



United States Government Accountability Office
Washington, DC 20548

October 29, 2010

The Honorable Frank Lautenberg
Interim Chairman
The Honorable George Voinovich
Ranking Member
Subcommittee on Homeland Security
Committee on Appropriations
United States Senate

The Honorable David E. Price
Chairman
The Honorable Harold Rogers
Ranking Member
Subcommittee on Homeland Security
Committee on Appropriations
House of Representatives

Subject: *FEMA Has Made Limited Progress in Efforts to Develop and Implement a System to Assess National Preparedness Capabilities*

This letter formally transmits a briefing we provided to your staff in draft form on September 29, 2010, and subsequent agency comments. We provided this briefing in response to a mandate in the conference report to the Department of Homeland Security (DHS) Appropriations Act, 2010.¹ In accordance with the direction in that report and in consultation with your staff, we provided interim oral briefings in March and July 2010 and are reporting the results of our final briefing on the Federal Emergency Management Agency's (FEMA) efforts to assess national preparedness. Specifically, we are reporting on (1) the usefulness and limitations of the national preparedness capabilities data that have been collected to date through selected evaluation efforts as described by FEMA, and (2) the extent to which FEMA has made progress in its national preparedness capability assessment efforts since we last reported on this issue in April 2009.² To conduct this work, we analyzed information, such as system user guides and project plans for six of FEMA's

¹ H.R. Rep. No. 111-298, at 109-110 (Conf. Rep.). The conference report accompanied the Department of Homeland Security Appropriations Act, 2010, Pub. L. No. 111-83, 123 Stat. 2142 (2009).

² GAO, *National Preparedness: FEMA Has Made Progress, but Needs to Complete and Integrate Planning, Exercise, and Assessment Efforts*, [GAO-09-369](#) (Washington, D.C.: Apr. 30, 2009).

evaluation efforts that FEMA officials identified as being key in assessing preparedness; reviewed the Post-Katrina Emergency Management Reform Act³ to identify legislative requirements associated with assessing national preparedness capabilities; and interviewed FEMA officials.

In summary, FEMA officials said that evaluation efforts used to collect data on national preparedness capabilities were useful for their respective purposes, but that the data collected were limited by data reliability and measurement issues related to the lack of standardization in the collection of data. For example, FEMA officials reported that one of its evaluation efforts, the State Preparedness Report, has enabled FEMA to gather data on the progress, capabilities, and accomplishments of a state's, the District of Columbia's, or a territory's preparedness program, but that these reports include self-reported data that may be subject to interpretation by the reporting organizations in each state and not be readily comparable to other states' data. They also stated that they have taken steps to address these limitations, for example by creating a Web-based survey tool to provide a more standardized way of collecting state preparedness information that will help them validate the information by comparing it across states. However, since April 2009, FEMA has made limited progress in assessing preparedness capabilities. Since that time, its primary efforts to assess national preparedness have focused on the ongoing implementation of the Comprehensive Assessment System (a five-step process for analyzing available preparedness data) and efforts to streamline preparedness data-reporting requirements for state, tribal, and local stakeholders. However, FEMA has not yet developed national preparedness capability requirements based on established metrics to provide a framework for these assessments. Further, FEMA has not yet fully implemented the five-step Comprehensive Assessment System because of delays in completing the fourth step—reporting national preparedness capabilities—and issuing the first National Preparedness Report. Until such a framework is in place, FEMA will not have a basis to operationalize and implement its conceptual approach for assessing local, state, and federal preparedness capabilities against capability requirements to identify capability gaps for prioritizing investments in national preparedness. For additional information on a summary of our work, see enclosure I, slides 13 through 15. Based on the results of our review, we are not making any recommendations for congressional consideration or agency action.

We provided a draft of this briefing to DHS for review and comment. DHS provided written comments, which are reprinted in enclosure II. In commenting on a draft of this briefing, DHS stated that FEMA is working toward refining its programs, and GAO's analysis of its program performance greatly benefits its ability to continually improve its activities. In addition, DHS commented that FEMA believes it has made much progress since 2009 in meeting the Post-Katrina Emergency Management Reform Act and other legislative requirements and highlighted some of its specific

³ The Post-Katrina Emergency Management Reform Act was enacted as Title VI of the Department of Homeland Security Appropriations Act, 2007, Pub. L. No. 109-295, 120 Stat. 1355 (2006). The act defines capability as "the ability to provide the means to accomplish one or more tasks under specific conditions and to specific performance standards." *Id.* at § 641, 120 Stat. at 1424 (codified at 6 U.S.C. § 728).

achievements, such as the establishment of a working group to help consolidate and streamline reporting requirements for state, tribal, and local stakeholders. The actions FEMA has taken are discussed in more detail in the enclosed briefing. DHS also provided technical comments, which we incorporated into the report as appropriate.

We are sending copies of this report to other appropriate congressional committees. We are also sending copies to the Secretary of Homeland Security, the FEMA Administrator, and the Director of the Office of National Preparedness Directorate. This report will also be available at no charge on our Web site at <http://www.gao.gov>. Should you or your offices have any questions concerning this report, please contact me at (202) 512-8757 or JenkinsWO@gao.gov. Contact points for Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report were Chris Keisling, Assistant Director; Frederick Lyles, Jr., Analyst-in-Charge; Jared Hermalin; Tracey King; Cynthia Saunders; and Adam Vogt.

A handwritten signature in black ink that reads "William O. Jenkins". The signature is written in a cursive style with a large, sweeping flourish at the end.

