor, the Federal Response Plan.

Two NRP Designations Had Little Effect on Response Operations

A key concept in the all-hazards NRP is the distinction between events that occur every day and are addressed by the responsible jurisdiction or governmental authority and those that are considered "Incidents of National Significance." Incidents of National Significance are major events that must be addressed by the combined effort of federal, state, local, tribal, private sector, and nongovernmental entities. They involve situations including:

- Acts or credible threats of terrorism involving a response by more than one federal agency;
- Federal support to states during a catastrophic incident or disaster declared under the Stafford Act;
- Federal response to special events such as National Security Special Events (e.g., national political conventions);
- Federal-to-federal support requested of DHS by another agency; and,
- Direction from the President for DHS to manage response to an incident.

According to the NRP, all declared emergencies and major disasters by the President under the Stafford Act are Incidents of National Significance. DHS' Secretary may also designate Incidents of National Significance, which are not Stafford Act declarations. Between April 14, 2005, when the NRP superseded other plans, and Hurricane Katrina's landfall, FEMA responded to 19 declared disasters (all NRP Incidents of National Significance).

The President approved emergency declarations for all three states prior to Hurricane Katrina's landfall, making them Incidents of National Significance. However, confusion arose when DHS' Secretary formally declared Hurricane Katrina an Incident of National Significance on August 30, 2005. It was unclear what federal resources would be made available under the August 30, 2005, designation. The announcement did not significantly alter the response operation, but calls into question whether senior officials were knowledgeable of NRP authorities and protocols.

As a whole, the NRP does not require a formal statement of activation, but parts of the plan such as the Catastrophic Incident Annex do. This annex

coordinates an accelerated, proactive federal response to a no-notice or short-notice catastrophic mass victim or mass evacuation incident, and is activated by DHS' Secretary. No one we interviewed could definitively state whether DHS activated the Catastrophic Incident Annex for Hurricane Katrina. Irrespective, FEMA and the Homeland Security Operations Center (HSOC) activated federal departments and the Red Cross. Federal resources that the annex would have afforded were deployed before landfall.

A more detailed Catastrophic Incident Supplement supports the annex with a time-phased deployment matrix of federal resources and assets, including special teams, equipment, supplies, and transportation to provide critical life saving support and incident containment. The Catastrophic Incident Supplement was still in draft when Hurricane Katrina made landfall and was not approved until September 2005. The supplement identifies 131 actions that agencies must take within 96 hours after an incident for a natural hazard event. Of these actions, DHS is responsible for or supports 79. Our analysis demonstrated that all FEMA teams listed in the supplement had initiated deployment actions as required by the "push" concept of operations for natural hazards before landfall. In most instances, more FEMA teams and resources than referenced in the supplement were deployed. Extra teams sent included Urban Search and Rescue Teams, Deployable Mortuary Operational Response Teams, and Disaster Medical Assistance Teams. During our analysis, we also note apparent discrepancies between the Execution Schedule (Annex 1) and the accompanying Transportation Support Schedule (Annex 2) of the supplement. For example, as currently written, Annex 2 does not provide for the transportation support of Disaster Medical Assistance Teams for natural hazard and biological events, but for chemical, radiological, nuclear, and high yield explosive events, the annex provides transportation support for 14 such teams.

Overlap Between the Interagency Incident Management Group and the Homeland Security Operations Center

Hurricane Katrina reinforced the lesson from *Top Officials 3* exercise that the role of the IIMG needs better definition. According to the NRP, the IIMG is a federal, headquarters-level, multiagency coordination entity that assembles on an as-needed basis to provide strategic incident management planning, coordination, and decision-making support for the DHS Secretary and White House. However, during *Top Officials 3* exercise, IIMG members adopted a less strategic role and, although not formally, we recommended:

“The roles and responsibilities of the HSOC and the IIMG should be clarified. ...Under the NRP, a key role of the IIMG is to provide decision-making support to top and senior officials during an incident. However, rather than provide policy advice to top officials during the exercise, the IIMG was under pressure from senior federal officials to provide situational information and address lower level coordination issues that should have been part of HSOC’s role.”¹⁶

Co-located with the HSOC, during Hurricane Katrina the IIMG established operational hours, fulfilled requests for situational information, and created routine reports. IIMG members we interviewed said that the senior officials on the IIMG served as a reporting cell to DHS leadership and the White House, running parallel functions with the HSOC. Doubling the headquarters-level information collection effort to include both the HSOC and the IIMG burdened response operations at the JFO and the NRCC, which began hiring contractors to manage information requests.

DHS needs to consider revising the respective roles of the IIMG and HSOC. The disaster response role of the IIMG is not new; it replaces the Catastrophic Disaster Response Group that served as the policy-level interagency coordination entity under the Federal Response Plan. The NRCC and JFO also fulfill roles that previously existed under that plan. DHS should clarify how it intends to integrate these entities with the HSOC, which has the primary role of collecting operational and situational information for DHS headquarters.

Recommendation #1: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Director of the Office of Operations Coordination, clarify the National Response Plan guidelines for federal, headquarters-level collection and synthesis of situational and operational information, with the intent of eliminating duplication of effort between the Interagency Incident Management Group and Homeland Security Operations Center.

Role of the Principal Federal Official Requires Clarification

The NRP describes several key leadership positions during a disaster response. In addition to the role of DHS’ Secretary, positions include:

¹⁶ *A Review of the Top Officials 3 Exercise*, Report Number OIG-06-07, November 2005, page 15.

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- **Federal Coordinating Officer:** The President designates an FCO as the lead federal official to coordinate federal resource support for each emergency or major disaster declared under the Stafford Act.¹⁷ FEMA maintains a standing roster, or cadre, of FCOs who have undergone a rigorous agency-wide certification program with preparation for all-hazard events including terrorism and weapons of mass destruction. Additionally, FCOs must participate in actual disasters or full-scale exercises as part of the certification program.
 - **Principal Federal Official:** The DHS Secretary serves as or formally appoints a PFO as needed.¹⁸ According to the NRP, the PFO facilitates federal support to the established incident command structure and coordinates overall federal incident management and assistance to officials such as the FCO acting under their disaster response authorities. The PFO does not direct or replace the incident command structure. The PFO provides a primary point of contact and local situational awareness for DHS' Secretary, a channel for media and public communications, and an interface with state, local, and other federal officials. DHS' roster of PFO designees includes senior officials from several DHS components, the Environmental Protection Agency, and the Departments of Treasury, Health and Human Services, and Justice. As of July 2005, over 100 candidates had received DHS' one-day PFO orientation training. However, neither PFO designated by DHS' Secretary had attended the training.
 - **Federal Resource Coordinator:** DHS appoints the Federal Resource Coordinator to perform a function similar to the FCO in disasters not declared under the Stafford Act. In those situations, the Federal Resource Coordinator coordinates support through interagency agreements and memorandums of understanding. The Federal Resource Coordinator is responsible for coordinating the timely delivery of resources to the requesting agency. Members of the FCO cadre generally serve as Federal Resource Coordinators.

¹⁷ 42 U.S.C. §5143, Coordinating Officers.

¹⁸ For certain scenarios, DHS' Secretary may pre-designate a PFO to facilitate federal domestic incident planning and coordination at the local level outside the context of a specific threat or incident. When the Secretary of Homeland Security activates the Catastrophic Incident Annex and Supplement, the Secretary designates the PFO within an hour of the incident, and the FEMA Regional Director serves as the interim PFO until the designated PFO arrives on the scene.

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- Disaster Recovery Manager: When the President issues an emergency or major disaster declaration under the Stafford Act, FEMA Regional Directors serve as or designate Disaster Recovery Managers to exercise all the authority of the Regional Director in administering the financial aspects of assistance authorized under the Stafford Act. Disaster Recovery Managers oversee the delivery of Stafford Act programs, determine funding requirements, execute the FEMA/State Agreement, issue mission assignments, and obligate money from the Disaster Relief Fund.¹⁹ In many cases, the FCO also serves as the Disaster Recovery Manager.

When both a PFO and an FCO are assigned to a specific incident, as was the case during Hurricane Katrina, the FCO will coordinate with the PFO and work closely with representatives of other federal agencies. For a side-by-side comparison of duties of both the FCO and PFO, as outlined in the NRP, see Appendix F. For natural disasters, DHS' Secretary may not designate a PFO, in which case the FCO designated by the President serves as the lead federal official. Prior to Hurricane Katrina, the PFO element of the NRP was only tested during terrorism-related events rather than natural disasters, in exercises such as *Top Officials 3*, and National Special Security Events. The response to Hurricane Katrina was the first operational use of the PFO.

On August 30, 2005, DHS' Secretary designated the Under Secretary of Emergency Preparedness and Response (EP&R) as the PFO for Hurricane Katrina. The majority of state and federal officials we interviewed said that the Under Secretary's execution of the PFO role matched the non-directive, coordination duties described in the NRP. However, when the Secretary appointed Vice Admiral Allen as PFO on September 9, 2005, the PFO took a greater role in directing the federal response, which was contrary to the PFO's role as outlined in the NRP.²⁰

As the PFO assumed a greater role in the response operations, the new lines of command and authority created confusion. For example, a state official told us the PFO was coordinating directly with local government officials without the knowledge of the state. In addition, the PFO duplicated planning and reporting activities in the JFO. In New Orleans, the Deputy PFO cell was

¹⁹ The Regional Director is responsible for executing the FEMA/State Agreement even if not serving as the Disaster Recovery Manager.

²⁰ We also observed a gravitation of the PFO towards a more operational rather than coordination role during the *Top Officials 3* exercise.

established and FEMA had an Area Field Office; it was unclear who was responsible for federal operations in New Orleans. Further, the Louisiana JFO operations section identified instances where the PFO submitted action request forms to the JFO operations section on behalf of the state while at the same time the state was submitting the same action request form. Also, the PFO cell issued action request forms directly to emergency support function leads, in conflict with the JFO operations section. In Louisiana, the JFO staff and PFO cell spent a significant amount of energy establishing and clarifying respective roles and responsibilities.

Effective September 21, 2005, the Acting Under Secretary for EP&R designated the PFO as FCO for the states of Alabama, Mississippi, and Louisiana.²¹ This action sanctioned the shift toward a greater directive role for the PFO in the response. Several officials commented that the eventual blending of PFO and FCO authorities suggests an unnecessary division within the NRP. Others added that the FCO's statutory authorities as the representative of the President fully encompass the PFO role. Further, if one justification for a PFO is to reduce the non-operational burden of the FCO, such as public and media relations, combining the roles defeats the purpose. Moreover, inconsistent use of PFOs for some affected states and not others added to the confusion.²² For example, one FEMA region delegated Disaster Recovery Manager authority to the PFO/FCO while another region did not, which provided different financial authorities and responsibilities in Louisiana than in Mississippi and Alabama.

Many senior FEMA officials viewed consolidating roles as necessary in Louisiana, but were neutral on the subject in Alabama. Both state and FEMA officials said it had a less than positive effect in Mississippi. They disagreed with the change because the consolidation created regional leadership for the response when many issues were state-specific, such as the type of damage and long-term housing. State officials said that a single federal official should not hold responsibilities for more than one state and that consolidation delayed the approval of Mississippi requests to add additional counties and types of disaster assistance for weeks.

²¹ 70 Fed. Reg. 57308 and 57309 (September 30, 2005).

²² Although Hurricane Katrina affected the state of Florida, the PFO designation did not extend to Florida. Additionally, a PFO was designated for Hurricane Ophelia (North Carolina) and Hurricane Rita (Texas and Louisiana) but not for Hurricane Wilma (Florida).

Recommendation #2: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, clarify the roles of the Principal Federal Official, the Federal Coordinating Officer, the Federal Resource Coordinator, and the Disaster Recovery Manager to provide a clear distinction for the types and levels of response activities that warrant a combination or modification to those roles; develop procedures for the timely activation of each role; and, ensure that these officials be provided with the necessary training to complement their qualifications for serving in these positions.

Structures and Procedures for Emergency Support Functions Were in Development

Although the concept of emergency support functions is not new, the structures of certain ESFs are. The following table lists the ESFs and agencies responsible for their functions under the NRP. The NRP created new ESFs for public safety and security (ESF-13), long-term community recovery and mitigation (ESF-14), and external affairs (ESF-15). Also, it substantially revised the scope of ESF-5 from information and planning to encompass all emergency management and expanded ESF-6 to mass care, housing, and human services. The following sections discuss FEMA's role as a coordinator or primary agency for ESF-5, ESF-6, ESF-9, and ESF-15.

Emergency Support Functions Under the Federal and National Response Plans

Federal Response Plan	E S F	National Response Plan		
		Now	ESF Coordinator	Primary Agency
Transportation	1	Transportation	Department of Transportation	Department of Transportation
Communications	2	Communications	DHS (National Communications System)	DHS (National Communications System)
Public Works & Engineering	3	Public Works & Engineering	Department of Defense (U.S. Army Corps of Engineers)	Department of Defense (U.S. Army Corps of Engineers) DHS (FEMA)
Firefighting	4	Firefighting	Department of Agriculture (Forest Service)	Department of Agriculture (Forest Service)
Information & Planning	5	Emergency Management	DHS (FEMA)	DHS (FEMA)
Mass Care	6	Mass Care, Housing, & Human Services	DHS (FEMA)	DHS (FEMA) American Red Cross
Resource Support	7	Resource Support	General Services Administration	General Services Administration
Health & Medical Services	8	Public Health & Medical Services	Department of Health & Human Services	Department of Health & Human Services
Urban Search & Rescue	9	Urban Search & Rescue	DHS (FEMA)	DHS (FEMA)
Hazardous Materials	10	Oil & Hazardous Materials Response	Environmental Protection Agency	Environmental Protection Agency DHS (U.S. Coast Guard)
Food	11	Agriculture & Natural Resources	Department of Agriculture	Department of Agriculture Department of the Interior
Energy	12	Energy	Department of Energy	Department of Energy
No such function	13	Public Safety & Security	DHS Department of Justice	DHS Department of Justice
No such function	14	Long-term Community Recovery & Mitigation	DHS (FEMA)	Department of Agriculture Department of Commerce DHS (FEMA) Department of Health & Human Services Department of Housing & Urban Development Department of the Treasury Small Business Administration
No such function	15	External Affairs	DHS (Public Affairs)	DHS (FEMA)

Need to Solidify Role of ESF-5, Emergency Management

Hurricane Katrina highlighted issues as to whether there is a need for ESF-5, Emergency Management. Unlike the other 14 functions, which have established desks at the NRCC, RRCCs, and JFOs, ESF-5 did not staff a desk, appoint coordinators, or organize below the incident commander and section chiefs. FEMA and DHS staff performed ESF-5 activities as described by the NRP, such as activating, staffing, and running the NRCC, RRCCs, JFOs, and emergency response teams. However, FEMA had performed those roles

without a specific emergency support function designation under the Federal Response Plan.

Several FEMA managers questioned the need for ESF-5 as it is currently written in the NRP. Under the Federal Response Plan, FEMA was the lead for ESF-5 and performed information and planning activities such as collecting, analyzing, processing, and disseminating information, and providing support for planning and decision-making at all levels of government during a disaster.

The NRP altered this structure by adding information-processing and decision-making support roles for the HSOC, IIMG, and ESF-15. Further, by folding in plans for response to terrorist events, the NRP envisioned responses in which FEMA would not manage overall response efforts. NRP planners told us this concerned state and local emergency managers, who believed emergency management was not going to have a defined role within the new plan. Therefore, DHS transformed ESF-5 to encompass all emergency management, not just information and planning.

ESF-5's responsibilities under the NRP involve "supporting overall activities of the federal government for domestic incident management." The NRP provides a list of responsibilities under FEMA's ESF-5 purview, predominately coordination, management, staffing, and support functions. During a response, ESF-5 activates federal emergency assets including the other ESFs; coordinates operations with state, regional, local, and tribal entities; coordinates use of remote sensing, reconnaissance, and Geographic Information System support; and staffs the NRCC, RRCCs, JFOs, and other components within the federal incident command structure. ESF-5 response tasks also include incident action planning and situational reporting.

FEMA staff performed all these functions during Hurricane Katrina and submitted daily situational reports with summaries of ESF-5 work. However, we were unable to determine who within FEMA claimed responsibility for ESF-5 coordination at its headquarters or field locations.

FEMA staff that created ESF-5 for the NRP said it was hastily designed, is incomplete, and has not been fully implemented. A detailed standard operating procedure is in development and should define emergency management's function, identify key participants, list the skills and assets they provide, and clarify how these elements synthesize under the NRP. Once a more comprehensive document has been released, FEMA must ensure all

employees receive training to minimize confusion over the roles and responsibilities of ESF-5.

Information and Reporting Problems

In redesigning ESF-5, the NRP changed the processes for collecting and disseminating disaster information. Even though ESF-5 retains responsibility for information and reporting, the HSOC and ESF-15, External Affairs, also have roles. During Hurricane Katrina, physical difficulties with the communications infrastructure were compounded by an inadequate structure for collecting and disseminating disaster information. Staff in operations, logistics, and ESF sections, such as mass care and external affairs, had difficulty obtaining complete, timely, and accurate information on response efforts.

According to the NRP, overall federal responsibility for disaster information collection and sharing belongs to DHS' HSOC. The NRCC, FEMA's operational and informational center and part of ESF-5, is an important information resource for the HSOC. The NRP describes the NRCC as an HSOC component. The NRCC activated staffing and contributed to DHS situation reports, executive summaries, official briefings, the National Situation Update, the National Situation Report, and HSOC spot reports. Information requests from the HSOC and the IIMG consumed the NRCC's planning section, which decided to hire contractors after the second week of the disaster to handle the sheer volume. Working with the NRCC, FEMA's Operations Center maintains an on-going situational watch, assists in report distribution, and publishes incident reports.

The HSOC, NRCC, and FEMA Operations Center were part of a larger network of responding entities that generated thousands of reports related to Hurricane Katrina. Despite these multiple levels of reporting, critical, timely, and accurate information did not consistently reach FEMA and DHS leadership. For example, DHS' Secretary and key FEMA officials said that they did not learn of the first breach of the New Orleans levees until almost 24 hours after it occurred. FEMA staff learned of the breach the morning of August 29, 2005, at the FEMA Operations Center and, separately, through Public Affairs staff that afternoon. The HSOC also received the report through the U.S. Army Corps of Engineers. However, the information was not included in the DHS Situation Report until the morning of August 30, 2005, and in the FEMA National Situation Update and National Situation Report until August 31, 2005.

One change implemented by FEMA for its response to Hurricane Wilma in October 2005 was to pre-position staff as forward observers for information collection. Other changes are needed, and involve other DHS components such as the HSOC in addition to FEMA. First, DHS needs to standardize its format and methodology for collecting and reporting information. One possible explanation for why the FEMA Operations Center had no record of forwarding the reported levee breach is that the center follows a draft 2001 notifications manual that has not been updated to describe its relationship with the HSOC or compliance with NIMS.

Second, DHS should establish a common information management system to consolidate and publish disaster information including incident reports, contact information, duty logs, and resources. During Hurricane Katrina, this information was fragmented and dispersed among multiple systems. The HSOC's Homeland Security Information Network published all DHS situation reports on its secure internet-based system but had an incomplete library of other reports, including HSOC Spot Reports. In addition, each state, the National Guard Bureau, and multiple Department of Defense groups, including Northern Command and Joint Task Force-Katrina, published incident reports. Duty logs, plans containing contact information, and resource information were not readily accessible. State incident, resource, and planning data, stored in commercially available software such as E-Team, were not compatible for exchange with FEMA information software.

Recommendation #3: We recommend that the Director of the Office of Operations Coordination for the Department of Homeland Security, in coordination with the Chief Information Officer, design an information management system that allows users to track and share information more openly and efficiently; and, standardize the format and methodology for collecting and reporting information.

ESF-6, FEMA's Coordination Efforts with Other Governmental and Nongovernmental Partners

FEMA made major efforts to coordinate with other agencies and improve its ability to provide housing resources in its response to Hurricane Katrina. Some of its efforts were more effective than others. For example, FEMA and the Red Cross experienced difficulty in identifying the number and location of

evacuees because both held different expectations for coordinating the mass care function. FEMA was slow in identifying and establishing its direct housing mission, so alternative housing resources, such as cruise ships, were initially used. Also, it was hard for FEMA to staff its Disaster Recovery Centers with experienced personnel. However, better coordination between FEMA and voluntary organizations did exist and the use of the Coordinated Assistance Network afforded more efficient and effective service coordination among voluntary, as well as governmental, agencies during the disaster.

Initial Activation

Under the NRP, FEMA is designated as the coordinator for ESF-6. Both it and the Red Cross are primary agencies – the Red Cross for mass care functions and FEMA for housing and human services functions.²³ Both support governmental and nongovernmental efforts to address non-medical needs of individuals and families affected by an Incident of National Significance or other disaster event.²⁴

ESF-6 was activated August 27, 2005, and its desk at the NRCC was staffed. FEMA readied approximately 40 Community Relations staff for deployment to Orlando, Florida on August 27, 2005, and placed an additional 40 on alert.²⁵ The National Voluntary Organizations Active in Disaster (VOAD) convened an interagency conference call and planning for Disaster Recovery Centers began.²⁶ By August 28, 2005, FEMA's housing taskforce was in Louisiana and had started contingency planning for potential shortfalls in sheltering.

²³ All other voluntary organizations are positioned under the National Voluntary Organizations Active in Disaster as support agencies. Other ESF-6 support agencies include: the Departments of Agriculture, Defense, Health and Human Services, Homeland Security, Housing and Urban Development, Interior, Justice, Labor, Transportation, Treasury, Veterans Affairs, General Services Administration, Office of Personnel Management, Small Business Administration, Social Security Administration, U.S. Postal Service, and Corporation for National and Community Service.

²⁴ Mass care includes activities to provide sheltering, feeding, and emergency first aid; housing addresses both shorter and longer-term needs of displaced disaster victims; and human services covers a range of programs, such as crisis counseling, benefit processing for FEMA's Individuals and Households Program, disaster unemployment, and identifies support for persons with special needs.

²⁵ The Community Relations function resides with ESF-15, External Affairs.

²⁶ The National VOAD is a membership organization composed of approximately 40 organizations that provide services following disasters and is responsible for sharing information with its members regarding the severity of the disaster, needs identified, and actions taken to address these needs. See Appendix G for a list of some of the VOADs that provided assistance and services in response to the hurricanes that affected the Gulf Coast region.

By August 30, 2005, FEMA was planning to deploy 50 strike teams to address interim and temporary housing solutions and another 50 teams to shelters to register disaster victims. It worked with the U.S. Army Corps of Engineers to develop a contingency plan for the construction of temporary shelters for up to 50,000 disaster victims. At FEMA headquarters, a consolidated management cell was formed to ensure consistency in Individual Assistance program implementation across current and anticipated JFO locations within the three affected areas. In addition, FEMA activated four contracts, estimated at \$400 million, for Individual Assistance Technical Assistance Contractors to support its temporary housing assistance program and other resource implementation such as establishing Disaster Recovery Centers and training sites. Pre-deployment training of Individual Assistance personnel began in Orlando, Florida, on August 31, 2005.

Red Cross Mass Care Activities

Prior to landfall and before ESF-6 activation, the Red Cross established 30 shelters, placed 15 shelters on standby, and sent 12 emergency response vehicles as well as 3,000 clean up and comfort kits to Florida. In preparation for the second landfall, the Red Cross identified sites in Louisiana and worked with the Southern Baptist Convention to open 15 kitchens with a capacity to serve 25,000 meals per day at each site, and identified 10 additional sites to provide the same capability. Approximately 228,000 meals were sent to Baton Rouge, Louisiana and 227,000 to Montgomery, Alabama. The Red Cross assigned 100 emergency response vehicles, with an additional 100 to be assigned depending on where landfall occurred.

Sheltering and Number of Evacuees

FEMA worked with the Red Cross and states to coordinate assistance and the movement of evacuees as shelters became operational for both general and special needs populations. The day before landfall, 13 shelters were open: 9 in Mississippi housing 15 people and 4 in Louisiana housing 830 people. The number of shelters and evacuees surged significantly on August 29, 2005, to 204 Red Cross shelters and 30,046 evacuees in five states.²⁷ However, FEMA estimated the total number of Red Cross and non-Red Cross-shelters was 240, housing 51,852 evacuees.

²⁷ On August 29, 2005, 38 shelters were open in Alabama housing 2,134; 13 in Florida housing 711; 68 in Mississippi housing 7,834; 11 in Texas housing 739; and 74 in Louisiana housing 18,628.

On August 31, 2005, ESF-6 processed a request to the Department of Defense to provide 800 personnel to assist with sheltering and feeding disaster victims in Louisiana and Mississippi. Also, a request was made of FEMA Logistics to source and acquire 700,000 additional MREs for delivery to the Red Cross to support shelter operations, but FEMA had sourcing and logistical problems in fulfilling that request. It took FEMA six days to fulfill all of the Red Cross' requests for MREs.

FEMA worked with the Red Cross and with states to identify and open multiple shelter locations throughout the United States but both had great difficulty confirming the number of people in shelters and tracking the number of evacuees and those being housed at unofficial shelter locations. For example, by September 4, 2005, FEMA had identified 499 shelters housing a population of 120,509 but later estimated the number of shelters to be 419, with a population of 273,100 evacuees. See Appendix H for an estimate of the number of shelters and shelter population by state from August 26, 2005 to September 30, 2005.²⁸

FEMA continued to track evacuees to assure more reliable information was available on the number and destination of evacuees so that it could notify the Red Cross to arrange for sheltering. However, FEMA continued to have difficulties in obtaining reliable information on where evacuees were located and when they would arrive.

By September 12, 2005, FEMA was working to transition evacuees from shelters into temporary or interim housing by an October 1, 2005, target date. However, 853 shelters in 18 states were still housing an estimated 80,289 evacuees on September 26, 2005. Given the widespread evacuation of residents to states throughout the nation, the target date was difficult for FEMA and its governmental and nongovernmental partners to achieve, and may have been an unrealistic expectation.

²⁸ FEMA used multiple sources of information and data to establish what it viewed as reliable numbers for shelters, evacuees, and host states. We reviewed this information as reported by FEMA field offices, FEMA headquarters, and ESF-6, to develop the chart listed in Appendix H. The data used in our report may not reflect the actual total number of shelters, locations, evacuees, or host states on any given date.

ESF-6 Total Shelters & Shelter Population		
Date	Shelters	Population
08/29/05	204	30,046
08/30/05	252	42,059
09/02/05	351	122,759
09/04/05 ²⁹	419	273,100
09/06/05	735	234,321
09/08/05	774	246,834
09/10/05	604	134,608
09/12/05 ³⁰	679	140,711
09/14/05	1,034	122,639
09/16/05	926	97,795
09/18/05	949	89,445
09/20/05	643	73,244
09/22/05	717	60,888
09/24/05	814	79,774
09/26/05	853	80,289

Identifying the number and location of evacuees, as well as the need for shelters, was initially difficult for FEMA in its ESF-6 role. As Hurricane Katrina was the first activation of ESF-6 under the NRP, the roles and responsibilities that had been more defined under the Federal Response Plan for the mass care function, were not yet clearly defined or established under the NRP. Both FEMA and the Red Cross must work together, along with other governmental and nongovernmental organizations within the ESF-6 structure, to define the expectations each has for its role and area of responsibility. For example, a senior Red Cross official told us it is responsible for the coordination and reporting only of Red Cross mass care operations. FEMA, on the other hand, said it was relying heavily on the Red Cross to coordinate mass care operations and reporting that was inclusive of other ESF-6 support agencies. Establishing a working group, in coordination and consultation with all ESF-6 primary and support agencies, to serve as a forum to resolve coordination issues experienced during Hurricane Katrina is prudent and would assist in defining roles and realizing expectations.

Recommendation #4: We recommend that the Director of the Federal Emergency Management Agency establish an ESF-6 working group to define the explicit roles and responsibilities for each agency, develop standard operating procedures, and implement a concept of operations plan for response activities that address all levels of disasters.

²⁹ FEMA estimate of number of shelters and shelter population, DHS Situation Report Number 19, September 4, 2005.

³⁰ FEMA verifying shelter totals, DHS Situation Report Number 35, September 12, 2005.

Hotels and Motels

The Red Cross expanded its financial assistance and hotel and motel housing programs in response to Hurricane Katrina. To qualify for financial assistance, clients must have had a pre-disaster address in an affected area that was verified by the Red Cross. In addition, FEMA would make referrals to the Red Cross. As of September 30, 2005, over 1,223,099 rooms had been provided and the Red Cross had funded more than \$65 million for this program – all from funding donated to the organization.

The vast majority of evacuee stays in hotels and motels facilitated by the Red Cross under the Hurricane Katrina Special Accommodations Program were done through an agreement with Corporate Lodging Consultants, Inc. During our review, FEMA and the Red Cross worked out a reimbursement contract as the response created additional demands and longer-term housing needs than what the Red Cross traditionally provides. FEMA may reimburse the Red Cross for housing disaster victims in hotels, motels, or other housing resources when extraordinary expenses outside of the Red Cross' normal programs occur. On October 20, 2005, the Red Cross and FEMA established a contract, for approximately \$250 million, for reimbursing the costs of shelter and emergency pharmaceutical prescription assistance to evacuees.

As of October 24, 2005, Corporate Lodging Consultants, Inc. estimated that approximately 200,000 evacuees were housed under this program in approximately 65,000 rooms in nearly 10,000 hotels and motels nationwide.³¹ The Hurricane Katrina Special Accommodations Program, which the Red Cross carried out on behalf of the federal government, transitioned to FEMA on October 25, 2005. FEMA established its own contract with Corporate Lodging Consultants, Inc. and the program continued to cover the cost of evacuee short-term stays in motels or hotels, where other accommodations were not available.³² FEMA was also working with evacuees to find safe and affordable longer-term housing.

³¹ Corporate Lodging Consultants, Inc. website, October 24, 2005.

³² The DHS OIG Office of Gulf Coast Hurricane Oversight reviewed FEMA's contract management processes for awarding and administering a task order to provide emergency lodging to Hurricane Katrina evacuees. See DHS OIG, *Management Advisory Report on Invoices Submitted under Order HSFHQ-06-F-0047* by Corporate Lodging Consultants, Inc., Report Number GC-HQ-06-09, February 2006.

Disaster Welfare Information

The intent of the Disaster Welfare Information concept of operations for ESF-6 is to collect and provide information on individuals who live in an affected disaster area to family members and friends outside of the disaster area. The Red Cross, in collaboration with Microsoft Corporation, established the Family Links Website to provide this service. It includes records from the previous Red Cross Family Links website and many other websites. Family Links attempts to provide the most current and accurate information available. However, due to the relocation and movement of Hurricane Katrina evacuees, location information on the website was not always complete, current, or correct. Evacuees were able to provide information on their location, and concerned family members and friends could search the list of those already registered. This website was available online for evacuee searches through February 28, 2006. As of September 25, 2005, 276,439 evacuees had reported their status and 28,237 concerned family members and friends had registered on line. In addition, calls were made to the Red Cross' 1-877-LOVED1s number concerning the status of 167,682 names.

FEMA's Efforts to Identify and Establish Housing Resources

FEMA's overall housing strategy for Hurricane Katrina was to use shelters, hotels, motels, cruise ships, tents, applicants staying with friends and relatives, tarping of roofs so applicants could remain in place where possible, and other available housing resources to address immediate housing needs of disaster victims. It would then transition victims to travel trailers and mobile homes, and finally to apartments to address longer-term housing needs. Some components of FEMA's housing strategy were not well planned or coordinated, while other components to address and support the housing needs of displaced disaster victims were not as effective or efficient as FEMA had anticipated.

Because of Hurricane Katrina's devastation, FEMA made immediate housing decisions. For example, on August 31, 2005, it procured 20,000 manufactured housing units, for approximately \$1 billion, to address anticipated housing needs and planned to purchase over 100,000 units. It also purchased 30 mobile Disaster Recovery Centers to compliment its existing inventory and 30 office trailers for use in implementing Individual Assistance field operations. By September 4, 2005, FEMA continued to assess available housing resources such as hotels, properties owned by federal agencies, and vacant lots at mobile home parks as well as the potential use of recently closed nursing homes and

commercial cruise ships as options for temporary housing resources. The Individual Assistance Technical Assistance Contactors were en route to Mississippi and two cruise ships, with a capacity to hold 5,200 passengers, were to arrive the following day in Galveston, Texas for use as interim housing for the elderly, persons with special needs, and families with small children who were in shelters.

By September 5, 2005, FEMA's Individual Assistance management cell had developed a strategy to address the immediate needs of disaster victims that included: deploying teams to register evacuees, activating expedited assistance, facilitating relocation of evacuees, using alternative means to verify program eligibility, and establishing a gradual transition to its standard operating procedures and program implementation once immediate needs had been addressed. By September 7, 2005, the U.S. Department of Agriculture was working with the private sector to identify privately owned rental resources nationwide that could be used to house displaced victims. In addition, the department made 3,000 vacant housing units in the affected region available and 30,000 housing units available nationwide. FEMA and the department also coordinated with faith-based organizations to match displaced residents with those housing resources. FEMA officials expressed to us the integral role the Department of Agriculture played in identifying and providing housing resources to displaced victims.

The Corporation for National and Community Service and FEMA worked to develop a plan for the most effective use of national service resources in assisting disaster victims. Also, FEMA made requests of the Corporation for National and Community Service to help augment its Disaster Recovery Centers staff by providing casework, outreach, and other administrative services throughout the impacted area.

Travel Trailers and Mobile Homes

By September 6, 2005, FEMA's primary ESF-6 issues in Louisiana were to stabilize shelter operations and food distribution; in Mississippi it was supporting shelters and the relocation of evacuees as well as identifying emergency group sites for travel trailers; and in Alabama it was coordinating the installation of travel trailers on individual private sites and developing group sites. FEMA's Housing Area Command stated it had identified sufficient sites to address the housing needs of displaced Alabama residents and would redirect resources to address the more affected states of Mississippi and Louisiana. In all states, 3,500 manufactured homes and 5,200 travel

trailers, in various stages of production, were purchased from dealer lots. FEMA also began moving approximately 5,000 units from its inventory to staging areas, had 60,000 travel trailers being produced at the rate of approximately 120 per day, and awarded a contract for 1,500 modular structures.

By September 10, 2005, staff at FEMA registration call centers began recording information for mobile and travel trailer pre-placement interviews. The first family to be placed in a travel trailer occurred 12 days after the disaster was declared. By September 12, 2005, construction started on a 500-unit travel trailer site in Louisiana with an accelerated occupancy schedule of one week. Within the three affected states, there were 903 travel trailers occupied by September 15, 2005; an additional 1,306 (both travel trailers and mobile homes) were ready for occupancy; and 4,798 were positioned in various staging areas. The following day, only 910 units were occupied: 491 in Louisiana; 107 in Mississippi; and 312 in Alabama.

In Louisiana, the Housing Area Command was working to have 2,405 housing units ready for occupancy by the week of September 17, 2005, and an additional 3,408 units ready the following week. Construction began on a site in Baton Rouge on September 19, 2005, to place 580 travel trailers. The anticipated completion date for this project was September 29, 2005. As of October 1, 2005, only 4,128 units were occupied: 667 in Louisiana, 2,929 in Mississippi, and 532 in Alabama; and, an additional 5,446 units were ready for occupancy. FEMA, in working with its contractors, experienced difficulty in identifying acceptable sites to place units and was slow in identifying applicants to occupy units.³³ For example, several sites initially identified by FEMA in Louisiana to place multiple units were not well coordinated with local officials, and local officials determined placement was not acceptable. Also, in several states there were issues with leasing existing parks. FEMA can pay only for minimum improvements and some parks required major renovations before being considered suitable for unit placement.

Cruise Ships

In Alabama, FEMA's use of a cruise ship was primarily focused on housing evacuees from Mississippi who were 65 years and older and in good health, single parents with children, and homeless individuals living in adverse

³³ The DHS OIG Office of Gulf Coast Hurricane Oversight is conducting ongoing work regarding housing issues.

conditions.³⁴ By September 5, 2005, the ship had a lower than anticipated occupancy rate. The lower rate may have been caused by the availability of shelters and tents in the area. Evacuees could commute more easily to work and were closer to their damaged homes by residing in these facilities rather than on the ship, as living on the ship meant a 45-minute commute for some. By September 19, 2005, FEMA was working to move more displaced persons on to the ship. In addition, it had been trying to move the ship from Mobile, Alabama to Pascagoula, Mississippi, as this would place the evacuees closer to home and work, but FEMA received resistance from Mobile's port director because a docking fee would be lost should the ship move. As of September 30, 2005, the number of Mississippi residents aboard the cruise ship was 1,111, although the ship was capable of accommodating 1,848 passengers. The ship moved to Pascagoula, Mississippi on October 29, 2005.

On September 10, 2005, two cruise ships arrived in New Orleans, Louisiana, to provide housing to disaster victims, with a primary focus to house disaster victims and first responders or personnel essential to the recovery effort. On September 12, 2005, FEMA met with New Orleans and parish officials regarding the use of the ships for evacuees but the most critical need expressed to FEMA was to house essential city personnel, such as police and firefighters. Boarding began that day. The two ships provided immediate housing for essential emergency workers, created a base camp from which to operate, and also housed disaster victims. An additional 262 boarded on September 15, 2005, and pre-registration for an additional 866 began, bringing the total cruise ship occupants registered to approximately 3,366, with 1,430 on board. By September 18, 2005, a third cruise ship was in the New Orleans area and the total boarded population was 2,105. By October 1, 2005, 4,658 passengers were on all four ships in New Orleans and Chalmette, Louisiana, and Mobile, Alabama.

During the first 30 days after the disaster, all four ships were only about 35 percent occupied. At that occupancy rate, the cost to FEMA was approximately \$3,363 per week, per evacuee, which was about three times higher than the existing per diem rate for federal government workers for the area. As of October 31, 2005, however, the occupancy increased significantly. In New Orleans, one ship with a capacity of 2,634 passengers had 2,118 on board (80 percent occupied); another ship with the same

³⁴ DHS OIG Office of Audits conducted an initial review of the decision to use cruise ships to provide housing for victims and first responders. DHS OIG, Memorandum to AIG for Hurricane Katrina Oversight, *Hurricane Katrina Cruise Ships*, November 4, 2005.

capacity had 2,374 passengers (90 percent occupied); and the additional ship with a capacity of 1,020 had 862 passengers (85 percent occupied). The last of the four ships, with a capacity of 1,848 had 1,367 passengers (74 percent occupied).

The use of high occupancy ships as an alternative resource to provide housing for disaster victims and personnel essential to the response and recovery effort was effective, but not necessarily efficient. For example, in Alabama, because other immediate housing resources were available in the affected area and provided evacuees with better accessibility to their work and damaged residences, the initial efficiency of the ships as an alternative housing resource was diminished. Future planning for the use of this resource should be focused more on accommodating the needs of disaster victims and should take into account other available housing resources to avoid potential duplication.

Recommendation #5: We recommend that the Director of the Federal Emergency Management Agency develop alternative housing resource plans that include a review of all identified resources within an affected area, determine whether potential duplication exists, and efficiently deliver services that are accommodating to the disaster victim.

Coordination with Voluntary Organizations

Voluntary organizations are FEMA's partners in the provision of many mass care services for ESF-6, such as feeding and the bulk distribution of items to victims of disaster, and offer assistance that FEMA is unable to provide. For example, by September 23, 2005, both the Red Cross and the Salvation Army had provided over 16 million meals, 12 million snacks, established over 780 fixed feeding sites, and used over 520 mobile feeding units in response to Hurricane Katrina.³⁵ In addition, over 158,000 clean up kits and 287,000 comforts kits had been distributed.³⁶

FEMA worked with the Department of Agriculture and ESF-6 to keep sufficient food supplied to shelters. In Louisiana, a mass feeding coordination group was established that included: ESF-11, FEMA, VOAD, the Red Cross, the Salvation Army, the Southern Baptist Convention, and the state. The group reviewed and updated resources, parish feeding needs, and meal capacity for hurricane victims and evacuees. By September 30, 2005, six

³⁵ ESF-6, data as of September 23, 2005.

³⁶ ESF-6, data as of September 26, 2005.

kitchens were operational in Mississippi with a capacity to serve 100,000 meals per day, 38 in Texas with a capacity of 185,000 meals per day, and 24 in Louisiana with a capacity of 309,000 meals per day. As of December 15, 2005, the Red Cross, in coordination with the Southern Baptist Convention, had served more than 27 million hot meals and 25 million snacks to hurricane survivors in the Gulf Coast region.

FEMA, working with National VOAD, was able to anticipate the proactive role some nongovernmental organizations would have in disaster response and recovery operations, and attempted to coordinate relationships with those organizations to provide assistance and alleviate the potential for duplication. Historically, volunteer and governmental agencies have sought to work together on behalf of disaster victims and to ensure that the most effective and efficient care is provided on their behalf. However, due to a wide-range of legal and practical challenges, a shared service coordination system was only developed last year.

Although FEMA and the voluntary organizations experienced coordination issues, better VOAD communication and cooperation existed in response to Hurricane Katrina than in other disaster recovery efforts. For example, the use of the Coordinated Assistance Network was an improvement over the lack of coordination that existed after the terrorist attacks of September 11, 2001. The Coordinated Assistance Network was established through a memorandum of understanding in 2003 and was first piloted during the 2004 hurricane season in Florida.³⁷ The goal of the Coordinated Assistance Network is to afford more efficient and effective service coordination among voluntary, as well as governmental, agencies during disaster events. It was designed as a communication mechanism for services providers and to identify any gaps or redundancies in services. The network allowed registered organizations to access information on available services and to share information on the levels of services delivered to individuals, families, or households. It also allowed disaster victims to explain their needs and register only once, as registration afforded disaster victims a registration with all service providers on the network. As of September 30, 2005, 5 organizations were using the network and 81,817 clients records were in the system.

³⁷ The following organizations signed this document: American National Red Cross, Salvation Army, Alliance of Information and Referral Systems, United Way of America, United Services Group, National VOAD, and Safe Horizon.

Inspection Services

When applicants apply for assistance from FEMA, the information provided is entered into the National Emergency Management Information System. Should an inspection be required to process the application, the system will generate an inspection request, which is then issued to one of FEMA's contract inspection service providers to verify the personal and real property losses and damages of the applicant. Inspectors then visit the homes of applicants to verify disaster-related damages. After the inspection is completed, inspectors upload (or return) their findings to FEMA's processing system so that an eligibility determination can be made.

FEMA historically has attempted to complete this process within ten days after an application is made. Because of the disaster's magnitude, it was difficult for FEMA to meet this performance standard. We were told inspectors faced limited accessibility to homes and encountered fuel and lodging shortages, which affected their ability to complete inspections in a timely manner. Because of the inaccessibility issues, FEMA initially used some inspectors to take applications from disaster evacuees in shelters.

By September 2, 2005, 1,200 inspectors were positioned in all three states, and 47,698 inspections were issued, 37,000 of which were for homes in Louisiana. By September 10, 2005, however, the number of inspections issued had significantly increased to 406,730. There were 1,037 inspectors in the field and only 20,535 (5 percent) of the inspections were completed. Specifically, 293,132 inspections were issued in Louisiana and 7,517 (3 percent) were completed; in Mississippi, 86,712 were issued and 3,543 (4 percent) were completed; and in Alabama, 26,886 were issued and 9,475 (4 percent) were completed.

FEMA determined that the need for inspectors to register applicants in shelters was decreasing and that some affected areas were becoming accessible, so it deployed more inspectors to the field to conduct inspections. By September 17, 2005, 791,735 inspections were issued and 48,593 (6 percent) had been uploaded; 1,591 inspectors were in the field. As of September 20, 2005, 877,706 inspections were issued and FEMA's contract inspectors had completed 94,949 inspections (11 percent); 2,016 inspectors were in the field.

Date	Inspections Issued	Inspections Returned	Percentage Returned	Inspectors in Field
09/04/05	47,698	1,625	3%	1,200
09/10/05	406,730	20,535	5%	1,037
09/17/05	791,735	48,593	6%	1,591
09/20/05	877,706	94,949	11%	2,016
09/23/05	943,506	142,680	15%	2,196
09/28/05	1,011,087	201,112	20%	2,099

FEMA personnel expressed concern that the rate of returned inspections was low and slowing the housing transition process within the affected states. The slow return rate may have been attributed to several factors such as the initial inaccessibility to homes and the lack of inspectors to address the disaster's sheer volume of homes requiring inspection. In addition, many disaster victims were dispersed throughout the United States and some were unable, or not easily available, to be present during the inspection of the damaged home.

To address this issue, FEMA developed a procedure that would allow an inspection without the applicant's presence. The applicant would sign applicable documents, such as the 90-69B and Authorized Agent Release forms.³⁸ The applicant could then make arrangements with the inspector for someone else – either a relative or friend over 18 years of age – to accompany the inspector during the inspection. A FEMA Community Relations representative accompanied the inspector in cases where the applicant did not have a family member or friend to act as an authorized agent. By September 23, 2005, 943,506 inspections were issued, 142,680 inspections were completed, and 2,196 inspectors were in the field. By September 28, 2005, 1,011,087 inspections were issued, and 201,112 were completed, with 2,099 inspectors.