William O. Jenkins
Director, Homeland Security and Justice Issues

Enclosures—2



**FEMA Has Made Limited Progress in Efforts to
Develop and Implement a System to Assess
National Preparedness Capabilities**

3rd Quarterly Briefing for Congressional Requesters

October 29, 2010

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Introduction

- The attacks of 9/11 and Hurricane Katrina were, respectively, the most destructive terrorist and natural disasters in our nation's history and highlighted gaps in the nation's readiness to respond effectively to large scale catastrophes. To strengthen the nation's preparedness for such incidents, in December 2003 the President issued Homeland Security Presidential Directive 8 (HSPD-8) that called on the Secretary of Homeland Security to enhance preparedness capabilities of federal, state, and local entities.¹ In October 2006, the Post-Katrina Emergency Management Reform Act (Post-Katrina Act) charged the Federal Emergency Management Agency (FEMA)—a component of the Department of Homeland Security (DHS)—with responsibility for leading the nation in developing a national preparedness system.²
- The Post-Katrina Act requires that FEMA develop a national preparedness system and assess preparedness capabilities—capabilities needed to respond effectively to disasters—to determine the nation's preparedness capability levels and the resources needed to achieve desired levels of capability.³ Figure 1 provides an illustration of how local, state, and federal resources provide capabilities for different levels of incident effect.
- FEMA's National Preparedness Directorate within its Protection and National Preparedness organization is responsible for developing and implementing a system for measuring and assessing national preparedness capabilities (see app. I for FEMA's organizational chart). Organizational responsibilities related to national preparedness assessments are summarized in appendix II.

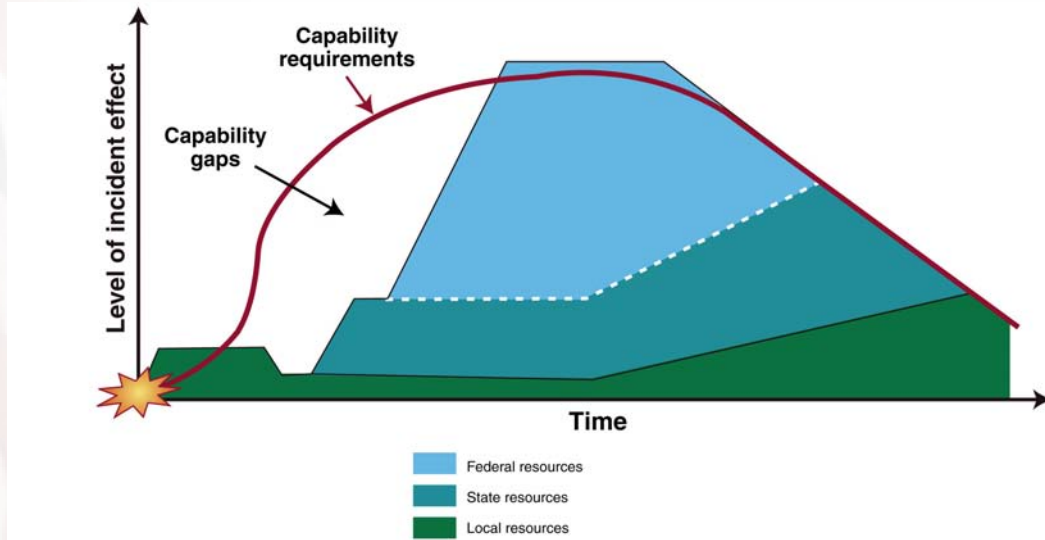
¹Homeland Security Presidential Directive 8 (HSPD-8)—National Preparedness (Dec. 17, 2003).

²The Post-Katrina Act was enacted as Title VI of the Department of Homeland Security Appropriations Act, 2007, Pub. L. No. 109-295, 120 Stat. 1355 (2006). The act defines capability as "the ability to provide the means to accomplish one or more tasks under specific conditions and to specific performance standards."

³Pub. L. No. 109-295, § 649, 120 Stat. 1355, 1428 (2006) (codified at 6 U.S.C. § 749).

Introduction (cont.)

Figure 1: Conceptual Illustration for Assessing Capability Requirements and Identifying Capability Gaps for National Preparedness



Source: GAO.



Introduction (cont.)

- In April 2009, we reported that FEMA was developing the Comprehensive Assessment System in response to the Post-Katrina Act requirement to assess the nation's capabilities and overall preparedness for preventing, responding to, and recovering from natural and man-made disasters.⁴ We reported that FEMA (1) lacked a comprehensive approach to managing the development of policies and plans to define emergency response roles and responsibilities; (2) faced challenges in meeting statutory and program requirements in conducting the National Exercise Program; (3) had not established a clearly defined course of action to assess capabilities or defined outcomes of where the nation should be in terms of domestic preparedness goals and measurable performance indicators for the nation's preparedness programs; and (4) had not established a strategic plan for integrating elements of the national preparedness system. We concluded that without defining capability requirements, FEMA and its local, state, tribal, and federal preparedness stakeholders cannot implement a standardized approach to identifying capability gaps. We recommended that FEMA take action to address these concerns, and FEMA concurred with our recommendations. Appendix III provides a summary of the status of the agency's implementation of our recommendations.⁵

⁴GAO, *National Preparedness: FEMA Has Made Progress, but Needs to Complete and Integrate Planning, Exercise, and Assessment Efforts*, GAO-09-369 (Washington, D.C.: Apr. 30, 2009).

⁵FEMA established a Target Capabilities List—a list of 37 specific preparedness capabilities related to the four homeland security mission areas: Prevent, Protect, Respond, and Recover—intended as planning guidance for state, tribal, and local stakeholders. It defines and provides the basis for assessing preparedness.



Introduction (cont.)