Given the initial inaccessibility issues, FEMA was creative in using deployed contract inspectors to register disaster victims in shelters. FEMA was also resourceful in developing an alternative mechanism for inspection in cases where the applicant was not available or able to be present. However, several FEMA officials said once affected areas did become accessible, there were not enough contract inspectors available to perform inspections.

³⁸ FEMA Form 60-69B, Declaration and Release, is signed by all applicants to declare that a member of the household is a citizen, non-citizen national, or qualified alien of the United States, and other certifying statements from the applicant, such as the information provided in their application for FEMA assistance is true and correct to the best of their knowledge.

Disaster Recovery Centers

FEMA faced many challenges in establishing its Disaster Recovery Centers in response to Hurricane Katrina. Traditionally, centers are established in facilities near an affected area to serve the needs of disaster victims in that area. The intent is to provide one-stop access to federal, state, local, and voluntary organizations' disaster assistance programs. By visiting a center, applicants may discuss their disaster-related needs, register for FEMA assistance, update any information initially provided during the registration process, inquire on the status of their application, and seek information from other disaster service providers. FEMA and the state work together to establish and manage the centers.

Because of widespread damage and evacuation of the majority of disaster victims, FEMA's standard process for site selection required a different approach. FEMA officials used the following assumptions in establishing the location of Disaster Recovery Centers: areas will be inaccessible longer and residents will not be able to return for an extended period of time. Centers were initially established in areas less affected by the disaster, where larger shelter populations existed or in areas where there was a significant influx of evacuees. FEMA thought this approach was more efficient in addressing disaster victim needs as accessibility was increased.³⁹

FEMA worked with the Red Cross and the states to identify multiple shelter locations, but all were having difficulty confirming the number of people in shelters and tracking the number of evacuees, and those housed at unofficial shelter locations. FEMA relied upon reports generated by the affected states and Red Cross to provide current information related to shelter populations. Because the number and location of evacuees was often uncertain and fluid, FEMA officials estimated the evacuated population by using previous New Orleans census data to factor in an average family size of 2.5 persons.

Collectively, centers were operational seven days a week with slight deviations between locations.⁴⁰ As additional centers were established, FEMA began targeting the more affected areas and used both fixed and mobile centers, as well as "sweep registration teams;" all of which assisted in

³⁹ See Appendix I for a map of FEMA's Disaster Recovery Center locations.

⁴⁰ See Appendix J for a list of Fixed Disaster Recovery Center locations and hours of operation.

registering applicants for FEMA assistance.⁴¹ The use of sweep teams was an innovative adjustment that assisted in addressing the needs of the most affected populations.

Disaster Recovery Centers were located in a variety of facilities: abandoned buildings, schools, churches, office buildings, and gymnasiums. Not all facilities, however, were compliant with the *Americans with Disabilities Act of 1990*, which made accommodating applicants more difficult, and other centers were cramped and inhibited an applicant's flow from one service provider to another. Also, there was an effort to co-locate centers with National Guard units in order to serve more affected areas. When co-location was not possible, FEMA used mobile centers to reach those areas.

A total of 43 fixed and mobile centers were open and operational by September 20, 2005: 16 in Louisiana; 7 in Mississippi; 7 in Alabama; 10 in Texas; and 3 in Florida.⁴² In Louisiana, 20,448 residents had been assisted at the 13 operational fixed centers since opening. A total of 51 centers were open and operational on September 21, 2005: 21 in Louisiana; 10 in Mississippi; 7 in Alabama; 11 in Texas; and 2 in Florida. Between August 24, 2005, and September 30, 2005, 50 fixed centers were operational. The use of mobile centers was difficult to quantify because each became operational based on need. FEMA was unable to provide us with an estimate of the total population serviced at both fixed and mobile centers during this period.

The Disaster Recovery Centers were staffed with representatives from federal, state, and local government agencies, non-profit organizations, voluntary agencies, and FEMA Disaster Assistance Employees (DAEs) and local hires. However, FEMA officials told us they had inadequate numbers of trained staff. They said the use of local hires had diminished over the years and should be better developed to help augment staff resources. They also expressed concern about a perceived limit on hiring DAEs, which hinders FEMA's ability to surge in staff during disasters.

To address the limitations, Disaster Recovery Center directors made important and independent decisions, ranging from the maintenance and upkeep of facilities to developing on-the-job training programs. During our fieldwork, a

⁴¹ Sweep registration teams were comprised of FEMA personnel that visited shelters and special populations that could not reach a Disaster Recovery Center.

⁴² Hurricane Katrina DHS Situation Report Number 50, September 20, 2005.

center director explained how they developed a program to re-train new personnel because new hires had not received adequate training during FEMA's accelerated orientation process. A number of Disaster Recovery Center directors do not view the accelerated process as efficient or effective because it did not facilitate or develop an ability to work independently. To expedite the transition between when new workers arrived at a center and when they were able to work independently, a shadowing system was used. The system paired a new hire with a more experienced worker. The pair worked together until the new hire was self-sufficient. The shadow system was a resourceful method to address training deficiencies, but it also strained limited staff resources, which decreased the number of staff available to assist disaster victims.

Recommendation #6: We recommend that the Director of the Federal Emergency Management Agency develop a more comprehensive training program to prepare existing and new personnel for Disaster Recovery Center assignments.

Recommendation #7: We recommend that the Director of the Federal Emergency Management Agency develop a more comprehensive program to recruit, train, and retain local hires for use in augmenting FEMA's Disaster Assistance Employees and permanent staff.

Additional FEMA Coordination with Governmental Organizations

Health and Human Services

FEMA coordinated with the Department of Health and Human Services, to provide services from the Administration for Children and Families. This agency is responsible for federal programs that promote the economic and social well being of families, children, individuals, and communities. By September 19, 2005, Health and Human Services deployed 5 teams, with 35 staff each, to Louisiana, Mississippi, and Texas to assist with the recovery effort and also provided information on service programs such as contacts for welfare aid, emergency energy assistance, Head Start, and support for displaced and foster children in all the affected areas.

Housing and Urban Development

By September 26, 2005, FEMA was working with the Department of Housing and Urban Development (HUD) on implementing an additional program to

provide housing assistance vouchers to eligible disaster victims and households. As not all applicants are eligible for FEMA's housing assistance programs, the Katrina Disaster Housing Assistance Program was developed as a special voucher by HUD and FEMA for those displaced households who previously lived in a HUD Section 8 property, held a Section 8 voucher, or who were homeless.

Applicants would first register with FEMA. Should the applicant not be eligible for FEMA's housing assistance, FEMA would then transfer appropriate applicant qualification data and funding to HUD. Under the Katrina Disaster Housing Assistance Program, the family could relocate to an area of their choice within the United States that was not affected by the disaster. Once housing resources were rebuilt or repaired, families could then return to their home state.

HUD's program was to provide a temporary monthly rent subsidy to assist eligible displaced households obtain decent, safe, and sanitary housing in the privately owned rental market. The monthly rent subsidy would be based on the area's fair market rent and available for a term not to exceed 18 months. Eligibility for the program was based on established criteria and the individual or family must have: (1) been evacuated from a Hurricane Katrina federally-declared disaster area within Louisiana, Mississippi, or Alabama; (2) had their residence destroyed or made uninhabitable, as determined by FEMA; (3) registered with FEMA by December 31, 2005; and, (4) been either homeless or resided in a HUD-assisted dwelling unit immediately prior to evacuation.

Under the program, the local public housing agency would assume responsibility to not only provide a monthly rent subsidy on behalf of the family, but also to actively assist the family locate an eligible unit, including coordinating both temporary shelter and transportation for the family, on an as-needed basis. When a unit was selected by the family and approved by the public housing agency, the owner and the public housing agencies would enter into a rent subsidy contract and the family and the owner would execute a lease. Under the program's rent subsidy contract, the public housing agency would pay the security deposit and a monthly rent subsidy directly to the owner on behalf of the family. The public housing agency would also pay assistance for deposits for utilities directly to the utility companies on behalf of the family. However, by September 30, 2005, FEMA and HUD were still in the process of negotiating a number of logistical and reimbursement issues regarding how the program would be implemented.

ESF-6 Lead Was Change and Challenge for FEMA

FEMA officials said being the coordinator and co-primary agency for ESF-6 was a change and a challenge from its role and responsibilities under the Federal Response Plan. Under that plan, the Red Cross was the primary agency for the Mass Care Annex and FEMA was a support agency. Also, both FEMA and the Red Cross were support agencies for the Food Annex. Under the NRP, however, FEMA is responsible for coordinating the activities of ESF-6 designated support agencies, providing assistance with response activities and operations, and implementing its Individual Assistance programs and longer-term recovery assistance solutions. The mass care, housing, and human services functions performed within ESF-6 have both a response element, to address the urgent mass care needs of victims, and a recovery element, to support governmental and nongovernmental efforts in addressing longer-term needs of individuals and families affected by an event.

FEMA officials stated repeatedly that it is not an emergency assistance provider. During the emergency response period of a disaster, FEMA relies upon organizations such as the Red Cross and National VOAD members to perform those activities. FEMA views its partnership with such organizations as invaluable as these organizations are the providers of emergency assistance to the most vulnerable and greatest need populations. As the NRP is a new construct, FEMA should better define its role and responsibilities for response activities as the coordinator and as a primary agency for ESF-6. It must also define and establish its expectations, and the expectations for other support agencies, so that they are clearly known and realized.

New Capabilities and Improved Coordination Necessary for ESF-9

FEMA US&R task forces, in conjunction with the U.S. Coast Guard, state and local first responders, and volunteers, rescued an estimated 50,000 victims stranded as a result of Hurricane Katrina. However, FEMA lacks water rescue capabilities within its national US&R task forces, and many US&R resources and operations were not coordinated by or through FEMA's ESF-9 role. Increased water rescue capabilities and improved ESF-9 coordination are needed for FEMA to be more responsive to future catastrophic events that involve large-scale flooding and the mass evacuation of stranded persons.

Urban Search and Rescue Mission Was Effective Despite Resource Limitations

FEMA's national US&R task forces worked under austere conditions to perform thousands of successful rescue missions, many of them water-based, even though FEMA has no existing capability for performing water rescues. As of September 30, 2005, FEMA's 28 national US&R teams had rescued 6,582 victims in Mississippi and Louisiana.⁴³

ESF-9 rapidly deploys national US&R task forces to provide specialized life-saving assistance to state, local, and tribal governments for an Incident of National Significance. FEMA is the ESF-9 coordinator and primary agency, and its National US&R Response System consists of 28 US&R task forces based throughout the United States and sponsored by state and local government emergency response organizations. Each is staffed by local fire department and emergency services personnel highly trained in collapsed structure search and rescue operations; the NRP focuses on collapsed structure operations. While FEMA US&R handled collapsed structure rescues with success, the majority of disaster rescues during the Hurricane Katrina response were water-based. None of FEMA's US&R task forces has water rescue capabilities.

To establish immediate water rescue capabilities in the affected areas, FEMA relied on its support agencies, primarily the U.S. Coast Guard, to provide personnel and boats and aircraft for water-based search and rescue activities. In addition, state officials in Louisiana issued a request for volunteers to assist search and rescue efforts using their personal boats. Hundreds of volunteers responded.

In addition, FEMA requested the assistance of eight swift water rescue task forces from California; however, getting these resources to Louisiana took time. Because California was not an EMAC participant at the time of the request, these task forces did not have the liability protections provided by

⁴³ A standard US&R task force complement consists of 70 specialists, plus search dogs, that are divided into six functional specialties: search, rescue, medical, hazardous materials (hazmat), logistics, and planning. To ensure a full, 70-specialist complement can deploy to a disaster, the task forces generally roster 130 trained members. Once deployed to a disaster site, specialists divide into two, 35-member teams to provide around the clock coverage. The task force also deploys with a \$1.4 million equipment cache that includes: listening devices and search cameras; heavy machinery such as cranes, bulldozers, and concrete cutting saws; a fully stocked mobile emergency room; decontamination equipment; and tents, cots, food, and water to sustain the task force for a 72-hour period.

EMAC.⁴⁴ FEMA's Office of General Counsel assisted in ensuring the California task forces were able to operate in Louisiana with requisite liability coverage. In addition, the arrival of the task forces was further delayed due to the approval process necessary for obtaining Department of Defense airlift support. Once in Louisiana, the California task forces were able to begin immediate water rescue missions. Water rescue operations using the California task forces in Louisiana did not begin until August 31, 2005.

While the California task forces and U.S. Coast Guard resources provided support for water-based search and rescue missions, FEMA US&R should consider establishing more formal arrangements to access water rescue capabilities, such as through the U.S. Coast Guard, additional DHS components, or with other federal departments and agencies, to ensure that resources will be available if needed in response to future Incidents of National Significance. As an alternative, FEMA US&R should consider developing its own water rescue capability.

FEMA Lacked Sufficient Personnel to Fully Staff ESF-9

FEMA's US&R section was limited in its ability to fully staff the ESF-9 coordination function. FEMA headquarters US&R staff was over extended, with most personnel performing multiple functions, and was unable to send staff to the RRCCs or JFOs. Instead, seasoned task force members were pulled away from US&R operational duties to staff the ESF-9 coordination function at the RRCCs and JFOs.

Urban Search and Rescue Coordination Efforts Need Improvement

As ESF-9 coordinator, FEMA is responsible for activating and coordinating national US&R assets. However, ESF-9 coordination activities were not scaled for large, geographically dispersed catastrophic events such as Hurricane Katrina. To improve its coordination of search and rescue efforts, FEMA may need to redistribute ESF-9 responsibilities or develop a surge plan to account for catastrophic situations requiring search and rescue capabilities not inherent to FEMA.

As a result of the disaster's magnitude, and subsequent levee breaches in New Orleans, a large number of US&R resources were needed quickly within the

⁴⁴ After Hurricane Katrina made landfall, any state not already a member of EMAC signed on as a member, including California. Due to its remote location, Hawaii does not participate in EMAC.

area. Because US&R task forces came from locations across the United States, ESF-9 phased in FEMA US&R deployments; full strength was reached in Louisiana on August 31, 2005, and in Mississippi on September 1, 2005. Also, the majority of search and rescue personnel were not provided through ESF-9. In addition to state and local first responders and volunteers, U.S. Coast Guard, Department of Defense, National Guard, and EMAC resources augmented search and rescue efforts in the affected area. The U.S. Coast Guard performed 32,967 rescues as of September 6, 2005.

Many US&R resources were not coordinated with or by FEMA in its role as ESF-9 coordinator. When providing ESF-9 status reports for DHS situation reports, FEMA reported only information concerning FEMA national US&R task forces. In addition, the NRCC Operations Section Chief tasked the U.S. Coast Guard with rescue missions directly, rather than going through ESF-9 to coordinate rescue operations.

Lack of coordination resulted in duplicative searches. FEMA US&R task forces conducting secondary building searches found symbols indicating US&R resources in the area through EMAC had already searched the buildings. US&R officials indicated they had very little coordination with the EMAC resources in the field. EMAC was an extremely useful resource; however, FEMA and EMAC resources need better coordination among search and rescue task forces to avoid duplicative efforts.

In addition, FEMA headquarters US&R officials indicated they did not fully understand the security support mission of ESF-13, Public Safety and Security, prior to Hurricane Katrina. Civil unrest in Louisiana and threats of civil unrest in Mississippi affected US&R operations as task forces had to provide their own force protection or rely on available National Guard or local law enforcement to protect task force members and equipment caches. A better understanding of the ESF-13 function may have resulted in FEMA coordinating with ESF-13 to provide security for US&R task forces rather than diverting US&R resources away from the search and rescue mission.

In addition, FEMA US&R task forces experienced difficulty coordinating with state and local officials to obtain probable cause authority to forcibly enter a building to conduct secondary searches. In Louisiana, the Governor and the Mayor of New Orleans each had different approaches for establishing probable cause to search the 22,313 buildings in Orleans parish. Ultimately, the Governor gave specific direction on forcible entry for US&R on September 10, 2005. US&R task forces did not have a problem obtaining

proper authorities for forcible entry in Mississippi; this was not an issue in Alabama either.

Some coordination of US&R efforts was achieved between the PFO and Joint Task Force-Katrina, but not until approximately a week after Hurricane Katrina's landfall. As a result, Department of Defense and National Guard resources conducted a coordinated grid search of New Orleans. However, this coordination did not occur through FEMA's ESF-9 coordination function.

While the search and rescue mission was for the most part one of FEMA's more effective resource implementation efforts, FEMA should review its current capabilities in coordination with other DHS components, such as the U.S. Coast Guard and Customs and Border Protection, and consider redistributing ESF-9 responsibilities. Or, it should consider developing its own water rescue capabilities and developing a surge plan for augmenting FEMA's ESF-9 coordination capability during catastrophic events.

Recommendation #8: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, review ESF-9 Annex capabilities for search and rescue and coordination within FEMA and other Department of Homeland Security components (such as U.S. Coast Guard and Customs and Border Protection) or with other federal departments and agencies, and either redistribute ESF-9 responsibilities or develop greater water rescue capabilities within FEMA.

Recommendation #9: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, develop a surge plan and standard operating procedures for augmenting FEMA's ESF-9 coordination capability during catastrophic events with resources such as the U.S. Coast Guard and Customs and Border Protection personnel.

ESF-15 Structure and State Coordination Need Improvement

ESF-15, External Affairs, serves as the primary means of sharing information and developing a unified message for the government, disaster victims, and the public. When Hurricane Katrina made landfall, problems with the communications infrastructure along the Gulf Coast region and staffing shortages hampered ESF-15 operations on the ground, as was true for many

FEMA, state, and local responders. Additional difficulties encountered by ESF-15 were confusion over the function's hierarchy and information flow, and its difficulty establishing a coordinated message with the State of Louisiana.

Refining the ESF-15 Organization

ESF-15 is a direct result of After Action Reports developed from Hurricane Isabel in 2003 and combined FEMA components that informally coordinated with each other during past incidents. ESF-15 serves to provide “coordination, staff, and assets to carry out the external affairs mission of providing accurate, coordinated, and timely information to affected audiences, including governments, media, the private sector, and the local populace.”⁴⁵ ESF-15 components include Public Affairs (media relations, public information), Community Relations (communications with victims and local officials), Congressional Affairs, International Affairs, State and Local Coordination/Intergovernmental Affairs, and Tribal Affairs. According to the NRP, state and local officials determine the level of federal External Affairs support required.

Although FEMA staff conducted External Affairs operations during previous 2005 disasters and exercises, Hurricane Katrina involved the first full use of ESF-15 under DHS' coordination. The DHS Assistant Secretary for Public Affairs coordinates ESF-15 field operations to promote effective communications with the public, and maintains contact with the White House Office of Communications and the Homeland Security Council. The Assistant Secretary named the lead External Affairs Officer for Hurricane Katrina, who supported the JFO leadership in all external communications and coordinated public information at the incident site through management of the Joint Information Center components.⁴⁶ Joint Information Centers for Hurricane Katrina were co-located with the JFOs, where public affairs personnel from responding organizations could conduct emergency communications, crisis communications, and public affairs functions. FEMA, as the primary agency for ESF-15, has the responsibility of identifying and deploying personnel and other resources to support the ESF and establishing the Joint Information Centers. Joint Information Centers were established in

⁴⁵ *National Response Plan, Emergency Support Function #15 External Affairs, Draft Standard Operating Procedures*, 2005, p. 3.

⁴⁶ ICS allows multiple Joint Information Centers to be established during large incidents involving multiple jurisdictions.

Louisiana, Mississippi, and Alabama, and a forward Joint Information Center was added in New Orleans on September 12, 2005.

For Hurricane Katrina, External Affairs personnel deployed to the state EOCs prior to landfall, and the ESF-15 desks at the NRCC and RRCCs were activated. DHS Public Affairs combined information from situation reports and conference calls to create a daily messaging template, complete with “Key Messages,” “Key Statistics,” media appearances by federal officials for that day, and media clips of quotes from officials about FEMA from the prior day. These tools helped the federal government to speak with one voice in the weeks and months following Hurricane Katrina and provided common operational awareness.

ESF-15 components report to their respective Joint Information Center, which communicates issues and needs up to the DHS headquarters level. The Joint Information Center’s leadership maintains constant contact with other ESFs at the JFO, as well as headquarters. As inquiries flow up to the Joint Information Center leadership, the resulting information flows back down to all ESF-15 components, avoiding duplicative efforts and consolidating research efforts.

Community Relations personnel, who have the most initial contact with victims and local officials at the incident site, also serve as a form of intelligence gathering, supplying the JFO and headquarters with information from the affected areas. The Assistant Secretary works with the lead External Affairs Officer and the PFO’s press secretary to coordinate key messages, with the lead External Affairs Officer reporting to and providing external affairs guidance to the on-site senior federal official.

In response to Hurricane Katrina, information flow within ESF-15 did not function well during the initial weeks, but eventually improved with enhancements to its organizational structure, developed through trial and error. During a July 2005 summit, DHS Public Affairs and FEMA External Affairs personnel attempted to formalize the NRP’s description of ESF-15 using a working draft of an ESF-15 standard operating procedures manual. While no formal standard operating procedures manual was completed during the summit, a resulting organizational chart helped to explain how ESF-15 should work. The organizational chart served as ESF-15’s initial framework during Hurricane Katrina, but it still required additional revision during the first month of the response.

During the first days of the response, DHS Public Affairs decided to allow FEMA Public Affairs to take the lead in establishing the ESF-15 operation, but as the response progressed, DHS Public Affairs became more involved. The Assistant Secretary chose a FEMA Region I Public Affairs member to be the lead External Affairs Officer on September 4, 2005, and had this FEMA official head the ESF-15 operation based out of Louisiana's Joint Information Center in Baton Rouge. Designating a FEMA official to represent the DHS ESF-15 leadership led to confusion over the ESF-15 reporting structure and whether FEMA field staff reported to DHS or FEMA Public Affairs headquarters. Adding to the confusion, the ESF-15 organizational chart developed in July 2005 excluded FEMA Public Affairs – a detail that had not yet been resolved. One DHS official referred to the “fundamental awkwardness” of having DHS in charge of something FEMA had historically controlled during disasters. This had to be sorted out in the midst of the largest response External Affairs had ever conducted.

The PFO cell and interaction between the five External Affairs components added to the need for greater clarity in ESF-15 organization and information flow. There was ambiguity about how these relationships should function. FEMA Public Affairs, Community Relations, Congressional Affairs, and the rest function as independent offices during non-response operations and manage DAEs trained only for their specific cadres. ESF-15 had to resolve issues of how the five components should support each other; for example, the NRCC ESF-15 desk, staffed by Public Affairs, elected to limit support to Congressional Affairs information requests in order to manage its workload. External Affairs could benefit from reorganizing its components into a single FEMA Office of External Affairs so daily operations more closely reflect those experienced during an incident.

Ultimately, DHS Public Affairs gave the Joint Information Center leadership the freedom to revise the organizational chart and clarify the appropriate information flow and reporting structures. The new chart added a PFO ESF-15 liaison position to work with the PFO's press secretary. Adding a liaison also helped the operations to improve their working relationship. The new chart recognized each Joint Information Center component as being equal in stature, with its own operations in each state. FEMA's Office of Public Affairs was still absent, but it was decided that the office could be best used in a supporting capacity, providing services to free resources in the field for other duties. The ESF-15 NRCC desk served as an extension of this support, acting as a conduit for information, both coming in and going out, across FEMA.

Prior to Hurricane Katrina, the only NRP training for ESF-15 staff was a basic overview of the plan that did not explain details of Joint Information Center operations or the ESF-15 organization. Based on observations of the Hurricane Katrina response, ESF-15 staff began to develop more detailed training to orient participants from across the External Affairs disciplines. The first session was at FEMA's Emergency Management Institute in February 2006.

Recommendation #10: We recommend that the Assistant Secretary for Public Affairs, in coordination with the Director of the Federal Emergency Management Agency, develop a definitive ESF-15 organizational chart that is scalable to the size of an incident, with a clear hierarchical structure and information flow.

Recommendation #11: We recommend that the Director of the Federal Emergency Management Agency further develop and fully implement formal ESF-15 training, so all full-time employees and Disaster Assistance Employees have a comprehensive understanding of how to operate within its structure during an incident.

State Coordination Needed to Establish a Unified Message

Alabama and Mississippi established joint operations with ESF-15. Federal External Affairs staff co-located at the state EOCs prior to landfall. Together, they worked continuously to maintain a unified message using joint federal-state press briefings, and later joint press releases. Both states had processes that facilitated an efficient information flow. The Mississippi state public information officer indicated satisfaction with the level of coordination between FEMA and the Mississippi Emergency Management Agency, as was the case with all local public information officers working with FEMA with whom she had contact.

In Louisiana, federal External Affairs staff and state public affairs staff began the response with co-location and joint public information efforts. However, after a verbal altercation on August 31, 2005, between the Under Secretary for EP&R and a communications staff member from the Louisiana Governor's office, Louisiana elected not to conduct external affairs jointly with ESF-15. The Governor held separate briefings and did not participate in the Louisiana Joint Information Center through most of September 2005. ESF-15 did establish a cooperative relationship with the public information officer for the

Louisiana Office of Homeland Security and Emergency Preparedness, which was secondary to the Governor's office in coordinating Louisiana public affairs. The Louisiana Governor's office joined the Joint Information Center at the end of September 2005, when the media moved from the state EOC to the Joint Information Center to cover federal briefings. Both federal and Louisiana officials felt they could have provided a more positive, unified image to the press and the public had they combined their efforts from the beginning. In particular, FEMA officials noted that the visible lack of cooperation helped to undermine public confidence in FEMA operations and diverted media attention from FEMA's victim assistance efforts.

The situation with Louisiana occurred despite ongoing efforts by FEMA's Region VI to build its relationship with the state. An External Affairs official from that office participated in the Hurricane Pam planning exercise and assisted Louisiana in developing a media plan for inclusion in the Southeast Louisiana Catastrophic Hurricane Plan.⁴⁷ Because the full plan had not yet been finalized, the state chose not to use the media portion, against the advice of a FEMA Region VI official to Louisiana's Governor. One federal official pointed to that incident as an example of how FEMA's training with state officials does not necessarily guarantee a smooth, joint operation during an actual incident.

DHS Public Affairs is now completing the development of an outreach program to each state, as part of an effort to encourage state participation and leadership in ESF-15. It consists of a multi-day conference bringing together state and local public information officers with FEMA and DHS Public Affairs officials for discussions on the NRP and ESF-15, with a focus on state and local roles in External Affairs. The hope is that the program will build better working relationships between federal and state officials, give federal officials a better understanding of the available emergency management resources in each state, and give state officials a better understanding of how they fit into and can use ESF-15 during an incident. DHS staff said the first outreach session, held in July 2005 in Wisconsin, was well received, and

⁴⁷ In 2004, FEMA and Louisiana began a series of meetings to develop a detailed response plan for a catastrophic hurricane. Participating federal, state, and local staff responded to a simulated Category 3 hurricane named Pam in order to develop strategies for pre-deployment; search and rescue; shelter and temporary housing; commodity distribution; and public information, among other functions. A FEMA contractor produced the Southeast Louisiana Catastrophic Hurricane Plan in January 2005. Subsequent meetings to address additional functions were postponed in 2005; they would have included strategies for external affairs, transportation, communications, feeding, security, and missing persons/family reunification.

participants' input is being used to refine the program for eventual use across the country.

Recommendation #12: We recommend that the Assistant Secretary of Public Affairs for the Department of Homeland Security, in coordination with the Director of the Federal Emergency Management Agency, complete the development of and fully implement the DHS Public Affairs state outreach program.

National Guard and Active Duty Troops Provide Valuable Support but Improved Coordination with FEMA is Needed

National Guard and active duty military troops deployed in record numbers to support the Hurricane Katrina response, including assisting with search and rescue efforts, commodity distribution, communications, evacuations, security, and medical care in the affected areas. However, the Department of Defense approval process at times delayed the arrival of assistance and coordination with FEMA seemed to be lacking in some instances.

National Guard and Active Duty Troops Deploy in Record Numbers to Support Hurricane Katrina Response Efforts

National Guard and active duty military troops provided support at unprecedented levels. Troops assisted with search and rescue efforts; distributed water, food, and ice to save and sustain the lives of victims and responders; provided fuel distribution in the affected area to allow for continued movement of personnel and commodities; reestablished basic communications; evacuated thousands of victims from the affected area to shelters in other states; provided medical care to victims; supported local law enforcement personnel to reestablish and maintain security in the affected areas; worked to rebuild damaged infrastructure; and assisted with debris clearance. Mission assignments accepted by the Department of Defense through September 30, 2005, total over \$2.1 billion in assistance to Mississippi and Louisiana.

At its peak, approximately 50,000 National Guard troops from 49 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands, and more than 22,000 active duty military troops, were supporting response efforts in Mississippi and Louisiana. In comparison, 7,700 National Guard and 22,800

active duty military troops deployed to support the Hurricane Andrew response in 1992. Prior to Hurricane Katrina, the largest domestic deployment of National Guard troops was 32,700 in support of the San Francisco (Loma Prieta), California earthquake response in 1989.

State governors call their respective National Guard troops to state active duty.⁴⁸ The state or FEMA requests assistance from National Guard troops through action requests or mission assignments. The Defense Coordinating Officer at the state EOC or at the JFO typically forwards requests for assistance to the National Guard. If a state's National Guard assets are not sufficient to meet a required need, the state can request assistance from National Guard troops in other states through EMAC. Through EMAC, National Guard troops came from across the United States to support efforts in Mississippi and Louisiana. To equalize the pay and benefits of National Guard troops from multiple states, the Deputy Secretary of Defense approved the use of Title 32 federal funds for National Guard personnel retroactive to August 29, 2005.⁴⁹

Through action requests or mission assignments initiated by the state or FEMA, or at the direction of the President, active duty military troops and Department of Defense assets can be requested to assist and support the response to a domestic incident.⁵⁰ Action requests and mission assignments normally travel through the Defense Coordinating Officer at the state EOC or at the JFO to the Department of Defense for approval, assignment, and action.

The *Posse Comitatus Act of 1878* prohibits active duty military troops from performing law enforcement activities within the United States.⁵¹ However, it does not prohibit them from providing aid after domestic incidents, including search and rescue, medical care, and food distribution. Nor does it prohibit federal troops from providing support to civil authorities as required by Homeland Security Presidential Directive-5. Defense support to civil authorities can include providing intelligence, equipment, and training, as long as federal troops do not personally enforce the law.⁵² Federal troops deployed

⁴⁸ Initially, National Guard troops were operationally under the control of the governor and under the command of the adjutant general of Louisiana or Mississippi, but received pay and benefits according to their home state's laws.

⁴⁹ Under Title 32 status, National Guard troops remain under the control of the state's governor and under the command of the state's adjutant general, but are paid with federal funds. Because they remain under the control of the state, National Guard troops under Title 32 can participate in law enforcement activities.

⁵⁰ The action request and mission assignment process will be discussed in detail later in the report.

⁵¹ 18 U.S.C. §1385.

⁵² 10 U.S.C. §§371-382.

to support a state government remain under the control and command of the Department of Defense. Currently, the Secretary of Defense must approve requests for the use of Department of Defense assets and active duty troops for domestic incident response support.

National Guard and Active Duty Troops Provide Critical Resources, but Improved Coordination with FEMA is Needed to Ensure Adequate Support

Within the Department of Defense, Northern Command has responsibility for military operations within the United States in the event of a domestic incident. For domestic incident response, the Department of Defense is set up to be largely independent in its operations. However, Department of Defense resources still need to be coordinated within the overall federal response to a domestic incident under the NRP.

National Guard and active duty troops provided critical assistance with evacuation efforts from the Superdome and other areas of New Orleans. As the number of victims arriving at the Superdome in New Orleans increased following several levee breaches, various levels of civil unrest ensued within the Superdome. Several response teams were removed from the Superdome because their safety could not be guaranteed. National Guard troops supplemented local law enforcement personnel and played a key role in reestablishing order and maintaining security in the Superdome, thus allowing response teams to return and continue providing life-sustaining assistance. According to FEMA officials, the National Guard was the primary source of intelligence and situational awareness information for the Superdome.

On August 30, 2005, Northern Command activated Joint Task Force-Katrina to coordinate the federal military response in support of the Hurricane Katrina response in Mississippi and Louisiana. Active duty troops with Joint Task Force-Katrina arrived in New Orleans on September 1, 2005, to support evacuation efforts from the Superdome. Coordination between FEMA and Joint Task Force-Katrina appeared to be lacking as several FEMA officials indicated they had no knowledge of Joint Task Force-Katrina's presence in the affected area until federal troops began arriving. Initially, troops appeared to act independently, sometimes resulting in duplication of efforts, as when different search and rescue task forces searched the same area multiple times.

However, the PFO actively engaged the Joint Task Force-Katrina Commander and the Adjutant General of Louisiana's National Guard, and coordination

appeared to improve. Coordination among FEMA, Joint Task Force-Katrina, the National Guard, the Department of Transportation, and others resulted in the evacuation of more than 22,000 people from the Superdome in New Orleans to multiple locations in Texas and other states in approximately four days. In addition, Joint Task Force-Katrina and National Guard troops conducted a coordinated grid search of the City of New Orleans. Through coordination with the PFO, the Joint Task Force-Katrina Commander and the Adjutant General of Louisiana, New Orleans was divided into three sections, which were searched by members of the 5th Army, 82nd Airborne, and National Guard respectively.

Some FEMA officials expressed frustration at the requirement for approval by the Secretary of Defense before Department of Defense resources could be used in support of a domestic incident response. In contrast, on-scene agency representatives from other federal agencies can approve mission assignments issued to them immediately. Officials indicated the Department of Defense approval process sometimes required 24 to 48 hours, creating delays for life saving and life sustaining missions. For example, on the evening of August 28, 2005, FEMA requested Department of Defense assistance to airlift eight California swift water rescue task forces to Louisiana. Because the Secretary of Defense must approve such requests, the order approving the airlift was not signed until August 30, 2005, and the task forces did not begin water rescue operations in Louisiana until August 31, 2005.

Recommendation #13: We recommend that the Director of the Federal Emergency Management Agency address levels of coordination and expectations with Department of Defense entities under the NRP, including Northern Command and the Military Liaison, to facilitate coordination during responses to future domestic incidents.

FEMA Provided Record Levels of Support but Delivery Structure Needs Improvement

During the response to Hurricane Katrina, FEMA provided record levels of support to victims and emergency responders. Life saving and life sustaining commodities and equipment were delivered to the affected areas; personnel increased significantly in a short period of time to support response efforts and provide assistance to victims; and assistance was provided quickly in record amounts, sometime through innovative means. However, a lack of asset

visibility in the resource ordering process, inexperienced and untrained personnel, unreliable communications, and insufficient internal management controls demonstrate a continued need for improvement in how FEMA supports its response activities and delivery of assistance.

Visibility and Improvements to Resource Ordering and Delivery Process Required

FEMA supplies commodities, equipment, personnel, and other resources to support emergency or disaster response efforts. In supporting requests for assistance and carrying out its logistics mission, FEMA is heavily dependent on factors outside of its control, such as other federal agencies, transportation contractors, accessibility to the affected area, and the receiving state's capabilities. As a result, FEMA's ability to track and source needed resources is key to fulfilling its mission. To ensure adequate support is available, FEMA should establish logistics performance measures and incorporate asset visibility, automation, and standardization into the resource ordering process.

Logistics Readiness

FEMA's ability to recognize that certain types of resources will be required immediately before and after a disaster is key to supplementing state and local response efforts. These resources include commodities such as food, water, ice, and baby formula; medical, veterinary, and search and rescue teams; supplies such as pharmaceuticals; and equipment such as generators. In order for FEMA to immediately provide some of these resources, it must maintain certain levels of these resources at all times. This allows FEMA to provide immediate assistance while standby contracts are activated, supply chains are established, and coordination with other logistics support agencies can be completed to address specific requirements. FEMA must strike a balance between a reasonable level of preparedness given varying state capabilities and the unpredictability, frequency, type, and magnitude of events requiring a federal response. In addition, FEMA must strike a balance between maintaining a reasonable level of preparedness and determining the prudent use of tax dollars to purchase, warehouse, and rotate commodities; purchase, warehouse, and maintain equipment; and, train and equip emergency teams in anticipation of major disasters or emergencies regardless of cause, size, or complexity.

On a day-to-day basis, FEMA headquarters operates seven logistics centers nationwide and one Disaster Information Systems Clearinghouse facility. These logistics centers are used to warehouse equipment and supplies purchased with Disaster Relief Funds and issued to support responders and field facilities during emergencies or major disasters declared by the President.

Also located at FEMA's logistics centers are essential supplies and equipment needed by disaster victims and emergency responders during the initial response period. These resources include supplies, such as baby formula, diapers, blankets, cots, MREs, plastic sheeting, tents, and water; and equipment such as emergency generators, industrial ice making machines, mobile kitchen kits, portable toilets and showers, and refrigerated vans. After each disaster deployment, logistics center personnel refurbish and repackage equipment and supplies for reuse, and replenish commodity levels. An inventory of accountable property at each logistics center is maintained in FEMA's Logistics Information Management System. Information systems and communication devices purchased with Disaster Relief Funds are returned to the Disaster Information Systems Clearinghouse located in Virginia after each disaster deployment to be refurbished and repackaged for reuse in other disaster operations.

When events occur that may involve a federal response, FEMA logistics personnel begin operational logistics management activities at both the NRCC and the RRCC. After an initial situational assessment, a decision is made as to whether to move response supplies, equipment, and teams to a location closer to the incident area in order to decrease the response time to a validated request for federal assistance from the state. If the decision is made to move resources forward, a mobilization center is established near but not necessarily within the affected area. This mobilization center serves as a forward logistics center to house and maintain federal resources in anticipation of a validated request for federal assistance. All federal assets at mobilization centers remain under the NRCC Logistics Section's control when the NRCC is activated and involved in brokering resources for the affected area. When the NRCC is not activated, mobilization centers operate under the oversight of the Logistics Response Center, which is an extension of the NRCC Logistics Section. The Logistics Response Center is tasked with processing logistics requests and arranging for transportation of the requested equipment, supplies,

or commodities to mobilization centers, large warehouses, and, at times, forward operational staging areas.⁵³

In order to perform the logistics mission, the NRCC or RRCC Logistics Section may request the support of the following ESFs:

- ESF-1, Transportation: The Department of Transportation maintains a national transportation contract capable of providing ground, rail, marine, or aviation assets. If necessary, the Department of Transportation has the capability to contract for additional transportation resources. If commercial transportation is not available, the Department of Transportation may request Department of Defense support through the Defense Coordinating Officer or the Department of Defense liaison at the NRCC or RRCC.
- ESF-3, Public Works and Engineering: The U.S. Army Corps of Engineers maintains commodity contracts for ice and drinking water.
- ESF-7, Resources Support: The General Services Administration, as the central procurement authority for the federal government, provides additional contracting support.

FEMA activated the ESFs by issuing mission assignments to these federal agencies that were initially funded through a surge account.

In addition to relying on other federal agencies to support its logistics mission, other factors outside of FEMA's control significantly impact the overall logistics process to include accessibility to the affected area and state capabilities. High winds, flooded roadways, damaged infrastructure, primarily on the U.S. roadway system, and widespread debris hamper on-time deliveries of resources. Therefore, FEMA is exploring greater use of containerization for possible transportation via other means such as by rail and sea. Even so, the effectiveness of a response is dependent upon FEMA's

⁵³ The Logistics Response Center was created after Hurricane Isabel (September 2003). Once requests reach the Logistics Response Center from the NRCC, the Logistics Response Center works closely with transportation staff to ensure that transportation taskers are issued to transport the requested resources. The Logistics Response Center is responsible for providing situational awareness of where requested resource quantities are in the supply chain. This status is based primarily on reports from the field (e.g. federal operational staging areas or mobilization centers) not an analysis of Logistics Response Center records.

ability to anticipate and address potential shortfalls through adequate contingency planning with other federal and state entities.

In addition, states must be prepared to receive and distribute requested commodities and supplies once they arrive. Otherwise, commodities may sit unused for extended periods of time and take valuable and costly transportation resources out of service. Louisiana initially requested that FEMA transport commodities to the points of distribution until the state was able to take over this responsibility.

Asset Visibility

In 2004, FEMA Logistics received approval from its headquarters to pilot an asset visibility system, which involved tracking equipment being placed on selected trucks to monitor its movement.⁵⁴ Once surge funds became available in anticipation of Hurricane Katrina making landfall, it was estimated that 25 to 33 percent of the trucks were equipped with tracking units. FEMA logistics officials said that budgeted funds were simply not available to purchase the number of tracking units needed to equip all of the trucks used. However, due to software limitations of the tracking equipment, FEMA was unable to determine whether a truck had been offloaded or had changed cargo once it left its point of origin. Additionally, FEMA had to retrieve the tracking device from trailers that were not FEMA-owned. Once testing of the asset visibility system is complete, a decision will be made as to whether the system will be pursued.

FEMA Direction and Expectations Are Needed to Establish Logistics Performance Measures

Historically, FEMA has established a 72-hour time period as the maximum amount of time for emergency response teams to arrive on scene. However, it is unclear whether this is responsive to the needs of a state and the needs of disaster victims. What is clear is that a 72-hour response time does not meet public expectations, as was vividly demonstrated by media accounts within 24 hours after landfall. Shorter time periods, such as 60-hours, 48-hours, or even 12-hours, have been mentioned; however, to meet this level of expectation,

⁵⁴ Stratix is the contractor supporting the Total Asset Visibility system.

several factors must be addressed.⁵⁵ Once strategic performance measures and realistic expectations are established, other actions can be taken to support these response goals.

In order to meet aggressive timelines, a FEMA logistics official said they need more control over logistic transportation resources, citing a study performed by the Logistics Management Institute following Hurricane Dennis.⁵⁶ This would include the need for more FEMA-owned transportation resources. FEMA officials were repeatedly critical of contract transportation support, stating that contractors were frequently unresponsive and unreliable both in past disasters as well as during the response to Hurricane Katrina. For example, some truck drivers were slow and unresponsive to initiate deliveries, particularly over weekends and holidays.⁵⁷ Some drivers were quick to turn back due to poor road or weather conditions; some claimed roads were closed when in actuality they were open. In one instance, a driver claimed to be en route but a tracking device indicated he was still in a parking lot where he was found asleep. One solution FEMA has explored has been to lease trailers so that an independent driver can just separate from a leased trailer.

Another solution that might allow FEMA to meet more aggressive delivery timeframes would be to secure additional, strategically located warehouses to preposition or stockpile resources that exceed the capacity of existing logistics centers. Within the past two years, FEMA Logistics officials requested \$500,000 to fund the cost of warehousing, stockpiling, and rotating perishable emergency commodities such as meals, water, and ice that is stored at cold storage facilities.⁵⁸ Also, FEMA has been authorized to fund pre-identified warehouse facilities along the U.S. Gulf and Atlantic coasts.⁵⁹ Following Hurricane Isabel, FEMA secured additional warehouse space in Georgia to store excess MREs (3 million) and water (2.7 million gallons).

A third major consideration to be addressed is quantities of on-hand equipment, supplies, and commodities that should be immediately available. For example, quantity levels set by FEMA logistics officials in 1990 required

⁵⁵The only reference we identified regarding essential commodities was in a 2001 FEMA annual performance goal that referenced to a 12-hour goal (after a Presidential disaster declaration) for FEMA to meet the needs of disaster victims for water, food, and shelter.

⁵⁶ Logistics Management Institute, *FEMA's Logistics Response to Hurricane Dennis: Annotated Briefing*, October 2005.

⁵⁷ This was particularly true over Labor Day weekend, September 3-5, 2005, which was the first weekend after landfall.

⁵⁸ According to a senior FEMA Logistics official, a decision was made in conjunction with the U.S. Army Corps of Engineers to store ice at cold storage facilities instead of discarding it.

⁵⁹ Five major locations and ten additional sites were identified.

enough commodities to support 30,000 people for 72 hours. FEMA logistics officials told us they maintain 10 million meals at two logistic centers; however, no one could tell us whether this quantity level was deemed sufficient or what period of time and population this quantity covers.

Historical data and planning assumptions have also been used to gauge whether an adequate supply of commodities were on-hand. For example, based on 4 catastrophic events and 12 lower-level events, FEMA estimated that approximately 1 million meals a day would be required. Similarly, field estimates can be used to gauge potential need. However, in previous disasters, this has resulted in a surplus of commodities because according to FEMA logistics officials, the field places excessive or “uncontrolled” orders.

Hurricane Katrina was no different. Ironically, some FEMA and state field personnel suggested they had to order twice as much to get half of what they needed primarily because they had no confidence in a system that had no asset visibility. One JFO published a commodity status report as of September 5, 2005, which indicated that between August 27, 2005, and September 5, 2005, they had received less than half of what they requested for ice, water, and MREs at all three of their commodity staging areas.⁶⁰ In Louisiana, there was an excess of ice during Hurricane Katrina because planning assumptions were based on concern raised by New Orleans officials that the fatality count could reach 10,000 people, suggesting a significant number of disaster victims would still be in the impacted area.

U.S. Army Corps of Engineers modeling is another way of predicting possible requirements, however this process is imprecise. During the Hurricane Katrina response, these models consistently indicated that significantly fewer commodities were needed. No analysis was performed to establish which ordering methodology was more precise.

An alternative for not funding additional warehouse facilities has been to make greater use of surge account funds to move more commodities forward. However, as noted by FEMA’s Chief Operating Officer, the surge account is used to fund all of FEMA’s preparatory activities, not just logistics activities.

⁶⁰An additional report on the ice and water deliveries indicate that only 37 percent of ice requests were filled and 34 percent of water requests were filled. The average daily request for ice during this time was 287 trucks and the average amount delivered was 106 trucks. Similarly, the average daily request for water during this time was 287 trucks and the average amount delivered was 97 trucks. One truck of ice is approximately 40,000 one-pound bags of ice. One truck of water equals 4,500 one-gallon bottles of water.

FEMA's dilemma during each response is whether this approach is a prudent use of limited funding.

Recommendation #14: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, establish measurable response expectations and provide the necessary financial, technical, and staff support to meet those expectations.

Resource Ordering Process

FEMA's process for requesting, sourcing, and transporting resources is as follows:

1. Resource requirements (commodities, equipment, or services) are identified at the lowest governmental level.
2. The local jurisdiction attempts to fill the need from existing resources. If it does not have the resource, it will pass the requirement to the county or to the state.
3. The state attempts to fill the requirement through existing resources, commercial sources, or through EMAC or mutual aid agreements. If the state cannot fill the need, it submits a request for federal assistance to FEMA.
4. Once FEMA's Operations Section receives a state request for federal assistance, it validates the request by ensuring that it is appropriate, reasonable, and submitted by the appropriate state officials, and determines if the request can be filled with on-hand resources. If the resource is not available, the requirement is passed to the Logistics Section or is tasked to a federal agency via the mission assignment process.⁶¹
5. If passed to the Logistics Section, the Logistics Section Chief will:

⁶¹ A mission assignment is a work order issued by FEMA to another federal agency directing completion of a specific task. Mission assignments may be given in anticipation of, or response to, a Presidential declaration of a major disaster or emergency; the process as outlined applies in either case. Mission assignments may result from either a state request for federal assistance, or from another federal request to support the overall federal response and recovery operation. Mission assignments address funding levels, the requirements of the task(s) to be performed, completion dates, and state cost-share requirements, if applicable. Generally, mission assignments are considered the action of last resort if a request cannot be addressed by FEMA with available resources or through some other contracting instrument.

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- a. Fill the requirement from on-hand or in-stock resources located at a mobilization center, logistics center, or the Disaster Information Systems Clearinghouse;
 - b. Prepare a requisition and recommend commercial sources for goods and services to the Finance/Administration Section as applicable;
 - c. Address smaller requirements through a credit card purchase; or
 - d. If the resource is still not readily available, the Logistics Section passes the requirement back to the Operations Section to issue as a possible mission assignment.
6. Once a requirement is sourced, the Logistics Section arranges for the delivery of that resource to the specified location.

Closer examination of steps 4 and 5 above highlight the effort involved in ordering resources. Requests for federal assistance are submitted to the FEMA Operations Section on an action request form. Action request forms were cataloged into a locally generated tracking log, evaluated by Operations Section personnel, and assigned a unique tracking number. If forwarded to the Logistics Section, another locally generated spreadsheet was used to catalog and track requests received from the operations sections.⁶²

In two JFOs we visited, when an action request form was received, a FEMA Form 60-1, Request for Supplies and Services, was prepared and attached to the action request form. In most cases, both documents were cross-referenced with each other for tracking purposes. The action request form and accompanying FEMA Form 60-1 were routed to the Logistics Section for disposition. If a resource purchase action was required, both forms were routed to the Comptroller for review and approval before a FEMA Form 40-1, Requisition and Commitment for Services and Supplies, was prepared. If a purchase action was approved, a FEMA Form 40-1 was prepared in the National Emergency Management Information System and routed through the various approval queues for funding obligation.

During Hurricane Katrina, FEMA headquarters decided to centralize the ordering process for ice and water. Therefore, the JFO's Operations or Logistics Section immediately forwarded action requests for these commodities to the Logistics Response Center.

⁶² At one JFO, this tracking activity was paper-based.

Resource Ordering System Needs Improvement, Standardization, and Automation

We tested FEMA's resource ordering process for ice, water, as well as food commodities referenced in action request forms for all three affected states. We anticipated being able to follow requests from intake through processing to delivery of the commodity to the mobilization center, staging area, or other designated location. We sampled 57 requests: 7 from Alabama, and 25 from both Mississippi and Louisiana. Of the 57 actions we sampled, only 3 requests could be tracked through the entire process.

There were various reasons why so few requests could be tracked through the established process. For example, in one field operation, the requests tracked by the operations section did not correspond to any of the requests for commodities to the Logistics Response Center. Rather, the logistics staff used a separate time-phased force deployment list process to project requirements for a three-day period.⁶³ Otherwise, requirements were discussed during daily logistics conference calls. Requests processed by the other two JFOs demonstrate some commodities were purchased locally and not forwarded to the Logistics Response Center. Both situations, however, illustrate inconsistencies with FEMA's processes for requesting commodities and an inability to determine where a requested item was within the resource ordering process.

At FEMA headquarters, the Logistics Response Center received action request forms by varying means and sources such as facsimile, email, telephone, or through the NRCC or other FEMA logistics personnel. As a result, incoming requests for critical commodities could have been lost, mishandled, miscommunicated, or processed multiple times. For example, our efforts to manually search request forms and electronically sort data yielded few matches to requests from the JFOs. Based on our initial sample of 57 actions, only 17 appear to have reached the Logistics Response Center. Deficiencies in FEMA's tracking system were also identified in the Special Remedial Action Management Program (RAMP) report from the 2004 hurricane season.⁶⁴ An electronic taskers system is being developed to assist the

⁶³ The time-phased force deployment list is a logistics management and operational tool routinely used by federal response agencies in disasters to facilitate the orderly flow of critical response resources into a disaster area. It is a prioritized list of the most critical resource requirements developed in advance of an event. However, local officials must identify requirements for each event, survey resource availability within their jurisdiction, and then develop a priority list.

⁶⁴ See Special RAMP report dated November 29, 2004 issue LG-2 and LG-4.

Logistics Response Center catalog and track all requests. However, FEMA views this effort only as an interim solution.

Logistics Response Center records identified transportation taskers for these requests but documents only account for three requests reaching the requested destination. In one instance, the delivery date was one day after the requested delivery date and two days after the request date. In the other two instances the delivery dates were 8 and 12 days respectively after the requested delivery date. When an action completes the request process, it may have over six unique tracking numbers, few of which are crossed referenced.⁶⁵ FEMA lacks standardization in resource ordering, has an inefficient and ineffective system for tracking a request, and the same information is entered into at least three tracking systems that are not linked.

Standard operating procedures are still in development due to a lack of firm direction from FEMA leadership and the restructuring of FEMA's Logistics Section pursuant to NIMS and NRP. According to FEMA records, the lack of logistics procedures were identified in After Action Reports as far back as Hurricane Georges in 1998, and, more recently, after the terrorist attacks of September 11, 2001. Based on interviews and a review of FEMA tracking logs, steps taken to ensure that an action request was completed or resolved were either performed as time permitted or not performed at all.

Without performing this critical step, there is no assurance that a requested activity was completed or resources were provided, and no data exists to measure the efficiency with which actions were taken or performed. Key factors within FEMA's control for resource ordering and delivery were not well performed. FEMA needs a resource tracking system that is capable of documenting whether requested resources were delivered and the efficiency with which the resource was provided. This would allow FEMA to monitor both operational and contractor performance.

Recommendation #15: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary

⁶⁵ Tracking numbers might include, a state tracking number (e.g. ETEAM or Web EOC tracking number), an internal RRCC tracking number (handwritten on the action request form because there is no field on the form for this), a Logistics Section 60-1 tracking number, an internal JFO tracking number (handwritten on the action request form because there is no field on the form for this), an internal Logistics Response Center number, and a transportation tracking number.

for Policy, develop a means to standardize and streamline the resource ordering and tracking process.

Recommendation #16: We recommend that the Director of the Federal Emergency Management Agency develop and implement a resource tracking system that is capable of documenting whether resources were delivered and the efficiency with which the resource was provided.

Mission Assignment and Emergency Management Assistance Compact Activity

FEMA initiated over 68 actions before landfall to activate federal agencies and pre-position teams, commodities, and equipment in an effort to establish a readiness posture in anticipation of Hurricane Katrina's landfall in the Gulf Coast region. FEMA records demonstrate these activities continued after emergency declarations were issued for all three states as 26 additional actions with federal agencies continued.⁶⁶ In all, 438 separate mission assignments were issued involving 57 different federal departments, agencies and other organizations.⁶⁷

The peak mission assignment activity in Louisiana took place between August 29, 2005, and September 6, 2005; 72 percent of the mission assignments were written during this period. Louisiana submitted 47 requests for assistance through FEMA and 520 requests for assistance through EMAC.

The peak activity in Mississippi took place between August 28, 2005, and September 10, 2005; 77 percent of the mission assignments were written. Mississippi submitted 44 requests for assistance through FEMA and 541 requests for assistance through EMAC.

The only significant mission assignment activity in Alabama took place on August 30, 2005, when 40 percent of the mission assignments were written. Alabama submitted six requests for assistance through FEMA and five requests for assistance through EMAC. Because FEMA did not consistently

⁶⁶ This count includes similar actions taken during the surge period after the emergency declaration was declared. Financial accounting requires that once a declaration is approved, activity must be charged to the declared event. This requires similar missions to those written during the surge period to be reissued under an approved declaration. For example, if the Environmental Protection Agency is activated under the surge account, once the emergency declaration is approved, FEMA is required to reactivate the Environmental Protection Agency under an emergency declaration fund code.

⁶⁷ See Appendix K for a comprehensive list of the 57 different federal departments, agencies, and other organizations.

track mission assignments, we were unable to determine the status of these mission assignments.

The following chart summarizes the mission assignment activity during our review period.⁶⁸

	Louisiana		Mississippi		Alabama	
Date of State's Initial Request	August 29, 2005		August 30, 2005		September 1, 2005	
Total Missions Assignments Written⁶⁹	156		237		45	
Mission Assignments Written in Support of the Federal Operation⁷⁰	109	70%	193	81%	39	87%
Mission Assignments Written at the Request of the State	47	30%	44	19%	6	13%

Unreliable Disaster Communications During the Initial Response

Hurricane Katrina caused significant damages and outages in the telecommunications infrastructure. This impeded reporting and coordination, and significantly affected the efficiency and effectiveness of disaster response efforts. Responsibility for the restoration of the communications infrastructure resides with the National Communications System, a component within DHS that coordinates ESF-2, Communications, which is separate from FEMA. However, FEMA plays a key role in communications by providing interim communications support to emergency managers and responders when the infrastructure cannot support the needs for operational capability and when field sites are established. FEMA needs to strengthen its capabilities to provide communications support during the initial disaster response when the infrastructure is most weakened and emergency responder teams are still establishing operations.

The National Communications System, a component of DHS' new Preparedness Directorate, administers programs that provide priority

⁶⁸ See Appendix L for a description of the types of missions assigned and the tasked agency for each affected state.

⁶⁹ We did not include mission assignments or mission assignment requests that were denied, cancelled, or otherwise not fully processed during our review period, missions assignments that were obligated and subsequently fully deobligated during our review period, and mission assignments that were written to adjust the original funding level, extend the performance period or modify the scope of work of the initial task during our review period.

⁷⁰ An in-depth examination of federal operation support mission assignments was not performed due to the focus and time limitations of this review.

restoration of telecommunications services and priority access to services for emergency responders. These services include the Telecommunications Service Priority Program, Government Emergency Telecommunications Service, Wireless Priority Service, and Shared Resources High-Frequency Radio Program. For example, when wireless call channels become congested during emergencies, designated personnel may use the Wireless Priority Service to obtain the next available open call line. The National Communications System was activated as ESF-2 on August 27, 2005. Other DHS components with a role in disaster communications include DHS' Science and Technology Directorate, which is responsible for adopting standards for improved, interoperable communications equipment.⁷¹ The Office of Science and Technology Policy maintains the *National Plan for Telecommunications Support in Non-Wartime Emergencies*, used in conjunction with the NRP. The operation of these elements during Hurricane Katrina is outside the scope of our review.

The NRP designates FEMA as one of seven supporting agencies for ESF-2. FEMA's role in ESF-2 includes supporting its own responders; supporting the JFO and video teleconferences; coordinating on-site use of federal radio frequencies; disseminating warnings; and coordinating with ESF-2 on the use of DHS telecommunications assets. FEMA provides this support primarily through its five MERS detachments. The MERS detachments support FEMA responders and the JFO with telecommunications assets and staffing, and also provide fuel, power, life support, and site setup. The NRP indicates that MERS units will provide communications support to augment federal, state, and local capability.

For Hurricane Katrina, all five regional MERS detachments responded, supporting over 25 sites in Alabama, Mississippi, and Louisiana. Four of the five detachments began deploying prior to landfall, while one had to withdraw from support of a Wyoming disaster before deploying. On August 27, 2005, the Denton, Texas MERS detachment arrived at Barksdale Air Force Base in Louisiana, and the Thomasville, Georgia MERS arrived in Jackson, Mississippi. A MERS team was already in New Orleans, Louisiana, dismantling the JFO supporting operations for Tropical Storm Cindy. As the response continued, MERS mobile emergency operations vehicles provided temporary workspace for FEMA responders. MERS also set up the JFOs, provided satellite and radio communications, and enabled approximately 1200

⁷¹ See DHS OIG report, *A Review of DHS' Progress in Adopting and Enforcing Equipment Standards for First Responders*, Report Number OIG-06-30, March 2006.

video teleconferences. The MERS detachments provided support to FEMA responders, the PFO cell, state EOCs, and the city of New Orleans.

Despite these efforts, emergency responders at some sites did not have sufficient communications during the first critical days after the storm. Officials in the two most southern counties in Alabama had difficulty communicating their needs to the JFO for the first two days after landfall. The state sent a communications vehicle, and FEMA sent a MERS unit to the area to provide communications support and other response assistance. Communications were also an issue in Mississippi. A MERS detachment was deployed to the Gulfport area with a mobile emergency operations vehicle containing satellite equipment and a satellite link. Officials said there would have been no communications in the area without MERS. FEMA US&R teams had difficulty maintaining communication with their task forces in the affected areas of Louisiana and Mississippi because their satellite communications equipment had to compete with the media and other first responders for satellite bandwidth. In Louisiana, the US&R team augmented their radio equipment with a repeater from the Jefferson Parish Sheriff's Department until MERS units began providing support on September 2, 2005.

At the conclusion of our fieldwork, MERS detachments had not completed collection of customer satisfaction surveys from the FCOs, but the PFO and FCO comments we obtained on MERS performance during Hurricane Katrina were unequivocally positive. The primary criticism made in prior surveys was that more MERS staff and equipment would help FEMA responders. FEMA staff needed additional capability. For example, the ESF-15 desk could not regularly communicate with staff in the Gulf Coast region, so FEMA staff acted as couriers when traveling between the state EOCs and affected localities during the initial days. Additionally, lack of communications capability prevented FEMA Public Affairs and "embedded" reporters from releasing search and rescue stories for days.

In 2004 and 2005, FEMA's MERS program and Chief Information Officer created a Disaster Support Initiative for communications that contains 14 projects to enhance FEMA's communications capability. The Office of Management and Budget provided partial funding for nine projects in December 2005. However, these projects provide a limited upgrade to existing capabilities. None of the project justifications provides analysis regarding what communications equipment or staffing FEMA needs to support a catastrophic disaster mission, but FEMA should undertake this effort.

In terms of equipment, MERS projects in the initiative include replacing deteriorating 1980s-era communications support equipment; funding communications aspects of three incomplete projects; and acquiring the narrowband radios required to comply with 47 Code of Federal Regulations Part 300. A project in the initiative creates a backup facility to support FEMA's use of K_u-band satellite communications. K_u-band satellite communications were clogged with commercial and first responder traffic during Hurricane Katrina, plus they are vulnerable to weather interference. The initiative projects do not discuss how FEMA will ensure that satellite or other communications are available during the first critical days of a response. Further, the projects do not discuss whether or how to augment the equipment deployed by other FEMA staff, such as US&R, NDMS, or External Affairs teams.

In terms of staffing, FEMA should review the MERS allocation and add staff as needed. The most complete study of MERS staffing strength is from the 1980s and sets the MERS allocation at 318 staff. After authorization cuts in the late 1990s, the MERS program has not been able to increase staff above the low 200s. While staff told us MERS supports federal responders, the NRP assigns an additional role to MERS to support state and local responders. MERS allocations have not changed to reflect this expectation. FEMA is currently revising a Disaster Support Initiative for workforce management, and as part of that effort, FEMA should assess its staffing needs for disaster communications.

Recommendation #17: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Manager of the National Communications System, determine and fill requirements to provide emergency responders with communications equipment capable of performing in austere conditions.

Recommendation #18: We recommend that the Director of the Federal Emergency Management Agency define the Mobile Emergency Response Support authorizations for equipment and staffing, including requirements for mission support during a catastrophic disaster, and fund and staff the detachments to meet requirements.

FEMA Does Not Have Staff or Plans Adequate to Meet Its Human Capital Needs during Catastrophic Disasters

FEMA has attempted to set baseline staffing levels for disasters of various size but these attempts have not resulted in a disaster workforce plan. Instead, FEMA maintains a reactive posture and responds to field requests for response and recovery staffing by organizing full-time personnel and by maintaining a cadre of temporary personnel available to deploy in a surge capacity. FEMA struggled to provide staff in response to Hurricane Katrina, lacking sufficient reserve staff and the automated support needed to deploy over 5,000 disaster personnel on short notice. It implemented several creative solutions and conducted rapid hiring to provide over 8,000 disaster response staff in support of state and local efforts. However, throughout the response FEMA had difficulty tracking and training its augmentation staff.

The Stafford Act authorizes FEMA to draw upon temporary personnel for disaster operations. FEMA's staffing model includes four categories of temporary employees: (1) DAE reservists; (2) local hires; (3) Disaster Temporary Employees; and, (4) Cadre of On-Call Response Employees (COREs). FEMA policies designate DAE reservists as short-term temporary employees, activated and charged with responding to a specific disaster. Experienced DAE reservists are deployed more frequently to disasters, while less experienced DAEs and local hires are added for a specific disaster response, and COREs have a four-year appointment to support disaster response activities.

FEMA was not able to dedicate its full staffing strength to Hurricane Katrina for several reasons. First, it had to maintain response operations for disasters other than Hurricane Katrina. On August 31, 2005, FEMA had personnel assigned to the Hurricane Katrina response and 38 other disasters not related to Hurricane Katrina. It attempted to closeout previously declared disasters more quickly to make additional personnel available. However, FEMA was not able to dedicate all staff to Hurricane Katrina as during this response, Hurricane Ophelia in the Carolinas, Hurricane Rita in the Gulf Coast region, and flooding in the Northeast were declared disasters and required FEMA resources. FEMA had to divert personnel from Hurricane Katrina to respond to those other disasters.

Second, an average of 30 percent of FEMA DAEs reported they were unavailable to respond to Hurricane Katrina or any other disaster during the

August 24, 2005, to September 30, 2005, timeframe. Disaster Workforce Management Section staff explained there are various reasons why DAEs may be unavailable, such as issues with health or family concerns. Third, some FEMA cadres were not at full strength or fully equipped. With only enough volunteer headquarters staff to fill the rosters of one and a quarter teams, the NRCC was short-staffed during Hurricane Katrina. The NRCC depended heavily on key managers to work shifts for two teams without relief. One NRCC manager said he had to release people during critical periods to avoid burnout. US&R and MERS teams were also short-staffed, as were many NDMS teams, which deployed smaller “strike teams” instead of full-sized teams.

Several FEMA officials and mid-level managers told us that FEMA deployed more personnel in advance of Hurricane Katrina than ever before and more than what states requested. On August 29, 2005, FEMA had deployed almost 1,700 DAEs plus permanent staff. By September 30, 2005, FEMA had 5,767 DAEs on the rolls, having hired 1,778 DAEs in six weeks – an increase of 31 percent. FEMA ultimately surged to approximately 7,333 DAEs deployed to the Gulf Coast. In addition, over 1,000 permanent full-time FEMA employees deployed, along with approximately 200 COREs.

FEMA’s roster of reserve personnel, however, is not sufficient to address the staffing need presented by a catastrophic disaster of Hurricane Katrina’s scale. Immediately after the disaster, 46 percent of FEMA’s DAEs were listed as unavailable to deploy. FEMA deployed all available personnel in the immediate aftermath to assist with the disaster response, including personnel with Community Relations and Individual Assistance program skill sets. When these programs became operational, the experienced DAEs were already engaged in response activities and FEMA had to ask for assistance. In addition, ESF-15 needed more staff. Too few experienced External Affairs DAEs slowed operations at the Mississippi and Louisiana Joint Information Centers and FEMA headquarters; ESF-15 was unable to staff fully the New Orleans forward Joint Information Center for weeks.

FEMA employed several methods to supplement field staff. For example, on August 30, 2005, FEMA circulated a memo throughout DHS requesting personnel to fill critical roles in Community Relations and Individual Assistance. Over 1,000 DHS employees deployed to support the response. The U.S. Fire Administration requested assistance for Community Relations in Mississippi and Louisiana, and over 4,000 firefighters responded. The deployed teams of firefighters complemented trained Community Relations

personnel and served as a force multiplier with their ability to reach victims in disaster areas that might have otherwise been inaccessible.

FEMA wrote mission assignments to request additional staff from other federal agencies, such as SBA and the U.S. Postal Service. EMACs were used to assist in obtaining incident management teams from other states. Unlike the 2004 disasters, FEMA did not rely heavily on Citizen Corps volunteers, though some of those volunteers did assist in the response. FEMA administered the Citizen Corps program, which was subsequently transferred to DHS' Office of Domestic Preparedness (ODP). The use of other non-FEMA personnel, including from other DHS components and other federal agency employees, as well as fire fighters and other volunteers, was an *ad hoc* response to the magnitude of the event, rather than based on any previously developed disaster workforce augmentation plan by FEMA, DHS headquarters, or other DHS components.

Individuals who deployed as FEMA employees and augmentation staff were placed and tracked by FEMA's Automated Deployment Database (ADD) system, a database that summarizes the availability and basic capabilities of reservists. The system is outdated and required significant manual intervention to deploy personnel and produce somewhat accurate reports. The ADD database only identifies reservists and is not capable of automatically deploying personnel as the name suggests. FEMA staff at its Mount Weather Deployment Support Office search the database listings, choose personnel to deploy, and make activation calls. This manual process occurs even though FEMA possesses a more modern system that uses automatic notifications. Once deployed by ADD, personnel are to travel to designated locations and check in for tracking purposes.

The ADD tracking process is cumbersome. For Hurricane Katrina, FEMA added 17 staff at Mount Weather and at its headquarters to activate personnel under ADD. Activation calls were also set up in FEMA's Human Resources Section and at facilities in Atlanta, Georgia, Chicago, Illinois, and Orlando, Florida, to log arrival calls of DAEs. This process was labor intensive and diverted personnel from other disaster response duties.

During Hurricane Katrina, FEMA deployed strike teams to the Gulf Coast region to process disaster personnel as they arrived on site. Often employees would begin work and forget to check in with the Mount Weather Deployment Support Office. The strike teams were able to check in disaster personnel as they arrived and maintained records. Although these strike teams were

deployed to address weaknesses in ADD, it meant staff were unable to fulfill other duties during the disaster response.

Despite deploying strike teams, there were still problems in tracking disaster employees when they transferred to different duty stations within the affected area. Network connectivity in the field was another problem due to the large number of users on the satellite bandwidth.

During the 2004 hurricanes, FEMA recognized that the ADD database did not accurately reflect proficiency levels and training of many employees. The system also lacks a method for prioritizing or coordinating requests for staff among multiple field locations, which can lead to deploying and redeploying staff. We were told reservists place low priority on maintaining accurate ADD records of their deployment, and often manual and *ad hoc* methods are employed to manage deployment. An audit we issued in September 2005 noted that the lack of integration among the ADD system, the Logistics Information Management System III, and the National Emergency Management Information System required significant personnel to coordinate.⁷² FEMA noted its ADD system is cumbersome, not user friendly, and not compatible with current technology. ADD also does not provide a consolidated view that determines whether an employee: (1) was deployed to a disaster location; (2) was en route but not yet arrived; (3) was sent by FEMA headquarters but not entered into ADD; or, (4) had arrived at the disaster location, and whether they had checked in with the region.⁷³

Ultimately, FEMA's additional efforts to identify and track deployments only resulted in 85 to 90 percent visibility of its disaster workforce during Hurricane Katrina. An automated system to track all disaster personnel would improve FEMA's resource visibility.

Problems with Surge Capacity Training During Hurricane Katrina

FEMA needs to strengthen its ability to provide training for surge reservists activated during large-scale disasters. During the 2004 hurricanes, FEMA created a human resources center in Atlanta, Georgia, to centralize its hiring and training activities near field sites. However, the centralized process did

⁷² "Emergency Preparedness and Response Could Better Integrate Information Technology with Incident Response and Recovery." OIG-05-36, p. 21-22.

⁷³ For example, NDMS and US&R are usually activated by their respective program managers, and the managers are responsible for updating ADD.

not sufficiently screen employees to ensure suitability for assigned tasks, did not provide clear job expectations, and did not provide adequate administrative support for the new staff. During Hurricane Katrina, these concerns resurfaced.

Following the 2004 hurricane season, FEMA's Disaster Field Training Operations updated its guidebook and incorporated changes to its standard operating procedures, including a surge-training checklist. However, the checklist is very general, and staff expressed concerns that there is still not an adequate plan for a catastrophic surge. Further, communication and coordination issues remained unresolved between FEMA's Emergency Management Institute and the regional training manager, both of which are responsible for providing instructors and classes during a disaster. The new protocols were to be tested during Hurricane Dennis in early July 2005. However, this event did not serve as a sufficient test, as surge capacity was not required. Hurricane Katrina was the first opportunity to test the new protocols.

Regional managers told us there were delays in surge training for Community Relations and Individual Assistance, with some newly hired personnel not receiving training until two weeks after Hurricane Katrina made landfall. There was confusion over how many people would be at the training sessions, when they would arrive, and what they would be doing once training was completed. To compound the situation, there were too many people in the classes; hundreds attended classes rather than the usual 50, curtailing the ability of the new hires to ask questions or obtain additional information regarding assignment, expectation, and role and responsibilities. FEMA's surge training plans were inadequate to prevent training delays – the large number of trainees within classes did not create an environment conducive to learning. In addition, FEMA had too few of its training staff deployed to support needs – 24 of 47 staff deployed.

Disaster Support Initiatives Could Enhance Temporary Disaster Work Force System

Since 1992, FEMA amassed 12 studies on disaster workforce management without developing a final plan. Prior to Hurricane Katrina, FEMA recognized deficiencies in its reserve cadre size, automated deployment and tracking systems, and surge training, and began two projects to remediate the deficiencies.

First, from April to July 2005, FEMA halted hiring DAEs in an effort to remove inactive personnel from its roster and establish a baseline level for its DAEs. However, the temporary hiring freeze was grossly ill-timed because FEMA's traditional hiring for the hurricane season was delayed, resulting in a lower number of DAEs available for deployment than there had been a year prior.⁷⁴

Second, FEMA staff proposed a Disaster Support Initiative to enhance the temporary disaster workforce system that includes disaster workforce planning and modernizing the automated workforce management system. Establishing the disaster workforce plans and staffing baselines has been difficult for FEMA. FEMA does not have a clear understanding of the size or number of disasters to which it should prepare to respond. Further, setting a baseline according to disaster history does not necessarily provide the surge capability that future catastrophic events may require. Maintaining excess reservists solely for catastrophic disasters involves significant administrative costs, and infrequently used reservists are more likely to seek permanent positions elsewhere. The Disaster Support Initiative would also be used for training, updating related policy manuals, and replacing the ADD database. FEMA is currently revising the initiative for resubmission to the Office of Management and Budget for funding approval.

Recommendation #19: We recommend that the Director of the Federal Emergency Management Agency develop a disaster workforce plan that accounts for standing capability for permanent, temporary, and reserve staff that is responsive to the needs demonstrated in response to previous disasters, and also develop a plan that is scalable to other events irrespective of cause, size, or complexity.

Recommendation #20: We recommend that the Director of the Federal Emergency Management Agency develop and implement a system that automates and tracks the selection, deployment, training, and demobilization of responders.

⁷⁴ While DAE levels in 2005 were significantly lower than in 2004, they were in line with DAE levels in 2001, 2002, and 2003. Due to a severe hurricane season, 2004 DAE levels were significantly higher than in prior years. Given forecasts of a severe 2005 hurricane season, it is reasonable to compare 2004 and 2005 DAE levels.

Individual Assistance

In April 2003, FEMA's Recovery Division prepared a narrative justification for what it termed "over-target" requests for additional funding in FY 2005.⁷⁵ The funding would allow FEMA to enhance its base capability, which FEMA stated was deficient and not in keeping with standard business practices to effectively provide assistance to disaster victims. In the narrative FEMA foreshadowed, "The failure to provide funding to ensure scalable recovery capability will result in a crisis of unimaginable proportions not only for individual victims and their communities and States, but also for the country as a whole." No additional funding was provided to FEMA in FY 2005 or FY 2006 to enhance its Recovery Division's existing capability.

Recognizing deficiencies in its business practices, processing systems, and ability to provide assistance to disaster victims in an efficient and effective manner, FEMA attempted to address these issues using existing resources. Its performance in response to Hurricane Katrina, however, highlighted those deficiencies and its ability to provide Individual Assistance to address the needs of disaster victims was not as effective or efficient as it had envisioned.

FEMA's Efforts to Augment Staff and Call Center Capacity

Prior to Hurricane Katrina, FEMA could activate four internal centers, or NPSCs, to register disaster victims for individual assistance and make referrals to other assistance providers. These facilities were staffed with approximately 700 personnel to field applicant calls (registration intake), provide information on the status of applications (helpline), and process and perform case management activities on applications for assistance.

In response to Hurricanes Charley, Frances, Ivan, and Jeanne, which affected Florida during the 2004 hurricane season, FEMA faced challenges in augmenting its ability to handle the volume of applicant calls for assistance. It worked with the other governmental entities, such as the Internal Revenue Service, to establish additional registration intake capability, but maintained helpline and casework activities. In addition, FEMA began a major training effort the week of August 24, 2005, at each NPSC, to enhance capability for

⁷⁵ Over-target requests are funds FEMA requested of DHS to achieve additional capability over its existing baseline funding. Over-target funding for FY2005 was to provide a foundation for its program and process improvements to meet milestones it had set for FY2006–FY2009 to be more responsive to large-scale disasters; \$3.9 million was requested.

the 2005 hurricane season. Among all 4 NPSCs, approximately 426 agents were in training.

Prior to landfall, FEMA contacted the Internal Revenue Service to activate four call centers, as outlined in an interagency agreement developed between the two agencies. In response to Hurricane Katrina, all FEMA internal NPSCs were operational on August 29, 2005, staffed with approximately 1,170 personnel. One NPSC assumed around-the-clock operations.⁷⁶ By September 1, 2005, all NPSCs were providing 24-hour services and the Internal Revenue Service call centers were also operational. Total registration intake staff was 1,613.

On September 3, 2005, FEMA opened 2 additional call centers, and another on September 10, 2005; total staff increased to 3,375.⁷⁷ Further, FEMA worked with the private sector to establish 7 additional call centers that became operational on September 14, 2005; total staff levels were approximately 8,199. Within 19 days, FEMA's call center capability surged from a base capability of 4 call centers and 700 staff pre-landfall, to 19 sites and registration intake agent capability of over 10,000. By September 29, 2005, 12,185 were on staff to answer registration intake calls⁷⁸ but FEMA maintained the majority of helpline and casework activities.⁷⁹

From August 24, 2005, to September 30, 2005, approximately 5,320,578 registration intake and helpline calls reached FEMA's call centers. Of those calls, 1,524,423 (29 percent) were deflected; 672,043 (12 percent) hung up; and FEMA answered 3,124,112 (59 percent) of the calls.⁸⁰ During the same period, of the 3,097,888 registration intake calls that reached a call center, 595,942 (19 percent) were deflected; 482,855 (16 percent) hung up; and 2,019,091 (65 percent) were answered. The following demonstrates registration intake call activity that reached a call center, the calls answered, and the percent of those calls answered by the call center from August 24, 2005, to September 30, 2005.

⁷⁶ NPSC agents in training are not represented in the staff totals as the data we used only demonstrates staff scheduled to work registration intake, helpline, and casework.

⁷⁷ Also, one additional call center was established by FEMA in Virginia.

⁷⁸ See Appendix M for detailed information on registration intake and helpline volume, staffing levels, and call centers in operation from August 24, 2005, to September 30, 2005.

⁷⁹ One of the contractors, Cendera, performed helpline activities in addition to FEMA call centers.

⁸⁰ Deflected calls are calls that reach a call center, but are not answered because the waiting queue is full.

Registration Intake Calls Made and Answered			
Call Center	Calls Made	Calls Answered	Percent Answered
FEMA MD NPSC	421,756	203,375	48%
FEMA TX NPSC	349,949	187,967	54%
FEMA VA NPSCs	482,981	119,208	25%
FEMA PR NPSC	266,209	112,858	42%
FEMA IL	119,548	101,588	85%
FEMA CA	113,980	89,475	79%
FEMA FL	70,066	59,824	85%
Contractor - Teletech	362,207	354,308	98%
Contractor - Cendera	113,815	107,374	94%
Contractor - IRS	797,377	683,114	86%

Even with its internal efforts to augment call center sites and staff, a large number of calls continued to be deflected and not answered. For example, of the 134,919 registration calls made on September 11, 2005, 21,661 (16 percent) were deflected; 32,875 (24 percent) hung up; and 80,383 (60 percent) were answered. By the following week, however, progress was being made as the call volume had significantly decreased and contractor support was operational. For example, of the 32,441 calls that reached a call center on September 18, 2005, 36 (0.11 percent) were deflected; 571 (1.76 percent) hung up; and 31,834 (98.13 percent) were answered.

Initial Delays in Speaking with Agents

Many applicants experienced initial delays as their calls waited in queue before speaking with an agent. For example, from August 29, 2005, to September 11, 2005, applicants waited an average of ten minutes before speaking with an agent.⁸¹ After reaching an agent, the average call lasted 19 minutes. From September 12, 2005, to September 25, 2005, applicants waited an average of 5 minutes to speak with an agent and the average call took 11 minutes. By September 14, 2005, in an effort to reduce Helpline calls regarding document status, FEMA established an auto-dialer service to generate automated calls to provide applicants notification that their application was received.

Registration Intake Versus Helpline

Registration intake call volume is higher immediately following a major disaster declaration and begins to taper off after several weeks. Applicants

⁸¹ See Appendix N for detailed information on the average minutes applicants waited in queue and the length of call with agents.

then begin calling FEMA's helpline to change information initially provided or to seek information on the status of an application. By augmenting its staff with contractors, FEMA intended to use its more experienced staff to handle helpline calls and to process and manage applicant cases. However, due to the enormous call volume, excessive wait times, and deflection of calls initially experienced, FEMA temporarily used all call center resources to support registration intake. From September 2, 2005, to September 11, 2005, applicants calling FEMA's helpline were provided answers to frequently asked questions and directed to FEMA's website for more information, but no helpline calls were answered by agents.

By September 12, 2005, agents resumed answering helpline calls, however the overwhelming majority of agents were only trained to register applicants for assistance and did not have the training and skills necessary to perform helpline or case management duties – only 1,200 NPSC staff had been trained to perform these duties. When helpline activities resumed, applicants continued to experience delays. For example, of 767,595 helpline calls that reached a call center from September 12, 2005, to September 18, 2005, 476,016 (62 percent) were deflected; 57,497 (7.5 percent) hung up; and 234,082 (30.5 percent) were answered. Of the 791,291 calls to helpline the following week, FEMA was only able to answer 507,417 (64 percent).

By September 17, 2005, FEMA was in the process of training additional agents to handle helpline calls. FEMA's progress in fielding applicant calls for assistance may have been affected by the additional calls it received in response to the September 24, 2005 disaster declaration for Hurricane Rita. FEMA's enhanced resources quickly became finite given the second surge of calls for assistance.

By focusing on enhancing registration intake capabilities, augmentation efforts for helpline and case management activities were not realized. FEMA's overall performance in assisting applicants with helpline and management activities cannot be considered favorable or responsive; irrespective of the progress it had made registering applicants for assistance.

Given the scale of this disaster and the sheer number of applicants seeking assistance from FEMA, initial efforts to augment call center sites and registration intake agents were admirable. But FEMA staff and resources need to be positioned to succeed. Additional investment is necessary to establish basic case management capabilities that are responsive to applicant needs. More resources must be afforded to FEMA and its efforts focused on

attaining subject matter expertise in all levels of applicant assistance and case management activities.

Recommendation #21: We recommend that the Director of the Federal Emergency Management Agency provide training to additional National Processing Service Center staff and contractors to enhance FEMA’s capability to perform applicant assistance and case management activities responsive to the needs of applicants.

On-Line Registrations

In addition to calling, applicants can apply for assistance on-line via FEMA.gov.⁸² According to FEMA, internet registrations accounted for over 40 percent of initial registrations received as of September 19, 2005. By September 30, 2005, 704,086 on-line registrations were made, compared to 853,851 through registration intake.

Total Registrations Taken for FEMA’s Individuals and Households Program and Housing 08/28/05 to 09/30/05			
State	Total Internet Registrations	Total FEMA Registrations ⁸³	Total Registrations
Louisiana	491,647	499,270	990,917
Mississippi	185,095	279,367	464,462
Alabama	27,344	75,214	102,558
Total	704,086	853,851	1,557,937

For several weeks after the major disaster was declared, however, many applicants experienced difficulty applying on-line. The system would “lock up” or “time out” during the application process and applicants could not tell whether the application was completed, sent, or received by FEMA. Some registered again and again, creating duplicate applications. For example, as of October 18, 2005, there were 1,645,784 total registrations made, 736,108 of them on-line. Of those, 96,866 (13 percent) were cancelled by FEMA as exact duplicate registrations and another 145,613 (20 percent) were flagged as potential exact duplicates.

FEMA realized its information technology infrastructure was unable to support the number of applicants applying on-line, and on September 15, 2005, it doubled the on-line user capacity. At the same time, to lessen the number of potential duplicate applications, FEMA developed a

⁸² Internet application via the FEMA.gov website was first made available by FEMA on October 5, 2004.

⁸³ These are registrations taken by FEMA from calls made to its toll-free number.

script to acknowledge a unique social security number. After completing an application through a certain point, the National Emergency Management Information System would acknowledge the application. In addition, if an applicant attempted another registration using the same social security number, a message indicating an existing application would appear. However, even with these adjustments, duplicate applications occurred.

Using the internet as an additional resource to register assistance was innovative and enhanced FEMA's ability to register disaster victims for assistance. However, the system was not adequately tested before its release and lacked sufficient infrastructure to avoid duplicate efforts on the part of applicants and additional work for NPSC staff. Problems with the system should be resolved before FEMA uses this capability during future disaster response efforts.

Recommendation #22: We recommend that the Director of the Federal Emergency Management Agency establish and test the information technology infrastructure of the system to ensure support of user demands and develop internal controls to decrease the potential for duplicate applications.

Significance of Call Volume and Registrations Taken

To place Hurricane Katrina registration activity into perspective, the following reflects the largest number of registrations taken by FEMA in one day over the last five calendar years. For example, after Hurricanes Charley, Frances, Ivan, and Jeanne in 2004, the highest daily registrations ever taken by FEMA were 44,800 as compared to 101,363 in response to Katrina.⁸⁴ Total registrations taken in the past five calendar years demonstrate a significant increase in registrations taken by FEMA.

⁸⁴ FEMA Recovery Division, data as of September 16, 2005.

Registrations Taken in One Day		Total Yearly Registrations	
Year	Registrations	Year	Registrations
2000	5,475	2000	215,707
2001	9,355	2001	490,805
2002	14,989	2002	609,884
2003	13,636	2003	608,082
2004	44,800 ⁸⁵	2004	1,959,192
2005	101,363 ⁸⁶	2005	1,323,742 ⁸⁷

We also compared registration totals six weeks after each declaration for Hurricanes Charley, Frances, Ivan, and Jeanne, and determined the volume experienced in response to Hurricane Katrina was significant. Even with combining the four 2004 Florida hurricanes, FEMA registered 1,052,284 applicants compared to 1,621,284 for Hurricane Katrina. Other significant disasters and total registrations taken by FEMA include: 1999 Hurricane Floyd – 161,027; 1998 Hurricane Georges – 406,441; and 1992 Hurricane Andrew – 151,134.

Registrations Six Weeks After Declaration			
2004 Hurricanes	Declaration	Registrations	Total Registrations ⁸⁸
Charley	08/13/04	222,949	273,033
Frances	09/04/04	396,174	459,420
Ivan	09/16/04	131,783	151,387
Jeanne	09/26/04	301,378	363,979
Total		1,052,284	1,247,819
2005 Hurricanes	Declaration	Registrations	Total Registrations ⁸⁹
Katrina	09/29/05	1,621,266	1,692,024
Rita	09/29/05	818,082	836,563
Total		2,439,348	2,528,587

FEMA Referrals to Other Assistance Providers

In addition to registration intake for its individual assistance programs, FEMA makes referrals to other governmental and nongovernmental departments, agencies, and organizations to assist applicants in addressing needs. As of

⁸⁵ On September 28, 2004, FEMA established a record of 44,800 registrations taken over a 24-hour period. *Audit of FEMA's Individuals and Households Program in Miami-Dade County, Florida, for Hurricane Frances*, DHS OIG-05-20, May 2005, page 45.

⁸⁶ FEMA Recovery Division, data as of September 16, 2005.

⁸⁷ Ibid.

⁸⁸ FEMA NPSC, data as of December 13, 2005.

⁸⁹ Ibid.

November 16, 2005, FEMA had made over four million referrals to other assistance providers.⁹⁰

Housing Area Command Concept

The introduction of a contractor, and lessons learned from the 2004 hurricane season, led to a concept of operations to more effectively coordinate and manage housing operations. A Housing Area Command concept was established in 2005 to respond to large-scale disasters where housing needs were significant and spread over multiple states. The Housing Area Command would coordinate and oversee housing solutions throughout the affected area where several JFOs had been established. However, the Housing Area Command would not be an operational element as the housing operation functions remain within the JFO.⁹¹ The Technical Assistance Contractor would be involved in staffing housing operations and implementing housing solutions such as emergency group shelters, manufactured housing, travel trailers, and modular construction.

In response to the Hurricane Dennis disasters declared on July 10, 2005, FEMA used a Technical Assistance Contractor to implement its direct housing assistance mission for the first time. The contractor would be responsible for mobile home and travel trailer site assessment, transportation, installation, and group site coordination. However, Hurricane Dennis' predicted devastation was not realized and the contractor did not become fully operational.

On August 22, 2005, a disaster was declared in Wyoming as a result of damages sustained from a tornado. This event provided FEMA with an opportunity to implement contractor support in a controlled disaster environment, as the needs and damage were specific and defined within a determined geographic area. For example, 278 individuals had applied for disaster assistance, approximately \$413,689 in assistance was approved, and 52 families were housed in mobile homes as of October 17, 2005.

One week after the Wyoming declaration, Hurricane Katrina made landfall. Because a contractor was already engaged, FEMA was able to mobilize it and make preparations for direct housing needs in the Gulf Coast region. Prior to Hurricane Katrina, however, FEMA had only used a Technical Assistance

⁹⁰ See Appendix O for FEMA's referrals to other assistance providers.

⁹¹ Housing Area Command, draft Concept of Operations Plan, July 29, 2005.

Contractor once, and its tasking for the provision of direct housing assistance was minimal.

Initial Implementation Lacked Coordination with Oversight and Operational Elements

Prior to landfall, FEMA's Housing Area Command was activated and began planning contingencies for potential shortfalls in sheltering and housing. FEMA activated four technical assistance contractors to support its temporary housing mission, procured 20,000 manufactured housing units, and planned to purchase over 100,000 units. All contractors reported directly to the Housing Area Command. Eighteen days after landfall, only 910 units were occupied by disaster victims, 1,306 additional units were ready for occupancy, and 4,798 additional units were positioned in various staging areas. As of October 1, 2005, 4,128 units were occupied: 667 in Louisiana, 2,929 in Mississippi, and 532 in Alabama.