- The conference report accompanying the Department of Homeland Security Appropriations Act, 2010, directed us to provide quarterly reports to Congress in fiscal year 2010 on the status of FEMA's efforts to assess national preparedness.⁶ This is the final in our series of briefings.
- As part of our first quarterly briefing (March 2010) to staff of the Senate Appropriations Committee, Homeland Security Subcommittee, and the House Appropriations Committee, Homeland Security Subcommittee, we reported that FEMA had initiated efforts to develop a framework to assess preparedness capabilities by, for example, creating a working group to assist in the development of an integrated approach for assessing national preparedness.⁷ We also reported that for fiscal years 2008 through 2010, FEMA had budgeted about \$58 million to develop and implement the evaluation efforts they had identified as being key in assessing preparedness. FEMA officials said these efforts were useful for their respective purposes, but had certain limitations such as data reliability given that the data collected were in many cases self-reported by states and grant recipients and FEMA did not have a verification mechanism for them.

⁶H.R. Rep. No. 111-298, at 109-110 (Conf. Rep.). The conference report accompanied the Department of Homeland Security Appropriations Act, 2010, Pub. L. No. 111-83, 123 Stat. 2142 (2009).

⁷FEMA established a Reporting Requirements Working Group consisting of 41 officials from FEMA, state, local, and tribal governments, and the National Emergency Management Association to develop an agencywide information-gathering system that is fielded to state, local, tribal, and territorial governments and provide recommendations for streamlining data requests.



Introduction (cont.)

- As part of our second quarterly briefing (July 2010) to staff of the Senate Appropriations Committee, Homeland Security Subcommittee, and the House Appropriations Committee, Homeland Security Subcommittee, we reported that the working group FEMA created to assist in the development of an integrated approach for assessing national preparedness had concluded its efforts and made several recommendations to FEMA management regarding the requirements that any future data-reporting system related to national preparedness should address. We also reported that FEMA had developed a Comprehensive Assessment System to assess the nation's preparedness for disasters but faced challenges in collecting data needed to implement the system because the data are collected by many organizations in different forms.



Objectives

In accordance with this mandate, our objectives were to determine the following:

1. How has FEMA described the usefulness and limitations of the national preparedness capabilities data that have been collected to date through selected evaluation efforts?
2. To what extent has FEMA made progress in its national preparedness capability assessment efforts since April 2009?



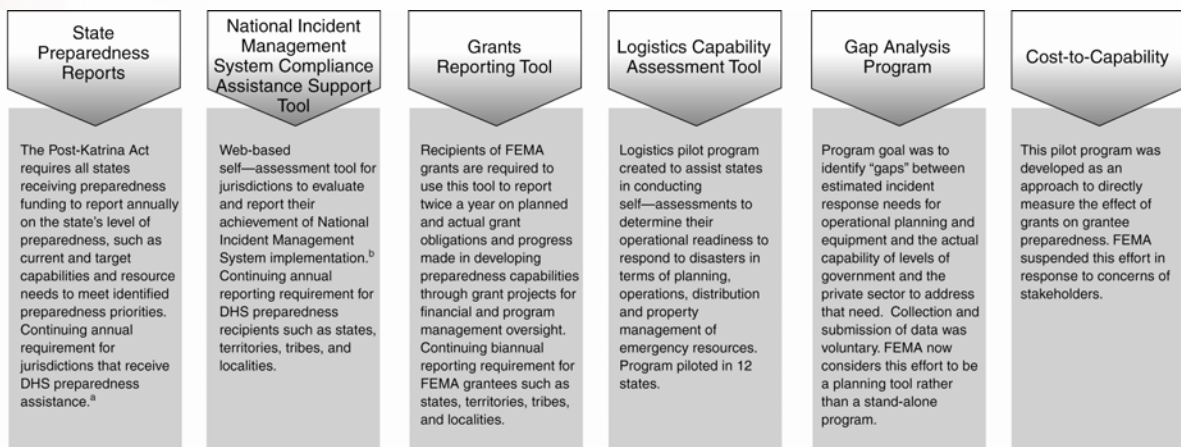
Scope and Methodology

To identify how FEMA has described the usefulness and limitations of the national preparedness capabilities data they have collected as of September 2010 through the selected evaluation efforts, we

- obtained and reviewed information such as system user guides and project plans for six of FEMA’s evaluation efforts that FEMA officials identified as being key in assessing preparedness—the State Preparedness Reporting system, the National Incident Management System Compliance Assistance Support Tool, the Grants Reporting Tool, the Logistics Capability Assessment Tool, the Gap Analysis Program, and the Cost-to-Capability pilot program. Figure 2 provides a description of each of the six evaluation efforts. We previously reported on the State Preparedness Reporting system, the National Incident Management System Compliance Assistance Support Tool, the Gap Analysis Program, and the Cost-to-Capability pilot program in our April 2009 report, and FEMA officials identified the Grants Reporting Tool and the Logistics Capability Assessment Tool as additional key evaluation efforts, and
- interviewed FEMA officials to obtain information on the status, usefulness, and limitations of these evaluation efforts.

Scope and Methodology (cont.)

Figure 2: Six Evaluation Efforts Selected for This Review



Source: FEMA.

^aIncludes the states, territories, and the District of Columbia.

^bThe National Incident Management System provides a standardized program of planning, organization, and resources for management of emergency incidents.



Scope and Methodology (cont.)

To determine the extent to which FEMA has made progress in its national preparedness capability assessment efforts since we reported on its status in April 2009, we reviewed the status of FEMA's efforts to implement the Comprehensive Assessment System, streamline preparedness reporting requirements, and work with the congressionally-mandated Local, State, Tribal and Federal Preparedness Task Force (Task Force).⁸ Specifically, we

- reviewed the Post-Katrina Act sections that required FEMA to develop and implement the Comprehensive Assessment System to identify legislative requirements associated with assessing national preparedness capabilities and analyzed FEMA's contracts for the system and associated documents including project and implementation plans, and monthly progress reports;
- observed several meetings and reviewed the meeting minutes of the Reporting Requirements Working Group, which was responsible for reviewing the agency's preparedness data collection efforts and reducing the reporting burden on state, local, and tribal governments, to identify FEMA's planned approach and progress achieved to date;
- observed the Local, State, Tribal, and Federal Preparedness Task Force meetings in April, June, July, and September 2010 and reviewed its meeting minutes to obtain information on its efforts to develop recommendations related to policy and guidance, grant programs, and capabilities and assessments; and

⁸The Conference Report accompanying the 2010 Department of Homeland Security appropriations act called for a Task Force responsible for "making recommendations for all levels of government regarding: disaster and emergency guidance and policy; federal grants; and federal requirements, including measuring efforts." H.R. Rep. No. 111-298, at 102 (2009) (Conf. Rep.). This Task Force is comprised of 35 members of federal, state, local, and tribal governments.



Scope and Methodology (cont.)

- interviewed officials from national stakeholder organizations identified by FEMA, including the International Association of Emergency Managers, the National Advisory Council, the National Council on Disability, and the National Emergency Management Association to obtain their views on FEMA's preparedness capability assessment efforts.⁹ Although the views of the officials from these organizations can not be generalized to all of FEMA's national stakeholder organizations, they provided useful perspectives on FEMA's preparedness capability assessment efforts.
- To ensure the technical accuracy of the briefing, we provided a draft of this briefing to DHS and FEMA and met with officials to obtain technical comments, which we incorporated as appropriate.
- We conducted this performance audit from December 2009 through October 2010, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

⁹The International Association of Emergency Managers is a nonprofit educational organization dedicated to promoting the goals of saving lives and protecting property during emergencies and disasters. The National Advisory Council was established by the Post-Katrina Act to advise the FEMA Administrator on all aspects of emergency management, incorporating state, local, and tribal government and private-sector input in the development and revision of national preparedness policies and plans. Pub. L. No. 109-295, § 508, 120 Stat. 1355, 1403 (2006) (codified at 6 U.S.C. § 318). The National Council on Disability is an independent federal agency that provides advice to the President, Congress, and executive branch agencies to promote policies for individuals with disabilities. The National Emergency Management Association is a nonprofit, nonpartisan association of emergency management and homeland security professionals.



Summary

- FEMA officials said that their evaluation efforts were useful for their respective purposes, but the national preparedness capabilities data that have been collected to date through selected evaluation efforts were limited by data reliability and measurement issues related to the lack of standardization in the collection of data. However, FEMA officials stated that the cost of using federal employees or contractors to collect and validate preparedness data at the state and local levels would be cost-prohibitive. In terms of usefulness of the preparedness capabilities data provided by the evaluation efforts we selected for this review, each of the evaluation efforts has provided data of specific use to its respective users. For example, FEMA officials reported that the Logistics Capability Assessment Tool helped states and localities conduct their self-assessments in identifying disaster response capabilities for operational readiness (i.e., short term actions for an immediate event), and target areas for improvement. In terms of limitations, FEMA has identified data reliability as a primary limitation of the evaluation efforts that have been implemented. For example, FEMA officials said State Preparedness Reports include self-reported data that may be subject to interpretation by the reporting organizations in each state and not be readily comparable to other states' data. They also stated that they have taken steps to address these limitations, for example by creating a Web-based survey tool to provide a more standardized way of collecting state preparedness information that will help them validate the information by comparing it across states. FEMA officials stated that they believe overall the data they have are reliable.
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Summary

- Since April 2009, FEMA has made limited progress in assessing preparedness capabilities. Its primary efforts to assess national preparedness since our April 2009 report have focused on the ongoing implementation of the Comprehensive Assessment System and efforts to streamline preparedness data reporting requirements for state, tribal, and local stakeholders. Specifically:
 - FEMA has developed a Comprehensive Assessment System—a five-step process for analyzing available preparedness data—but has not developed national preparedness capability requirements based on established metrics to provide a framework for these assessments. Further, FEMA has not yet fully implemented the five-step process because of delays in completing the fourth step—reporting national preparedness capabilities—and issuing the first National Preparedness Report.
 - FEMA officials said they planned to consider the Task Force’s October 2010 report and its recommendations, and their progress in assessing national preparedness capabilities depended on the outcome of the administration's effort to revise HSPD-8, the national preparedness presidential directive; the revision was still in process as of October 2010.
 - Until such a framework is in place, FEMA will not have a basis to operationalize and implement its conceptual approach for assessing local, state, and federal preparedness capabilities against capability requirements to identify capability gaps for prioritizing investments in national preparedness.
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Summary

- FEMA established a Reporting Requirements Working Group, which met eight times from August 2009 through April 2010 to discuss analysis efforts underway by FEMA's offices and directorates. Although the goal of the group was to develop an agencywide information system and provide recommendations for streamlining data requests, FEMA discontinued the working group prior to it developing a system or specific recommendations for streamlining preparedness assessment reporting requirements for state, local, and tribal stakeholders.



Objective 1

FEMA Reports That Its Evaluation Efforts Have Been Useful for Their Intended Purposes, but Limitations Exist

- FEMA officials said that, in general, the data developed through the evaluation efforts we selected for this review have provided information of specific use to FEMA programs responsible for supporting the development of national preparedness capabilities. Program officials identified data reliability as a primary limitation of the evaluation efforts since they all rely on self-reporting of preparedness data and assessments. For example, FEMA officials identified issues regarding whether data are complete and accurate and regarding establishing and applying objective ways to measure preparedness capabilities; they said the ongoing development of capability measures is intended to address this issue. They also stated that they have taken steps to address these limitations, for example by creating a Web-based survey tool to provide a more standardized way of collecting state preparedness information that will help them validate the information by comparing it across states. FEMA officials stated that they believe overall the data they have are reliable.