FEMA field and headquarters staff told us the use of the Technical Assistance Contractors provides FEMA with new resources to enhance its housing mission and the use of contractors should continue in response to future disasters. FEMA staff also told us they experienced great difficulty in obtaining information on the contractors' progress to establish direct housing resources. Significant communication impediments resulted from having all technical assistance contractors report only to and obtain tasking only from the Housing Area Command, without appropriate coordination and input from field operational elements, such as the JFOs.

A week before landfall, FEMA was in the process of conducting briefings and soliciting proposals from contractors to perform its direct housing mission. However, FEMA had not adequately defined the roles, responsibilities, expectation for deliverables, or performance measures for contractors. In response to Hurricane Katrina, the Housing Area Command awarded several contracts; however the terms, conditions, and deliverables of the contracts were unknown and not appropriately coordinated with FEMA personnel responsible for contract oversight. For example, FEMA officials said the Housing Area Command tasked the Technical Assistance Contractors without the knowledge of the Contracting Officer's Technical Representative or the JFO, creating a tasking for work without proper documentation.

A lack of coordination and communication also existed between the Housing Area Command and operational elements in all affected areas. Some FEMA

officials viewed the Housing Area Command as becoming an operational element working parallel to JFO operations, while others viewed it as working in disregard of housing resource needs and identified requirements set or requested by other FEMA components.

For example, the Housing Area Command identified the need for a 1,400 housing unit site in Alabama; however, the FCO and JFO housing operations element had not identified or requested such a group site. Instead, the FCO had asked for and received permission from FEMA headquarters to use the U.S. Army Corps of Engineers' Planning Response Team for the placement of travel trailers on private sites and the development and placement of one smaller group site. FEMA field officials told us that they were instructed by FEMA headquarters to only use the Housing Area Command and its tasked Technical Assistance Contractors to establish housing resources.

Further, FEMA has specific requirements for determining whether a travel trailer or mobile home is "ready for occupancy." One essential requirement is that the unit has a reliable source of power. When FEMA conducted quality assurance checks on a select number of trailers in Louisiana, which the contractors had certified as units ready for occupancy, a reliable source of power had not been established and FEMA was not able to approve the units for occupancy. In addition, no mobile homes may be placed in a Special Flood Hazard Area; only travel trailers are allowable in these areas and only on a very limited basis when establishing emergency sites. In these cases, the Housing Area Command, and its use of Technical Assistance Contractors, had allowed the potential establishment of housing resources under conditions contrary to FEMA standards. Collectively, these examples demonstrate a lack of coordination within FEMA to effectively implement its direct housing mission and a basic lack of understanding for the regulations that govern the placement and functional requirements for direct housing resources.

Recommendation #23: We recommend that the Director of the Federal Emergency Management Agency develop a contract mechanism for its direct federal resources that clearly defines the expected roles, responsibilities, deliverables, and performance measures for contractors implementing FEMA's direct housing operations mission.

Recommendation #24: We recommend that the Director of the Federal Emergency Management Agency discontinue the practice of tasking any contractor without the appropriate coordination and approval of the Contracting Officer or Contracting Officer's Technical Representative.

Recommendation #25: We recommend that the Director of the Federal Emergency Management Agency establish clear roles and responsibilities for the Housing Area Command and define its reporting requirements and chain of command relationship with the FEMA headquarters, Joint Field Offices, and Technical Assistance Contractors.

Delivery of FEMA’s Individuals and Households Program

FEMA realized that implementing the IHP in its traditional manner was unrealistic given the widespread relocation of many disaster victims throughout the United States, the total destruction of significant numbers of homes, and inaccessibility issues in performing home inspections to determine damage and verify need. Many disaster victims would be unable to return to their homes for an extended period of time. In an effort to assist those victims, FEMA attempted to devise new methods to expedite financial assistance and technology to verify need. However, it was difficult for FEMA to maintain internal controls as modifications were made to eligibility criteria and the use of technology to verify damage, occupancy, and ownership were less reliable than initially anticipated.

For example, FEMA realized that a large number of registrations for IHP assistance were potentially duplicate applications. As of October 18, 2005, there were 1,645,784 total registrations made. Of those, 120,489 (7 percent) were cancelled by FEMA as exact duplicate registrations, and another 189,437 (12 percent) were flagged as potential exact duplicates.⁹² Because other federal agencies, such as the Social Security Administration, the Internal Revenue Service, and the SBA, maintain basic identification information on individuals, information sharing agreements between FEMA and other federal agencies could provide FEMA with more accurate means to verify applicant identity and eligibility for assistance.

Expedited Assistance

On September 6, 2005, FEMA authorized the use of expedited assistance within the housing assistance component of the IHP. Expedited assistance is initiated rarely and used only during extraordinary disaster events. FEMA made the determination to award this form of assistance based upon the

⁹² FEMA NPSC, data as of October 18, 2005.

severity of damage and nationwide relocation of disaster victims. Unlike other forms of FEMA housing assistance, on-site inspections to verify damages are not performed as expedited assistance allows for a pre-inspection disbursement of funds based on specific criteria.

FEMA provided an equal amount of assistance, \$2,000, to all eligible households that met the following criteria: (1) the registration must be for the primary residence only; (2) the registrant must be displaced due to the disaster; and, (3) the registrant is in need of shelter. These eligibility questions were not directly asked of the applicant during the registration intake process, but questions included within the registration script were used to meet the criteria. If the criteria were met, assistance was provided without any other verification. Funds could be used for any needs an applicant may have had, such as food, shelter, clothing, and personal necessities. There was also no requirement of applicants to account for how funding was spent, in consideration for additional FEMA IHP assistance.⁹³

Debit Cards Used as Delivery Mechanism

By September 7, 2005, FEMA had developed an additional mechanism for providing expedited assistance to applicants who did not have electronic access to an existing bank account, did not have an existing bank account, or who did not have access to a mailing address. In these instances, FEMA's pilot program would provide a debit card once the registration process was completed and eligibility criteria for expedited assistance were met. Individuals without electronic funds transfer would receive a card with a personal identification number and the assistance would be loaded onto it after one business day. The debit card's associated banking information (routing and account number) would be used by FEMA to electronically deposit the disaster assistance. This would allow for verification that the applicant's name and social security number matched before funds would be released. Accounts would then be established, where electronic funds could be transferred, for those applicants who did not have bank accounts.

On September 8, 2005, FEMA's Director authorized the distribution of debit cards which began the following morning at three shelters in Texas: Reliant Arena (Astrodome) in Houston, Kelly Air Force Base in San Antonio, and Reunion Arena in Dallas. However, FEMA's Director made the decision to

⁹³ In instances where an applicant was provided expedited assistance in error, the applicant was required to demonstrate the exhaustion of funds before a recertification of additional IHP assistance was made.

issue the cards as active with the \$2,000 and with a personal identification number. Basically, this meant FEMA was providing funds without any assurance of need and with no way to verify that people who received the cards were actually eligible for the assistance. Cards were distributed for two days before this delivery mechanism for expedited assistance was abruptly discontinued.

Total Debit Card Distribution		
Location	Cards Issued	Total Card Value
Houston	6,701	\$ 13,402,000
Dallas	2,479	\$ 4,958,000
San Antonio	2,194	\$ 4,388,000
Total	11, 374	\$ 22,748,000

Without the internal controls established by FEMA’s program officials, the pilot program as implemented, greatly increased the potential for mismanagement and the likelihood of fraud and abuse. Greater attention must be made by FEMA in establishing and maintaining eligibility criteria for the distribution of any federal funds, especially for a pilot-program that was never before tested. In two days, over \$22 million was provided to persons who may, or may not, have been eligible for assistance.

Eligibility Modifications

One condition that must have been met to qualify for assistance was that the primary residence sustained damage. However, some people had evacuated their homes not knowing whether damages were sustained. When applicants registered for assistance and answered “no” or “did not know” to that particular question, they were determined ineligible. FEMA made a decision to change the processing script and allowed those applicants to be eligible.

FEMA also determined the fixed amount of \$2,000 in expedited assistance would not be considered a duplication of benefits with its housing assistance program and therefore was not subject to recoupment. In addition, expedited assistance was provided to applicants with insurance, with the understanding it was to be treated as an advance on the applicant’s insurance settlement. This decision would be retroactive on applicants who were previously denied. Federal regulation, however, prohibits FEMA from funding applicants who are able to meet their needs through other means and prohibits duplication of benefits.⁹⁴ For those applicants with insurance coverage, temporary housing

⁹⁴ 44 CFR §206.110(a) and (h)

assistance shall be provided only when payment of insurance benefits have been significantly delayed, benefits are not sufficient to cover housing needs, or when housing is not available in the private market.⁹⁵

FEMA began fielding reports that members of a number of households had been separated during the evacuation process and were residing in different geographic locations. Initially, FEMA determined that only one expedited assistance award would be provided per household, pursuant to federal regulation, but it has the authority to provide assistance to more than one residence and, eventually it did so, making expedited assistance available to separated household members, including minor children housed with extended family or guardians.⁹⁶

FEMA awarded over \$1.6 billion to 803,088 applicants in the three affected states. The Hurricane Katrina authorization for expedited assistance was discontinued on September 26, 2005. In comparison, FEMA provided approximately \$51 million to 94,993 applicants during the four hurricanes that affected Florida in 2004.⁹⁷

Total Expedited Assistance 30 Days After Declaration for Hurricane Katrina ⁹⁸			
State	EA Applications	EA Eligible	EA Approved
Louisiana	618,692	618,692	\$1,249,112,299
Mississippi	161,540	161,540	\$323,148,354
Alabama	22,856	22,856	\$45,707,416
Total	803,088	803,088	\$1,617,968,069

Great liberty, within its limited authority, was taken by FEMA to modify the delivery of expedited assistance to afford assistance to as many applicants as possible. However, any semblance of internal control that initially existed to ensure basic eligibility criteria were met was significantly diminished, if not entirely removed. Program controls should not be removed in response to catastrophic events. Modifications, while maintaining internal control, should be anticipated and planned for by FEMA.

Recommendation #26: We recommend that the Director of the Federal Emergency Management Agency establish eligibility criteria, internal

⁹⁵ 44 CFR §206.101(d)

⁹⁶ 44 CFR §206.117(b) (A)

⁹⁷ FEMA NPSC, provided December 19, 2005, from data compiled as of six weeks after the declaration of each disaster.

⁹⁸ FEMA NPSC, data as of September 30, 2005.

program controls, and a basis for testing a program before implementation to ensure the program meets disaster assistance provisions of the Stafford Act.

Implementation of the IHP Housing Assistance Component

In less affected areas, FEMA implemented its traditional housing assistance and other needs assistance components of the IHP and performed home inspections to verify damage and assess need. A home inspection is generally required as a condition of eligibility for IHP assistance. Once inspections were completed, FEMA determined eligibility for both components.

Under the housing assistance component, if needs could not be addressed through insurance or loans from the SBA, depending on the degree of damage, FEMA provided renters and homeowners temporary housing in the form of rental assistance or provided housing units (such as travel trailers or mobile homes) when rental resources were not available within the affected area. It also provided homeowners with funds for home repair when a damaged home could be made safe, sanitary, and functional, or funds for replacement when homes were destroyed.

Total Registrations for FEMA's IHP and Housing Assistance Awards 08/28/05 to 09/30/05				
State	Registrations	HA Referrals	Average Grant ⁹⁹	Total Grants
Louisiana	990,917	897,280	\$1,699	\$1,947,569,186
Mississippi	464,462	395,939	\$2,330	\$390,682,308
Alabama	102,558	87,345	\$1,825	\$63,483,992
Total	1,557,937	1,380,564	\$1,951	\$2,401,735,486

Other Needs Assistance

Under the other needs assistance component, if needs could not be addressed through insurance or loans from the SBA, depending on the degree of damage, grants were provided to repair damaged personal property or to pay for disaster-related necessary expenses and serious needs, which were limited to items or services that help prevent or overcome a disaster-related hardship, injury, or adverse condition. Such items included: reimbursement for medical and dental costs; funeral and burial costs; clothing; household items (room furnishings, appliances); tools required for employment (specialized or protective clothing and equipment); necessary educational materials (school

⁹⁹ The average grant reflects the average award amount per registration. A single registration may receive multiple categories of housing assistance.

books, computers, supplies); generators; cleaning items (wet/dry vacuum, air purifier, dehumidifier); and damages to vehicles. The majority of other needs assistance provided was for items listed in the other category, such as generators and cleaning equipment, personal property, and transportation needs.

Total Registrations for FEMA's IHP and Other Needs Assistance Awards 08/28/05 to 09/30/05				
State	Registrations	ONA Referrals	Average Grant ¹⁰⁰	Total Grants
Louisiana	990,917	469,608	\$1,114	\$18,043,483
Mississippi	464,462	251,477	\$2,433	\$30,005,548
Alabama	102,558	63,802	\$1,110	\$20,744,939
Total	1,557,937	784,887	\$1,552	\$68,793,970

The maximum amount of assistance for both components combined, however, could not exceed the IHP cap of \$26,200. In all affected states, as of September 30, 2005, over \$2.4 billion in housing assistance was awarded, and over \$68 million for other needs assistance. The majority of applicants determined ineligible for housing assistance and other needs assistance were due to duplicate applications, insufficient damage, and insurance.

Efforts to Determine Eligibility Without Inspection

In the most affected areas, however, FEMA determined the conduct of inspections within a reasonable and responsive timeframe was not feasible and attempted to verify damage using new methods and technology. Homes with major damage or completely destroyed homes were identified through rapid assessment, the use of satellite imagery, and geospatial maps to indicate water levels of one foot or higher. Residents in those dwellings would have their pre-disaster occupancy and ownership verified through external databases, so that a physical inspection was not necessary to provide more expedient assistance for real and personal property.

Transitional Housing Assistance

FEMA awarded transitional housing assistance to eligible homeowners and renters by providing an initial payment of \$2,358 to cover three months rent.¹⁰¹ An equal amount of transitional housing assistance was awarded only

¹⁰⁰The average grant reflects the average award amount per registration. A single registration may receive multiple categories of other needs assistance.

¹⁰¹ FEMA determined the amount by using a national average of fair market rent for a two-bedroom unit.

to eligible households in the most affected counties and parishes of Mississippi and Louisiana. It was provided without inspection to applicants in Orleans, Jefferson, St. Bernard, St. Tammany, and Plaquemines parishes in Louisiana; and Jackson, Harrison, and Hancock counties in Mississippi. Applicants in all other counties and parishes in the affected states would receive rental assistance and other forms of IHP assistance if found eligible after inspections were conducted. As of October 2, 2005, 332,992 applicants were approved for transitional housing assistance totaling over \$788 million.¹⁰²

With satellite imagery and geospatial maps, in combination with information supplied by a FEMA contractor on consumer information to verify occupancy, FEMA thought it would be able to “auto-determine” assistance for the majority of applicants that resided within these areas. The contractor used tax records, census data, public utilities, and other public records to verify the occupants of individual homes and their residency status as an owner or renter. However, the contractor was not able to provide FEMA with verification data as early as anticipated. Also, FEMA had not explored or developed contingencies should the information be untimely or incomplete. For applicants with occupancy that could not be verified by the contractor or through documents submitted by the applicant, FEMA attempted to verify occupancy by using the internet to match the phone number, name, and address with additional sources of information. When verification could not be established using these methods, applicants would be referred to HUD for assistance under the Hurricane Katrina Housing Assistance Program.

To avoid possible duplication of assistance, FEMA continued its policy of providing housing assistance to only one member of a household, and attempted to determine the primary lease or mortgage holder as “head of household,” and provided transitional housing assistance only to that individual. Other household members were determined ineligible for transitional housing assistance, but could qualify for other needs assistance, for personal property, transportation, or medical, dental, and funeral expenses, when the need for such assistance was verified.

Delay in Providing Additional Housing Assistance to Most Affected Areas

The initial method FEMA developed to provide expedited transitional housing assistance was thought to be an unreliable method for use in awarding

¹⁰² DHS Situation Report Number 73, October 2, 2005.

additional IHP housing assistance. Concerns were raised within FEMA and elsewhere in DHS that additional analysis and data would be required to validate the method before additional housing assistance could be provided. The implication of this decision was that eligible applicants in the most affected areas were only provided expedited assistance (\$2,000) and transitional housing assistance (\$2,358) to address their housing needs, while applicants in other areas where inspections were conducted were potentially eligible for up to \$26,200 in IHP assistance. Applicants who resided outside of the most affected areas were not eligible for transitional housing assistance.

By October 28, 2005, FEMA program officials had completed additional analysis and provided data to support the extent of damage caused by different water levels (four to six feet) in a variety of homes that ranged in size, style, and foundation type. It believed this data demonstrated that any home with two feet or more of water in it for a week or longer had sustained damages beyond the housing assistance maximum replacement award amount of \$10,500, and that water levels two feet or below would often result in damage that could be repaired to a habitable condition within the replacement award. Further, maps it had used on water depth in particular areas, could be enhanced with zip code overlays to the extent where individual homes were visible to view the physical condition of the home. It had also conducted on-site visual inspections in more than 200 locations within the defined areas of the maps and the physical inspection results supported the reported water levels.

FEMA proposed that homes that had two feet or more of standing water be deemed destroyed, and uninsured homeowners be eligible for the maximum real property replacement grant of \$10,500. Homes with standing water levels between one and two feet were deemed as having major damage, and uninsured homeowners were eligible for the maximum real property repair grant of \$5,200. Homes with one foot or less would be deemed as having sustained moderate damage, and uninsured homeowners were eligible for a real property repair grant of \$2,600.

In addition, both renters and homeowners in these designated areas were eligible for personal property other needs assistance awards if the following criteria were met: (1) an applicant was uninsured; (2) failed the SBA income test and had been denied a loan; and (3) had damage levels of two feet or more for 100 percent replacement award, damage level one to two feet for 50

percent replacement award, and damage of one foot or less for 25 percent replacement award.¹⁰³

Finally, FEMA placed additional requirements on the provision of IHP assistance. All homes with less than six inches of water would be inspected and IHP assistance provided through traditional means. Applicants with flood insurance would not be eligible for IHP real or personal property grants, unless the applicant was able to demonstrate that insurance was insufficient to address need. For any personal property awards made to applicants residing in a Special Flood Hazard Area-Zone A, FEMA would initiate a Group Flood Insurance Purchase Requirement (\$600), which would be calculated towards the maximum IHP awards.

Given the degree of damage, inaccessibility issues for conducting traditional inspections, and the widespread relocation of the majority of residents within these areas, FEMA's initial efforts to verify damages and determine occupancy through alternative means were creative and demonstrated an effort to provide assistance as expeditiously as possible. However, initial assumptions FEMA made on the data's accuracy, reliability, and timeliness were not realized, which cast doubt upon its effectiveness for use as a basis for awarding additional assistance. FEMA should place priority on its efforts to use new methods and technology to verify damage, occupancy, and ownership, when traditional methods of inspection are not responsive in the timely provision of assistance. FEMA must ensure the method used has been tested, is based on supportable data, and provides the highest assurance that assistance is provided only to applicants meeting established program eligibility criteria.

Recommendation #27: We recommend that the Director of the Federal Emergency Management Agency place priority on analysis of new methods and technology to verify damage, occupancy, and ownership, when traditional methods of inspection are not responsive in the timely provision of assistance. Methods and applicable technology must be tested, based on supportable data, and provide the highest assurance of meeting program eligibility requirements.

In general, we determined the authorities of the Stafford Act are adequate to deliver the necessary assistance required in response to a catastrophic event.

¹⁰³ The other needs assistance personal property replacement awards were based on a two-bedroom home with complete furnishings.

However, Individual Assistance programs are cumbersome, not easily administered, confusing to applicants, subject to funding caps, cost share requirements, and time limitations. FEMA should consider revising its program delivery process to more efficiently and effectively address the needs of victims.

Delivery of FEMA's Public Assistance Program

The Public Assistance program was an integral part of FEMA's ability to assist states with funding to shelter evacuees throughout the United States. Program modifications were made to expedite the processing of project worksheets, removing debris from private property, and funding 100 percent of eligible costs for emergency protective measures and debris removal for 60 days.¹⁰⁴ Some practices demonstrated a unique interpretation of statutory authority, while others provided an unprecedented level of federal assistance.

Request for Federal Assistance

Given the amount of debris and immediate threats to life and health, the decision to reimburse 100 percent of eligible costs for emergency protective measures and debris removal for an initial 60-day period, seemed prudent yet, with the exception of the World Trade Center recovery after September 11, 2001, was unprecedented. Historically, these costs are shared between the federal government, the state, and the applicant, and the time period allowed for reimbursement of emergency activities is more closely aligned with the initial response period of a disaster, for activities within a 72-hour period.

Emergency protective measures and debris removal accounted for the vast majority of work requested under the Public Assistance program by the affected states as of October 1, 2005.¹⁰⁵ In addition, Mississippi submitted one project under the buildings and equipment category. Alabama submitted nine projects for buildings and equipment, six for utilities, and five for parks, recreational facilities, and other items. As of October 1, 2005, FEMA had

¹⁰⁴ A project worksheet initiates the process for receipt of federal funds under the Public Assistance program, and includes information on the project's location, damage description and dimensions, scope of work, and an estimate or actual costs of the project depending on its size.

¹⁰⁵ See Appendix C for a detailed list of eligible work categories under FEMA's Public Assistance program.

received a total of 430 project worksheets requesting Public Assistance program funds and obligated more than \$962 million.

Public Assistance Projects Obligated as of October 1, 2005				
Category	Louisiana	Mississippi	Alabama	Total
A – Debris Removal	\$1,425,334	\$128,567,943	\$5,286,941	\$135,280,218
B – Emergency Protective Measures	\$777,861,116	\$43,847,142	\$4,623,733	\$826,331,991
C – Roads and Bridges	0	0	\$914	\$914
E – Buildings and Equipment	0	\$330,572	\$21,622	\$352,194
F – Utilities	0	0	\$29,930	\$29,930
G – Parks, Recreational Facilities, and Other Items	0	0	\$14,221	\$14,221
Total	\$779,286,450	\$172,745,657	\$9,977,361	\$962,009,468

Program Implementation

FEMA must notify Congress of any project estimated at \$1 million or more before funds may be obligated. Of the 430 projects, 48 were over \$1 million. FEMA made conscious decisions to expedite its processing of these projects so funds could be available to support applicant needs. Once a project worksheet was entered into FEMA’s National Emergency Management Information System, a fact sheet and press release were prepared and distribution coordinated for official notification. FEMA processed project worksheets for the debris removal and emergency protective measures categories within one day, and for all other categories within three days.

In addition to debris on public property caused by Hurricane Katrina, FEMA determined that debris on private property also created a threat to life, public health, and the safety of the general public.¹⁰⁶ FEMA identified eight parishes in Louisiana, six counties in Mississippi, and two counties in Alabama where FEMA would reimburse eligible costs for removing debris from private property. As a standard practice, debris located on private property is not reimbursed under the Public Assistance program.

Use of Stafford Act Section 403

Prior to and soon after landfall evacuees began arriving in states through coordinated and uncoordinated means. With the potential of thousands of evacuees arriving with and without notice, the efforts of the Red Cross, VOADs, states, and other organizations to shelter evacuees would likely

¹⁰⁶ FEMA based its determination on the declaration of a Public Health Emergency in Alabama, Mississippi, and Louisiana by the Secretary of the Department of Health and Human Services on August 31, 2005.

become overwhelmed, requiring state and local governments to provide both short and long term sheltering needs beyond existing capabilities. In an effort to assist state and local governments to supplement their efforts to shelter and care for Hurricane Katrina evacuees, FEMA used Section 403, Essential Assistance, of the Stafford Act.¹⁰⁷ On September 2, 2005, the President began issuing emergency declarations authorizing reimbursement of 100 percent of eligible costs incurred by states providing shelter and care to evacuees. Prior to Hurricane Katrina, such authority had not been used to reimburse states for the costs associated with sheltering disaster victims from other states. By September 30, 2005, 45 emergency declarations had been made and over \$72 million obligated to five states.

FEMA planned to use Section 403 funding until it could develop a longer-term strategy for implementing its Individual Assistance programs, which have statutory assistance limitations of 18 months and a maximum of \$26,200. On September 9, 2005, FEMA provided guidance on eligible costs for emergency sheltering and determined states could be reimbursed for such costs under Section 403 for up to 12 months. In response to the guidance, several states engaged in contracts to support their short-term and interim sheltering operations. Further, the subsequent announcement to move all evacuees out of shelters and into longer term housing by October 1, 2005, left states uncertain as to what costs FEMA would reimburse, and for how long.

The use of authorities under Section 403 of the Stafford Act should be viewed as resourceful and innovative given the unprecedented evacuation of thousands of people to locations throughout the United States as well as the loss of significant housing resources within the affected areas. However, FEMA should evaluate the policy implications of its continued use as a means to provide emergency shelter when the assistance provided is not closely aligned with the initial response period of a disaster.

As a condition of reimbursement to states, FEMA did not require evacuees to have registered with FEMA, which is not a requirement for the provision of assistance under Section 403 of the Stafford Act. This decreased FEMA's ability to know whether people were actually eligible for assistance as a direct result of the disaster. Also, FEMA increased the potential for duplication with its other assistance programs, as there was no internal mechanism to check whether an evacuee had received assistance from the IHP and when interim housing may have been provided. Only when FEMA was able to identify that

¹⁰⁷Stafford Act, P.L. 93-288, as amended, Section 403, 42 U.S.C. §5170b

an evacuee had received IHP funds was the interim housing assistance funded under Section 403 phased out.

We believe the decision to use Section 403 to address longer-term housing needs of disaster victims demonstrates a fundamental lack of planning by FEMA and other federal and nongovernmental partners to address contingencies for the loss of housing resources presented by catastrophic disasters.

FEMA should also reevaluate using emergency declarations as a delivery mechanism for Section 403 assistance, as each declaration required staff intensive resources to process and administer this assistance by individual state. Centralizing the administration and funding of this assistance under the major declarations for Louisiana, Mississippi, and Alabama could have served the same purpose, without having placed additional demands on limited resources and could have enhanced the communication and consistency by which this assistance was provided. However, FEMA officials believed that the decision was prudent as its regional offices continue to maintain responsibility for states within their jurisdiction, as would be the case in any emergency or major disaster declaration.

Recommendation #28: We recommend the Director of the Federal Emergency Management Agency, in coordination with federal, state, and nongovernmental partners, develop more effective and efficient plans for the delivery of assistance to address long-term housing issues, and test these plans in a simulated environment before application in actual disasters.

FEMA Needs to Improve Readiness

The response to Hurricane Katrina showed that FEMA was not adequately prepared for a catastrophic event in terms of staffing, training, planning, exercises, and the remediation of “lessons learned” during previous events. We surveyed FEMA’s efforts in these areas from 1995-2005, including grants to improve state readiness, in order to evaluate FEMA’s overall posture for catastrophic events. FEMA’s poor workforce management and frequent reorganizations have not provided sufficient trained staff for catastrophic surges or day-to-day operations. FEMA’s involvement in state efforts through federal emergency management grants has diminished significantly, reducing opportunities to build relationships between federal and state responders.

Finally, FEMA needs a stronger mechanism for redressing issues identified in previous disasters and exercises.

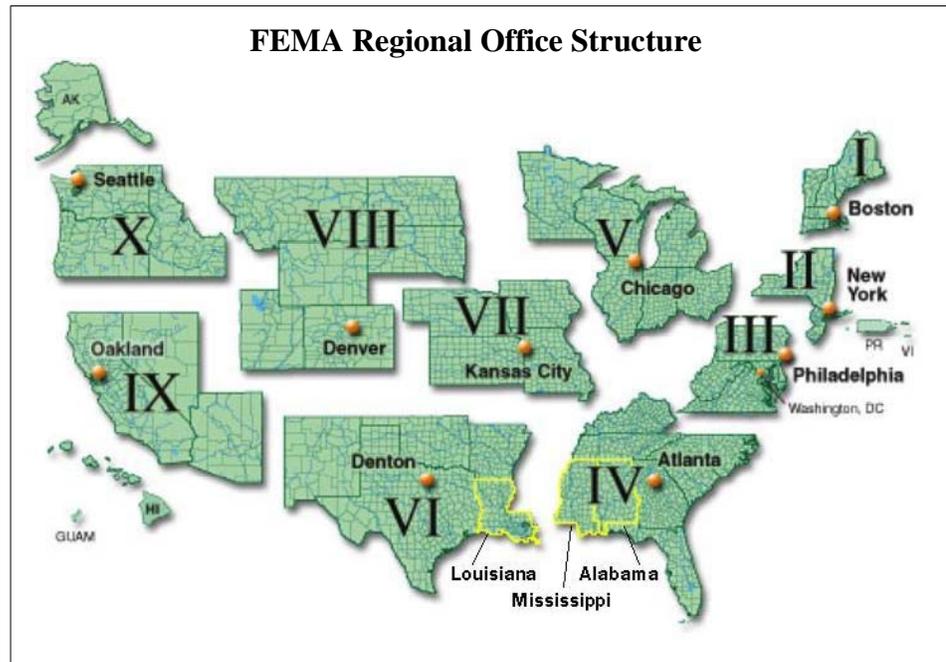
FEMA's Organization and Capacity to Respond to Disasters

Including its alignment within DHS, FEMA has undergone more than five reorganizations in the past decade.¹⁰⁸ At the onset of Hurricane Katrina, these were the operational divisions at FEMA headquarters:

- **Response Division**: The Response Division includes 2 emergency operations centers; 8 logistics centers that stock initial response resources and accountable property including meals, generators, and computers; 5 MERS detachments to provide communications and life support for emergency responders; 28 US&R teams in 19 states; and the NDMS teams that staff hospitals, veterinary clinics, and morgues. Response Division staff participate in catastrophic planning and exercises and coordinate ESF-5 and ESF-9.
- **Recovery Division**: The Recovery Division administers Individual and Public Assistance programs, processes all gubernatorial requests for major disasters and emergencies, supplies the cadre of FCOs, administers the Emergency Food and Shelter Program, and coordinates ESF-6. Its resources include four NPSCs that manage telephone registration and process disaster victim applications for assistance.
- **Mitigation Division**: The Mitigation Division manages programs intended to lessen the risk and effect of disasters, including the National Flood Insurance Program and pre-disaster mitigation grants.
- **Preparedness Division**: The Preparedness Division conducts capability assessments, resolves remediation issues, and participates in some state-run exercises. In previous years, this division had additional responsibilities in conducting exercises, administering grants, and preparing for chemical and radiological incidents.

¹⁰⁸ Appendix P contains two DHS organizational charts highlighting DHS components with a role in the phases of emergency management. The August 2005 chart represents DHS' organization when Hurricane Katrina occurred; the October 2005 chart represents organizational changes following the DHS Secretary's Second Stage Review.

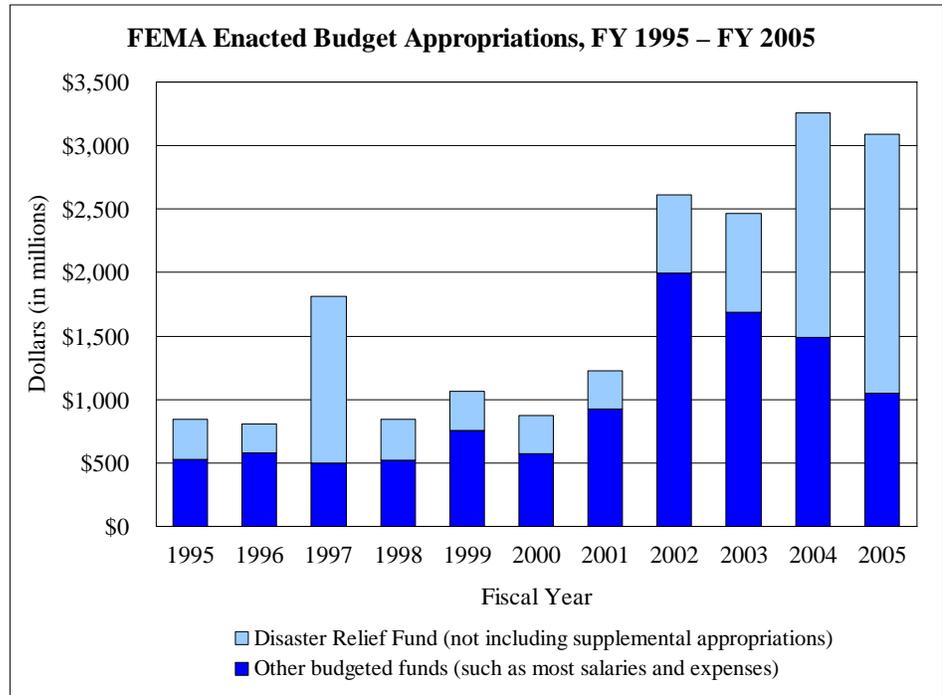
FEMA also houses the U.S. Fire Administration and training centers such as the Emergency Management Institute. Further, FEMA has ten regional offices across the country to assist states in disaster management. The regional offices staff the RRCCs and JFOs.



In FY 2005, FEMA was authorized 4,905 employees divided between permanent full-time and temporary staff. In addition, FEMA maintains a roster of several thousand DAEs trained for different cadres such as disaster logistics, individual assistance, or public affairs. When response and recovery demands increase, FEMA obtains surge staffing for particular disasters by activating DAEs and by shifting some permanent employees to disaster-specific positions.

FEMA expenditures in a given year are funded through annual appropriations, previous appropriations authorizing funds to be spent over multiple years, and no-year funds, such as the Disaster Relief Fund. Most of FEMA's salaries and expenses and some programs are funded through the annual appropriation. FEMA assistance for specific disasters, such as individual assistance payments or preparations in the days immediately before a disaster, is paid for with the Disaster Relief Fund. FEMA's enacted FY 2005 budget, excluding supplemental appropriations, was \$3.1 billion. FEMA's non-Disaster Relief Fund appropriations have consistently decreased since

FY 2002, but Disaster Relief Fund appropriations increased.



While FEMA receives an appropriation each year for the Disaster Relief Fund, in eight of the past ten fiscal years Congress passed supplemental appropriations bills to augment the fund. After Hurricane Katrina, Congress passed two emergency supplemental appropriations totaling \$62.3 billion for relief and recovery, \$60 billion of which went to FEMA to administer. As of November 30, 2005, FEMA had obligated or expended funds worth \$19 billion in response to Hurricane Katrina. During December 2005, Congress passed a hurricane relief bill that redirected \$29 billion from the first appropriations to economic development, federal facility restoration, and efforts to strengthen the New Orleans levee system.

Grant Program Changes Contributed to Weakened Relationship with States

Over the past ten years, a number of changes to the administration of grants for natural hazards preparedness diminished FEMA's involvement in how states conduct emergency training, planning, exercises, and other functions.

In 1995, FEMA had strict oversight of how states and territories spent emergency management grants, which provided FEMA with a degree of influence over state emergency preparedness. Several program changes increased state discretion for how grants could be spent and decreased FEMA direction and involvement. Changes in recent years have also diverted attention from natural hazards preparedness to terrorism preparedness. In 2005, FEMA no longer administered natural hazards preparedness grants,¹⁰⁹ as this program was transferred to DHS' Office of Domestic Preparedness (ODP), now part of the new Preparedness Directorate.¹¹⁰

Over the last decade, FEMA used three different mechanisms for providing funds and technical assistance to state and local governments to enhance all-hazards preparedness:

- 1983-1995 – Comprehensive Cooperative Agreement: The Comprehensive Cooperative Agreement combined the requirements from many preparedness programs into a single document for each state, enabling FEMA to consolidate the administration and funding of its grant programs. The Comprehensive Cooperative Agreement involved between 9 and 27 programs that prescribed very specific uses for funds. In 1995, these programs included state and local assistance; training; hurricane preparedness; earthquake preparedness; the Community Assistance Program; the Disaster Preparedness Improvement Grant, a counter-terrorism program; hazardous materials; Superfund Amendment and Reauthorization Act Title III; and the Chemical Stockpile Emergency Preparedness Program. Under the Comprehensive Cooperative Agreement, states submitted quarterly reports to FEMA on the use of program funds.

¹⁰⁹ In addition to the natural hazards preparedness grant programs discussed in this section, FEMA continues to administer grants for the National Flood Insurance Program, the Map Modernization Management Support and Cooperating Technical Partners programs (mitigation), Flood Mitigation Assistance, the Pre-Disaster Mitigation program, Hazardous Materials Assistance, Superfund Amendment and Reauthorization Act Title III, the Chemical Stockpile Emergency Preparedness Program, the Radiological Emergency Preparedness Program, the National Dam Safety program, US&R, and a few smaller miscellaneous grants such as research consortiums. Although the responsibility for the Assistance to Firefighters Grants program shifted to ODP in 2004, FEMA still administers these programs and is reimbursed by ODP.

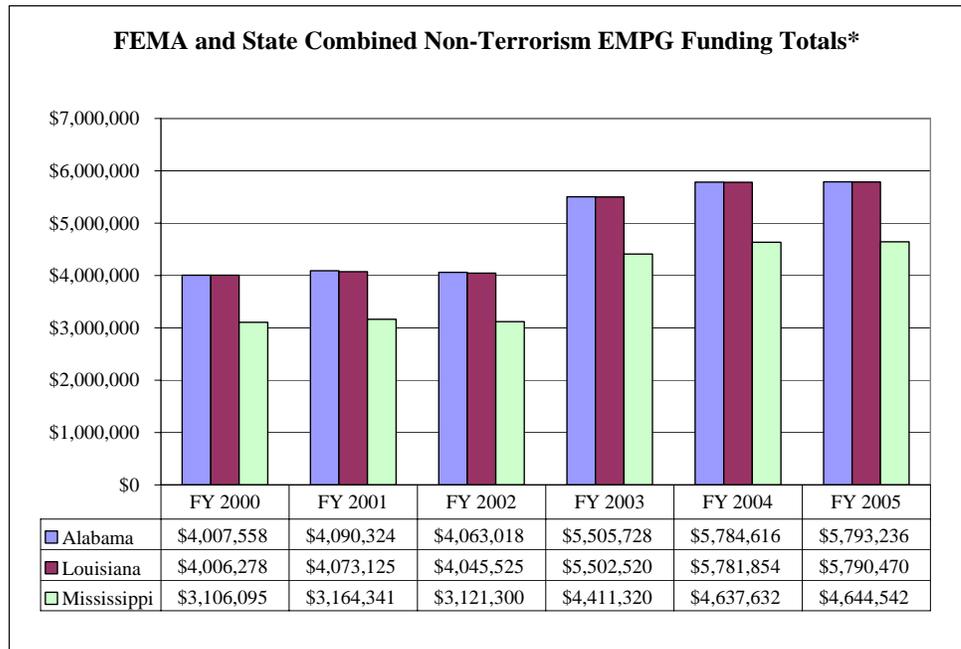
¹¹⁰ On July 13, 2005, DHS' Secretary reorganized the department. The Office of Domestic Preparedness was realigned under the Assistant Secretary for Grants and Training, reporting to the Under Secretary for Preparedness. ODP's parent office, State and Local Government Coordination and Preparedness, was realigned under the Assistant Secretary for Congressional and Intergovernmental Affairs.

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- 1996-1999 – Cooperative Agreement Under the Performance Partnership Agreement: In 1996, FEMA began using Performance Partnership Agreements for emergency preparedness grants to states. These agreements consolidated the previous, specific grant programs to give states more flexibility in allocating preparedness grant funding and to reduce FEMA’s administrative management burden. In return, states were to develop the new, strategic agreements with FEMA and achieve measurable results each year. The Cooperative Agreement under the Performance Partnership Agreement shifted FEMA’s focus from grant oversight to technical assistance; removed “one size fits all” grant prescriptions; deregulated the Civil Preparedness Guide; and reduced state reporting to a semi-annual basis. This agreement contained most of the same programs as the Comprehensive Cooperative Agreement, such as state and local assistance, but it added a 50 percent state matching requirement for some programs.¹¹¹ The Performance Partnership Agreement five-year plans were never fully implemented because the program was replaced after four years.
 - 2000-2004 – Emergency Management Performance Grants (EMPGs): In 2000, EMPGs replaced the Cooperative Agreements and combined separate funding streams to states into a single grant.¹¹² The EMPG was less prescriptive than its predecessor. FEMA required states to develop a tailored preparedness baseline that matched the Capability Assessment for Readiness, and to resume quarterly financial reporting. As long as expenditures addressed state needs identified in the assessment and supported FEMA’s strategic plan and annual goals and objectives, states had the authority to use funding, as they considered appropriate. The amount of EMPG funds allocated to the states was based on a share of all program funds that were included in the grants, a population factor, and the gradual incorporation of a 50 percent federal-state match requirement. Administration of this grant transferred to ODP in FY 2005.

¹¹¹ Other programs consolidated under these agreements included the Mitigation Assistance Program, Hurricane Program, and State Hazard Mitigation Program in 1997; Earthquake Program, Pre-Disaster Mitigation, and Flood Mitigation Assistance in 1998; and the National Dam Safety Program in 1999.

¹¹² The programs consolidated into the EMPG were State and Local Assistance, Superfund Amendment and Reauthorization Act Title III, Mitigation Assistance Program (which included the Earthquake and Hurricane Preparedness programs), Anti-Terrorism Training, Disaster Preparedness Improvement Grant, and the state administration portion of Project Impact. Programs that were funded under separate authorities were left out of the EMPG and became separate Cooperative Agreements, i.e., Chemical Stockpile Emergency Preparedness Program, Community Assistance Program – State Support Services Element, and Flood Mitigation Assistance.

Overall, federal funding for all-hazards preparedness grants has decreased. Between FY 2000 and FY 2005, EMPG funds increased noticeably, with a slight decrease in FY 2002, a marked jump in FY 2003, and a plateau in FY 2005. The following chart demonstrates the increase in EMPG funding for the three states affected by Hurricane Katrina. Some states were challenged to obtain EMPG funds under the 50 percent match requirement, considering that some programs included in the EMPG had been previously provided at 100 percent federal funding.



* For FY 2000 through FY 2002, Non-Terrorism and Terrorism EMPG funds were allocated separately due to separate funding authorizations.

Even though there were reporting requirements and accountability mechanisms for EMPGs, FEMA was limited in its ability to prioritize or direct state activities. In practice, EMPGs required states to report to FEMA regions on their annual plans and performance objectives, but EMPG authorization language did not enable FEMA regions to influence changes to the plans or use of funds. Additionally, according to FEMA headquarters and regional officials, EMPG reporting mechanisms were inconsistent and lacked quantitative performance measures.

FEMA Region IV and VI and ODP officials assert that EMPGs provide limited assistance and fund only basic operational costs such as salaries and overhead, both at the state and local levels. State emergency management agencies in Alabama, Mississippi, and Louisiana reported distributing a significant portion of their EMPG funds to local emergency managers for county and parish preparedness activities, with the remainder used for state salaries and overhead. States use little EMPG funding to undertake specific natural hazards preparedness activities such as catastrophic planning. According to state officials, EMPG does not provide enough funds to conduct as many activities – exercises, conferences, training sessions, and other events – as states would need to be sufficiently prepared for disasters. In fact, officials from the Louisiana Office of Homeland Security and Emergency Preparedness said that EMPG funds are closer to half of what is required. The remaining amount is either provided by the state, or unfunded.

When the EMPG program transferred to ODP, FEMA ceased providing financial assistance to states for natural hazards preparedness activities. The program and its predecessors had been the exclusive mechanism for FEMA to provide such assistance. FEMA was no longer able to influence state activities tied to the grant funding, including state training, planning, and exercises. FEMA lost its direct preparedness relationship with the state emergency management agencies. By the time FEMA begins joint operations with the state under a federally declared disaster, preparedness activities will have given way to immediate response and recovery needs. FEMA's relationship with state agencies for natural hazards preparedness is no longer structural but *ad hoc*.