Objective 1

FEMA Reports That State Preparedness Reports Have Been Useful for Assessing Capabilities, but Limitations Exist

Usefulness:

- State Preparedness Reports, which are required by the Post-Katrina Act, have enabled FEMA to gather data on the progress, capabilities, and accomplishments of a state's, the District of Columbia's, or a territory's preparedness program. States, territories, and the District of Columbia submitted their first state preparedness reports to FEMA in 2008.
- The reports track information regarding planning and incident management efforts, current preparedness capability levels, targeted levels of capability, preparedness expenditures, and estimates of needed monetary resources.
- For fiscal year 2010 reporting, FEMA developed a Web-based survey to make the report more user-friendly. According to FEMA officials, the new format uses quantitative scores and common metrics to help assess capabilities in the Target Capabilities List.

Limitations:

- Prior to fiscal year 2010, FEMA had not yet established common metrics, which made comparisons among states' prior years' reports difficult.
- FEMA required that states assess 10 to 15 "priority" capabilities in prior years' reports, rather than all 37 capabilities in the Target Capabilities List.
- The reliability of the data in reports could be limited because FEMA relies on states to self-report data, which makes it difficult to ensure data are consistent and accurate.

Status: This is a continuing annual requirement for jurisdictions receiving preparedness assistance from DHS.



Objective 1

FEMA Reports That the National Incident Management System Compliance Assistance Support Tool Has Been Useful for Assessing Compliance, but Limitations Exist

Usefulness:

- This Web-based tool enabled FEMA to collect data from stakeholders at all levels of government and report on compliance with National Incident Management System (NIMS) at the state level.
- Users identify successes, shortfalls, and corrective action plans (if necessary) for each NIMS compliance objective.
- The tool is widely used; as of January 2010, fiscal year 2009 compliance data were submitted by 50 states, the District of Columbia, and territories; 406 state agencies; 10,877 local agencies; and 36 tribal nations.¹⁰

Limitations:

- While state reporting is standardized and required, no standardization exists across states regarding the type of jurisdictions within each state reporting on their implementation of NIMS. Tribal accounts may be created under FEMA regions, and are not necessarily linked to state accounts.
- Because jurisdictions input data and information through the tool based on self-assessments, data reliability issues exist.

Status: DHS preparedness recipients such as states, territories, tribes, and localities are to report annually on NIMS compliance. Homeland Security Presidential Directive (HSPD-5) requires the DHS Secretary to develop standards and guidelines for state and local adoption of NIMS.¹¹

¹⁰One territory did not respond, according to FEMA officials.

¹¹According to HSPD-5, the purpose is to enhance the ability of the United States to manage domestic incidents by establishing a single, comprehensive national incident management system.



Objective 1

FEMA Reports That the Grants Reporting Tool Has Been Useful, but Limitations Exist

Usefulness:

- The Grants Reporting Tool database provided: (a) standardized and ad hoc reports to Congress, DHS, auditors, program administrators, and grantees; (b) grantee audit trails; and (c) links between project data and Homeland Security strategies and target capabilities.
- Using the tool, FEMA tracked 21 grant programs from fiscal years 2004 through 2009.
- The tool allowed FEMA staff to track the entire grant life cycle, and assisted in financial and program management oversight by collecting information on, among other things, state, local, and tribal grant recipients' planned and actual obligations and expenditures.

Limitations:

- Because the system is not designed to capture information on preparedness capability improvements, it can be difficult to measure the relationship between expenditures and preparedness capabilities.
- While validation mechanisms are built into the Web-based system, data reliability is an issue because the tool relies on state and local officials to self-report data for preparedness assessments that are subject to individual interpretation; thus, the consistency of information across grantees is uncertain. For example, grantees may be asked to report whether they have made progress toward implementation of national priorities.

Status: Grant recipients are required to use the Grants Reporting Tool on a continuing biannual basis to provide information for FEMA monitoring and oversight.



Objective 1

FEMA Reports That the Logistics Capability Assessment Tool Has Been Useful, but Limitations Exist

Usefulness:

- This tool was designed for the exclusive use of states to help them conduct self-assessments to identify their disaster logistics planning and response capabilities for operational readiness (i.e., short term actions for an immediate event), and target areas for improvement.
- The tool focuses on four core logistics competencies (related to planning, operations, distribution, and property management) and their subcategories; respondents choose from a range of competency levels.
- The results of the tool are intended to measure local logistics capability levels compared to logistics needs.

Limitations:

- The tool was neither designed nor intended to be used to evaluate logistical capabilities at the federal or state level.
- Differences in states' logistics capabilities make it difficult to summarize capabilities to identify, inventory, dispatch, mobilize, transport, and track resources for incident management at the regional level because the tool was not designed for this purpose.

Status: This pilot evaluation program is to be completed in fiscal year 2010; FEMA is exploring opportunities to continue the effort.



Objective 1

FEMA Reports That Its Gap Analysis Program Provided Useful Information, but Limitations Exist

Usefulness:

- The program helped state and local governments to identify potential preparedness shortfalls (gaps) and enhance their operational disaster capabilities.
- The program helped provide flexibility to states to use scenarios that are tailored to their risks, such as hurricanes or earthquakes.

Limitations:

- To estimate response requirements in the absence of actual disaster events, states may not have the resources or ability to provide accurate capability information into Gap Analysis Program response models and simulations.
- The depth and transparency of analysis is uneven across states, which casts a degree of uncertainty on reported results, and the lack of a national planning system and collaborative federal, state, and local planning is an impediment to identification of capability requirements.

Status: FEMA revised its approach to operational planning assistance. As a result, FEMA officials no longer consider this evaluation program as a stand alone program; instead program officials said they will continue to support these types of evaluations by offering the analysis tools to assist in state and local planning activities.



Objective 1

FEMA Reports That Its Cost-to-Capability Program Was Useful, but Limitations Resulted in its Discontinuation

Usefulness:

- FEMA pilot testing of the system in fiscal year 2009 was its first attempt to study how grants help build preparedness capabilities, and the pilot program provided useful information about the limitations of the cost-to-capability model.

Limitations:

- FEMA officials identified difficulties in establishing metrics to measure enhancements in preparedness capabilities; FEMA has an ongoing effort to develop measures for target capabilities as planning guidance to assist in state and local assessments; officials plan to complete their efforts after the revision of HSPD-8.
- FEMA said that state officials expressed concerns that there is no standardized formula for determining the projected dollar amounts that are necessary for “gaining” or “sustaining” levels of capability; users apply their judgment in assessing the status of preparedness capabilities.

Status: FEMA officials discontinued the program in 2010; however, FEMA officials said they plan to continue to explore ways to assess the effect of grant funds on state and local preparedness capabilities, including quantitative and qualitative measures.



Objective 2

FEMA Has Made Limited Progress in Implementing the Comprehensive Assessment System and Streamlining Reporting Requirements

- FEMA has made limited progress in implementing its national preparedness capabilities assessment efforts since we reported on its efforts in April 2009. Specifically, FEMA has not
 - fully implemented its Comprehensive Assessment System—its primary effort intended to bring together multiple sources of preparedness information and data (including data from the evaluation efforts included in this review)—nor determined a framework for assessing and reporting national preparedness capabilities based on established metrics and
 - streamlined reporting requirements as a result of the Reporting Requirements Working Group’s efforts.
 - Until such a framework is in place, FEMA will not have a basis to operationalize and implement its conceptual approach for assessing local, state, and federal preparedness capabilities against capability requirements to identify capability gaps for prioritizing investments in national preparedness.
 - FEMA officials said that the Comprehensive Assessment System was fully functional and would continue to be developed and improved, although they did not identify a time frame for publication of the National Preparedness Report. They said that implementation of the working group’s recommendations would be part of their ongoing efforts.
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Objective 2

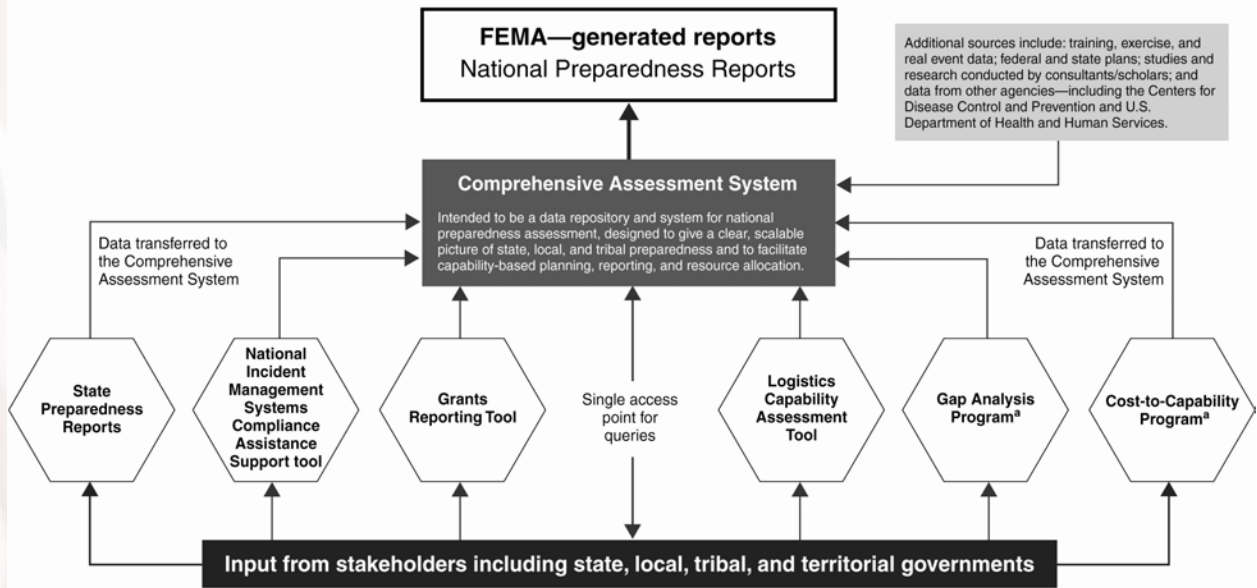
FEMA Has Made Limited Progress Implementing Its Comprehensive Assessment System

- FEMA has developed a system to assess preparedness that it defines as a five-step process (defining, collecting, analyzing, reporting, and improving preparedness data). FEMA reported facing challenges in collecting data on preparedness activities needed to implement the system because such data are collected by many organizations in many different forms. FEMA officials said they had produced a draft report assessing national preparedness utilizing the Comprehensive Assessment System process. According to FEMA officials, FEMA began developing the first National Preparedness Report in October 2008.¹² Since then, the report has undergone a series of revisions and the latest version of the draft report was submitted for review in May 2010. FEMA officials said they plan to submit the draft report for review and approval by the end of calendar year 2010.
- Based on discussions with FEMA officials and our review of its evaluation efforts, system documentation and products, we developed an illustration that reflects the relationship between the six evaluation efforts and the way FEMA collects and plans to report on preparedness capabilities data—see figure 3. FEMA has not yet determined how information technology will be used to collect and store these data and make them accessible to FEMA and state and local governments. FEMA officials said that decisions regarding the technological approach for gathering and disseminating information on national preparedness capabilities will be finalized once they take actions to address the working group and task force recommendations. FEMA officials agreed that the figure reflects a general concept of how FEMA might gather and disseminate preparedness data to the stakeholders.