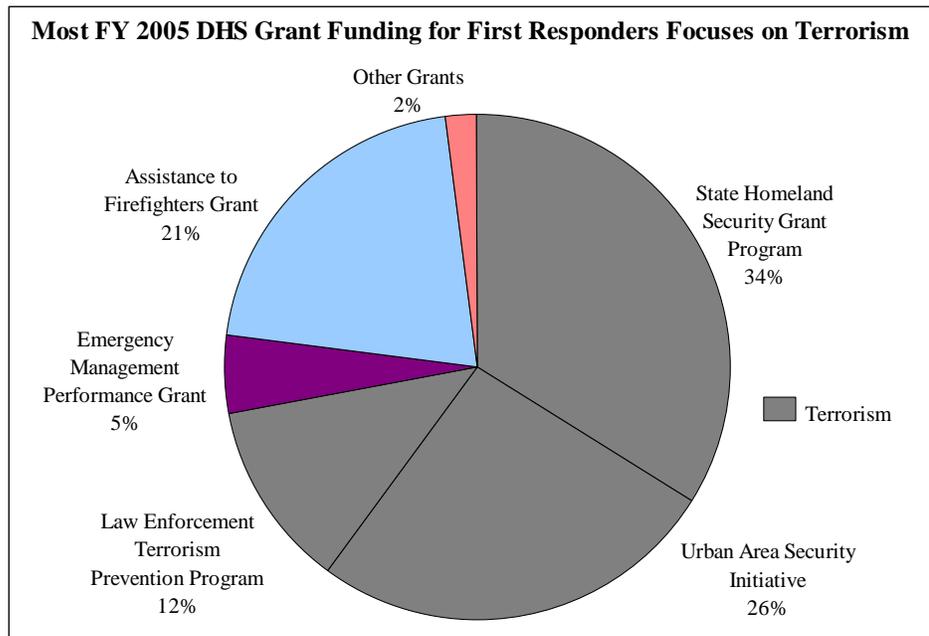
FEMA has limited visibility and no required evaluation of the states' overall preparedness goals or their day-to-day activities. There is no formal mechanism for FEMA regional personnel to provide feedback on both the development of EMPG guidance and the use of EMPG funds, which distances FEMA from state activities. At the federal headquarters level, ODP writes EMPG annual guidance without the input of FEMA employees experienced in natural hazards preparedness.

Nevertheless, ODP and states have invited FEMA to continue its involvement in some informal ways. At the regional level, ODP established a system of preparedness officers that roughly parallels FEMA's regional structure. ODP regional staff make efforts to include FEMA in state EMPG evaluation and reporting systems. In addition, state officials at the Alabama, Mississippi, and Louisiana emergency management agencies have worked to maintain a

relationship with FEMA by including it in their activities. For example, natural hazards program managers at the state level invite FEMA regional personnel to conferences and state and local exercises. However, because FEMA is no longer funded to oversee grant-related activities, staff in both Regions IV and VI said they depended on diverting travel funds to participate, which were not readily available.

Even though federal funding for all-hazards preparedness has not decreased, there is a perception among states that DHS favors terrorism preparedness because of the less prescriptive grant mechanism, FEMA's discontinued administration of these grants, and the expansion of terrorism preparedness grants. While ODP officials state that they have adopted a multi-hazard or capabilities-based approach to domestic preparedness, the majority of preparedness grants are reserved for terrorism-related activities. In addition to EMPG, ODP distributes funds through the State Homeland Security Program, the Urban Area Security Initiative, and the Law Enforcement Terrorism Prevention Program, which focus on improving state and local terrorism preparedness.

Recent analysis from the Government Accountability Office demonstrates that legislative language directed ODP to emphasize funding for terrorism programs, potentially at the expense of funding for natural hazards preparedness, or even all-hazards. In FY 2005, almost three out of every four grant dollars provided to state and local governments were for three primary programs with an explicit focus on terrorism.



Source: *DHS' Efforts to Enhance First Responders' All-Hazard Capabilities Continue to Evolve*, GAO-05-652, July 2005.

Moreover, unlike the very flexible EMPG block grants, ODP's terrorism-oriented programs contain stringent requirements for how funds can be spent. As a result of state efforts to comply with such requirements in order to receive funding, state officials experienced ODP's "multi-hazard approach" as a shift towards terrorism preparedness, at the expense of natural hazards.

Organizational Staffing Requires Better Management

While Hurricane Katrina highlighted weaknesses in FEMA's ability to staff catastrophic events, FEMA confronts staffing challenges on a day-to-day basis. Frequent reorganizations, chronic vacancies, the use of temporary staff in permanent positions, and fragmented human resources management limit FEMA's ability to hire and retain sufficient staff.

FEMA has reorganized its divisions and offices more than five times since 1995.¹¹³ Though some divisions within FEMA have created organizational charts, FEMA has not created a chart for its current organization. FEMA's

¹¹³ See Appendix Q for an overview of FEMA's reorganizations over the past ten years.

transient structure disrupts working relationships as staff counterparts alter roles. It also creates the opportunity for increased turnover as staff adjusts to changing duties and accountability structures. In addition, the reorganizations caused FEMA offices to delay hiring while position needs were determined.

While interviews suggest that low staffing levels might be a chronic and worsening condition, we could not ascertain the extent of changes in vacant positions, because staffing baselines have only been recorded since January 2005. The lack of organizational charts and workforce plans compounded the issue. According to FEMA, approximately 20 percent of FEMA positions are not filled with permanent full-time staff. A July 2004 report from the Office of Personnel Management determined that FEMA Disaster Temporary Employees, COREs, and DAEs are at times unavailable to provide surge capacity during a disaster response because they are being used in permanent roles.

Vacancies existed for many years but have increased since FEMA's incorporation into DHS. For example, FEMA's Response Division had over 100 vacancies as of June 2005. In contrast, based on budgeted staffing levels, FEMA's staffing levels have remained relatively constant. However, these numbers are misleading because they do not reflect funds set aside to support DHS programs (3 percent of FEMA's budget) or the number of positions Human Resources deliberately leaves unfilled because of budget constraints (15 percent of FEMA positions).

Negative effects from FEMA's understaffing include decreased morale and inadequate succession planning. The remaining FEMA staff is overworked, often performing multiple duties and working with few days off during disaster responses. The annual Office of Personnel Management reports on morale indicate that FEMA has one of the lowest levels in the federal government.¹¹⁴ Also, because hiring is restricted, FEMA staff said they rely on retirements and departures to open up positions for new hiring. But waiting for such vacancies to occur does not allow FEMA to prioritize hiring positions based on need. In addition, many FEMA headquarters and FEMA field personnel told us that they will not continue to work for the agency or

¹¹⁴ In 2003, FEMA was ranked the worst place to work in Federal government by its own employees in the Office of Personnel Management surveys analyzed by the Partnership for Public Service. In 2005, FEMA was ranked at this level, as it was no longer a cabinet-level agency, but remained tied for last place among many others. See *Best Places to Work, 2005*. Partnership for Public Service, viewed at http://www.ourpublicservice.org/usr_doc/Subcomponent_Rankings.pdf Compare with *Best Places to Work, 2003*. Partnership for Public Service, viewed at http://www.ourpublicservice.org/usr_doc/2003-Rankings.pdf

will retire as soon as they are eligible. The negative media portrayals of FEMA's efforts in response to Hurricane Katrina and the staff's perceived lack of confidence by DHS' Secretary have also contributed to low morale.

FEMA does have significant vacancies in higher-level positions. For example, within the Preparedness Division, half of the Senior Executive Service and GS-15 positions were vacant during our review. Vacancies at higher levels not only decrease institutional knowledge, but also disrupt divisions as acting managers often perform two jobs, and postpone less immediate concerns such as planning and training.

Despite Expanded Training Delivery, Some FEMA Training Needs Are Unmet

FEMA provides regular training for emergency responders at the federal, state, and local levels, manages the training and development of FEMA employees internally, and provides disaster-specific training through the Disaster Field Training Operations cadre. FEMA's Training Division increased the size and number of classes it delivered, even as budgets decreased. Courses provided by the Emergency Management Institute are one of FEMA's primary interactions with state and local emergency managers and responders. However, employee development lacks the resources and organizational alignment to improve performance.

FEMA Training for Emergency Responders Has Increased

FEMA's Training Division provides instruction through four venues: the Emergency Management Institute, part of the National Emergency Training Center located in Emmitsburg, Maryland; the Noble Training Center for public health in Anniston, Alabama; at field locations and conferences; and distance learning via independent study courses. The number of Emergency Management Institute enrollees has increased significantly over the past ten years, even as institute staff decreased. Since 1995, resident enrollments tripled and use of FEMA's independent study courses increased 30 times over, largely due to internet enrollments. Students complete over 1 million courses each year.

While the vast majority of those are NIMS and ICS courses, the use of hurricane-specific and general emergency management courses has increased

as well. FEMA's Training Division conducts industry-standard evaluations of these courses and can demonstrate student learning in Emergency Management Institute classes. However, the ability of the classes to improve emergency management during a hurricane is not quantifiable with current measurements. Additionally, some older courses, including Community Hurricane Preparedness, need to be updated to incorporate evaluations of student learning and course effectiveness.

The Emergency Management Institute conducts an Integrated Emergency Management Course that provides small-scale exercises for managers and elected officials to learn and rehearse disaster response plans and decision-making skills. The Integrated Emergency Management Course can be tailored for specific communities. It was provided to New Orleans officials in 2001. While the Emergency Management Institute selects applications based on risk, prioritization depends on communities and individuals that apply for the training.

Under current authorities and grant program requirements, FEMA does not have the ability to impose training requirements on states. When FEMA replaced its prescriptive grant programs with EMPG block grants in 2000, FEMA decreased its oversight of state training budgets and training requirements. The NIMS Integration Center has begun to reestablish requirements from FEMA, prescribing NIMS and NRP basic training courses for state and local emergency managers and responders.

FEMA also retains influence over state and local training by supporting emergency management certifications, through its own programs and through partnerships. It supports the International Association of Emergency Managers' Certified Emergency Manager certification and the Association for State Floodplain Managers' Certified Floodplain Manager program. FEMA's Emergency Management Higher Education Project supported the rapid growth of college programs in emergency management from 4 in 1994 to 123 in 2005.

FEMA Lacks an Organized System for Employee Development

Several FEMA staff told us that insufficient employee development led to a shortage of qualified staff for key positions responding to Hurricane Katrina. For example, the NRCC was unable to obtain trained managers and section chiefs to man additional shifts, which caused some FEMA employees to work long shifts every day without relief. Staff also said that FEMA does not have

enough trained and experienced personnel for day-to-day positions supporting emergency preparedness and response.

Under the *Chief Human Capital Officers Act*, the Office of Personnel Management established standards in the human capital assessment and accountability framework to ensure that agencies close skill gaps in mission-critical occupations and maintain continuity of effective leadership.¹¹⁵ According to the standards, FEMA should create individual development plans (or a similar process) and maintain accurate information on training planned and completed.

FEMA does not have individual development plans, despite attempts to institute such plans in the past. With the exception of training requirements for cadres such as the FCOs, FEMA does not have standard requirements for pursuing credentials, additional qualifications, or recommended training. FEMA's Employee Development Branch, which provides general professional development, does not have authority to set training requirements. Overall, FEMA enrollments in professional development courses, which include leadership and managerial training, decreased significantly in the past ten years. For example, in 2005 only 25 percent of its employees were enrolled in such programs when compared to 1995 levels.

Furthermore, FEMA has no centralized and comprehensive information on employee training. FEMA uses several incompatible systems, including databases operated by the Employee Development branch, Emergency Management Institute, Disaster Field Training Operations cadre, and information technology security. Additional classes, including classes provided at conferences, classes provided by the state or locals, and leadership training courses, are not consistently tracked. FEMA regional training managers also maintain records on their own, drawing from each of these systems. Not only is this process inefficient and susceptible to error, it complicates efforts to monitor employee development of mission-critical skills and competencies.

Recommendation #29: We recommend that the Director of the Federal Emergency Management Agency create individual development plans (or a similar process) and implement a consolidated records system to maintain accurate information on training completed.

¹¹⁵ 5 U.S.C. §1003(c).

FEMA Planning Efforts Were Incomplete and Insufficient

Other than evacuation plans created under the National Hurricane Program, our review demonstrated no FEMA efforts to conduct planning specifically for catastrophic natural disasters, and little awareness of the need for preparing for them, prior to 2001. Individual officials within FEMA promoted catastrophic planning for New Orleans that culminated in the Hurricane Pam planning scenario in 2004. Though the Hurricane Pam efforts were only partially complete when Hurricane Katrina made landfall, they resulted in the draft Southeast Louisiana Catastrophic Hurricane Plan. FEMA is pursuing additional initiatives to increase its catastrophic planning.

The National Hurricane Program: An Effective Tool

The National Hurricane Program, which has several components, is FEMA's most comprehensive hurricane preparedness tool. The current National Hurricane Program budget is \$2.9 million, with \$1.8 million used for the Hurricane Evacuation Study Program.¹¹⁶ The purpose of the Hurricane Evacuation Study is to inform emergency managers about factors affecting hurricane evacuation planning and decision-making, and to provide skills and training aids for public education. FEMA, along with the U.S. Army Corps of Engineers and the National Oceanic and Atmospheric Administration, developed the Hurricane Evacuation Study, which includes analyses of hazards, vulnerability, behavior, shelter, and transportation for a given state. The Hurricane Evacuation Study also involves an effort to coordinate evacuations between states, resolving issues such as exit routes that cross over state borders and sheltering in another state. After a hurricane, the Hurricane Evacuation Study develops a post-storm assessment, which it uses to guide future program goals and initiatives. These assessments contain recommendations for program improvement and identify areas to focus preparedness and response efforts.

Although the National Hurricane Program has had a steady budget for the Hurricane Evacuation Study, because the U.S. Army Corps of Engineers' budget for this program is decreasing, the program is required to do more with the funding FEMA provides. National Hurricane Program personnel told us that updating states' studies are difficult because the budget is limited and conducting the studies requires an extensive amount of time. The Hurricane

¹¹⁶The remaining \$1.1 million is used for other mitigation activities, such as developing building codes for coastal construction.

Evacuation Study must be updated as populations shift and geographical changes alter the supporting assessments and analyses. Therefore, the 22 states and island territories covered under the Hurricane Evacuation Study take turns having their studies conducted.

Over the past ten years, the National Hurricane Program has conducted several studies in the Gulf Coast region. Alabama had its Hurricane Evacuation Study completed in 2001, Mississippi's was completed in 2002, and Louisiana's study was in progress during the 2005 hurricane season. Louisiana and Mississippi had a joint Hurricane Evacuation Study done in order to model traffic congestion, shelter demand, and to review existing traffic plans for major evacuation routes between the two states.

In addition to the Hurricane Evacuation Study, the National Hurricane Program maintains a number of decision assistance tools including software packages to assist state and local officials in hurricane prone regions decide when to evacuate. The software is used in conjunction with the Hurricane Evacuation Study, which provides evacuation timetables to assist states with estimating how long an evacuation might take.

FEMA's Catastrophic Planning Efforts Were Incomplete

There were no FEMA efforts to conduct planning specifically for catastrophic incidents, and little awareness of the need for preparing for them prior to 2001. In 2001, FEMA categorized a major hurricane striking New Orleans as among the three most likely catastrophic disaster events to occur within the United States. After 2001, FEMA staff attempted catastrophic planning but staff comments and supporting documents point to inadequate funds to complete such plans. Beyond the overarching strategy compiled in the Catastrophic Incident Supplement to the NRP, FEMA has not developed final, incident-specific catastrophic plans for functional responses to disasters.

New Orleans Planning Project

In 2001, FEMA's Director requested that its Region VI and Louisiana develop a proposal for a hurricane-planning project. Louisiana's Office of Emergency Preparedness, FEMA, and representatives from the New Orleans district of the U.S. Army Corps of Engineers jointly developed a proposal and scope of work. FEMA awarded a contract for \$99,000 to URS Corporation to conduct information collection on the development of a Southeastern Louisiana Catastrophic Disaster Plan. URS Corporation was to collect all existing plans,

maps, infrastructure information, meteorological information, and other preliminary information regarding New Orleans' hurricane threat. URS Corporation produced a report on decision-making and sheltering, which FEMA later provided to IEM, Inc. for use in developing the 2004–2005 Hurricane Pam catastrophic planning session.

New Orleans Among Overall Catastrophic Planning Efforts

In 2003, several catastrophic planning projects within FEMA as well as among coordinating agencies were either underway or had been proposed. A draft November 2003 FEMA document lists 22 such projects, 7 of which were catastrophic hurricane projects involving New Orleans. FEMA had either lead or joint responsibility for 17 projects.¹¹⁷ Several documents from these projects were in draft form at the time Hurricane Katrina struck.

Also in FY 2003, FEMA's Response Division developed a five-year strategy for catastrophic planning in the highest risk communities across the country. The strategy called for FEMA to engage in state, local, and regional-based planning initiatives involving multiple agencies at all levels of government. The strategy was submitted in the FY 2005 budget request from FEMA to DHS for a funding increase of \$4.5 million to develop catastrophic disaster response plans at the federal level, in partnership with state and local governments, for five of the nation's highest-risk communities, and to establish catastrophic planning templates adaptable to other U.S. communities.¹¹⁸ However, the additional funding was not approved.

In 2004, Louisiana's Office of Homeland Security and Emergency Preparedness briefed a senior administration official on catastrophic planning. This official insisted that the State of Louisiana work with FEMA to develop a catastrophic plan for New Orleans. However, as FEMA had not received additional funding for the project, it secured funds by making cuts to other programs.

Design and planning for the Louisiana catastrophic hurricane-planning event began in March 2004. The project was based on a scenario that assisted Louisiana and its 13 southernmost parishes to develop a response and

¹¹⁷The other projects included four national catastrophic planning projects; three catastrophic housing activities; three Texas hurricane projects; one catastrophic New Madrid fault earthquake project; one catastrophic Miami hurricane; and more peripheral but related activities.

¹¹⁸ DHS EP&R, "Justification of FY 2005 Over Target Requests," July 25, 2003.

recovery plan for a major hurricane that floods New Orleans and the surrounding parishes, and to identify any issues that could not be resolved based on current capabilities. It was the only ongoing catastrophic planning effort for the region when Hurricane Katrina occurred; however, the plan resulting from this scenario was in draft form at that time.

Planning sessions were built upon an initial scenario named “Hurricane Pam” that was conducted from July 16 – 23, 2004. It involved over 350 participants from more than 15 federal agencies, 30 Louisiana state agencies and 13 parishes, FEMA headquarters, FEMA Regions I, II, IV, and VI, the Louisiana Office of Homeland Security and Emergency Preparedness, the State of Mississippi, the State of Arkansas, and numerous voluntary agencies. The weather scenario, designed by the National Weather Service, involved a slow moving Category 3 hurricane, sustaining 120 mph winds at landfall in Louisiana. IEM, Inc., a contractor hired in May 2004, provided planning session support. The first two days of the exercise were devoted to pre-landfall planning and achieved the following objectives:

- Validation of existing local, state, regional, and headquarters plans, recommendation of changes needed, and consolidation into a single joint master plan;
- Identification of potentially available existing teams and resources and where, when, and how they will be alerted, activated, and deployed;
- Identification of new plans, checklists, and decision and action points that need to be developed and documented;
- Identification of any inconsistencies or conflicts between state, regional, and national plans and recommendations of changes to resolve discrepancies;
- Objectives with specific emphasis on search and rescue, temporary medical care, sheltering, temporary housing, schools, and debris; and,
- Objectives with specific emphasis on other action topics selected during the exercise, including hazardous materials; dewatering of levee-enclosed areas; billeting of federal response personnel; donations management and volunteer resources; distribution of ice, water, and power; public information; transition from rescue to temporary housing; and reentry and access control.

The Southeast Louisiana Catastrophic Hurricane Plan, which included 15 specific areas of focus, was a major output of these planning sessions. Beyond the four Hurricane Pam sessions, however, no catastrophic planning

events reached fruition. According to FEMA officials, the major challenge in conducting catastrophic planning was a lack of funding. There were three follow-up planning sessions after the initial event, which focused on sheltering, temporary housing, and temporary medical issues with the last one held in August 2005. The follow up sessions were significantly delayed after the initial Pam exercise due to difficulties in obtaining funding.

The original proposals for the Southeast Louisiana Catastrophic Plan included a second series of planning sessions, Pam II, which was originally scheduled for April 2005. Pam II was intended to cover additional subject areas, including transportation, communications, feeding, security, external affairs and public relations, financial, personal records, and missing persons/family reunification. The areas of focus proposed for Pam II were not only essential issues, as demonstrated by problems that emerged after Hurricane Katrina, but they were problems for which little to no planning had been conducted. FEMA leadership never approved funding for Pam II. In total, FEMA spent \$1.5 million on the Hurricane Pam planning scenario and all additional sessions.

In addition to Hurricane Pam, there have been at least a few initiatives to conduct additional catastrophic planning. During the 2004 hurricane season, FEMA requested funding from the disaster supplemental funds for several initiatives. FEMA's Response Division initially requested \$20 million from these funds to create ten catastrophic plans, including completion of the New Orleans plan. The funding was intended primarily for contract support of state and local efforts, as well as to fund federal, state, and local travel. FEMA issued a draft "Strategy for Catastrophic Incident Planning" for FY 2005 – FY 2009 in early 2005, which is designed to establish "a comprehensive and aggressive set of unified goals and objectives" and to provide "a baseline against which to identify, validate, align, and prioritize necessary capability-building initiatives" to meet the challenges posed by an incident of catastrophic magnitude.¹¹⁹ However, this document has not been finalized or distributed, and thus does not provide much-needed guidance on the conduct and purpose of catastrophic planning initiatives.

Also in 2005, FEMA introduced seven Disaster Support Initiatives, one of which focuses on catastrophic planning and exercises. The catastrophic planning initiative proposes 16 projects to be implemented in FY 2005 and

¹¹⁹ DRAFT Strategy for Catastrophic Incident Planning, FY 2005–FY 2009 (DHS-FEMA-0079-0000403–0000417).

FY 2006. According to the project's abstract, the catastrophic planning initiatives address five concerns: (1) improving local response and recovery planning in high-risk localities; (2) improving mass care capabilities; (3) improving catastrophic temporary housing capabilities, (4) improving decontamination capabilities; and (5) expanding logistical support capabilities. FEMA resubmitted the catastrophic planning initiative to the Office of Management and Budget for approval in October 2005. Also in 2005, the Response Division received supplemental funding which provided \$160,000 to complete the Southeast Louisiana Hurricane Planning Project Initiative, plus \$60,000 for federal and state travel to two Louisiana workshops.

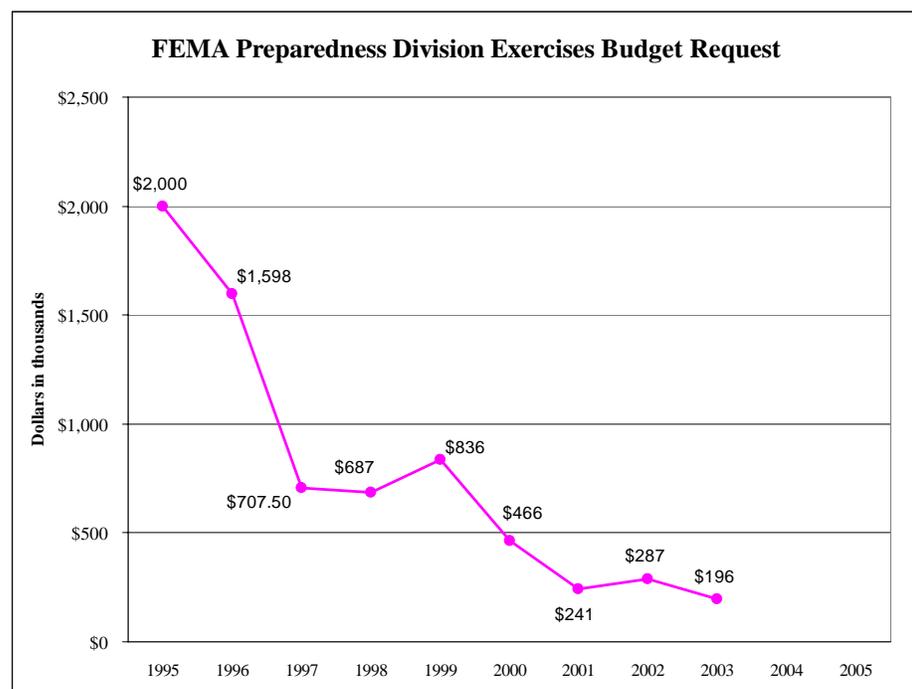
Recommendation #30: We recommend that the Director of the Federal Emergency Management Agency finalize and distribute the Southeast Louisiana Catastrophic Hurricane Plan, using the lessons learned during Hurricane Katrina to improve the plan.

Recommendation #31: We recommend that the Director of the Federal Emergency Management Agency request appropriation or provide other funding, resources, and institutional support to agency components and to state and local partners to complete draft or proposed catastrophic planning initiatives for natural disasters.

Long-term Deterioration in FEMA's Exercise Program

Emergency management exercises are developed to test and validate existing programs, policies, plans, and procedures to address a wide range of disasters to which FEMA must respond. There are numerous types of exercises, ranging from tabletop exercises where participants discuss actions and responses; to command post exercises, where specific aspects of a situation are exercised; to large-scale exercises, which involve multiple entities and a significant planned event with activation of personnel and resources. In 1998, FEMA ceased conducting large-scale exercises, and its exercise program has gradually deteriorated in authority, staff, and budgetary resources. Further, FEMA no longer has a significant role in the development, scope, and conduct of state exercises, though FEMA personnel maintain a presence at state events. FEMA participates in exercises administered by other agencies, including DHS' ODP and the Department of Defense, but these exercises limit FEMA's ability to choose which plans, objectives, and relationships to test.

Until 1993, FEMA had one branch dedicated to planning, preparing, and directing exercises. After Hurricane Andrew, a reorganization dispersed exercise personnel throughout FEMA; and following additional reorganizations, only one section retained a focus on exercises. Currently, the All Hazards Exercise Section in FEMA's Preparedness Division¹²⁰ has one staff member working on exercise planning and development. Compounding the decline in staff, over the past ten years, FEMA's exercises budget decreased by more than 90 percent to less than \$200,000. This funding leaves FEMA unable to conduct a large-scale catastrophic event exercise, which costs between \$500,000 and \$1 million. The decline in budget highlights the diminished focus on exercises in particular and natural hazards preparedness in general.¹²¹



Further, there is now no clear “owner” within FEMA with the authority to plan and implement exercises and induce the participation of the other FEMA

¹²⁰ FEMA's Preparedness Division remained intact at the time of Hurricane Katrina, and is therefore referred to as such in this report. The Division has begun the Second Stage Review transformation into the Preparedness Directorate directly under the Secretary of Homeland Security, outside of FEMA.

¹²¹ Each of FEMA's programs, such as the Radiological Emergency Preparedness Program and the Chemical Stockpile Emergency Preparedness Program, has its own required exercises run by program personnel. There are no required natural disaster exercises.

divisions. While an interoffice memorandum designates the Preparedness Division's All Hazards Exercise Section as the "executive agent within FEMA for all exercise matters," there does not appear to be any coordination between divisions for exercises, giving the designation little real effect.¹²² For example, staff said that the Response Division did not inform the All Hazards Exercise Section of the Hurricane Pam planning exercise until the planning scenario was already taking place. While the Hurricane Pam planning scenario is not a typical test and validation exercise, it is significant that FEMA Response Division staff did not tap Preparedness Division experience in developing the scenario. Similarly, exercise staff have developed scenarios but been unable to solicit participation from the Response and Recovery Divisions. Now, with the Second Stage Review reorganization of DHS, FEMA's exercise staff may move to the new Preparedness Directorate, leaving FEMA's role undefined.

FEMA No Longer Conducts Catastrophic Natural Disaster Exercises on a National Level

Between 1995 and 1998, FEMA conducted several large-scale natural event exercises, targeting different areas threatened by natural disasters such as hurricanes, earthquakes, and floods. In 1998, FEMA leadership determined that FEMA exercises would focus on tabletop rather than full-scale exercises. Staff in the Response Division questioned the need for expensive full-scale exercises, and instead believed small-scale exercises with fewer participants and objectives would be more useful.

Now that FEMA does not conduct its own catastrophic natural disaster exercises, it partners with exercise conductors. For example, FEMA participates in exercises run by the Department of Defense, jointly developing scenarios in order to test Defense and FEMA objectives. When FEMA collaborates with the Department of Defense, there is usually at least one terrorist or weapon of mass destruction event occurring at the same time as a hurricane or other natural disaster event.¹²³ FEMA is on a two-year staggered cycle of exercise planning and conduct, meaning that the agency plans one exercise while another is in more advanced stages, and continues in this way.

¹²² There is currently a draft exercise policy, but it has been on hold through the 2005 hurricane season as FEMA personnel have been responding to events, such as Katrina. Compounding this have been personnel changes within FEMA's Preparedness Division (it has been without a Director for one year), and the shift to the Second Stage Review reorganization.

¹²³ The scenario for Unified Defense '04 was the release of a dirty bomb at the same time that a hurricane strikes the south coast of Texas.

The difficulty with FEMA’s “piggybacking” exercise strategy is that FEMA must wrap its objectives around an exercise that it is able to participate in, as opposed to creating an exercise around the objectives it seeks to test. A set of general objectives has been developed by the All Hazards Exercise Section as a foundation for FEMA participation in national-level exercises. We note very little specificity regarding the plans, procedures, and scenarios FEMA seeks to test.

Diminished FEMA Role in State Exercises

FEMA regional officials built relationships with state and local officials through exercises, grants for exercises, and other preparedness efforts. With changes in grant management including its transfer to ODP, FEMA no longer has a significant role in the development, scope, and conduct of state exercises, though FEMA personnel maintain a presence at state events. Without this mechanism, FEMA regional personnel said they are struggling to maintain relationships with the states to support future responses.

Under its system of grant management in the late 1990s, FEMA required states to participate in a four-year exercise cycle. During the first three years, states tested their response to a natural disaster, a technological disaster, and a national security event. States chose their own scenarios in the fourth year according to risks faced. However, FEMA’s consolidation of EMPG in 2000 eliminated the state exercise cycle requirement. In spring 2004, ODP assumed FEMA’s former responsibility for the development and distribution of the all hazards exercise schedule, a monthly, yearly, and tri-yearly schedule of all planned exercises in the country. This reduced FEMA’s association with another aspect of state exercises. Finally, with the transfer of preparedness grants to ODP in FY 2005, responsibility and authority for the funding and oversight of exercise requirements moved as well, and FEMA could no longer require states to conduct exercises it deemed necessary or appropriate for preparedness. Because ODP provides grant funding, states seek ODP guidance on exercise requirements, where they once turned to FEMA. Nearly all DHS first responder grants provide funds for states to conduct exercises for terrorist and weapons of mass destruction scenarios.

While FEMA does not have control or influence over state exercises, FEMA regional personnel participate in the state exercises in a variety of roles. In Regions IV and VI, a FEMA regional representative is present at most major state exercises as a participant, evaluator, or observer. Regional personnel told us relationships are developed through participation and coordination,

which are invaluable during actual responses. FEMA personnel in both Region IV and VI said that a lack of travel funds, however, has prevented them from participating in state-run exercises sufficient to sustain the relationships they believe are vital to the conduct of emergency management and response. What travel funds they do have are earmarked for specific programs, such as the Radiological Emergency Preparedness Program.

Exercise is one component of preparedness that has been allowed to atrophy over the past decade. While augmenting FEMA's exercise capabilities will not immediately enhance its ability to respond and prepare for natural disasters, it is one of the best ways to determine the appropriateness of policies, plans, and procedures, and alert FEMA to the circumstances and situations for which it is not prepared.

Recommendation #32: We recommend that the Director of the Federal Emergency Management Agency and Under Secretary for Preparedness jointly develop a formal mechanism to ensure continuity between preparedness, response, and recovery by including FEMA regional staff in the Preparedness Directorate's relationships with state emergency management agencies for grants, exercises, planning, technical assistance, and training.

FEMA Should Strengthen Remediation Measures for Lessons Learned

Some of FEMA's difficulties during the response to Hurricane Katrina were first observed during previous disasters and exercises. After Action Reports, facilitator-led discussions (hotwashes), and third party reviews resulted in recommendations and "lessons learned." However, changes for corrective action were not tracked or implemented to prevent problems and issues from recurring. After several unsuccessful attempts at tracking lessons learned, FEMA began using RAMP in 2003 to consolidate, assign, track, and monitor the remediation of issues and the distribution of lessons learned.¹²⁴ FEMA should strengthen RAMP by providing greater management support and by requiring interim remediation measures.

¹²⁴ Another repository of lessons learned is ODP's Lessons Learned Information Sharing website, which consolidates lessons learned in a single site accessible to emergency response providers and homeland security officials throughout the country. Unlike FEMA's RAMP, the Lessons Learned Information Sharing website does not include mechanisms for pushing new lessons to designated staff or for monitoring the implementation of recommendations. It serves as an "information clearinghouse" rather than a remediation tool.

Following are some examples of issues FEMA still needs to remediate:

- In 2003, Hurricane Isabel demonstrated that FEMA needed a better understanding of state capability to respond to a disaster. FEMA expected the states affected by Hurricane Isabel to support themselves with basic provisions for the first 72 hours, but states required federal assistance sooner. In 2003, it was recommended that FEMA communicate closely with the states regarding their mutual expectations.¹²⁵ However, in 2005, FEMA remained unable to determine the point at which states will become overwhelmed and require federal assistance. FEMA's awareness of state capabilities, now based on state self-assessments and a third-party review conducted and compiled by a nongovernmental organization, does not include 21 states and territories and has no requirement that state assessments be kept current.
- During the *Top Officials 2* exercise in 2003, states affected by a simulated biological attack requested major disaster declarations under the Stafford Act, but FEMA interpreted the biological attack not to be within the scope of the Act and ineligible for assistance. During the exercise, the Department of Health and Human Services provided assistance under its authority, which is less comprehensive than the assistance available under the Stafford Act. FEMA did not alter its interpretation or seek amendment to the Stafford Act by the time of *Top Officials 3*, in April 2005.¹²⁶
- The 2004 hurricanes highlighted that FEMA had insufficient methods to track logistics assets. In December 2004, FEMA added improving asset visibility as a remedial action in RAMP.¹²⁷ While FEMA began implementing a total asset visibility program in the summer of 2005, during Hurricane Katrina FEMA remained unable to track most state requests through to order fulfillment. Staff compiled reports manually with paper tracking forms and *ad hoc* spreadsheets.

FEMA's RAMP program provides a tool to address these issues. It combines the essential components of a lessons learned system to: collect issues from hotwashes around the country, consolidate issues into a single report, assign responsibility for fixing problems, and monitor the progress of those solutions. However, the program does not have consistent high-level oversight or

¹²⁵ DHS 2003 Performance and Accountability Report, February 13, 2004, p. 170.

¹²⁶ *A Review of the Top Officials 3 Exercise*, Report Number OIG-06-07, November 2005.

¹²⁷ Special RAMP report from the 2004 hurricane season dated November 29, 2004, issue LG-2 and LG-4.

support, and it does not have strong mechanisms to ensure completion of assigned remediation tasks. The RAMP program manager and remedial action managers in each FEMA division perform those tasks as collateral duties. The FEMA divisions have authority to reject assigned RAMP tasks and to set their own completion date for accepted tasks. While this flexibility can be helpful – for example, it allows a division to refuse a new task for a problem recently addressed – it also leads to delays. In August 2005, there were four action plans overdue and five missed remediation completion dates, some older than three months. Monthly RAMP reports did not exist for September, October, November, and December 2005, because of the increased agency demands due to hurricane response activities. FEMA needs to emplace stricter oversight of RAMP task completion.

A second issue with RAMP is the need for interim solutions when remediation plans are long-term. As of December 2005, RAMP contained eight outstanding remedial action issues that have a remediation completion date greater than one year from the time the issue was assigned. For the RAMP action to improve logistics asset visibility, staff revised the completion date twice, extending it to October 2009. We observed no interim remediation measures in RAMP for these long-term solutions. Since the majority of disasters to which FEMA responds recur on a yearly cycle, such as hurricanes, long completion dates allow the problems and issues to recur. We recognize that particular issues may require long-term remediation plans. However, FEMA should implement interim solutions to lessen the impact of known problems.

Recommendation #33: We recommend that the Director of the Federal Emergency Management Agency oversee the Remedial Action Management Program to maintain focus and provide support for corrective action.

Recommendation #34: We recommend that the Director of the Federal Emergency Management Agency direct its Remedial Action Management Program to identify interim remediation plans for issues that have a remediation completion date of greater than one year from the date assigned.

Future Considerations

The integration of FEMA, natural hazards preparedness, and disaster response and recovery into DHS requires additional work and a level of support not

currently demonstrated. After the September 11, 2001, terrorist attacks, terrorism prevention and preparedness overshadowed preparedness for natural hazards, both in perception and in application. This has occurred even though natural disasters are more frequent and cannot be prevented. An all-hazards approach can address preparedness needs common to both types of disasters. DHS needs to take a greater role in ensuring that all four phases of emergency management – preparedness, response, recovery, and mitigation – are managed throughout the department on an all-hazards basis. DHS’ leadership in these areas will assist in unifying the many DHS components with emergency management and response roles into a single, integrated culture that can enhance and sustain its all hazards capability.

Working Toward All-Hazards Preparedness

The response to Hurricane Katrina demonstrated that DHS’ efforts to protect and prepare the nation for terrorist events and natural disasters have not yet translated into preparedness for all hazards. State emergency management staff we interviewed said the majority of DHS preparedness grants are spent on terrorism preparedness, which has not afforded sufficient support or funding for natural hazards preparedness. However, a July 2005 Government Accountability Office report said that while some DHS grants have prescriptive requirements focused on terrorism, most of the grant funding is applicable to all-hazards preparedness. Many preparedness measures funded by DHS first responder grants can serve both means, and federal and state emergency managers need to adopt an all-hazards approach. Second, emergency managers need to establish a baseline for preparedness at both the state and federal level in order to meet increasing standards of preparedness.

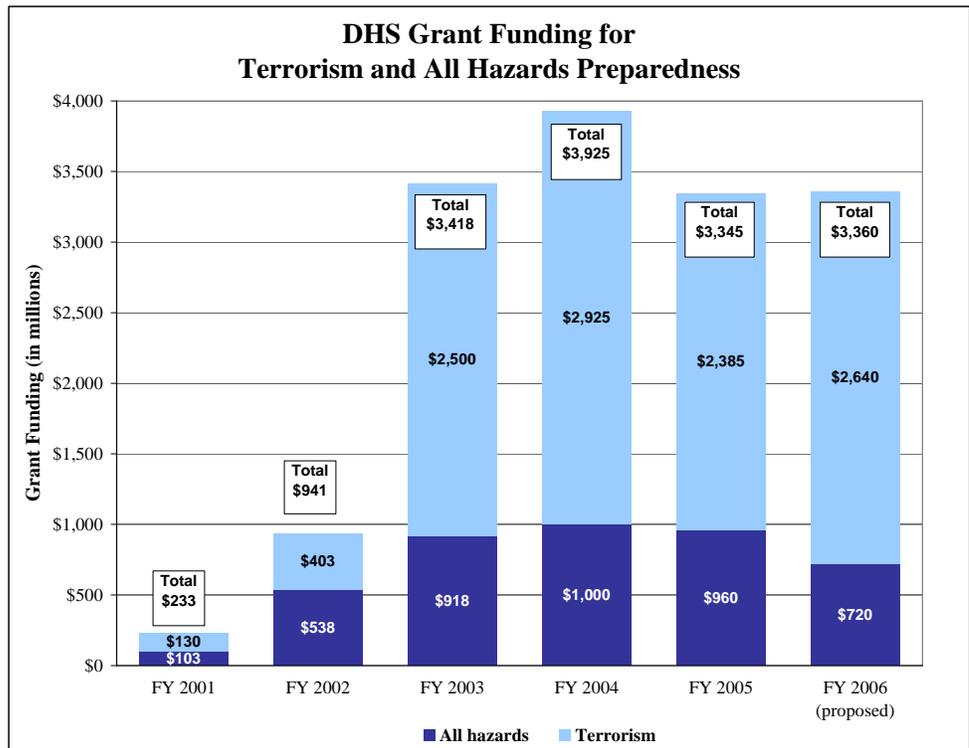
Directing Preparedness Activities Toward All Hazards

Homeland Security Presidential Directive-5, “Management of Domestic Incidents,” calls for a single national incident management system. Homeland Security Presidential Directive-8, “National Preparedness,” calls for the development of a national preparedness goal. Together these directives form the backbone of the National Preparedness System, encompassing seven component documents: the NRP, the National Preparedness Goal, the National Preparedness Guidance, the 15 Homeland Security Planning Scenarios, the Universal Task List, the Target Capabilities List, and NIMS.¹²⁸

¹²⁸ The National Preparedness Goal is still in draft form.

There are differences between responses to terrorist incidents and natural disasters such as hurricanes. For example, a response to a weapon of mass destruction would require expert assessments, protective gear, and law enforcement investigation. However, the incident management techniques and resources for terrorist events and natural disasters are more similar than different: use of the incident command structure, communications and information techniques, applying federal assistance under the Stafford Act. The greatest delta is perception. Staff in the Hurricane Katrina affected states described a heavy emphasis on terrorism funding and expressed bafflement at the lack of natural hazards funding. Few perceived grants as “all-hazard.” This perception may be fueled by the fact that all DHS preparedness grants are now managed by an entity – ODP – whose mandate was originally terrorism preparedness. Additionally, only 2 of the 15 National Planning Scenarios, a compilation of potential disasters that ODP developed to support preparedness, involve natural disasters (a major hurricane and a major earthquake). Though the documents in the National Preparedness System address all hazards, the prevalence of terrorism-related items in them fosters a perception that the preparedness for and response to a terrorist event is different from that of a naturally occurring event.

Further, requirements associated with federal emergency preparedness grants to states also support the perception that terrorism preparedness is separate from natural disaster preparedness. A majority of grants to states emphasize preparedness for terrorism and weapons of mass destruction and limit use of the grants to terrorism-preparedness measures, such as the purchase of specific personal protective equipment. ODP staff said that state grantees are failing to take advantage of the grants’ flexibility and use them for all-hazards preparedness measures. State emergency managers questioned grant packages that required so much spending on potential events involving terrorism and weapons of mass destruction, when they received far less funding to prepare for natural disasters that are certain to recur. For example, the Gulf Coast region experienced 91 major disaster and emergency declarations from September 1, 1995, to September 1, 2005, all due to natural hazards such as hurricanes and flooding. Yet a significant portion of the federal funding for these states is earmarked for terrorism preparedness to the exclusion of natural hazards preparedness.



One official involved in the Hurricane Katrina response added that DHS’ preparations for natural hazards should be considered in the same context as preparations for National Security Special Events, which are high profile, large-scale events that present high-probability targets. National Security Special Events, though historically less a cause of loss of life and property than natural disasters, receive millions of preparedness dollars. For example, for the 2005 Super Bowl in Jacksonville, Florida, overtime costs alone, which DHS helped fund, topped \$1.5 million. Over 50 state, local, and federal agencies including the U.S. Secret Service, FEMA, the U.S. Coast Guard, Customs and Border Patrol, and the Federal Bureau of Investigation had worked for over a year to establish security for the 2006 Super Bowl in Detroit, Michigan.

Preparedness Baseline Needed

Although the seven components of DHS’ National Preparedness System establish goals and targets for preparedness, they do not assess current state or federal capabilities in terms of plans, equipment, staff, training, and resources. FEMA does not currently have a system to determine when a disaster is

beyond the capabilities of state and local governments; and systems to assess state capabilities remain unable to determine the point at which the state will need federal assistance. Currently, there is no baseline of preparedness for either the states or the nation, though there have been several attempts to develop baselines. Such assessments are needed to plan response efforts and to remediate shortfalls.

Federal awareness of when an individual state will become overwhelmed and require federal support enables preparation and is essential to a rapid and seamless response. Differences in state and local capabilities translate into differences in the federal response. For example, the state of Florida's response to October 2005's Hurricane Wilma required significantly less federal support than September 2003's Hurricane Isabel response in North Carolina, though Hurricane Wilma far surpassed Hurricane Isabel in strength, damage, and mortality. North Carolina required federal commodities right away, whereas Florida supplied much of its own commodities and logistics management throughout its response to the storm. What is catastrophic for one state may not be catastrophic for another. Similarly, unpredictable disasters may render an otherwise capable state helpless by destroying essential infrastructure, including emergency response commodities. Therefore, each state and potentially any disaster may have a different trigger at which a state becomes overwhelmed. This prevents the federal government from establishing a single, national point – such as after the first 72 hours of a disaster – at which the federal government prepares to intervene.

FEMA has never had an effective system for assessing state readiness or determining a standard to which a state must be prepared. Beginning in the late 1990s, FEMA used the Capabilities Assessment for Readiness to assess state capabilities. Designed jointly by FEMA and the National Emergency Management Association, Capabilities Assessment for Readiness required states to conduct self-assessments. However, the program had flaws, including the short time frame allowed to complete assessments, limited empirical data about state capability, insufficient confidence in the validity and accuracy of the of the self-assessment process, and a lack of information from which to determine how large a disaster each state can handle on its own.¹²⁹

¹²⁹ FEMA Office of Inspector General, *Review of FEMA's Cooperative Agreement Process*, Report #I-01-99, March 1999.