¹²Homeland Security Presidential Directive 8 (HSPD-8) directs the Secretary of Homeland Security to report annually on the nation's level of the preparedness, including state capabilities. The report is referred to as the National Preparedness Report (Dec. 17, 2003).

Objective 2

Figure 3: Conceptual Illustration of How FEMA Might Gather and Disseminate Preparedness Data



Source: GAO analysis of FEMA data.

^aFEMA now considers the Gap Analysis Program to be a planning tool rather than a stand-alone program, and the Cost-to-Capability Initiative evaluation effort was discontinued; related evaluation efforts continue as part of a new Grants Effectiveness Analysis effort, according to FEMA officials.



Objective 2

FEMA Has Made Limited Progress Implementing Its Comprehensive Assessment System (cont.)

- According to FEMA officials, the requests for revisions to the draft National Preparedness Report reflect management concerns regarding methodological issues with the preparedness assessment. For example, initial drafts utilized four scenarios of catastrophic events—two man-made and two natural—to identify critical capabilities and shortfalls in those capabilities at federal, state, and local levels.¹³ However, management reviewers directed program officials to use a mission-oriented framework (prepare, protect, respond to, recover from, and mitigate) to identify critical capabilities and shortfalls for the report. As a result, FEMA has not yet completed implementation of its five-step Comprehensive Assessment System process for defining, collecting, analyzing, reporting, and improving preparedness data. Program officials plan to submit the draft report for review and approval by the end of calendar year 2010. At such time, the fourth step should be completed, and FEMA plans to address the fifth step to improve preparedness data to reflect ongoing and evolving national preparedness reporting requirements.

¹³FEMA utilized the following four scenarios of catastrophic events in its preparedness assessment: (1) influenza pandemic, (2) category 3 and 5 hurricanes, (3) terrorist use of explosives, and (4) improvised nuclear devices.



Objective 2

FEMA Has Made Limited Progress Implementing Its Comprehensive Assessment System (cont.)

In our 2009 report on the National Preparedness System,¹⁴ we recommended that FEMA improve its approach for developing the Comprehensive Assessment System by enhancing its project management plan—to include milestone dates, an assessment of risk, and addressing concerns of stakeholders in comprehensively collecting and reporting on disparate information sources—to reflect best practices for project management established by the Project Management Institute.¹⁵ The practices include, among other things,

- developing milestone dates to identify points throughout the project to reassess efforts underway to determine whether project changes are necessary,
- managing project risk to increase the probability and effect of positive events and decrease the probability and effect of adverse events on the project, and
- adapting the specifications, plans, and approach to the different concerns and expectations of the various stakeholders involved in the project.

In response, FEMA

- developed a project and implementation plan in August 2009 that provides milestone dates and identifies key assessment points throughout the project to determine whether project changes are necessary,
- developed an October 2009 proposal for a risk management plan, and
- drafted a November 2009 plan for improving customer service for state and local preparedness stakeholders.

¹⁴GAO-09-369.

¹⁵Project Management Institute, *A Guide to the Project Management Body of Knowledge* (PMBOK Guide), 4th ed. (Newton Square, Pa. 2008).

Objective 2



FEMA Has Made Limited Progress Implementing Its Comprehensive Assessment System (cont.)

- FEMA officials stated that they continue to experience the challenges we identified in our April 2009 report regarding the quality and availability of data needed as inputs for the Comprehensive Assessment System's five-step process to measure national preparedness.¹⁶ Specifically, because responsibilities for protecting against, responding to, and mitigating emergencies are shared by different federal, state, and local organizations, data on emergency preparedness are collected by many organizations for different purposes, in many different forms, and to differing degrees of thoroughness and completeness.
- FEMA officials said their effort to implement sections in the Post-Katrina Act prescribing that the system assess, among other things, the nation's preparedness capability levels against target capability levels and the resources needed to achieve such capability levels is being revised to incorporate pending anticipated changes to national homeland security preparedness policies and the national-level review of preparedness by the task force. They did not know when the revised policies would be issued. The task force issued its report in October 2010. According to FEMA officials, the agency plans to complete revisions to the Target Capabilities List by the end of 2010 and provide them to the states, with changes based on the recommendations of the task force and FEMA leadership guidance.
- As a result, FEMA has not yet established measurable capability requirements for federal, state, tribal, and local preparedness efforts to provide a framework for analyzing the results of capability assessments provided by the Comprehensive Assessment System process to identify capability gaps and prioritize national preparedness resource investments.

¹⁶GAO-09-369.

Objective 2



FEMA Has Made Limited Progress Implementing Its Comprehensive Assessment System (cont.)

To improve the availability and quality of preparedness data, officials from FEMA's National Preparedness Directorate said they are

- working with state and local officials to improve the quality of information obtained through evaluation of federal, regional, state, and local emergency response exercises;
- promoting a new Emergency Management Institute training course to enhance standardization in the way evaluators observe and report on the results of exercises; and¹⁷
- developing a program with the Emergency Management Accreditation Program to better assess exercises.¹⁸

However, FEMA officials said they had not yet taken steps to implement our April 2009 recommendation to the National Exercise Division to improve its implementation of statutory and program requirements and its efforts to measure program performance. As a result, FEMA's data for measuring the effectiveness of the National Exercise Program are incomplete. On August 17, 2010, Secretary of Homeland Security Janet Napolitano announced plans to revise the program by the end of November 2010. In addition, according to FEMA officials, they are reviewing after-action reporting requirements for exercises conducted by homeland security grant program recipients as part of their efforts to reduce the reporting burden on state and local stakeholders.