In 2002, the Emergency Management Accreditation Program replaced the Capabilities Assessment for Readiness for state assessments.¹³⁰ The Emergency Management Accreditation Program is a non-governmental association that assesses states' emergency management capabilities. Like the Capabilities Assessment for Readiness, the Emergency Management Accreditation Program assessments rely on state self-assessments and do not calculate the scale of disaster a state can manage without federal assistance. However, the Emergency Management Accreditation Program adds on-site, peer-evaluations of state assessments to accredit states on a voluntary basis. When the management of emergency management grants transferred from FEMA to ODP, FEMA lost its authority to require state assessments and validation of them under an accreditation program. In 2005, ODP encouraged but did not require states to use Emergency Management Accreditation Program assessments. For FY 2006, ODP plans to make grant awards contingent on states using an assessment like the Emergency Management Accreditation Program, but ODP will not require accreditation.

FEMA remains involved in the state assessment process because FEMA contracts out to the Emergency Management Accreditation Program to perform the assessments in the National Emergency Management Baseline Capabilities Assurance Program (NEMB-CAP). NEMB-CAP is a one-time project to combine Emergency Management Accreditation Program state assessments into a national preparedness baseline. Begun in 2003, NEMB-CAP did not meet its 2005 completion deadline. If the project is completed, the baseline will be difficult to use in comparative analysis because early assessments may no longer be current or relevant. Of the 56 states and territories eligible for assessment, only 35 (62.5 percent) have completed assessments since 2003. The NEMB-CAP results to date show insufficient state capabilities, and there does not appear to be a system to address the shortfalls. In its most recent progress report, the NEMB-CAP has demonstrated that only 2 of the 35 assessed states are fully compliant with the Emergency Management Accreditation Program standards. FEMA and ODP have not yet determined whether states that scored higher should receive additional funds because they spent previous grants effectively, or whether states that scored lower should receive additional funds because they have greater deficiencies.

An additional weakness is that NEMB-CAP does not include a federal assessment component to determine the readiness of FEMA and other federal

¹³⁰ Separate Capabilities Assessment for Readiness assessments are still in use for local and tribal governments.

agencies to support states. NEMB-CAP's premise is that because the state response precedes the federal one, an assessment of the readiness of each state provides a baseline of the readiness of the nation. However, Hurricane Katrina demonstrated that federal readiness could not be taken for granted. A two-tiered state and federal assessment would provide a more realistic and "big picture" view of national readiness and allow FEMA to determine areas of weakness across all levels of government.

Recommendation #35: We recommend that the Under Secretary of Preparedness for the Department of Homeland Security provide states with training on the applicability of the National Preparedness System and preparedness grants to all hazards, including natural disasters.

Recommendation #36: We recommend that the Under Secretary of Preparedness for the Department of Homeland Security develop a system to assess state capability to respond to a disaster, without federal assistance and in respect to a minimum level of preparedness based on the Emergency Management Accreditation Program standard.

Recommendation #37: We recommend that the Director of the Federal Emergency Management Agency develop a method for determining the level of readiness of FEMA to respond to a disaster that exceeds a state's capabilities.

Developing DHS Culture in Carrying Out Emergency Management Responsibilities

Emergency management refers to the comprehensive approach to preparing for, responding to, recovering from, and mitigating the effects of emergencies and disasters. With the creation of DHS, what was traditionally the responsibility of one agency has evolved into a department-wide responsibility. DHS is positioned to significantly enhance the nation's emergency management capability. It has more internal resources within one department than what existed when FEMA was an independent agency. DHS is the executive agent of the NRP and the NIMS. Finally, it is the central point of oversight to integrate the four phases of emergency management.

Many DHS components provide support throughout the emergency management phases of preparedness, response, recovery, and mitigation.

Under the Federal Response Plan, FEMA was the lead for only 2 of 12 ESFs: Information and Planning and US&R. Under the NRP, DHS is either the coordinator or has lead responsibilities for 8 of the 15 ESFs.¹³¹ In addition to the ESFs that FEMA leads, DHS furnishes leadership for ESF-15, External Affairs, with its Public Affairs staff, and ESF-2, Communications, with National Communications System staff. Several DHS components support ESF-13, Public Safety and Security, including the U.S. Secret Service, U.S. Coast Guard, Immigration and Customs Enforcement, Customs and Border Protection, and Transportation Security Administration. Moreover, of the 57 federal departments, agencies, and other organizations tasked by FEMA (mission assigned) to support the federal or state operation for Hurricane Katrina during our review period, 14 were DHS components:

Responding DHS Components
Border and Transportation Security
Citizen and Immigration Services
Coast Guard
Customs and Border Protection
Federal Law Enforcement Training Center
Federal Protective Service
Immigration and Customs Enforcement
Information Analysis and Infrastructure Protection
National Communications System
Office of State and Local Government Coordination and Preparedness
Office of the Chief Financial Officer
Science and Technology Directorate
Secret Service
Transportation Security Administration

In addition, DHS is the central element in identifying Incidents of National Significance and coordinating activities in support of other federal departments and agencies acting under their own authority. DHS is responsible for the establishment and operation of critical coordination and operation centers, field office facilities and organizational elements, such as the IIMG. DHS' HSOC continually monitors potential disasters and emergencies and provides informational and operational support during Incidents of National Significance. Also, DHS is responsible for identifying personnel to lead, coordinate, and communicate activities in such critical roles as the PFO, the FCO, and the IIMG Director.

DHS' emergency response role was further illustrated when then Under Secretary for EP&R requested, and the Secretary supported, the use of all

¹³¹ See page 31 for a list of ESFs for which DHS is either the coordinator or primary agency under the NRP.

available DHS employees to respond to the needs of the disaster and reinforce the department's all-hazards capabilities. During our field interviews one FEMA employee suggested that all DHS employees should be assigned to an emergency response function and provided with the necessary training to perform that function. The employee also felt that a department-wide credentialing program could be used to measure proficiency.

Finally, DHS' central role in emergency management is reinforced by the changes it has made to assign responsibility for the four phases of emergency management (preparedness, response, recovery, and mitigation) within the department. DHS began transferring preparedness grant and exercise responsibilities from FEMA to the Office of State and Local Government Coordination in 2004. The Secretary's Second Stage Review reinforced the redistribution by creating a Preparedness Directorate in 2005, with FEMA retaining responsibility for response, recovery, and mitigation. Ensuring that all four phases of emergency management are working harmoniously is the responsibility of the DHS Secretary.

Merging the preparedness activities within one office allows for department-wide priority setting of funds and resources that are available for grants, training, exercises, equipment, personnel, and other preparedness activities. With all of its preparedness activities and resources consolidated, DHS is better poised to assist state, local, and tribal entities, and embrace the capabilities of the private sector in adopting an all-hazards approach to national preparedness. Such an approach considers the risks of not only natural and accidental disasters, but also events that result from terrorism.

DHS' implementation of Homeland Security Presidential Directive-8 through its new Preparedness Directorate requires the department to coordinate the development of a national all-hazards preparedness goal that would establish measurable readiness priorities and targets that balance the potential threat of terrorist attacks and large-scale disasters with the resources required to prevent, respond to, and recover from them.¹³² The consolidated or "one-stop shop" nature of these activities diminish the possibility of gaps or duplication in allocating funds and resources on a risk-oriented basis. Unlike its previous designation where distinct agencies within DHS endeavored to separately assist state, local, and tribal governments in preparedness functions, the Preparedness Directorate is positioned to effectively target DHS' cumulative

¹³² *DHS's Efforts to Enhance First Responders' All-Hazard Capabilities Continue to Evolve*, GAO-05-652, July 2005, available at <http://www.gao.gov/new.items/d05652.pdf>, p. 2 (accessed on January 10, 2006).

resources, such as grants to urban areas for increased security and assistance to firefighters, in an integrated and complementary manner.

It is critical that DHS develop a culture that maximizes the capabilities of its components, personnel, and resources; establishes performance expectations; and adequately funds department priorities. To this end, DHS needs to revise the NRP during its upcoming scheduled review to aggressively address deficiencies; streamline, clarify, and enhance processes, protocols, and procedures so as not to delay critical decision-making; and incorporate lessons learned from Hurricane Katrina. DHS must also provide the necessary emergency management leadership to other federal departments, agencies, and other organizations when responding to Incidents of National Significance.

Recommendation #38: We recommend that the Under Secretary of Preparedness for the Department of Homeland Security, in coordination with the Director of the Federal Emergency Management Agency, ensure all DHS employees receive training on DHS responsibilities under the NRP and NIMS.

Stafford Act Authorities are Sufficient, Long-Term Recovery Issues Need to be Addressed

In general, we determined the authorities of the Stafford Act are adequate to deliver the necessary supplemental assistance required after such a catastrophic event, subject to funding caps, cost shares, and time limitations. However, the Stafford Act specifically limits Department of Defense assistance to ten days.¹³³ In statute and federal regulation, which implements the Stafford Act, we were not able to establish a provision for an extension of time for this assistance.¹³⁴ Other provisions of Stafford Act assistance contain provisions for time extensions, waivers of funding caps, and the ability to increase the funding cost share of eligible disaster related costs giving the President or his designee the flexibility to provide assistance, based on the severity and magnitude of the event. For example, the time limit for

¹³³ According to 44 CFR 206.34, the 10-day limit only applies to instances where FEMA's Associate Director can direct the Department of Defense to utilize its personnel and equipment "during the immediate aftermath of an incident which may ultimately qualify for a Presidential declaration of a major disaster or emergency, when threats to life and property are present which cannot be effectively dealt with by the State or local governments."

¹³⁴ 42 U.S.C. §5170b, Essential Assistance, Section 403; and 44 CFR Section 206.34, Request for utilization of Department of Defense resources.

completing a direct federal assistance mission assignment is 60 days after the President's declaration.

However, based on extenuating circumstances, or unusual project requirements, FEMA may extend this time limitation.¹³⁵ Additionally, the President or his designee can approve up to 100 percent funding of direct federal assistance for an extended period of time. For example, in Louisiana, direct federal assistance mission assignments are eligible for 100 percent funding through and including June 30, 2006. In Mississippi, direct federal assistance mission assignments were eligible for 100 percent funding through and including March 15, 2006. And, in Alabama, direct federal assistance mission assignments were eligible for 100 percent funding for 60-days from the date of the major disaster declaration which was August 29, 2005. DHS may want to consider whether this limitation has an effect on the overall federal response to catastrophic events.

Congress intended the Stafford Act to provide an orderly and continuing means of supplemental assistance by the federal government to state and local governments in carrying out their responsibilities to alleviate the suffering and damage which result from declared disasters. The authorities, as applied by FEMA, have demonstrated to be dynamic and sufficient in addressing the needs of individuals, states, and local governments in most emergency and major disaster events declared by the President. As the Stafford Act was intended to provide supplemental federal disaster relief and emergency assistance, we urge that considerable caution be exercised when recommending changes to this authority in light of the flexibility that already exists.

However, we note areas where individual needs have been demonstrated and authorities are not provided: (1) the ability to address individual physical loss from an event that results in widespread physical catastrophic damages; and (2) the ability to address individual economic loss from an event that results in widespread economic disruption.

As previously discussed, FEMA's IHP has a maximum financial cap of \$26,200. The program's direct federal assistance provision may not be extended past 18-months after the date of a declared major disaster, except when the President extends that period due to extraordinary circumstances that would be in the public interest. In events where entire communities have been

¹³⁵ 44 CFR 206.208 (d).

affected and the vast majority of housing stock destroyed, there is no other current mechanism, aside from FEMA's IHP, for the federal government to address individual needs for persons without insurance or persons unable to obtain a loan. Congressional consideration may be warranted to better position the federal government to address widespread physical catastrophic damages and economic loss issues of individuals affected by disasters.

Management Comments and OIG Analysis

The Department did not provide its official comments to our report until after the report was signed on March 31, 2006. Although we attached management comments, which were dated April 4, 2006, we did not perform an in depth analysis of them. We requested the Department to advise us, within 90 days, of the actions taken or planned to implement each of our recommendations. We consider all 38 recommendations to be unresolved and open.

Hurricane Katrina – Storm Track, Key Events and Decisions August 24 – September 30, 2005	
Wednesday, August 24, 2005	
0500 hrs ¹³⁶	<ul style="list-style-type: none"> • Tropical depression 12 – to become Hurricane Katrina – identified about 270 miles ESE of Florida.
0700 hrs	<ul style="list-style-type: none"> • FEMA Hurricane Liaison Team activated. • FEMA Region IV RRCC activated at modified level in Thomasville, GA
Thursday, August 25, 2005	
0500 hrs	<ul style="list-style-type: none"> • Tropical Storm Katrina is located 90 miles east of Fort Lauderdale, FL
0700 hrs	<ul style="list-style-type: none"> • FEMA NRCC Red Team activated at modified Level 2 • FEMA NRCC ESFs 1 (with Air Ops Element), 3, 4, 5, 7, 15, and a Military Liaison activated
1200 hrs	<ul style="list-style-type: none"> • FEMA Region IV RRCC transitioned from Thomasville at Level 3 to Atlanta, GA at Level 2; ESFs 1, 3, 4, 7, 14, 15, and a Military Liaison activated.
1530 hrs	<ul style="list-style-type: none"> • Tropical Storm Katrina becomes a hurricane, located 25 miles east of Fort Lauderdale, FL
1830 hrs	<ul style="list-style-type: none"> • Hurricane Katrina makes first landfall in Florida as a Category 1 hurricane.
Friday, August 26, 2005	
0500 hrs	<ul style="list-style-type: none"> • National Hurricane Center predicts second landfall near the Florida panhandle Category 1 storm on August 28 or 29, 2005
1130 hrs	<ul style="list-style-type: none"> • Hurricane Katrina strengthened to a Category 2 storm; National Hurricane Center predicts second landfall near the Florida panhandle as Category 3 storm on August 29, 2005.
1700 hrs	<ul style="list-style-type: none"> • National Hurricane Center advises Hurricane Katrina’s track has shifted significantly to the west; predicts second landfall near eastern Louisiana and Mississippi coast • Governor of Louisiana declares State of Emergency • Alabama Emergency Operations Center activated
Saturday, August 27, 2005	
0700 hrs	<ul style="list-style-type: none"> • FEMA NRCC activated at Level 1 (24-hour operations) • FEMA NRCC ESFs 2, 6, 8, 9, 10, 11, 12, 13, 14, 15, and EMAC activated
0830 hrs	<ul style="list-style-type: none"> • Louisiana Emergency Operations Center activated • Governor of Mississippi declares State of Emergency • Mississippi Emergency Operations Center activated
1000 hrs	<ul style="list-style-type: none"> • FEMA Emergency Response Team-Advanced activated; pre-staged at FEMA RRCC Region IV in Atlanta, GA • FEMA Emergency Response Team-Advanced activated and deployed to Alabama Emergency Operations Center • FEMA Emergency Response Team-Advanced activated and deployed to Mississippi Emergency Operations Center

¹³⁶ All times are eastern daylight time.

Appendix A
Hurricane Katrina Event Timeline

1200 hrs	<ul style="list-style-type: none"> FEMA Region IV RRCC activated at Level 1; all ESFs plus a Military Liaison activated FEMA Region VI RRCC activated at Level 1; all ESFs plus a Military Liaison and U.S. Coast Guard activated FEMA Emergency Response Team-National activated and deployed to Louisiana Emergency Operations Center
1700 hrs	<ul style="list-style-type: none"> Contra Flow activated on Mississippi and Louisiana interstate highways
1944 hrs	<ul style="list-style-type: none"> Emergency Declaration FEMA-3212-EM-LA issued for Louisiana; FCO-William Lokey
Sunday, August 28, 2005	
	<ul style="list-style-type: none"> Governor of Alabama declares State of Emergency
1115 hrs	<ul style="list-style-type: none"> Emergency Declaration FEMA-3213-EM-MS issued for Mississippi; FCO-William Carwile
by 1700 hrs	<ul style="list-style-type: none"> Contra Flow deactivated on Mississippi and Louisiana interstate highways
1830 hrs	<ul style="list-style-type: none"> Emergency Declaration FEMA-3214-EM-AL issued for Alabama; FCO-Ron Sherman
Monday, August 29, 2005	
0710 hrs	<ul style="list-style-type: none"> Hurricane Katrina makes second landfall over Southeast Louisiana as a Category 4 storm
0921 hrs	<ul style="list-style-type: none"> First report of levee breaches; City of New Orleans begins to flood
1448 hrs	<ul style="list-style-type: none"> Major Disaster Declaration FEMA-1603-DR-LA issued for Louisiana; FCO-William Lokey Major Disaster Declaration FEMA-1604-DR-MS issued for Mississippi; FCO-William Carwile
2051 hrs	<ul style="list-style-type: none"> Major Disaster Declaration FEMA-1605-DR-AL issued for Alabama; FCO-Ron Sherman
Tuesday, August 30, 2005	
	<ul style="list-style-type: none"> DHS' Secretary, Michael Chertoff, declares Hurricane Katrina an Incident of National Significance; Under Secretary for EP&R Michael Brown appointed PFO
Thursday, September 1, 2005	
	<ul style="list-style-type: none"> Alabama operations transition to Joint Field Office in Montgomery, AL
Friday, September 2, 2005	
	<ul style="list-style-type: none"> Emergency declarations issued to support Hurricane Katrina evacuees – Arkansas, Texas
Monday, September 5, 2005	
	<ul style="list-style-type: none"> Vice Admiral Thad Allen appointed as Deputy PFO for Hurricane Katrina in New Orleans Emergency declarations issued to support Hurricane Katrina evacuees - Tennessee, Georgia, Oklahoma, Florida, West Virginia, North Carolina, Utah, and Colorado
Tuesday, September 6, 2005	
	<ul style="list-style-type: none"> Expedited Assistance authorized in the amount of \$2,000 for eligible applicants under the Individuals and Households Program

Appendix A
Hurricane Katrina Event Timeline

Wednesday, September 7, 2005	
	<ul style="list-style-type: none"> Emergency declarations issued to support Hurricane Katrina evacuees – Michigan, the District of Columbia, Washington, Oregon, New Mexico, and Illinois
Friday, September 9, 2005	
	<ul style="list-style-type: none"> Vice Admiral Thad Allen appointed as PFO for Hurricane Katrina
Saturday, September 10, 2005	
	<ul style="list-style-type: none"> Emergency declarations issued to support Hurricane Katrina evacuees – Kentucky, Missouri, South Carolina, South Dakota, Pennsylvania, Kansas, Alabama, Indiana, Iowa
Monday, September 12, 2005	
	<ul style="list-style-type: none"> Under Secretary Michael Brown resigns as FEMA’s Director Louisiana operations transition to Joint Field Office in Baton Rouge, LA Emergency declarations issued to support Hurricane Katrina evacuees – Virginia and Arizona
Tuesday, September 13, 2005	
	<ul style="list-style-type: none"> R. David Paulison appointed as Acting Director of FEMA Emergency declarations issued to support Hurricane Katrina evacuees – Minnesota, Nevada, Idaho, Nebraska, Connecticut, North Dakota, California, Wisconsin, Ohio, Maryland, Massachusetts, and Montana
Saturday, September 17, 2005	
	<ul style="list-style-type: none"> Mississippi operations begin transition to Joint Field Office in Jackson, MS
Sunday, September 18, 2005	
	<ul style="list-style-type: none"> Mike Bolch appointed as FCO for Alabama
Monday, September 19, 2005	
	<ul style="list-style-type: none"> Joint Field Office in Jackson, MS becomes fully operational Emergency Declarations issued to support Hurricane Katrina evacuees – Rhode Island, Maine, New Jersey, and New Hampshire
Wednesday, September 21, 2005	
	<ul style="list-style-type: none"> Vice Admiral Thad Allen appointed as FCO in Louisiana, Mississippi, and Alabama
Saturday, September 24, 2005	
0330 hrs	<ul style="list-style-type: none"> Hurricane Rita makes landfall as Category 3 storm in Texas and Louisiana
Wednesday, September 28, 2005	
	<ul style="list-style-type: none"> Transitional Housing Assistance authorized for eligible applicants in the most affected areas of Louisiana and Mississippi in the amount of \$2,358 for rent without home inspection under the Individuals and Households Program
Friday, September 30, 2005	
	<ul style="list-style-type: none"> Emergency Declarations issued to support Hurricane Katrina evacuees – New York and Delaware

FEMA's Individual Assistance Programs

FEMA may provide financial assistance and, if necessary, direct services to eligible individuals and households who, as a direct result of a major disaster, have necessary expenses and serious needs and are unable to meet such expenses or needs through other means.¹³⁷ FEMA is authorized to administer four distinct Individual Assistance programs in response to disasters declared by the President: (1) Individuals and Households; (2) Crisis Counseling; (3) Unemployment Assistance; and, (4) Legal Services.

Individuals and Households Program

The Individuals and Households Program is FEMA's primary mechanism to assist individuals and households recover from damages or losses sustained as a direct result of a disaster, when losses are not covered by insurance and property has been damaged or destroyed. Applicants must meet specific eligibility criteria to qualify for assistance, and the program is designed to assist only with critical expenses that cannot be covered by other means, such as loans from the SBA. It does not cover all losses from damage to homes, personal property, and household items that result from a disaster and is not intended to restore damaged property to its condition before a disaster.

For Hurricane Katrina, an individual or household could receive a maximum of \$26,200 of IHP assistance, with repair and replacement assistance capped at \$5,200 and \$10,500 respectively.¹³⁸ Rental assistance was provided to renters whose homes were uninhabitable due to the disaster and to homeowners until more permanent repairs could be made to their primary residence. The combination of all forms of IHP financial assistance cannot exceed the maximum grant of \$26,200.

When housing resources are not available within an affected area to accommodate the needs of disaster victims, FEMA is authorized to provide direct federal assistance, such as mobile homes and travel trailers, for up to 18 months following a declared major disaster. Using lessons learned from previous disasters, FEMA developed a concept of operations and procurement strategy in August 2004 to address direct housing needs associated with multiple disasters. The strategy would allow FEMA to: (1) establish a temporary housing surge capacity of 2,500 units; (2) establish primary

¹³⁷ 42 U.S.C. §5174 and 44 CFR Part 206, Subparts D and F.

¹³⁸ The maximum grant amount is adjusted annually to reflect changes in the Consumer Price Index. See 69 FR 61515 (October 19, 2004).

contractors for installation, maintenance, site inspection of units, and deactivation; (3) develop uniform procurement specifications for temporary housing units; (4) develop a statement of work for refurbishing and deploying units in storage; (5) establish staffing requirements to support field and storage operations; and, (6) support shelter operations.

While supporting 2004 disasters, FEMA began to establish additional capability and capacity in its housing unit inventory, and formalized the use of Technical Assistance Contractors.¹³⁹ As of May 2005, FEMA's existing housing inventory was approximately 4,832 mobile homes and travel trailer units.¹⁴⁰

As of November 16, 2005, FEMA had received 1,680,516 registrations for IHP assistance from residents of the three affected states, determined that 984,432 (or 59 percent) were eligible, and approved approximately \$3.5 billion in assistance.¹⁴¹ IHP has two major components: Housing Assistance and Other Needs Assistance. Housing Assistance is 100 percent federally funded and administered and provides assistance for temporary rental assistance, home repairs, and home replacement. Other Needs Assistance is a cost-shared partnership between FEMA and the states.¹⁴² As part of this partnership, FEMA and the states engage in annual coordination efforts to determine how Other Needs Assistance will be administered for the coming year. States may choose to administer the component or to have FEMA administer it. For Hurricane Katrina, all three states elected to have FEMA administer the program; however, each retained influence over the program by determining which household items were eligible for reimbursement.

Contract inspectors, under FEMA's Inspections Services Branch, verify personal and real property losses and damages of individuals and households while FEMA personnel verify reported disaster-related deaths as well as medical and dental needs for the IHP. Inspectors visit homes of applicants to verify disaster-related damages to real and personal property. Findings are uploaded into FEMA's processing system, the National Emergency Management Information System, which in most disasters automatically determines eligibility in over 90 percent of cases. FEMA caseworkers process all cases that cannot be processed automatically to determine eligibility for IHP.

¹³⁹ Approximately 20,000 temporary housing units were assigned to the field to support FEMA's Disaster Housing Operations mission in 2004.

¹⁴⁰ FEMA Direct Housing 2005 Pre-Hurricane Season Briefing, May 26, 2005.

¹⁴¹ FEMA Data Status Report as of November 16, 2005.

¹⁴² Under the other needs assistance component of the IHP, a state must provide a 25 percent match.

Crisis Counseling

FEMA provides financial assistance for professional counseling services to relieve mental health problems caused or aggravated by a disaster or its aftermath. Under the Crisis Counseling Assistance and Training Program (Crisis Counseling Program), FEMA provides assistance to states through the Immediate Services Program and Regular Services Program. The Immediate Services Program affords funding for screening or diagnostic techniques that can be applied to meet mental health needs immediately following the disaster. The duration of the Immediate Services Program is 60 days from the declaration date, with a potential extension of 30 days or more. The Regular Services Program generally expands upon the existing Immediate Services Program to identify and reach impacted populations more effectively. The Regular Services Program funds up to nine months of services from the date of the award notice, with potential extensions of up to three months, contingent upon the ongoing need. For catastrophic disasters, the Regular Services Program often is extended beyond three months.

The Crisis Counseling Program is intended to supplement – not supplant – a state's mental health program. The program is 100 percent FEMA-funded. The Center for Mental Health Services under the U.S. Department of Health and Human Services consults with state officials and helps ensure that appropriate services are provided. Historically, only states receiving a disaster declaration were eligible to receive funding for the Crisis Counseling Program. Recognizing the special needs resulting from Hurricane Katrina and the unprecedented relocation of disaster victims, FEMA, in consultation with the Center for Mental Health Services, allowed states to apply for funding without a disaster declaration; funding was provided through the existing declarations. FEMA monitored applicant registrations from all states and when a threshold of 150 was exceeded, FEMA coordinated with the Center for Mental Health Services and contacted each State Emergency Management Agency and State Mental Health Authority to invite applications for the Immediate Services Program. As of November 17, 2005, 35 states and the District of Columbia had met the threshold. The Immediate Services Program was initiated for 33 states and the District of Columbia; FEMA approved \$24,423,729 to fund the program.¹⁴³

¹⁴³ FEMA Recovery Division, November 17, 2005. Two states decided not to initiate the Immediate Services Program because needs were met through existing resources.

Disaster Unemployment Assistance

The Stafford Act authorizes FEMA to provide assistance to any unemployed individual whose employment or self-employment was interrupted as a direct result of a declared disaster and who is not eligible for regular state Unemployment Insurance or other supplemental income. The Disaster Unemployment Assistance program provides financial assistance until applicants resume work or their customary employment, traditionally up to 26 weeks. Disaster Unemployment Assistance was not designed as an income replacement program. The amount of assistance is authorized by a state's regular unemployment program. Through a delegation of authority by FEMA, the U.S. Department of Labor oversees and coordinates the program. The program is 100 percent FEMA-funded and administered by state agencies responsible for providing unemployment services and insurance.

Eligible applicants received at least the minimum benefit rate, estimated at \$86 per week in Mississippi, \$89 per week in Alabama, and \$98 per week in Louisiana at the time of Hurricane Katrina.¹⁴⁴ Applicants qualifying for the maximum amount could receive \$210, \$220, or \$258 per week respectively. Gaps may exist between an applicant's day-to-day living expenses and Disaster Unemployment Assistance benefit amounts, which could be considerably less than the weekly pay of most. As of September 30, 2005, approximately 67,769 claims were received in all three affected states and 66,806 claims (98.6 percent) were approved, totaling \$18,982,565.¹⁴⁵

Hurricane Katrina Disaster Unemployment Assistance as of 09/30/05				
State	DUA Claims	DUA Eligible	First Payments	Amount Compensated
Louisiana	55,950	55,950	55,950	\$15,121,129
Mississippi	10,285	10,238	8,409	\$3,788,968
Alabama	1,534	618	333	\$72,468
Total	67,769	66,806	64,692	\$18,982,565

After Hurricanes Charley, Frances, Ivan, and Jeanne struck Florida during the 2004 hurricane season, approximately 14,761 claims were received during a comparable period and 12,698 claims (86 percent) were approved, totaling \$2,489,619.

¹⁴⁴ The minimum Disaster Unemployment Assistance benefit amount is based on 50 percent of the average weekly benefit amount for regular unemployment insurance within a state. For Hurricane Katrina, the initial minimum amount was based upon the average of total unemployment benefits from 04/01/04 to 03/31/05 within each state.

¹⁴⁵ U.S. Department of Labor, data as of September 30, 2005.

Disaster Unemployment Assistance for 2004 Hurricanes ¹⁴⁶				
Hurricane	DUA Claims	DUA Eligible	First Payments	Amount Compensated
Charley	3,283	3,244	1,770	\$779,529
Frances	6,888	5,984	2,946	\$1,197,349
Ivan	2,811	2,654	1,242	\$352,292
Jeanne	1,779	816	342	\$160,449
Total	14,761	12,698	6,300	\$2,489,619

The higher than average approval rate in the Hurricane Katrina affected states may have occurred as a result of the Department of Labor's decision to extend the 21-day filing period for applicants to provide supporting documentation to 90 days. Due to the widespread evacuation and limited access to appropriate documentation, many workers would likely be unable to present documentation within 21 days. As of November 17, 2005, FEMA had obligated the following funds to three affected states for Disaster Unemployment Assistance: Louisiana – \$94,402,248; Mississippi – \$28,400,000; and Alabama – \$1,150,000.

Legal Services

FEMA is authorized by the Stafford Act to provide legal services to help low-income victims with issues such as landlord and tenant relationships, employment, immigration, and insurance provisions. Assistance is also available to address issues with credit and bankruptcy, will validity, trusts and estates, real property, and powers of attorney. The Disaster Legal Services program was implemented for Hurricane Katrina with eligibility criteria used in previous disasters. Attorneys work *pro bono* and FEMA reimburses eligible administrative costs through the Young Lawyers Division of the American Bar Association. FEMA believes the program is cost effective because the work is *pro bono* and many lawyers, firms, and organizations donate legal services outside FEMA programs. Within the affected areas, the program was implemented as intended. As of November 23, 2005, legal services assistance totaled \$21,400.¹⁴⁷

Coordination with Voluntary Organizations

FEMA is authorized by the Stafford Act to coordinate the activities of voluntary organizations to the extent that they “agree to cooperate under this advice or direction.” Under ESF-6, FEMA exercised its lead responsibility in

¹⁴⁶ U.S. Department of Labor, Hurricane Charley data as of September 30, 2004; Hurricane Frances data as of October 31, 2004; Hurricane Ivan data as of October 31, 2004; and, Hurricane Jeanne data as of November 30, 2004.

¹⁴⁷ FEMA Recovery Division, November 23, 2005.

an environment of consensus that allowed the Voluntary Organizations Active in Disaster to carry out their missions in a coordinated manner. VOADs typically provide immediate emergency assistance to victims while FEMA addresses shorter and longer-term recovery needs. Near the end of the recovery phase, VOADs address victims' unmet needs.

FEMA is required by the Stafford Act to ensure that benefits are not duplicated among disaster programs, insurance benefits, or any other types of disaster assistance. FEMA traditionally has not considered the assistance of voluntary organizations to be duplicative of its assistance programs. For example, the Red Cross provides food and water to affected communities through fixed feeding sites and emergency response vehicles that canvass neighborhoods with hot meals, water, and snacks. These programs are separate from any assistance provided by FEMA and other government agencies.

Small Business Administration Loans Address More Permanent Needs

While disaster assistance is available through FEMA's IHP, most federal disaster assistance is provided through loans from SBA, which must be repaid. IHP applicants may be required to first seek assistance from SBA before being considered for certain types of IHP assistance.

SBA reviews the income-to-debt ratio of those who apply to determine whether applicants are eligible for loans. Based on this information, SBA determines whether the applicant has the resources to repay the loan. Applicants who cannot afford a loan or do not qualify will be referred back to FEMA to determine eligibility for IHP grant assistance.

Under SBA's Disaster Loan Program, homeowners may apply for real property loans of up to \$200,000 to repair or restore a primary residence damaged in a declared disaster area to its pre-disaster condition, but may not use the funds to upgrade homes or make additions. The loan amount depends on the cost of repairing or replacing the home, less any insurance settlements or grants. Any proceeds from insurance coverage on the property or home would be deducted from the total damage to the property to determine the eligible loan amount.

In addition, renters and homeowners may borrow up to \$40,000 in personal property loans to repair or replace clothing, furniture, cars, or appliances damaged or destroyed in the disaster. For applicants unable to obtain credit elsewhere the interest rate does not exceed four percent. For those who can

obtain credit elsewhere, the interest rate is no more than eight percent. The SBA offers terms of up to 30 years for repayment, which are determined on a case-by-case basis. For Hurricane Katrina, SBA provided the following data on loan applications for homeowners and renters.

SBA Disaster Loan Information by State through of 09/30/05				
State	Cumulative FEMA Referrals to SBA	Applications Received by SBA	Applications Approved by SBA	Amount Approved by SBA
Mississippi	290,286	10,089	95	\$7,661,700
Alabama	57,876	1,791	43	\$1,497,100
Louisiana	636,050	17,195	136	\$5,336,100

By September 30, 2005, SBA had approved 274 applications for \$14,494,900 in Mississippi, Alabama, and Louisiana; and, by November 23, 2005, had approved 8,979 applications for \$633,146,300 within the affected states.

FEMA's Public Assistance Program

FEMA's Public Assistance program provides supplemental federal disaster grants for the repair, replacement, reconstruction, or restoration of disaster-damaged, publicly owned facilities and the facilities of certain private non-profit organizations, and for the reimbursement of eligible emergency related activities such as debris removal and emergency protective measures.¹⁴⁸ The federal share of assistance is at least 75 percent of the eligible cost. The state determines how the non-federal share (up to 25 percent) is split among applicants; eligible applicants are state agencies, local governments, certain private non-profit organizations, and federally recognized Indian tribes or tribal organizations.¹⁴⁹

To be eligible for assistance, the work must be required as the result of the disaster, be located within the designated disaster area, and be the legal responsibility of an eligible applicant. Eligible work is categorized as either "emergency work" or "permanent work." Emergency work is defined as work that must be done immediately to save lives and protect improved property and public health and safety, or to avert or lessen the threat of a major disaster.¹⁵⁰

Emergency Work

Category A: Debris Removal

Clearance of trees and woody debris; building wreckage; sand, mud, silt, and gravel; vehicles; and other disaster-related material deposited on public and, in very limited cases, private property

Category B: Emergency Protective Measures

Measures taken before, during, and after a disaster to save lives, protect public health and safety, and to protect improved public and private property

¹⁴⁸ Stafford Act, P.L. 93-288, as amended, Sections 403, 406, 407, 418, and 419.

¹⁴⁹ Certain eligible private non-profit organization facilities must be open to the public and perform essential services of a governmental nature.

¹⁵⁰ 44 CFR §206.201(b)

Permanent Work

Category C: Roads and Bridges

Repair of roads, bridges, and associated features, such as shoulders, ditches, culverts, lighting and signs

Category D: Water Control Facilities

Repair of irrigation systems, drainage channels, and pumping facilities. Repair of levees, dams, and flood control channels fall under Category D, but the eligibility of these facilities is restricted (Permanent repair of Flood Control Works is the responsibility of the U.S. Army Corps of Engineers and the Natural Resources Conservation Service)

Category E: Buildings and Equipment

Repair or replacement of buildings, including their contents and systems; heavy equipment; and vehicles

Category F: Utilities

Repair of water treatment and delivery systems; power generation facilities and distribution lines; and sewage collection and treatment facilities

Category G: Parks, Recreational Facilities, and Other Items

Repair and restoration of parks, playgrounds, pools, cemeteries, and beaches. Also, this category is used for any work or facility that cannot be characterized adequately by Categories A-F

The state serves as the grant administrator for all funds provided under the program and also is considered the grantee, which then provides funds to subgrantees, such as local governments.¹⁵¹ Small projects, estimated to be less than \$51,000, are funded based on an approved project cost estimate. Large projects, estimated to be \$51,000 or more, are funded based upon the actual cost of the project. The state or grantee may provide advances or progress payments to subgrantees on large projects as work is completed.

The President's pre-landfall emergency declarations in Louisiana, Mississippi, and Alabama authorized federal funds under the Public Assistance program for debris removal and emergency protective measures (Categories A and B) at 75 percent. Major disaster declarations in all three states on

¹⁵¹Federally recognized tribes and tribal organizations may also be their own grantee if approved by FEMA.

August 29, 2005, authorized FEMA to provide Public Assistance for debris removal and emergency protective measures at 100 percent federal share for a period of up to 72 hours. However, the President amended the cost sharing arrangements two days later and authorized funding for debris removal and emergency protective measures at 100 percent of total eligible costs for a 60-day period, retroactive to August 29, 2005. The vast majority of work requested by the affected states as of October 1, 2005, was for emergency protective measures and debris removal. As of October 1, 2005, FEMA had received a total of 430 projects and obligated more than \$962 million.

Command and Management Under NIMS

To the extent possible, disasters are managed locally; most responses do not exceed the capabilities of the local government. However, some incidents require multiple jurisdictions or levels of government to provide an adequate response. In addition, some incidents initially can be handled locally but grow in size or complexity and require assistance and support beyond what is available at the local level. The NIMS provides an effective and efficient coordination system to enable multiple entities at different levels of government to conduct incident management activities.

The NIMS uses two levels of management structures depending on the size, nature, and complexity of the incident. First, an ICS is a standard on-scene, all-hazard incident management system that allows users to establish an integrated organizational structure to respond to single or multiple incidents. Second, Multiagency Coordination Systems provide a common framework to integrate and support incident management and coordination for incident prioritization, critical resource allocation, integration of communication systems, and information flow.

The Incident Command System

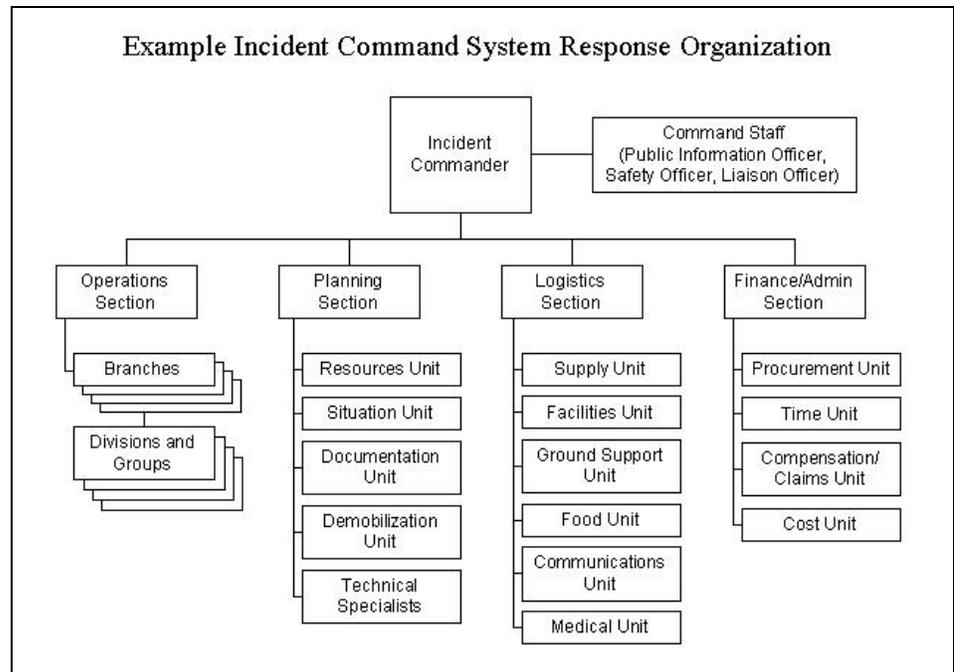
The ICS structure is designed to enable effective and efficient domestic incident management by integrating a combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure. The ICS structure is widely applicable to a variety of emergencies from small and basic to large and complex, whether natural or man-made. It applies across all levels of government, the private sector, and nongovernmental organizations, as well as across multiple functional disciplines. Several characteristics enable ICS to efficiently and effectively manage incidents:

- Use of common terminology;
- Scalable, top-down modular system based on the size, complexity, and nature of the incident;
- Incidents managed by objectives established by the incident command;
- Use of incident action plans to communicate strategic objectives and operational and support activities to the incident command organization;
- Span of control ranging from three to seven subordinates;
- Designation of one supervisor for each individual for the incident;

- Clear chain of command and authority within the organization; and,
- Use of communication plans and interoperable communications systems.

ICS Organization

The ICS structure usually includes five major functional areas: command, operations, planning, logistics, and finance/administration. Depending on the size and complexity of the incident, additional functional or geographic branches or divisions can be included within one or more of the major functional areas. FEMA used all five major functional areas in each of the affected states.



- **Incident Command:** The Incident Commander is responsible for overall management of the incident. This can be accomplished through a single command or a unified command. Under a single command, the Incident Commander develops the strategic incident objectives, approves the incident action plan, and approves all requests for ordering and releasing incident resources.

Unified command is used for incidents involving multiple agencies or jurisdictions. Under unified command, multiple agencies and jurisdictions are able to work together effectively without

compromising their different legal, geographic, and functional authorities and responsibilities. Designated members of each agency work together to develop a common set of objectives and strategies for the entire incident and jointly plan support activities under a single incident action plan. As a result, unified command improves information flow, communication, and coordination and reduces duplication of efforts. For Hurricane Katrina, Mississippi and Alabama established unified commands from the start, while Louisiana did not.

- Operations: The Operations Section is responsible for activities dedicated to reducing the immediate hazard, saving and sustaining lives and property, establishing situational awareness and control, and restoring normal operations. ICS provides flexibility for organizing incident operations depending on the nature of the incident, the agencies involved, and the strategic objectives set by the incident commander. Within the Operations Section, divisions or groups are established when resources involved exceed the Operations Section Chief's manageable span of control. Divisions create geographical areas of operation. Groups create functional areas of operation. If the number of divisions or groups exceeds the manageable span of control or the incident involves multiple jurisdictions, branches would be established.
- Planning: The Planning Section gathers, evaluates, and disseminates situational information and intelligence critical to the incident; prepares situation reports and incident maps; maintains the status of incident resources; and develops the incident action plan based on the incident commander's strategic objectives.
- Logistics: The Logistics Section provides support needs for the incident, including ordering resources from off-incident locations if not readily available in the incident area. Logistics provides facilities, transportation, supplies, equipment maintenance and fuel, food services, communications, and medical services for personnel.
- Finance/Administration: A Finance/Administration Section is established if an incident requires significant financial, reimbursement, or administrative support services. If established, this section monitors multiple sources of funds, tracks and reports funds spent or obligated, and reconciles operational records with financial records.

Multiagency Coordination Systems

Multiagency coordination systems provide the framework to coordinate and support incident management policies and priorities, facilitate logistics support and resource tracking, make critical resource allocation decisions, coordinate incident related information, and coordinate interagency and intergovernmental issues regarding incident management policies, priorities, and strategies. Facilities, equipment, personnel, procedures, and communications are resources integrated into a multiagency coordination system. Operational responsibility for incident management activities remains, however, with the on-scene incident commander.

Both EOCs and multiagency coordination entities could be part of a multiagency coordination system. EOCs, usually established at the state or local level, are the physical location where core functions of coordination, communications, resource dispatch and tracking, and information collection are executed. Personnel from multiple jurisdictions or functional disciplines may staff EOCs. For Hurricane Katrina, each affected state activated and staffed its EOC following basic ICS positions and elements. This facilitated coordination between federal and state counterparts, and ultimately, integration when the incident command organization was established in each state's JFO. The HSOC was activated and executed the core EOC functions at the federal level for Hurricane Katrina.

Multiagency coordination entities support and facilitate incident management, coordinate policy, and provide strategic guidance and direction to support incident management activities. These entities usually include representatives from agencies or organizations with direct incident management responsibility or significant support and resource responsibilities. Several multiagency coordination entities were used during the Hurricane Katrina response, including the NRCC, RRCCs, and the IIMG.

The National Response Plan

On April 14, 2005, the NRP superseded the Initial National Response Plan, the Federal Response Plan, the Domestic Terrorism Concept of Operations Plan, and the Federal Radiological Emergency Response Plan. The NRP references 70 statutes, regulations, executive orders, and presidential directives that outline the authorities and responsibilities of the signatories for domestic incident management. Thirty-two federal departments and service agencies agreed to support the NRP:

National Response Plan Signatories	
Department of Agriculture	Environmental Protection Agency
Department of Commerce	Federal Bureau of Investigation
Department of Defense	Federal Communications Commission
Department of Education	General Services Administration
Department of Energy	National Aeronautics and Space Administration
Department of Health and Human Services	National Transportation Safety Board
Department of Homeland Security	Nuclear Regulatory Commission
Department of Housing and Urban Development	Office of Personnel Management
Department of Interior	Small Business Administration
Department of Justice	Social Security Administration
Department of Labor	Tennessee Valley Authority
Department of State	U.S. Agency for International Development
Department of Transportation	U.S. Postal Service
Department of the Treasury	American Red Cross
Department of Veteran Affairs	Corporation of National Community Service
Central Intelligence Agency	National Voluntary Organizations Active in Disaster

The NRP consists of a base plan plus 31 annexes:

- **Fifteen ESF annexes:** The 15 ESF annexes categorize emergency services that are likely to be needed during a domestic incident, such as transportation, urban search and rescue, and food. These annexes provide for service planning, support, resources, and program implementation.

- Nine support annexes: These annexes explain crosscutting processes and administrative requirements, such as logistics management and public affairs.
- Seven incident annexes: The incident annexes explain how the NRP will be tailored to address particular events including catastrophic, terrorism, and biological incidents.

The NRP designates lead and support agencies for administering each annex. A chart of the 15 ESFs and the agencies responsible for their coordination is on page 31.

DHS has primary responsibility for the Catastrophic Incident Annex. The DHS Secretary officially activates this annex when needed. According to the NRP, a catastrophic event is any incident “that results in extraordinary levels of mass casualties, damage, or disruption severely affecting the population, infrastructure, environment, economy, national morale, and/or government functions.”¹⁵² The Catastrophic Incident Annex applies to any kind of incident of this scale, whether caused by a natural hazard or man-made. For such incidents, the NRP requires a proactive federal response, including rapid deployment of specific teams and resources. The Catastrophic Incident Supplement to the annex specifies which teams and resources deploy on a phased schedule. This supplement was published in September 2005, and therefore was not finalized in advance of Hurricane Katrina.

¹⁵² Page 43.

Appendix F
Comparison of PFO and FCO Duties

Comparison of PFO and FCO Duties Under the National Response Plan	
PFO	FCO
Designated by the Secretary of Homeland Security, as necessary, to facilitate federal support to established incident command structures and coordinate overall federal incident management and assistance to officials such as the FCO	Appointed by the President to coordinate the federal response effort for a specified emergency or major disaster declaration; manages and coordinates the application of programs and funds under the Stafford Act, including mission assignments and resource allocation
Provides real-time incident information to the Secretary of Homeland Security through the HSOC and the IIMG, as required	When delegated from the DHS/EPR/FEMA Regional Director, serves as Disaster Recovery Manager (DRM) to administer the financial aspects of assistance authorized under the Stafford Act
Ensures the seamless integration of federal activities in support of and in coordination with state, local, and tribal requirements	Taking other such action consistent with the authority delegated to him/her as deemed necessary to assist local citizens and public officials in promptly obtaining assistance to which they are entitled
Serves as a primary, although not exclusive, point of contact for federal interface with state, local, and tribal senior elected/appointed officials, the media, and the private sector	Working in partnership with the State Coordinating Officer (appointed by the governor to oversee operations for the state) and the Governor's Authorized Representative (empowered by the governor to execute all necessary documents for federal assistance on behalf of the state)
Ensures that adequate connectivity is maintained between the JFO and the HSOC; local, county, state, and regional EOCs; nongovernmental EOCs; and relevant elements of the private sector	Conducts an initial appraisal of the types of assistance most urgently needed
Ensures overall coordination of federal domestic incident management and resource allocation activities	Coordinates the timely delivery of federal assistance to affected state, local, and tribal governments and disaster victims
Coordinates response resource needs between multiple incidents as necessary, or as directed by the Secretary of Homeland Security	Coordinates the administration of relief, including activities of the state and local governments, and other relief or disaster assistance organizations, which agree to operate under his/her advice or direction
Facilitates interagency conflict resolution as necessary	Establishes such field offices as deemed necessary and authorized by the President
Participates in ongoing steady-state preparedness efforts (as appropriate for PFOs designated in a "pre-incident" mode, when a threat can be ascribed to a particular geographic area)	
Provides strategic guidance to federal entities	
Coordinates the overall federal strategy locally to ensure consistency of federal interagency communications to the public	

The following is a list of some of the organizations that contributed to the response, relief, and recovery efforts during the hurricanes that affected the Gulf Coast region and continue to provide assistance to help families recover.

Members – National Voluntary Organizations Active in Disaster

- Adventist Community Services
- America's Second Harvest
- American Baptist Men
- American Radio Relay League
- American Red Cross
- AMURT (Ananda Marga Universal Relief Team)
- Catholic Charities USA
- Center for International Disaster Information
- Christian Disaster Response International
- Christian Reformed World Relief Committee
- Church of the Brethren –Emergency Response/Service Ministries
- Church World Service
- Convoy of Hope
- Disaster Psychiatry Outreach
- Episcopal Relief and Development
- Friends Disaster Service, Inc.
- The Humane Society of the United States
- International Aid
- International Critical Incident Stress Foundation
- International Relief Friendship Foundation
- Lutheran Disaster Response
- Mennonite Disaster Service
- Mercy Medical/Angel Flight America
- National Emergency Response Teams (NERT)
- National Organization for Victim Assistance
- Nazarene Disaster Response
- Northwest Medical Teams International
- The Points of Light Foundation and Volunteer Center National Network
- Presbyterian Church (U.S.A.)
- REACT International, Inc.
- The Salvation Army
- Society of St. Vincent de Paul
- Southern Baptist Convention – North American Mission Board
- United Jewish Communities
- United Church of Christ – Wider Church Ministries
- United Methodist Committee on Relief (UMCOR)
- United Way of America
- Volunteers of America

- World Vision

Members of State, County, City VOADs also Providing Services

- Christian Appalachian Project
- Christian Contractors Association (FLVOAD)
- United Jewish Federation of New York

Friends of VOAD (These organizations have long standing relationships with National VOAD)

- Church of Jesus Christ of Latter Day Saints
- Compassion Alliance
- Hope Coalition America
- Samaritan's Purse International Relief
- Scientology Disaster Response

Other Organizations Providing Services and Accepting Donations

- Alzheimer's Association
- AmeriCares
- American Kennel Club
- American Veterinary Medical Foundation
- Blacks in Government
- NIEHS, Research Triangle Park Chapter
- Brother's Brother Foundation
- Children's Hunger Fund
- Christian Children's Fund
- Churches of Christ Disaster Relief Effort
- Green Cross Assistance Program
- Habitat for Humanity
- HOPE *worldwide*
- His Work In Progress
- Independent Charities of America (ICA)
- International Medical Corps
- International Rescue Committee
- Islamic Circle of North American Relief (ICNA Relief USA)
- Islamic Relief USA
- Mercy Corps
- National Alliance on Mental Illness
- Orphans International Worldwide
- Orthodox Christian Charities
- Save the Children
- World Relief

Appendix H
FEMA Consolidated Shelter Report

Region	Dates	8/26/2005	8/27/2005	8/28/2005	8/29/2005	8/30/2005	8/31/2005	9/1/2005	9/2/2005	9/3/2005	9/4/2005	FEMA Estimate 09/04/05	09/05/05	09/06/05	09/07/05	09/08/05	09/09/05	09/10/05
I	Connecticut																	
	Maine																	
	Massachusetts																	
	New Hampshire																	
	Rhode Island																	
	Vermont																	
	New Jersey																	
	New York																	
	Delaware																	
	District of Columbia																	
II	Maryland																	
	Pennsylvania																	
	Virginia																	
	West Virginia																	
	Alabama																	
	Florida																	
	Georgia																	
	Kentucky																	
	Mississippi																	
	North Carolina																	
III	South Carolina																	
	Tennessee																	
	Illinois																	
	Indiana																	
	Michigan																	
	Minnesota																	
	Missouri																	
	Ohio																	
	Wisconsin																	
	IV	Arkansas																
Louisiana																		
New Mexico																		
Oklahoma																		
Texas																		
Iowa																		
Kansas																		
Missouri																		
Nebraska																		
Montana																		
V	North Dakota																	
	South Dakota																	
	Utah																	
	Wyoming																	
	Arizona																	
	California																	
	Hawaii																	
	Nevada																	
	Alaska																	
	VI	Idaho																
Oregon																		
Washington																		
SHelters																		
Total																		

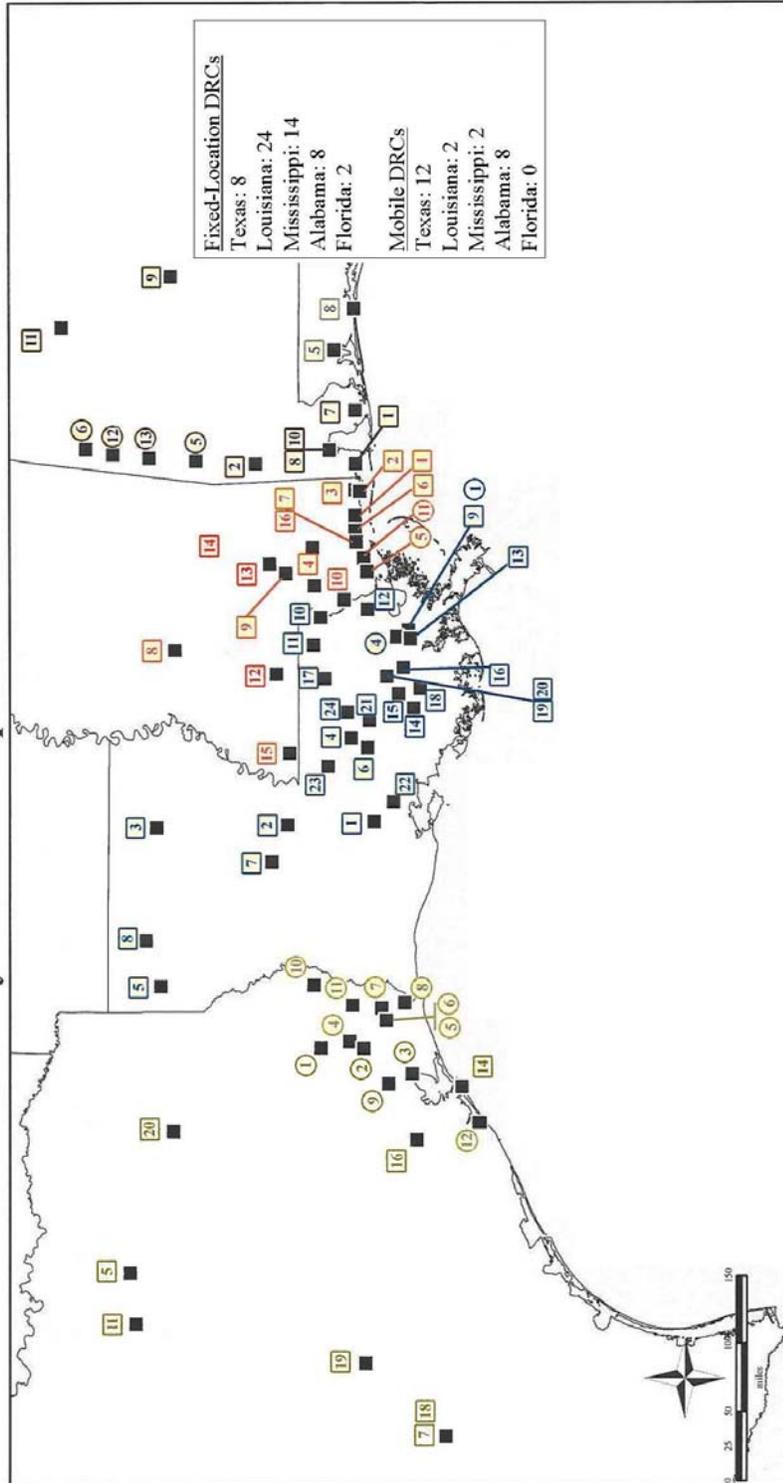
A Performance Review of FEMA's Disaster Management Activities
In Response to Hurricane Katrina

Appendix H
FEMA Consolidated Shelter Report

Region	Dates	Verifying Shelter Totals	09/11/05	09/16/05	09/17/05	09/18/05	09/19/05	09/20/05	09/21/05	09/22/05	09/23/05	09/24/05	09/25/05	09/26/05	Katrina & Rita Combined	09/27/05	Katrina & Rita Combined	09/28/05	Katrina & Rita Combined	09/29/05	Katrina & Rita Combined	09/30/05
I	Connecticut																					
	Maine																					
	Massachusetts	111	111	111	216																	179
	New Hampshire																					
	Rhode Island				162																	207
	Vermont																					
	New Jersey																					
	New York																					
	Delaware																					
	District of Columbia	164	164	165	157	171	164	142	134	140	105	97	97	97	88	80	80	80	80	80	80	80
II	Maryland																					
	Pennsylvania	35	35	35	35	35	73	80	80	123	123	123	123	123	123	123	123	123	123	123	142	
	Virginia																					
	West Virginia	316	316	342	225	225	205	205	205	160	163	152	110	110	106	98	98	98	98	98	98	
	Alabama	2,176	2,176	1,600	1,604	1,604	1,604	1,604	1,604	1,604	1,604	1,604	1,604	1,604	1,604	1,604	1,604	1,604	1,604	1,604	1,604	1,604
	Florida	1,559	1,559	965	968	967	969	969	969	969	969	969	969	969	969	969	969	969	969	969	969	969
	Georgia	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722	1,722
	Kentucky	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310	1,310
	Mississippi	13,395	13,395	11,671	9,496	10,073	8,091	8,091	8,091	4,447	4,447	2,269	2,269	3,339	4,054	4,054	4,054	4,054	4,054	4,054	4,054	3,529
	North Carolina	681	681	519	519	519	519	519	519	190	190	129	129	129	129	129	129	129	129	129	129	129
III	South Carolina																					
	Tennessee	1,839	1,839	9,273	2,017	1,824	1,824	1,824	1,824	1,824	1,824	1,824	1,824	1,824	1,824	1,824	1,824	1,824	1,824	1,824	1,824	
	Illinois	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	
	Indiana	138	138	138	138	138	138	138	138	138	138	138	138	138	138	138	138	138	138	138	138	
	Michigan	266	266	266	266	266	266	266	266	266	266	266	266	266	266	266	266	266	266	266	266	266
	Minnesota																					
	Ohio	20	20	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
	Wisconsin																					
	Arkansas	1,073	1,073	222	232	232	232	232	232	232	232	232	232	232	232	232	232	232	232	232	232	232
	IV	Louisiana	60,632	60,632	57,962	56,664	52,640	46,669	42,346	47,141	55,064	44,177	38,734	29,634	45,115	48,273	47,619	45,364	45,364	45,364	45,364	45,364
New Mexico		326	326	326	326	326	326	326	326	326	326	326	326	326	326	326	326	326	326	326	326	326
Oklahoma		1,287	1,287	1,000	1,076	1,076	1,076	1,076	1,076	601	601	601	313	313	313	313	313	313	313	313	313	313
Texas		46,354	46,354	24,628	21,763	20,697	17,973	17,973	13,162	11,607	11,607	13,162	13,162	13,162	13,162	13,162	13,162	13,162	13,162	13,162	13,162	13,162
Iowa																						
Kansas																						
Missouri		3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888	3,888
Nebraska		59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59
Nebraska		375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375
V		Colorado																				
	Montana																					
	North Dakota																					
	South Dakota																					
	Utah	325	325	275	269	226	226	187	187	168	168	113	98	23	23	23	23	23	23	23	23	
	Wyoming																					
	Arizona	502	502	287	176	176	176	176	176	94	94	94	94	94	94	94	94	94	94	94	94	
	California	62	62	62	39	39	41	41	41	41	41	61	69	69	69	69	69	69	69	69	69	69
	Hawaii																					
	Nevada																					
VI	Alaska																					
	Idaho																					
	Oregon																					
	Washington																					
	SHelters	679	679	817	1,034	966	926	881	949	1,042	643	651	717	795	814	863	893	1,366	1,111	1,111	1,140	
	Total	140,711	140,711	111,912	122,639	108,696	97,795	91,926	89,445	95,964	73,244	71,280	60,888	60,623	79,774	80,289	80,289	159,767	107,486	107,486	108,988	

A Performance Review of FEMA's Disaster Management Activities
In Response to Hurricane Katrina

**Hurricane Katrina
 Disaster Recovery Centers as reported 09/29/05 17:00:00 EDT**





FEMA
 ITS Mapping & Analysis Center
 Washington, DC
 09/30/05 -- 02:00:00 EDT
 Edited by DHS OIG



Location Map

Hurricane Katrina Fixed Disaster Recovery Centers Operational Hours August 24, 2005, to September 30, 2005

Louisiana				
#	Parish	City	Opening Date	Operational
1	Caddo	Shreveport	09/06/2005	9am-7pm
2	Ouachita	Monroe	09/06/2005	9am-7pm
3	Iberville	Plaquemine	09/08/2005	9am-7pm
4	Lafayette	Lafayette	09/09/2005	9am-7pm
5	Rapides	Alexandria	09/10/2005	9am-7pm
6	Webster	Minden	09/14/2005	9am-7pm
7	Plaquemines	Belle Chase	09/14/2005	8am-6pm
8	E. Baton Rouge	Baton Rouge	09/15/2005	9am-7pm
9	Washington	Bogalusa	09/16/2005	9am-7pm
10	Washington	Franklinton	09/16/2005	9am-7pm
11	Avoyelles	Marksville	09/17/2005	9am-7pm
12	St. Tammany	Slidell	09/19/2005	9am-7pm
13	Orleans	Algiers	09/19/2005	9am-7pm
14	St. James	Vacherie	09/20/2005	9am-7pm
15	LaFourche	Thibodeaux	09/20/2005	9am-7pm
16	St. Charles	Boutte	09/20/2005	9am-7pm
17	St. John the Baptist	LaPlace	09/27/2005	9am-7pm
18	Ascension	Gonzales	09/27/2005	9am-7pm
19	Jefferson	Gretna	09/28/2005	9am-7pm
20	LaFourche	Raceland	09/29/2005	9am-7pm
21	Iberia	New Iberia	09/29/2005	9am-7pm
22	Tangipahoa	Amite	09/30/2005	9am-7pm
23	Livingston	Walker/Denham Springs	09/30/2005	9am-7pm

Alabama			
#	City	Opening Date	Operational
1	Bayou La Batre	09/02/2005	8am-6pm Closed Sunday
2	Chatom	09/03/2005	8am-6pm Closed Sunday
3	Bay Minette	09/05/2005	7am-7pm
4	Robertsdale	09/05/2005	7am-7pm
5	Foley	09/11/2005	8am-6pm Closed Sunday
6	Mobile	09/18/2005	8am-6pm Closed Sunday
7	Montgomery	09/18/2005	8am-6pm Closed Sunday
8	Mobile	09/21/2005	8am-6pm Closed Sunday
9	Birmingham	09/23/2005	8am-6pm Closed Sunday
10	Livingston	09/30/2005	8am-6pm Closed Sunday

**Hurricane Katrina Fixed Disaster Recovery Centers
 Operational Hours
 August 24, 2005, to September 30, 2005**

Mississippi			
#	City	Opening Date	Operational
1	Ocean Springs	09/06/2005	8am-6pm; Sunday 1pm-6pm
2	Pascagoula	09/09/2005	8am-6pm
3	Moss Point	09/09/2005	8am-6pm; Sunday 1pm-6pm
4	Poplarville	09/12/2005	8am-6pm; Sunday 1pm-6pm
5	Waveland	09/08/2005	8am-6pm; Sunday 1pm-6pm
6	Gulfport	09/15/2008	8am-6pm; Sunday 1pm-6pm
7	Biloxi	09/15/2005	8am-6pm; Sunday 1pm-6pm
8	Jackson	09/19/2005	8am-6pm; Sunday 1pm-6pm
9	Purvis	09/19/2005	8am-6pm; Sunday 1pm-6pm
10	Picayune	09/20/2005	8am-6pm; Sunday 1pm-6pm
11	Pass Christian	09/19/2005	8am-6pm; Sunday 1pm-6pm
12	McComb	09/24/2005	8am-6pm; Sunday 1pm-6pm
13	Hattiesburg	09/25/2005	8am-6pm; Sunday 1pm-6pm
14	Laurel	09/25/2005	8am-6pm; Sunday 1pm-6pm
15	Woodville	09/27/2005	8am-6pm; Sunday 1pm-6pm
16	Biloxi	09/29/2005	8am-6pm; Sunday 1pm-6pm
17	Wiggins	09/30/2005	8am-6pm; Sunday 1pm-6pm

Appendix K
Agencies Receiving Mission Assignments

Cumulative Listing of Agencies Receiving Mission Assignments for All Three States For the Period August 28 - September 30, 2005	
American Red Cross	National Communications System (DHS)
Animal and Plant Health Inspection Service	National Credit Union Administration
Border and Transportation Security (DHS)	National Geospatial-Intelligence Agency
Center for Disease Control	National Labor Relations Board
Corporation for National and Community Service	National Oceanic and Atmospheric Administration
Customs and Border Protection (DHS)	National Science Foundation
Department of Agriculture	Nuclear Regulatory Commission
Department of Commerce	Occupational Safety and Health Administration
Department of Defense	Office of the Chief Financial Officer (DHS)
Department of Education	Office of Personnel Management
Department of Energy	Office of State and Local Government Coordination and Preparedness (DHS)
Department of Health and Human Services	Railroad Retirement Board
Department of Housing and Urban Development	Science and Technology Directorate (DHS)
Department of Interior	Securities and Exchange Commission
Department of Justice	Social Security Administration
Department of Labor	Soil Conservation Service
Department of Transportation	Tennessee Valley Authority
Department of Treasury	Transportation Security Administration (DHS)
Environmental Protection Agency	U.S. Agency for International Development
Federal Law Enforcement Training Center (DHS)	U.S. Army Corps of Engineers
Federal Protective Service (DHS)	U.S. Citizen and Immigration Services (DHS)
Food and Nutrition Service	U.S. Coast Guard (DHS)
General Services Administration	U.S. Forest Service
Immigration and Customs Enforcement (DHS)	U.S. Geological Survey
Information Analysis and Infrastructure Protection (DHS)	U.S. Postal Service
Merit Systems Protection Board	U.S. Public Health Service
National Aeronautic and Space Administration	U.S. Secret Service (DHS)
National Archives and Records Administration	U.S. Small Business Administration
	Veterans Administration

Appendix L
Mission Assignment Descriptions

Louisiana				
State Requests for Specific Types of Assistance from August 29 to September 30, 2005				
#	Tasked Agency	MA Type	Date	Description
1	Corporation for National Community Service	DFA ¹⁵³	08/31/05	Pharmaceuticals and other necessary medical supplies
2	U.S. Army Corps of Engineers	DFA	08/29/05	Procure, transport, and distribute bags of ice
3	U.S. Army Corps of Engineers	DFA	08/29/05	Emergency power generation
4	U.S. Army Corps of Engineers	DFA	08/29/05	Acquire, transport, and distribute bottled/bulk water
5	U.S. Army Corps of Engineers	DFA	08/30/05	Temporary roofing support, provide temporary roofing, and coordinate roofing activities
6	U.S. Army Corps of Engineers	DFA	08/30/05	Housing planning support
7	U.S. Army Corps of Engineers	DFA	08/30/05	Emergency debris clearance, removal, and disposal site management
8	U.S. Army Corps of Engineers	DFA	08/30/05	Complete a series of levee breaches to lower the water to level of the surrounding lakes/marshes, then repair the levee breaches, and repair and operate pumps to remove the remaining water
9	U.S. Army Corps of Engineers	DFA	08/31/05	Housing Planning support
10	U.S. Army Corps of Engineers	DFA	08/31/05	Dredging services for specified waterways
11	U.S. Army Corps of Engineers	DFA	09/03/05	Engineering and construction support to DMORTS
12	Department of Housing and Urban Development	DFA	09/27/05	Transitional housing assistance
13	Department of Defense	DFA	08/31/05	Helicopter support to move 2,500 victims per day
14	Department of Defense	DFA	08/31/05	Support rotary air operations for search and rescue and levee repairs
15	Department of Defense	DFA	09/01/05	Airlift support to transport an estimated 10,000 evacuees from New Orleans to Houston, Texas, and San Antonio, Texas
16	Department of Defense	DFA	09/02/05	Meals ready-to-eat (MREs)
17	Department of Defense	DFA	09/02/05	High-water vehicles
18	Department of Defense	DFA	09/04/05	Temporary housing support at NAS New Orleans
19	Department of Defense	DFA	09/06/05	Trucks/drivers for supplies and personnel
20	Department of Defense	DFA	09/22/05	Sheltering area for LA NG troops
21	Department of Education	DFA	09/15/05	Personnel to facilitate appropriate communication and coordination regarding displaced students that have been relocated nationwide
22	Department of Transportation	DFA	09/03/05	Air transportation for evacuation of critical medical patients
23	Department of Transportation	DFA	09/03/05	Transportation assistance
24	Department of Transportation	DFA	09/18/05	Supplemental emergency transportation
25	Environmental Protection Agency	DFA	08/29/05	Activate EPA to support FEMA
26	Environmental Protection Agency	DFA	09/01/05	Removal and disposal of actual and potential oil discharges releases of hazardous material, pollutants and contaminants
27	General Service Administration	DFA	09/03/05	Medical service package
28	Health and Human Services	DFA	08/31/05	Medical personnel to support hospital, clinic and medical special needs shelters

¹⁵³ Direct federal assistance consists of goods and services provided directly from the federal government to affected state and local jurisdictions when they lack the capability to perform or contract for eligible emergency work (such as providing debris removal, potable water, emergency medical services, and urban search and rescue). A Presidential emergency or major disaster declaration must be issued before direct federal assistance can be provided.

Appendix L
Mission Assignment Descriptions

29	Health and Human Services	DFA	08/31/05	Technical expertise, to determine requirements, if any, for vector control
30	Health and Human Services	DFA	08/31/05	Deliver 500 beds and associated supplies to the Strategic National Stockpile vendor supply chain
31	Health and Human Services	DFA	09/06/05	Mental health professionals
32	Health and Human Services	DFA	09/07/05	Veterinarians to assist with large and small animal care and carcass disposal issues
33	Health and Human Services	DFA	09/08/05	Deliver 1000 beds and associated supplies to the Strategic National Stockpile vendor supply chain
34	Health and Human Services	DFA	09/09/05	General health and medical assistance
35	Immigration and Customs Enforcement	DFA	09/27/05	Law enforcement support
36	Coast Guard	DFA	09/01/05	Air and ground support to perform lifesaving and, search and recovery missions
37	Coast Guard	DFA	09/05/05	Security personnel for law enforcement operations
38	Department of Agriculture	DFA	09/16/05	Assistance with the removal and disposal of animal carcasses
39	Department of Justice	DFA	09/02/05	Air transportation
40	Department of Justice	DFA	09/03/05	Protective services
41	Department of Justice	DFA	09/10/05	Beds with staff to maintain custody and control of up to 1000 inmates
42	Department of Justice	DFA	09/11/05	Transportation of inmates
43	Department of Justice	DFA	09/14/05	Law enforcement support
1	U.S. Army Corps of Engineers	TA ¹⁵⁴	08/30/05	Aid in accomplishing of priority missions
2	Environmental Protection Agency	TA	09/01/05	Assessment of water and wastewater facilities and threats of oil, hazardous substances, pollutants or contaminants
3	Health and Human Services	TA	09/10/05	Coordination of TB patients, tracking patients, coordinate distribution of drugs, and purchasing of supplies
4	Department of Justice	TA	09/22/05	Assist NOPD establish a law enforcement coordinating center in New Orleans and to reconstitute the NOPD and its supporting 911 system

Mississippi				
State Requests for Specific Types of Assistance from August 30 to September 30, 2005				
#	Tasked Agency	MA Type	Date	Description
1	Corporation for National Community Service	DFA	09/03/05	Teams to manage donations of volunteers, goods, and cash. Support the Blue Roof Project. Assist special needs clients
2	U.S. Army Corps of Engineers	DFA	08/30/05	Emergency power planning and preparation support
3	U.S. Army Corps of Engineers	DFA	08/30/05	Emergency debris clearance, removal, and disposal support
4	U.S. Army Corps of Engineers	DFA	08/30/05	Temporary roofing support, provide temporary roofing, and coordinate roofing activities
5	U.S. Army Corps of Engineers	DFA	09/07/05	Equipment/materials to make temporary repairs to the wastewater treatment plants and collection systems
6	U.S. Army Corps of Engineers	DFA	09/10/05	Self-help tarps for small areas of roof damage
7	U.S. Army Corps of Engineers	DFA	09/10/05	Design, develop, and construct, including installation utilities, sites for portable buildings to support public education and other public service entities

¹⁵⁴ Technical assistance is expertise provided to state and local jurisdictions when they have the resources but lack the knowledge and skills needed to perform the required activity (such as hazardous materials assessment). Technical assistance may be provided prior to a Presidential emergency or major disaster declaration.

Appendix L
Mission Assignment Descriptions

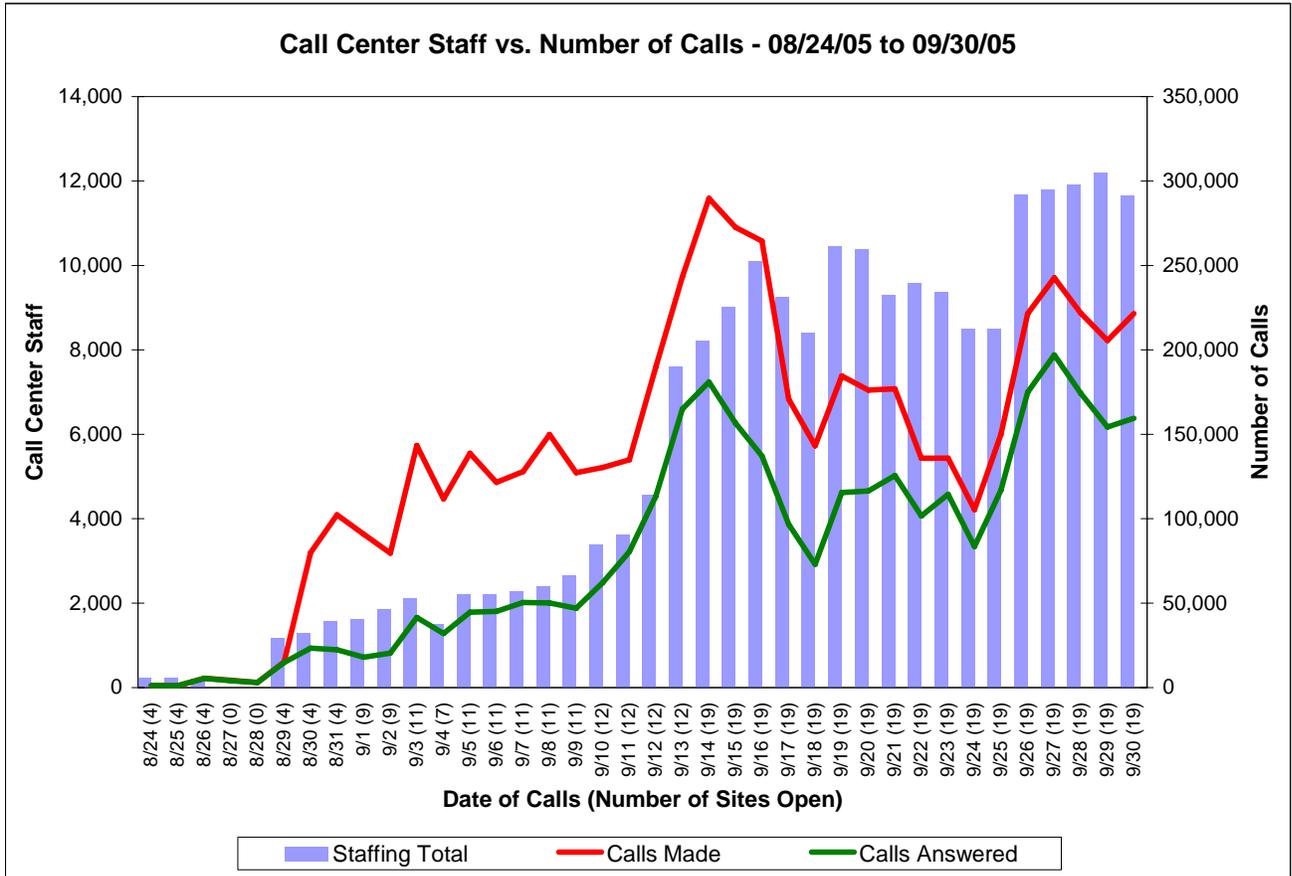
8	U.S. Army Corps of Engineers	DFA	09/29/05	Provide essential services including debris removal, provision of temporary government facilities essential for government operation and other measures to protect public health and safety
9	Department of Defense	DFA	09/01/05	Purchase of pharmaceuticals and medical supplies that cannot be immediately filled by HHS
10	Department of Defense	DFA	09/08/05	Emergency facility repair for displaced citizens, public shelters, local infrastructure and utilities
11	Department of Defense	DFA	09/23/05	Provide berthing barges for displaced individuals
12	Department of Transportation	DFA	09/30/05	Emergency public transportation services in support of the Red Cross and other essential government services
13	Department of Transportation	DFA	09/30/05	Emergency public transportation services to access essential government and life sustaining services
14	Environmental Protection Agency	DFA	08/31/05	Removal and disposal of oil discharges and other hazardous material, pollutants and contaminants and implement measures to prevent potential releases
15	Environmental Protection Agency	DFA	09/17/05	Burn sites monitors
16	Environmental Protection Agency	DFA	09/19/05	Disposal of rotting, decaying putrescible type matter
17	Federal Protective Service	DFA	09/02/05	Federal Protection Service support
18	Federal Protective Service	DFA	09/15/05	Law enforcement support
19	Health and Human Services	DFA	08/31/05	Environmental health support to include the inspection of food, potable water, sanitary waste, and other preventative medicine activities
20	Health and Human Services	DFA	08/31/05	Medical staff support to include physicians, nurses, and specialty staff
21	Health and Human Services	DFA	08/31/05	Providing staff support to and purchase pharmaceuticals and medical supplies for MSDoH
22	Health and Human Services	DFA	09/02/05	One Strategic National Stockpile push package
23	Health and Human Services	DFA	09/02/05	Epidemiology disease surveillance support
24	Health and Human Services	DFA	09/07/05	Personnel and equipment to provide technical assistance/assessment/surveillance activities to reduce vector borne pests
25	Health and Human Services	DFA	09/09/05	Supplement hospital capacity to provide collection point and triage for special needs patients
26	Health and Human Services	DFA	09/11/05	Vaccines and ancillary supplies
27	Health and Human Services	DFA	09/16/05	Liaison to coordinate emergency dental services
28	Health and Human Services	DFA	09/20/05	Personnel to support CFHC services
29	Health and Human Services	DFA	09/22/05	Dental staff to operate temporary dental facility
30	Health and Human Services	DFA	09/20/05	Assess patients in mobile medical facilities and shelters for replacement in nursing facilities, assisted living facilities and personal care homes
31	Health and Human Services	DFA	09/23/05	Medical teams needed to address medical and mental health concerns
32	National Aeronautics and Space Administration	DFA	08/30/05	Use of NASA facility to house state emergency workers and vehicles, or specific services
33	National Communication System	DFA	09/11/05	Telephone service to for shelter information, donation of goods and services, and volunteer placement provisions
34	National Communication System	DFA	09/19/05	Telephone service
35	Department of Agriculture	DFA	09/10/05	Resources to assist the state respond to animal and agricultural issues
36	Department of Justice	DFA	09/14/05	Law enforcement support
37	Forest Service	DFA	09/23/05	Fire fighting assistance to address fire threat
1	Environmental Protection Agency	TA	08/30/05	Assessment of water and wastewater facilities and threats of oil, hazardous substances, pollutants or contaminants

Appendix L
Mission Assignment Descriptions

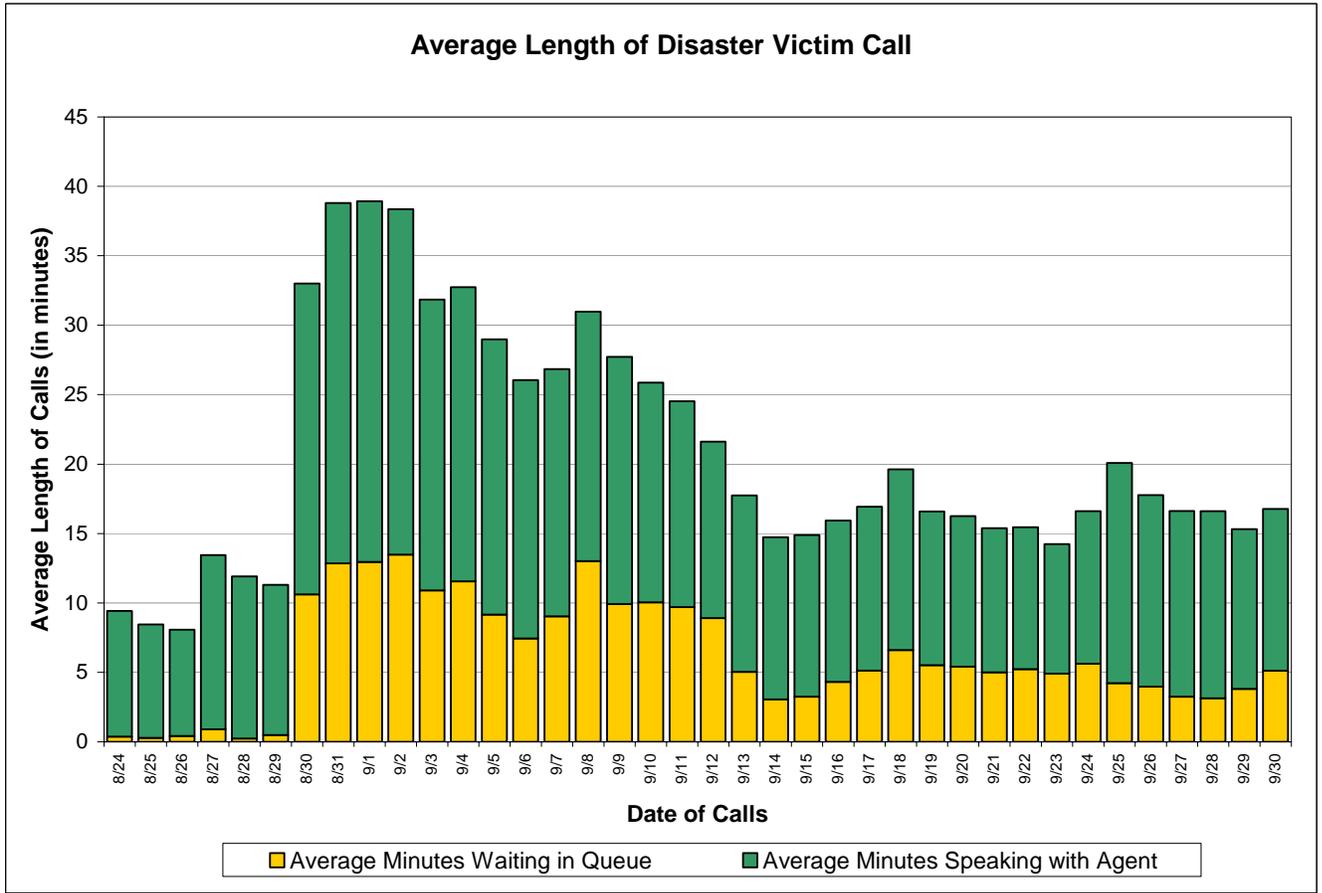
2	U.S. Army Corps of Engineers	TA	08/31/05	Aid in accomplishing of priority missions
3	Health and Human Services	TA	09/01/05	Expertise to estimate the amount and duration of federal support needed to augment hospital staffing
4	Health and Human Services	TA	09/04/05	Expertise to assess damage to community water supplies
5	Department of Agriculture	TA	09/10/05	Technical assistance
6	Forest Service	TA	09/10/05	FEMA liaison to county emergency manager providing guidance and advice on available FEMA recovery and response assistance
7	Health and Human Services	TA	09/17/05	Expertise needed to assist utility companies, and to monitor and track water and wastewaters systems as they come on line

Alabama				
State Requests for Specific Types of Assistance from September 1 to September 30, 2005				
#	Tasked Agency	MA Type	Date	Description
1	Corporation for National Community Service	DFA	09/04/05	Personnel to support call centers, warehouses and distribution systems for management of donations and volunteers, and other services and facilities
2	U.S. Army Corps of Engineers	DFA	09/01/05	Emergency debris clearance, removal, and disposal support
3	U.S. Army Corps of Engineers	DFA	09/05/05	Temporary housing support. Design, site development and construction, including installation of utilities at a mobile home group site
4	U.S. Army Corps of Engineers	DFA	09/06/05	Temporary housing support to FEMA Housing Area Command (HAC)
5	Environmental Protection Agency	DFA	09/02/05	Removal and disposal of oil discharges and other hazardous material, pollutants and contaminants and implement measures to prevent potential releases
1	Environmental Protection Agency	TA	09/04/05	Assessment of water and wastewater facilities and threats of oil, hazardous substances, pollutants or contaminants

Appendix M
 Call Center Staff Compared to Number of Calls



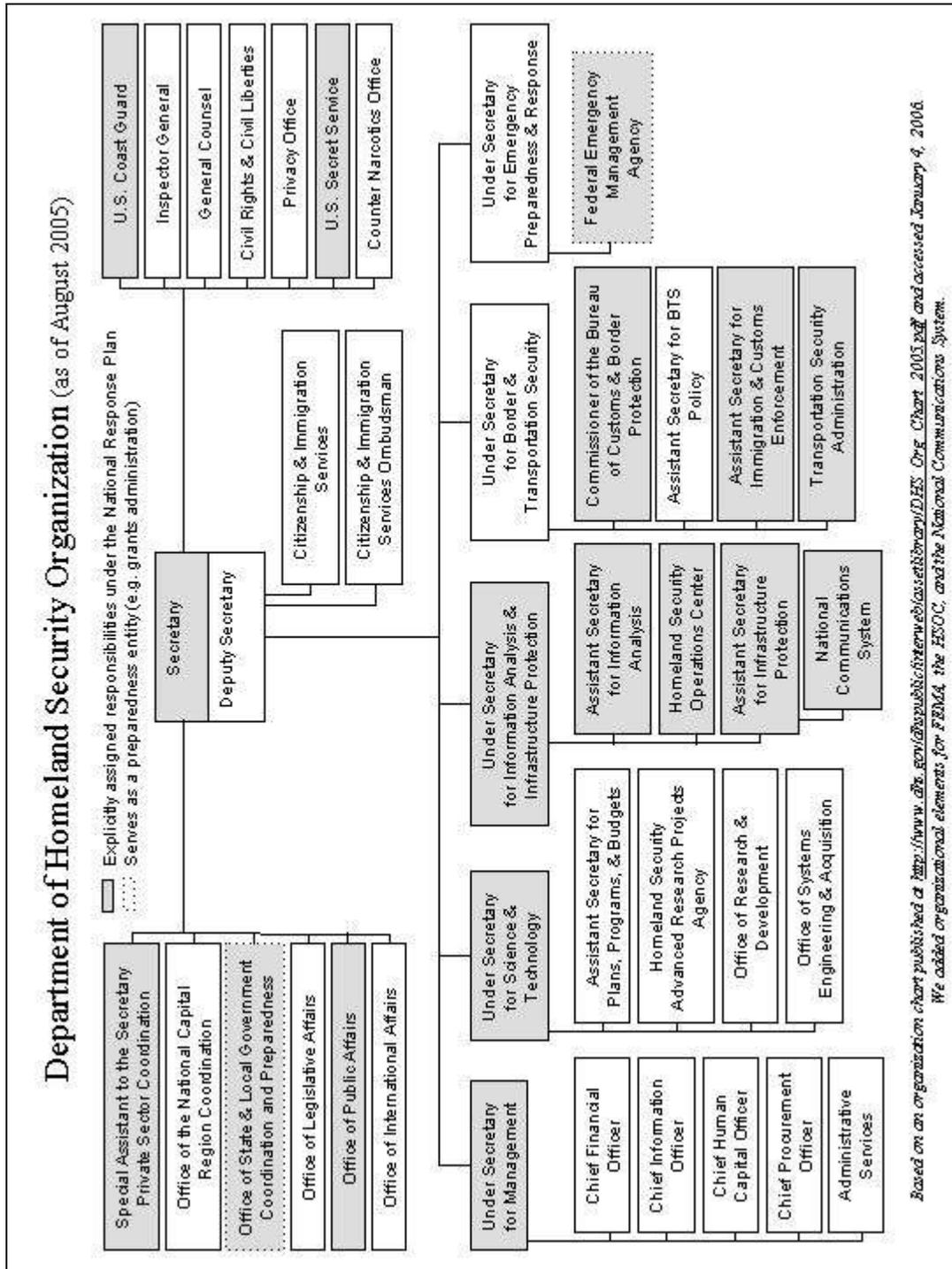
Appendix N
Average Length of Disaster Victim Calls



FEMA Referrals to Other Assistance Providers as of November 16, 2005

Assistance Providers	Total Referrals by State ¹⁵⁵			
	Louisiana	Mississippi	Alabama	Total
Aging Services	4,488	2,632	693	7,813
Agricultural Aid	21,406	25,446	2,695	49,547
Banking Questions	157	272	21	450
Consumer Services	3,038	1,235	60	4,333
Contractors License Board	0	736	194	930
Crisis Counseling	5,143	2,063	525	7,731
Department of Environment	1,661	735	206	2,602
Department of Human Services	0	1,856	507	2,363
Disaster Recovery Center	2,790	1,463	490	4,743
Disaster Unemployment Assistance	625,689	243,176	47,319	916,184
Emergency Assistance (Red Cross)	675,010	249,994	47,638	972,642
Financial Services	0	1,136	0	1,136
Fraud Detection	1,712	663	218	2,593
Health Department	3,844	1,627	441	5,912
Housing and Urban Development	0	591	0	591
Information and Referrals	5,182	2,099	700	7,981
Insurance Information	2,723	1,227	350	4,300
Legal Services	763	889	246	1,898
SBA	1,075	752	355	2,182
SBA Workshop	652,425	299,026	56,752	1,008,203
Social Security	3,359	1,528	407	5,294
Tax Assistance	659,173	304,924	57,793	1,021,890
Veterans Benefits	1,238	713	180	2,131
TOTAL REFERRALS	2,670,876	1,144,783	217,790	4,033,449

¹⁵⁵ FEMA Recovery Division, November 16, 2005.



Appendix Q
FEMA Ten-Year Overview

	FY 1995	FY 1996	FY 1997	FY 1998	FY 1999	FY 2000
Prominent Disaster Events*	Oklahoma City bombing; Hurricane Marilyn	Hurricanes Fran, Opal		Hurricanes Bonnie, Georges	Hurricanes Bret, Floyd	Cerro Grande fire; Hurricanes Irene, Lenny
Total Event Designations	35	149	57	148	106	104
Major Disasters	29	72	49	61	53	41
Emergencies	2	2	5	3	16	5
Fire Assistance	4	75	3	54	37	58
Laws, Plans, and Policies	The Stafford Act was most recently amended in 1993. The FRP was in effect since 1992.				Second version of FRP published.	<i>Disaster Mitigation Act of 2000</i> amends Stafford Act.
Leadership	President: William Clinton FEMA Director: James Lee Witt					
FEMA Reorganizations		Planning and Operations rejoined after 1993 split.	Three Territorial Logistics Centers established to stock commodities for initial response.			
Annual Appropriation	\$847 million	\$805 million	\$1,816 million	\$842 million	\$1,064 million	\$873 million
Supplementary Appropriation(s) for the Disaster Relief Fund	\$2,273 million	\$3,171 million	\$3,300 million	\$1,600 million	\$1,806 million	\$2,176 million
Authorized FTEs	3,864	3,860	4,945	4,625	4,539	4,789
FEMA Programmatic Changes Discussed In This Report	FEMA conducts its first large-scale natural event exercise (Response '95). Hurricane Liaison Team created.	FEMA consolidates preparedness grants and links them to state strategic agreements.	FEMA begins voluntary self-assessments of state readiness.	FEMA conducts its last large-scale natural event exercise (Response '98).		EMPGs combine six preparedness grants.

*Includes all Category 3, 4, and 5 hurricanes.

Appendix Q
FEMA Ten-Year Overview

	FY 2001	FY 2002	FY 2003	FY 2004	FY 2005
Prominent Disaster Events*	September 11 th attacks on World Trade Center and Pentagon		Loss of Space Shuttle <i>Columbia</i> ; Hurricane Isabel	Hurricanes Ivan, Charley, Jeanne, Frances	Hurricanes Dennis, Katrina, Rita
Total Event Designations	104	126	115	129	139
Major Disasters	50	42	62	65	45
Emergencies	15	1	19	7	67
Fire Assistance	39	83	34	57	27
Laws, Plans, and Policies			The <i>Homeland Security Act of 2002</i> creates DHS. DHS publishes the Initial NRP; FRP remains in effect. President Bush releases HSPD-5.	DHS publishes NIMS. President Bush releases HSPD-8.	NRP supersedes FRP in April.
Leadership	President: George Bush				
	FEMA Director: Joseph Allbaugh		DHS Secretary: Thomas Ridge	DHS Secretary: Michael Chertoff	
	EP&R Under Secretary and FEMA Director: Michael Brown				
FEMA Reorganizations	Preparedness, Training and Exercises merges with Response & Recovery into Readiness, Response, & Recovery Directorate. FEMA creates External Affairs and Administration & Resource Planning Directorates.	Readiness, Response, & Recovery Directorate splits into National Preparedness Division and Response & Recovery Division.	FEMA incorporated into DHS' EP&R Directorate. NDMS moves from HHS to FEMA. Some FEMA staff moved to DHS headquarters.		DHS Second Stage Review creates DHS Preparedness Directorate, absorbing some FEMA staff. EP&R layer to be eliminated.
Annual Appropriation	\$1,221 million	\$2,610 million	\$2,465 million	\$3,256 million	\$3,089 million
Supplementary Appropriation(s) for the Disaster Relief Fund	\$4,383 million	\$8,008 million	\$1,925 million	\$2,245 million	\$66,385 million
Authorized FTEs	4,859	4,952	4,574	4,859	4,905
FEMA Programmatic Changes Discussed In This Report	Initial FEMA proposal to develop a Southeast Louisiana Catastrophic Hurricane Plan.	Evacuation Liaison Team created.	NEMB-CAP preparedness baseline study and RAMP begin. Response Division develops a 5-year catastrophic planning strategy.	Four-part Hurricane Pam planning event begins in Louisiana.	Management of the EMPG transfers to ODP.

*Includes all Category 3, 4, and 5 hurricanes.

Purpose, Scope, and Methodology

The purpose of our review was to assess FEMA's performance as it conducted its disaster management activities in response to Hurricane Katrina. We examined whether FEMA's authorities, plans and procedures, organizational structure, and resources were adequate and operational.

The review included three of the four major phases of disaster management: preparedness, response, and recovery. We evaluated FEMA's preparedness efforts over the past ten years to determine its organizational capability and posture prior to Hurricane Katrina. For the response and recovery, we focused on the three states most affected by Hurricane Katrina's second landfall – Alabama, Mississippi, and Louisiana – and limited the review timeframe to August 24, 2005, through September 30, 2005. This period extends from the National Hurricane Center's first notice of the storm to the beginning of recovery efforts. We examined FEMA's role and performance under the National Response Plan and National Incident Management System, focusing on four ESFs for which FEMA is the coordinator or primary agency: ESF-5, Emergency Management; ESF-6, Mass Care, Housing, and Human Services; ESF-9, Urban Search and Rescue; and ESF-15, External Affairs.

We reviewed statutes and regulations related to FEMA and state disaster authorities. We examined FEMA documentation that included annual performance reports, policy memoranda, directives, standard operating procedures and manuals, and internet sites. Also, we reviewed various reports on FEMA programs from the Government Accountability Office; the Congressional Research Service; FEMA and DHS Office of Inspectors General; and, other related reports and news articles.

We interviewed over 230 people, in person and by teleconference, and performed site visits to the Alabama, Mississippi, and Louisiana JFOs and Joint Information Centers, and to FEMA Region IV and VI offices in Georgia and Texas. In addition to interviewing FEMA and PFO staff at these sites, we interviewed officials from the Alabama, Mississippi, and Louisiana state emergency management agencies. We also conducted interviews with officials at DHS and FEMA headquarters in Washington, DC, the Red Cross; the National VOAD; the Department of Labor; the SBA, and private sector contractors.

As part of our data analysis, we collected a sample of action request forms from all three affected states to determine and trace request fulfillment through FEMA field and headquarters offices. We examined work orders

FEMA assigned to other federal agencies in support of the federal response. We reviewed situation reports generated by federal and state agencies, incident action plans and activity chronologies assembled by the JFOs, and data from disaster assistance program offices. We studied FEMA's catastrophic planning materials, budget data, staffing levels, and training and exercise records for the past ten years. For the same period, we evaluated FEMA's efforts to work with state governments in preparing for natural disasters involving hurricane scenarios, particularly in the Gulf Coast region.

Fieldwork began at the end of September 2005 and continued through December 2005. This review was conducted under the authority of the *Inspector General Act of 1978*, as amended, and according to the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

Recommendation #1: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Director of the Office of Operations Coordination, clarify the National Response Plan guidelines for federal, headquarters-level collection and synthesis of situational and operational information, with the intent of eliminating duplication of effort between the Interagency Incident Management Group and Homeland Security Operations Center.

Recommendation #2: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, clarify the roles of the Principal Federal Official, the Federal Coordinating Officer, the Federal Resource Coordinator, and the Disaster Recovery Manager to provide a clear distinction for the types and levels of response activities that warrant a combination or modification to those roles; develop procedures for the timely activation of each role; and, ensure that these officials be provided with the necessary training to complement their qualifications for serving in these positions.

Recommendation #3: We recommend that the Director of the Office of Operations Coordination for the Department of Homeland Security, in coordination with the Chief Information Officer, design an information management system that allows users to track and share information more openly and efficiently; and, standardize the format and methodology for collecting and reporting information.

Recommendation #4: We recommend that the Director of the Federal Emergency Management Agency establish an ESF-6 working group to define the explicit roles and responsibilities for each agency, develop standard operating procedures, and implement a concept of operations plan for response activities that address all levels of disasters.

Recommendation #5: We recommend that the Director of the Federal Emergency Management Agency develop alternative housing resource plans that include a review of all identified resources within an affected area, determine whether potential duplication exists, and efficiently deliver services that are accommodating to the disaster victim.

Recommendation #6: We recommend that the Director of the Federal Emergency Management Agency develop a more comprehensive training program to prepare existing and new personnel for Disaster Recovery Center assignments.

Recommendation #7: We recommend that the Director of the Federal Emergency Management Agency develop a more comprehensive program to recruit, train, and retain local hires for use in augmenting FEMA's Disaster Assistance Employees and permanent staff.

Recommendation #8: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, review ESF-9 Annex capabilities for search and rescue and coordination within FEMA and other Department of Homeland Security components (such as U.S. Coast Guard and Customs and Border Protection) or with other federal departments and agencies, and either redistribute ESF-9 responsibilities or develop greater water rescue capabilities within FEMA.

Recommendation #9: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, develop a surge plan and standard operating procedures for augmenting FEMA's ESF-9 coordination capability during catastrophic events with resources such as the U.S. Coast Guard and Customs and Border Protection personnel.

Recommendation #10: We recommend that the Assistant Secretary for Public Affairs, in coordination with the Director of the Federal Emergency Management Agency, develop a definitive ESF-15 organizational chart that is scalable to the size of an incident, with a clear hierarchical structure and information flow.

Recommendation #11: We recommend that the Director of the Federal Emergency Management Agency further develop and fully implement formal ESF-15 training, so all full-time employees and Disaster Assistance Employees have a comprehensive understanding of how to operate within its structure during an incident.

Recommendation #12: We recommend that the Assistant Secretary of Public Affairs for the Department of Homeland Security, in coordination with the Director of the Federal Emergency Management Agency, complete the development of and fully implement the DHS Public Affairs state outreach program.

Recommendation #13: We recommend that the Director of the Federal Emergency Management Agency address levels of coordination and expectations with Department of Defense entities under the NRP, including

Northern Command and the Military Liaison, to facilitate coordination during responses to future domestic incidents.

Recommendation #14: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, establish measurable response expectations and provide the necessary financial, technical, and staff support to meet those expectations.

Recommendation #15: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, develop a means to standardize and streamline the resource ordering and tracking process.

Recommendation #16: We recommend that the Director of the Federal Emergency Management Agency develop and implement a resource tracking system that is capable of documenting whether resources were delivered and the efficiency with which the resource was provided.

Recommendation #17: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Manager of the National Communications System, determine and fill requirements to provide emergency responders with communications equipment capable of performing in austere conditions.

Recommendation #18: We recommend that the Director of the Federal Emergency Management Agency define the Mobile Emergency Response Support authorizations for equipment and staffing, including requirements for mission support during a catastrophic disaster, and fund and staff the detachments to meet requirements.

Recommendation #19: We recommend that the Director of the Federal Emergency Management Agency develop a disaster workforce plan that accounts for standing capability for permanent, temporary, and reserve staff that is responsive to the needs demonstrated in response to previous disasters, and also develop a plan that is scalable to other events irrespective of cause, size, or complexity.

Recommendation #20: We recommend that the Director of the Federal Emergency Management Agency develop and implement a system that automates and tracks the selection, deployment, training, and demobilization of responders.

Recommendation #21: We recommend that the Director of the Federal Emergency Management Agency provide training to additional National Processing Service Center staff and contractors to enhance FEMA's capability to perform applicant assistance and case management activities responsive to the needs of applicants.

Recommendation #22: We recommend that the Director of the Federal Emergency Management Agency establish and test the information technology infrastructure of the system to ensure support of user demands and develop internal controls to decrease the potential for duplicate applications.

Recommendation #23: We recommend that the Director of the Federal Emergency Management Agency develop a contract mechanism for its direct federal resources that clearly defines the expected roles, responsibilities, deliverables, and performance measures for contractors implementing FEMA's direct housing operations mission.

Recommendation #24: We recommend that the Director of the Federal Emergency Management Agency discontinue the practice of tasking any contractor without the appropriate coordination and approval of the Contracting Officer or Contracting Officer's Technical Representative.

Recommendation #25: We recommend that the Director of the Federal Emergency Management Agency establish clear roles and responsibilities for the Housing Area Command and define its reporting requirements and chain of command relationship with the FEMA headquarters, Joint Field Offices, and Technical Assistance Contractors.

Recommendation #26: We recommend that the Director of the Federal Emergency Management Agency establish eligibility criteria, internal program controls, and a basis for testing a program before implementation to ensure the program meets disaster assistance provisions of the Stafford Act.

Recommendation #27: We recommend that the Director of the Federal Emergency Management Agency place priority on analysis of new methods and technology to verify damage, occupancy, and ownership, when traditional methods of inspection are not responsive in the timely provision of assistance. Methods and applicable technology must be tested, based on supportable data, and provide the highest assurance of meeting program eligibility requirements.

Recommendation #28: We recommend the Director of the Federal Emergency Management Agency, in coordination with federal, state, and nongovernmental partners, develop more effective and efficient plans for the delivery of assistance to address long-term housing issues, and test these plans in a simulated environment before application in actual disasters.

Recommendation #29: We recommend that the Director of the Federal Emergency Management Agency create individual development plans (or a similar process) and implement a consolidated records system to maintain accurate information on training completed.

Recommendation #30: We recommend that the Director of the Federal Emergency Management Agency finalize and distribute the Southeast Louisiana Catastrophic Hurricane Plan, using the lessons learned during Hurricane Katrina to improve the plan.

Recommendation #31: We recommend that the Director of the Federal Emergency Management Agency request appropriation or provide other funding, resources, and institutional support to agency components and to state and local partners to complete draft or proposed catastrophic planning initiatives for natural disasters.

Recommendation #32: We recommend that the Director of the Federal Emergency Management Agency and Under Secretary for Preparedness jointly develop a formal mechanism to ensure continuity between preparedness, response, and recovery by including FEMA regional staff in the Preparedness Directorate's relationships with state emergency management agencies for grants, exercises, planning, technical assistance, and training.

Recommendation #33: We recommend that the Director of the Federal Emergency Management Agency oversee the Remedial Action Management Program to maintain focus and provide support for corrective action.

Recommendation #34: We recommend that the Director of the Federal Emergency Management Agency direct its Remedial Action Management Program to identify interim remediation plans for issues that have a remediation completion date of greater than one year from the date assigned.

Recommendation #35: We recommend that the Under Secretary of Preparedness for the Department of Homeland Security provide states with training on the applicability of the National Preparedness System and preparedness grants to all hazards, including natural disasters.

Recommendation #36: We recommend that the Under Secretary of Preparedness for the Department of Homeland Security develop a system to assess state capability to respond to a disaster, without federal assistance and in respect to a minimum level of preparedness based on the Emergency Management Accreditation Program standard.

Recommendation #37: We recommend that the Director of the Federal Emergency Management Agency develop a method for determining the level of readiness of FEMA to respond to a disaster that exceeds a state's capabilities.

Recommendation #38: We recommend that the Under Secretary of Preparedness for the Department of Homeland Security, in coordination with the Director of the Federal Emergency Management Agency, ensure all DHS employees receive training on DHS responsibilities under the NRP and NIMS.

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



**Homeland
Security**

April 4, 2006

MEMORANDUM TO: Robert L. Ashbaugh
Assistant Inspector General for Inspections and Special
Reviews

FROM: George W. Foresman
Under Secretary 

SUBJECT: Response to draft Office of Inspector General Report, "*A
Performance Review of FEMA's Disaster Management
Activities in Response to Hurricane Katrina*"

This responds to your February 10, 2006, memorandum requesting the Department's comments on the draft Office of the Inspector General report, "*A Performance Review of FEMA's Disaster Management Activities in Response to Hurricane Katrina*." The attached document provides comments on the 38 recommendations directed to the Department. In addition, we are providing some additional comments to clarify programs described in the draft report. Questions concerning specific comments should be addressed to Brad Shefka at 202-282-8532.

Please accept our thanks for the opportunity to respond to the draft report and to work with the Office of the Inspector General during this engagement. The Office of the Inspector General's independent analysis of the Department's efforts greatly benefits our ability to continuously improve our programs and activities. We look forward to continuing this partnership in the future.

Attachment

cc: Gus P. Coldebella
R. David Paulison
Steven Pecinovsky

**A Performance Review of FEMA's Disaster Management Activities
In Response to Hurricane Katrina**

**RESPONSE TO DRAFT OFFICE OF INSPECTOR GENERAL REPORT
“A PERFORMANCE REVIEW OF FEMA’S DISASTER MANAGEMENT ACTIVITIES
IN RESPONSE TO HURRICANE KATRINA”**

Initial Comments

Thank you for the opportunity to respond to the draft Report and to work with the Office of the Inspector General during this engagement. As mentioned above, the Office of the Inspector General’s independent analysis of the Department’s efforts greatly benefits our ability to improve our programs and activities. We look forward to continuing this partnership in the future.

We have a few initial comments that apply generally to the draft Report.

Implementation of Various Katrina-Related Recommendations. As you know, there are other after-action assessments in addition to the draft Report. The President’s Homeland Security Advisor has issued a report entitled “The Federal Response to Hurricane Katrina: Lessons Learned,” in which she details 125 recommendations to improve the federal response to Incidents of National Significance. A number of congressional committees, including the Senate Homeland Security and Governmental Affairs Committee and the House Select Committee, have or will be issuing reports on their inquiries into the federal government’s preparation for and response to Hurricane Katrina. There are other after-action assessments as well. These reports and recommendations may result in differing goals or plans for implementing them. We must be clear that the Secretary will have to evaluate and implement recommendations contained in these reports consistently and efficiently.¹

Also, various of your recommendations state that certain DHS officials—*i.e.*, the FEMA Director or other specified personnel—evaluate or implement the recommended course of action. While your suggestion is appropriate in some instances, we note that the Secretary must oversee the Department, its functions and operations, and the implementation of the National Response Plan (including the Homeland Security Operations Center and Interagency Incident Management Group). Therefore the Secretary must determine what office will carry out the implementation of various recommendations. (We will not address, in each response, which office will do so.)

DHS and Domestic Incident Management. The draft Report suggests that FEMA leads the Government’s response efforts under the National Response Plan (*see, e.g.*, p. 31). We note that the Department of Homeland Security, as a whole, leads the Federal Government in

¹ The reason for this is clear even from the draft Report. For example, recommendation #38 appears to recommend that the Under Secretary for Preparedness ensure all DHS employees receive training on DHS responsibilities under the National Response Plan and National Incident Management System (NIMS). This recommendation is in tension with Recommendations #11, 20, 29 and 32 which states that the FEMA Director with responsibility for training certain aspects of the NRP. Training responsibilities will reside within the Preparedness Directorate, and they will be closely coordinated with FEMA.

domestic incident management, pursuant to Homeland Security Presidential Directive 5, and that the NRP provides for implementation of resources from all corners of the government.

Improving the NRP and the Stafford Act. The draft Report should note that the National Response Plan is not a statute, and it does not assign legal authorities to any agency. Instead, it is a plan to coordinate the resources and activities of the Federal Government in Incidents of National Significance. The Stafford Act, on the other hand, is a statute. The draft Report suggests that the Stafford Act does not require amendment, while, at the same time, suggesting shortcomings in the Stafford Act and its authorities, as well as the need for updating terminology and reconciling with other documents related to emergency management. DHS is reviewing, and will continue to review, the Stafford Act and the NRP in light of Hurricane Katrina and other recent experiences.

Second Stage Review. The draft Report would benefit from a discussion regarding the changes implemented following the Secretary's Second Stage Review process (2SR). Specifically, the draft Report indicates that due to the reorganization of oversight and supervision over grant programs, "[c]hanges in recent years have . . . diverted attention from natural hazards preparedness to terrorism preparedness." (See p. 112.) We disagree with this statement. Additionally, the draft Report should reflect that pursuant to 2SR grant programs were transferred to the Preparedness Directorate for all hazards—natural disasters, accidents, and terrorist events. Finally, the draft Report (see p. 2) states that difficulties experienced during the response "directly correlate with weaknesses in FEMA's grant programs, staffing, training, catastrophic planning and remediation of issues identified during previous disasters and exercises." (Emphasis added.) This language implies that there is an exclusive relationship among the items listed. However, the difficulties faced in Hurricane Katrina were the result of many factors—many of which are unrelated to grants, staffing, training and planning issues.

Incident Command System. The draft Report implies that the Federal Government should have established an Incident Command System with local authorities (see, e.g., page 20). However, it should be noted that, traditionally, the Federal Government's emergency management officials interact with the state authorities who, in turn, interact with the local officials.

Responses to Specific Recommendations

Recommendation #1: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Director of the Office of Operations Coordination, clarify the National Response Plan (NRP) guidelines for federal, headquarters-level collection and synthesis of situational and operational information, with the intent of eliminating duplication of effort between the Interagency Incident Management Group and Homeland Security Operations Center.

The NRP will be reviewed and revised appropriately. We do not concur that there is structural duplication between the HSOC and IIMG. The Homeland Security Operations Center (HSOC) is the primary national-level hub for domestic situational awareness, common operational picture, information fusion, information sharing, communications, and coordination pertaining to the prevention of terrorist attacks and domestic incident management. The HSOC is the primary conduit for situational awareness to the White House Situation Room (WHSR), the Department of Homeland Security's Leadership, the Incident Management Division and the Interagency Incident Management Group (IIMG). The HSOC facilitates information sharing and operational coordination with other Federal, State, local, tribal, and nongovernmental operation centers and the private sector.

The IIMG oversees incident management functions to execute prevention, protection, preparedness, response, and recovery strategies. Incident Management Functions combine the existing Emergency Support Functions (ESFs) with other incident management activities from outside the ESF framework and include: counterterrorism and law enforcement; border, maritime and transportation security; weapons of mass destruction detection and preparedness; risk communication and public messaging; critical infrastructure protection; medical and public health; and emergency response and recovery.

Recommendation #2: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, clarify the roles of the Principal Federal Official, the Federal Coordinating Officer, the Federal Resource Coordinator, and the Disaster Recovery Manager to provide a clear distinction for the types and levels of response activities that warrant a combination or modification to those roles; develop procedures for the timely activation of each role; and, ensure that these officials be provided with the necessary training to compliment their qualifications for serving in these positions.

The NRP will be reviewed and modified appropriately, and in doing so the Department (in particular, the Undersecretary for Preparedness and the Director of FEMA) will evaluate these roles.

Recommendation #3: We recommend that the Director of the Office of Operations Coordination for the Department of Homeland Security, in coordination with the Chief Information Officer, design an information management system that allows users to track and share information more openly and efficiently; and, standardize the format and methodology for collecting and reporting information.

The Department is already developing the Homeland Security Information Network (HSIN) which is an extensive system encompassing numerous communities of interest (COIs) — groups that share a common functional, geographic, or industry role — such as law enforcement, the Louisiana state government, the oil and gas sector, and other public and private stakeholder communities. Each COI is typically given its own separate Internet portal with specialized communication and collaboration tools that are accessible only to vetted and validated members. The portal is built in consultation with the leadership of each COI and reflects the needs and requirements of that community. All COIs have a communications link with DHS that enables the community to receive alerts, threats, and warnings and to provide tips and suspicious activity reports. Collaboration tools that include document sharing, threaded discussions, and instant messaging enable members of each COI to communicate with one another regarding threats, vulnerabilities, disaster mitigation, and recovery activities.

HSIN embodies the DHS mandate to share relevant and critical information with homeland security stakeholders across all functional, agency, geographic, and jurisdictional boundaries. HSIN is designed to act as a single source for reporting, collecting, and fusing threat-related information from multiple parties. The HSIN program succeeds when all participants share a common set of tools and are both contributing to and receiving raw information to be analyzed and fused into a common operational view. HSIN members will be able to take applicable elements to develop their own relevant operating views of situations, on which to base decision making and take appropriate action.

Recommendation #4: We recommend that the Director of the Federal Emergency Management Agency establish an ESF-6 working group to define the explicit roles and responsibilities for each agency, develop standard operating procedures, and implement a concept of operations plan for response activities that address all levels of disasters.

DHS/FEMA is already working with American Red Cross (ARC) and National Voluntary Organizations Active in Disaster (NVOAD) to improve the support function and are adding Cadre of On-Call Response/Recovery Employees (CORE) positions specifically to support this effort. A principal ESF-6 staff position has been created and two other employees will be working with this ESF-6 to strengthen its connection with related Recovery Division Individual Assistance programs.

Recommendation #5: We recommend that the Director of the Federal Emergency Management Agency develop alternative housing resource plans that include a review of all identified resources within an affected area, determine whether potential duplication exists, and efficiently deliver services that are accommodating to the disaster victim.

Housing is a sizable area for review, and this recommendation will be considered in the lessons learned process.

Recommendation #6: We recommend that the Director of the Federal Emergency Management Agency develop a more comprehensive training program to prepare existing and new personnel for Disaster Recovery Center assignments.

FEMA is currently in the process of hiring a training coordinator and associated staff to develop such a program.

Recommendation #7: We recommend that the Director of the Federal Emergency Management Agency develop a more comprehensive program to recruit, train, and retain local hires for use in augmenting FEMA's Disaster Assistance Employees and permanent staff.

Please see previous response.

Recommendation #8: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, review ESF-9 Annex capabilities for search and rescue and coordination within FEMA and other Department of Homeland Security components (such as U.S. Coast Guard and Customs and Border Protection) or with other federal departments and agencies, and either redistribute ESF-9 responsibilities or develop greater water rescue capabilities within FEMA.

DHS will coordinate with its components and other Federal departments and agencies to address both search and rescue and water rescue responsibilities at the Federal level.

Recommendation #9: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, develop a surge plan and standard operating procedures for augmenting FEMA's ESF-9 coordination capability during catastrophic events with resources such as the U.S. Coast Guard and Customs and Border Protection personnel.

The Director of the Federal Emergency Management Agency will work in coordination with the Under Secretary for Preparedness towards this goal.

Recommendation #10: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, develop a definitive ESF-15 organizational chart that is scalable to the size of an incident, with a clear hierarchical structure and information flow.

DHS will coordinate this effort.

Recommendation #11: We recommend that the Director of the Federal Emergency Management Agency further develop and fully implement formal ESF-15 training, so all full time employees and Disaster Assistance Employees have a comprehensive understanding of how to operate within its structure during an incident.

DHS/FEMA will coordinate this effort.

Recommendation #12: We recommend that the Assistant Secretary of Public Affairs for the Department of Homeland Security, in coordination with the Director of the Federal Emergency Management Agency, complete the development of and fully implement the DHS Public Affairs state outreach program.

DHS anticipates training deployments in late spring or summer 2006. DHS Public Affairs, in coordination with the State of Wisconsin, developed the trial State outreach program in July 2005 to increase mutual awareness about incident communications and preparedness communications. The program has since been presented to the National Governors Association, National Association of County Officials, and NASL. DHS/FEMA formally briefed state and territory public affairs officials on March 9, 2006 and advised that it is prepared to visit states and/or conduct regional briefings.

Recommendation #13: We recommend that the Director of the Federal Emergency Management Agency address levels of coordination and expectations with Department of Defense entities under the NRP, including Northern Command and the Military Liaison, to facilitate coordination during responses to future domestic incidents.

This is already taking place.

Recommendation #14: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, establish measurable response expectations and provide the necessary financial, technical, and staff support to meet those expectations.

DHS/FEMA will coordinate this effort.

Recommendation #15: We recommend that the Director of the Federal Emergency Management Agency, in coordination with the Assistant Secretary for Policy, develop a means to standardize and streamline the resource ordering and tracking process.

This is already taking place.

Recommendation #16: We recommend that the Director of the Federal Emergency Management Agency develop and implement a resource tracking system that is capable of documenting whether resources were delivered and the efficiency with which the resource was provided.

This is already taking place.

Recommendation #17: We recommend that the Director of the Federal Emergency Management Agency determine and fill requirements to provide emergency responders with communications equipment capable of performing in austere conditions.

DHS/FEMA will continue to work on ways to enhance communications equipment for first responders and improve their functionality during catastrophic events.

Recommendation #18: We recommend that the Director of the Federal Emergency Management Agency define the Mobile Emergency Response Support authorizations for equipment and staffing, including requirements for mission support during a catastrophic disaster, and fund and staff the detachments to meet requirements.

Concur.

Recommendation #19: We recommend that the Director of the Federal Emergency Management Agency develop a disaster workforce plan that accounts for standing capability for permanent, temporary, and reserve staff that is responsive to the needs demonstrated in response to previous disasters, and also develop a plan that is scalable to other events irrespective of cause, size, or complexity.

Concur.

Recommendation #20: We recommend that the Director of the Federal Emergency Management Agency develop and implement a system that automates and tracks the selection, deployment, training, and demobilization of responders.

Concur.

Recommendation #21: We recommend that the Director of the Federal Emergency Management Agency provide training to additional National Processing Service Center staff and contractors to enhance FEMA's capability to perform applicant assistance and case management activities responsive to the needs of applicants.

DHS/FEMA is currently working to increase the level of support from other Federal partners, develop additional stand-by contracts to increase readiness, and increase training so that there will be a greater number of staff available to perform help-line and case management functions.

Recommendation #22: We recommend that the Director of the Federal Emergency Management Agency establish and test the information technology infrastructure of the system to ensure support of user demands and develop internal controls to decrease the potential for duplicate applications.

Concur.

Recommendation #23: We recommend that the Director of the Federal Emergency Management Agency develop a contract mechanism for its direct federal resources that clearly defines the expected roles, responsibilities, deliverables, and performance measures for contractors implementing FEMA's direct housing operations mission.

Concur.

Recommendation #24: We recommend that the Director of the Federal Emergency Management Agency discontinue the practice of tasking any contractor without the appropriate coordination and approval of the Contracting Officer or Contracting Officer's Technical Representative.

DHS/FEMA is currently hiring and training Officers and Representatives to ensure that FEMA contractors have the proper oversight and accountability. This additional staff will provide adequate resources for such supervision.

Recommendation #25: We recommend that the Director of the Federal Emergency Management Agency establish clear roles and responsibilities for the Housing Area Command and define its reporting requirements and chain of command relationship with the FEMA headquarters, Joint Field Offices, and Technical Assistance Contractors.

Concur.

Recommendation #26: We recommend that the Director of the Federal Emergency Management Agency establish eligibility criteria, internal program controls, and a basis for testing a program before implementation to ensure the program meets disaster assistance provisions of the Stafford Act.

Concur.

Recommendation #27: We recommend that the Director of the Federal Emergency Management Agency place priority on analysis of new methods and technology to verify damage, occupancy, and ownership, when traditional methods of inspection are not responsive in the timely provision of assistance. Methods and applicable technology must be tested, based on supportable data, and provide the highest assurance of meeting program eligibility requirements.

DHS/FEMA will continue its work in using geo-spatial mapping and other appropriate technology to assist us in identifying areas with high damage and special needs.

Recommendation #28: We recommend the Director of the Federal Emergency Management Agency, in coordination with federal, state, and nongovernmental partners, develop more effective and efficient plans for the delivery of assistance to address long-term housing issues, and test these plans in a simulated environment before application in actual disasters.

The specific nature of this recommendation is unclear. DHS/FEMA plans to improve coordination with the States and non-governmental organizations to reflect the lessons from this incident.

Recommendation #29: We recommend that the Director of the Federal Emergency Management Agency create individual development plans (or a similar process) and implement a consolidated records system to maintain accurate information on training completed.

Concur.

Recommendation #30: We recommend that the Director of the Federal Emergency Management Agency finalize and distribute the Southeast Louisiana Catastrophic Hurricane Plan, using the lessons learned during Hurricane Katrina to improve the plan.

Concur.

Recommendation #31: We recommend that the Director of the Federal Emergency Management Agency request appropriation or provide other funding, resources, and institutional support to agency components and to state and local partners to complete draft or proposed catastrophic planning initiatives for natural disasters.

Concur.

Recommendation #32: We recommend that the Director of the Federal Emergency Management Agency and Under Secretary for Preparedness jointly develop a formal mechanism to ensure continuity between preparedness, response, and recovery by including FEMA regional staff in the Preparedness Division's relationships with state emergency management agencies for grants, exercises, planning, technical assistance, and training.

DHS and FEMA have been coordinating efforts for several years. The partnership between the Preparedness Directorate, Office of Grants and Training (G&T) and FEMA has benefited our stakeholders across the country. Examples of coordination activities include the following:

- G&T routinely requests FEMA input into program grant guidance.
- G&T Preparedness Officers collaborate with FEMA Regional staff regarding NIMS compliance issues.
- FEMA staff were invited to participate in the Homeland Security Assistance Plan workshops that were conducted by G&T in FY 2005.
- G&T staff have provided briefings to the FEMA Regional Interagency Steering Committees.
- G&T has provided staff members to support the NIMS Integration Center.
- FEMA staff have been invited to participate in G&T conferences.
- G&T staff continue to work with FEMA contract staff regarding Metropolitan Medical Response System (MMRS) contracts that were awarded by FEMA prior to the transfer of the MMRS program.
- FEMA provided extensive support and assistance during the transition of Emergency Management Planning Grants (EMPG) and MMRS programs to G&T, and in some cases, assisted in the review of FY 2005 EMPG application proposals.
- FEMA has provided space and support to G&T staff located in the FEMA Regional offices.

There are several processes in place at G&T to work with FEMA and the emergency management community to provide input to program grant guidance.

Formal feedback on current and future grant guidance is solicited from Federal, State, and local stakeholders, including the emergency management community, through several formal channels (e.g., stakeholder workshop, national associations, etc). For example, the decoupling of the Emergency Management Performance Grants from the Homeland Security Grant Program (HSGP) in FY 2006 was a direct result of feedback provided from the emergency management community and state and local stakeholders to a joint G&T-National Emergency Management Agency survey conducted in May 2005. Also, potential grant guidance is reviewed by stakeholders prior to developing initial drafts of grant guidance. G&T also coordinated closely with the National Incident Management System Integration Center (NIC) for the HSGP in Fiscal Years 2005 and 2006. They gave a lot of input on how we addressed NIMS requirements in the document.

G&T has worked very closely with the NIC on developing a cohesive planning structure with the Department of Health and Human Services (HHS) and all grant and guidance related issues on a Joint Steering Committee.

In addition, all G&T grant guidance is aligned with the National Preparedness Goal, the National Priorities, and target capabilities. This guidance was developed in close coordination with federal, state, and local partners, including FEMA. They also participated in the first few DHS-HHS grant coordination committee meetings.

The DHS/FEMA NIC is also working with the Preparedness Directorate to implement the following:

- **Compliance Monitoring/Technical Assistance:** The NIMS Integration Center is working closely with the Preparedness/Office of Grants and Training to develop and provide a comprehensive framework to manage the compliance of NIMS Implementation and to provide technical assistance to help States maintain a viable national capability. Under the terms of this agreement, G&T would include FEMA Regional representatives in their grant monitoring visits.
- **Emergency Management Institute (EMI) Training and Exercise Activities:** The NIC and EMI is working closely with the Preparedness/Office of Grants and Training to ensure Homeland Security Exercise & Evaluation Program principles, concepts, and best practices are integrated in existing and proposed training programs and to ensure that all first responder training curriculum maintained by the G&T training consortium are coordinated with the NIC and EMI.
- **Resource Typing Activities:** The NIC is working closely with the Preparedness Directorate, Office of Policy Integration and Analysis, to type resources on the Target Capabilities List.

- Homeland Security Presidential Directive 8 Activities: The NIC is working closely with the Preparedness Directorate, Office of Policy Integration and Analysis, to coordinate Homeland Security Presidential Directive 8 initiatives, including the Annual Capabilities Assessment.
- "State and Local Government 101" Activities: The NIC is working closely with the Preparedness Directorate, Technical Assistance Office of State and Local Programs, to update a suite of guidance documents for State and local governments to ensure they comply with NIMS and the NRP.
- Readiness Review: The NIC is working closely with the Preparedness Directorate, Office of Policy Integration and Analysis, in a review of the Readiness System to ensure credentialing, resource typing, resource management and NIMS Implementation issues are addressed.
- Other Exercise Coordination: The NIC is working closely with the G&T to ensure policies, practices and principals of NIMS and the National Response Plan are incorporated in future exercise plans.
- Mutual Aid – The NIC is working closely with the U.S. Fire Administration to establish a mutual aid intrastate pilot project for firefighters. The project is being spearheaded by the International Association of Fire Chiefs.

Recommendation #33: We recommend that the Director of the Federal Emergency Management Agency oversee the Remedial Action Management Program to maintain focus and provide support for corrective action.

Concur.

Recommendation #34: We recommend that the Director of the Federal Emergency Management Agency direct its Remedial Action Management Program to identify interim remediation plans for issues that have a remediation completion date of greater than one year from the date assigned.

Concur.

Recommendation #35: We recommend that the Under Secretary of Preparedness for the Department of Homeland Security provide states with training on the applicability of the National Preparedness System and preparedness grants to all hazards, including natural disasters.

The Preparedness Directorate is pleased to report that the Directorate's Office of Grants and Training has been actively engaged in implementing the recommendation. Specifically, on March 30, 2005, the Directorate's Office of Grants and Training introduced the Interim National Preparedness Goal (Goal) under Homeland Security Presidential Directive 8 (HSPD-8). The Goal establishes a strategic preparedness framework for federal, state, local,

and tribal entities to prevent, protect, respond, and recover from an Incident of National Significance, whether natural or man-made. The Goal also establishes readiness priorities, targets, and metrics.

The Goal serves as the overarching policy to guide other programs within the Directorate, including grants, training and exercises, in implementing an all-hazards or capabilities-based planning approach. Together, these programs and concepts form the framework and components of the National Preparedness System. In support of the vision laid out within the Goal, G&T has actively redesigned the structure and processes employed by its grant programs, aiming to award funds based on a combination of the relative risk and the effectiveness of their homeland security programs at managing risk. This is also supported by a national planning and review process through which States and territories craft investments to build and sustain their capabilities.

The National Preparedness Goal is critical to addressing many of the recommendations identified by the Administration and Congress in the analysis of the responses to Hurricanes Katrina, Rita, and Wilma. In addition, other significant recent initiatives, such as the National Strategy for Pandemic Influenza require us to ensure the Goal is consistent and synchronized with these initiatives. The Department is revising the Goal on an accelerated timeline in concert with other specific recommendations.

The Directorate has actively conducted outreach to provide States with training on the applicability of the National Preparedness System and preparedness grants to all hazards, including natural disasters, and the new processes involved. Specifically, G&T held rollout conferences for the National Preparedness Goal and National Response Plan in Los Angeles, Chicago, and Miami in April and May 2005. G&T also conducted a series of regional conferences in San Francisco (Western region), Houston (Central region), and Boston (Eastern region) between August 2005 and January 2006, which included plenary sessions on National Preparedness as well as tracks covering the aspects of the National Preparedness System in greater detail. A central purpose of these conferences was to provide attendees with timely and relevant information on important national initiatives that affect the implementation of G&T Programs.

In addition, DHS supported a state-specific approach, providing individual orientations and facilitated discussions with key state leadership; to this end, Mobile Implementation Training Teams (MITT) were deployed to each of the 50 states, the District of Columbia, and five U.S. territories to provide further guidance on HSPD-8, the Goal, all-hazards preparedness, and capabilities-based planning. The Directorate remains committed to continuing these educational efforts and ensuring that States fully understand the applicability of the National Preparedness System and preparedness grants to the risks they face in their communities, including risks posed by natural hazards.

Recommendation #36: We recommend that the Under Secretary of Preparedness for the Department of Homeland Security develop a system to assess state capability to respond to a disaster, without federal assistance and in respect to a minimum level of preparedness based on the Emergency Management Accreditation Program standard.

The Preparedness Directorate's Office of Grants and Training is currently engaged with stakeholders in the filed in designing this system. Once operational, the system will include the capacity to examine preparedness at multiple levels of government. It will employ target capabilities, which define operational capabilities for four homeland security missions: prevent, protect, respond, and recover.

The Emergency Management Accreditation Program (EMAP) is appropriate for program level assessments; but, it is insufficient to determine operational readiness. As a result, a system is being developed, which provides the ability to report and assess readiness on a national scale under the requirements of Homeland Security Presidential Directive 8. HSPD-8 directed development of a National Preparedness Goal with measurable readiness priorities and targets, readiness metrics and elements that support the goal including standards for preparedness assessments and strategies. It also directed the development of a system for assessing the Nation's overall preparedness to respond to major events, especially those involving acts of terrorism.

Recommendation #37: We recommend that the Director of the Federal Emergency Management Agency develop a method for determining the level of readiness of FEMA to respond to a disaster that exceeds a state's capabilities.

Concur.

Recommendation #38: We recommend that the Under Secretary of Preparedness for the Department of Homeland Security, ensure all DHS employees receive training on DHS responsibilities under the NRP and NIMS.

Concur.

Additional Comments

Pages	Para.	Issue	Rationale
11	3	The OIG reports that between 8/31-9/3 over 22,000 evacuees were transported from the Superdome, Convention Center and other locations. Suggest that Report verify evacuee numbers.	The <i>Federal Response to Hurricane Katrina: Lessons Learned</i> report says that 35,000 people were evacuated by 9/3. (See p. 39 of that report.)
11-12		Not sure that figure of "22,000" for number of evacuees from SD, CC and other NO locations is accurate. Some have estimated figures to be much higher. OIG should double-check figures.	
12	2	Paragraph starting with "FEMA officials experienced difficulty in establishing joint, integrated operations with Louisiana's emergency management personnel..." These references are incorrect.	Bill Lokey, FEMA FCO, and Jeff Smith, Louisiana SCO, started establishing joint operational objectives from the day the FCO arrived in Baton Rouge, Louisiana, on the evening of Saturday, August 27, 2005.
20	3	"In addition, FEMA's FCO and Louisiana's State Coordinating Officer did not establish joint priorities and objectives for the response until September 11, 2005. Also, the first joint incident action plan was developed for the September 14, 2005, operational period after operations transitioned to the JFO on September 12, 2005." These references are incorrect.	Bill Lokey, FEMA FCO, and Jeff Smith, Louisiana SCO, started establishing joint operational objectives from the day the FCO arrived in Baton Rouge, Louisiana, on the evening of Saturday, August 27, 2005.
23	3	Suggest that Report adopt precise language of Homeland Security Presidential Directive 5 and/or the National Response Plan to identify "Incidents of National Significance." Suggest not using paraphrased language because it may result in ambiguity.	
24	2	Seems that could be misleading to indicate that "No one we interviewed could definitively state whether DHS activated the Catastrophic Incident Annex for Hurricane Katrina."	It is well known that the NRP-CIA was not formally activated, even though, as noted elsewhere in the draft Report, DHS/FEMA pre-positioned assets in a similar (or greater) amount/volume than the NRP-CIS called for.
26	Footnote 17	The statement about a PFO being designated within an hour of an incident is not substantiated in any DHS documentation.	Neither the NRP, NRP-CIA nor NRP-CIS state anything about a 1-hour time frame for designating a PFO in a catastrophic incident. In addition, the CPSD branch that manages the PFO program said this is not criteria they have ever stipulated.
32	4	"...Louisiana's FCO and Deputy FCO said that they did not learn of the first breach of the N.O. levees until almost 24 hours after it occurred." This reference is not entirely accurate.	Bill Lokey, FCO, said that he learned of the first levee breach and flooding, and the corresponding need for urgent rescue efforts on the afternoon of the Monday, August 29, 2005.
73	4	Asserts that "incoming requests for critical	

Appendix T
 Management Response to Draft Report

Pages	Para.	Issue	Rationale
		commodities could have been lost, mishandled, miscommunicated, or processed multiple times" – without any further substantiation.	
112	2	Not accurate to state "Changes in recent years have also diverted attention from natural hazards preparedness to terrorism preparedness."	<p>No substantiation offered, and do not think it "diverted attention" – even if no longer handled by FEMA. Suggest clarification or deletion.</p> <p>Further, the draft Report should reflect that pursuant to the 2SR process, the transfer of grant program responsibilities to the Preparedness Directorate for all hazards – natural disasters, accidents, and terrorist events.</p>

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