¹⁷The Emergency Management Institute is FEMA's national emergency management training, exercising, and education institution. The institute promotes integrated emergency management principles and practices through application of the National Response Framework, National Incident Management System, and an all-hazards approach.
¹⁸The Emergency Management Accreditation Program is a voluntary review process for state and local emergency management programs. Created by a group of national organizations to foster continuous improvement in emergency management capabilities, the program provides emergency management programs the opportunity to be recognized for compliance with national standards, to demonstrate accountability, and to focus attention on areas and issues where resources are needed.



Objective 2

FEMA Has Made Limited Progress in Streamlining Reporting Requirements

- In August 2009, FEMA established a Reporting Requirements Working Group consisting of 41 officials from FEMA; state, local, and tribal governments; and the National Emergency Management Association.¹⁹ The goal of the group was to develop an agencywide information-gathering system that is fielded to state, local, tribal, and territorial governments and provide recommendations for streamlining data requests. The working group met eight times from August 2009 through April 2010 to discuss analysis efforts underway by FEMA's offices and directorates.

¹⁹The National Emergency Management Association is a nonprofit, nonpartisan association of emergency management and homeland security professionals.



Objective 2

FEMA Has Made Limited Progress in Streamlining Reporting Requirements (cont.)

The Reporting Requirements Working Group established by FEMA reviewed analyses developed by National Preparedness Directorate staff and contractors supporting the working group who took a number of steps to assess reporting requirements. For example, they

- worked with FEMA's Office of Records Management to identify all FEMA reporting requirements;
 - performed an analysis of FEMA data collection tools and systems to determine opportunities for consolidation, which identified over 900 data-reporting requirements and suggested phasing out two systems to eliminate 376 of 988 questions;
 - met with representatives of the owners and operators of FEMA data-collection systems (Logistics, Response, and National Preparedness and Protection) to share information and consider possible consolidations; and
 - drafted a report summarizing data-collection and reporting methodologies that concluded using a survey tool is the most effective approach for collecting data from state, local, and tribal stakeholders.
-



Objective 2

FEMA Has Made Limited Progress in Streamlining Reporting Requirements (cont.)

- According to the Deputy Administrator for Protection and National Preparedness, FEMA discontinued the working group effort after achieving its purpose to consult with state, local, and tribal stakeholders related to streamlining efforts. He also said that FEMA plans to consider the working group's recommendations in the near future in its efforts to implement a system that meets the principles and goals approved by FEMA's senior leadership. FEMA informed the working group's state, local, and tribal members of the cessation of the effort in June 2010.
- The Deputy Administrator said the group's efforts resulted in seven recommendations. The recommendations focused on goals for an agencywide information-gathering system but did not provide specific recommendations for streamlining data requests.



Objective 2

FEMA Has Made Limited Progress in Streamlining Reporting Requirements (cont.)

- The working group made general recommendations in 2009 and reiterated them in April 2010:
 1. FEMA should better communicate the reasons, needs, and desired analysis prior to requesting information from state, local, and tribal governments;
 2. data submitted for analysis should meet the information needs of all stakeholders;
 3. a data collection and warehouse should be easily queried by all stakeholders;
 4. a data warehouse must have a high level of security;
 5. FEMA region offices should serve as a conduit for preparedness-related data requests to state, local, and tribal governments;
 6. FEMA should develop a 12-month calendar that outlines the frequency of existing FEMA reporting requirements to identify current effect and eliminate duplicative efforts; and
 7. FEMA should work with other partners, especially within DHS to ensure awareness of the initiative and improve interdepartmental consistency.
-



Objective 2

FEMA Has Made Limited Progress In Streamlining Reporting Requirements (cont.)

In notifying working group members that the working group was being discontinued, FEMA's Deputy Administrator for Protection and National Preparedness identified the following action items to implement the working group recommendations and continue efforts to develop an agencywide Information-gathering system and streamline data-collection efforts to be carried out by FEMA offices and divisions:

- review the approximately 100 identified data-collection efforts throughout FEMA, analyze them and make recommendations for consolidation of all data-collection systems within FEMA;
- identify an optimal data-collection methodology and related processes across FEMA;
- develop an overarching, agencywide FEMA data-collection policy that outlines standards to govern existing and future data collection;
- develop requirements for a unified preparedness, capability, and readiness information-collection system that has utility for meeting all stakeholders' needs; and
- solidify an annual timeline for data collection based on the current state and the stakeholders desired end state.



Objective 2

Next Steps by FEMA to Further National Preparedness Capabilities Assessment Efforts

- According to program officials, FEMA's efforts to define a framework within which its capability assessments can be effectively applied rely on the results of two key ongoing efforts: the first report of the congressionally-mandated Local, State, Tribal and Federal Preparedness Task Force, and planned revisions to Homeland Security Presidential Directive-8 (HSPD-8).
- In response to the conference report accompanying the 2010 DHS appropriations act, FEMA established the Local, State, Tribal, and Federal Preparedness Task Force.²⁰ The task force consists of 35 members of federal, state, local, and tribal governments and is to make recommendations for all levels of government. The task force evaluated (1) which policies and guidance need updating and the most appropriate process to do so; (2) which grant programs work the most efficiently and where programs can be improved; and (3) the most appropriate way to collectively assess national preparedness capabilities and identify capability gaps. Accordingly, the task force established three working groups—policy and guidance, grants programs, and capabilities and assessment—and held meetings in April, June, July, and September 2010. The working groups used teleconferencing and a task force information-sharing site to facilitate their work between meetings of the entire task force.
- According to FEMA officials, the administration is planning to issue a revision of HSPD-8; the revision will significantly affect FEMA's national preparedness policies and plans.

²⁰H.R. Rep. No. 111-298, at 102 (2009) (Conf. Rep.).



Objective 2

Next Steps by FEMA to Further National Preparedness Capabilities Assessment Efforts (cont.)

FEMA has identified a number of steps that the agency plans to take to further implement its ongoing initiatives once the administration has issued its planned revisions to HSPD-8, including the following:

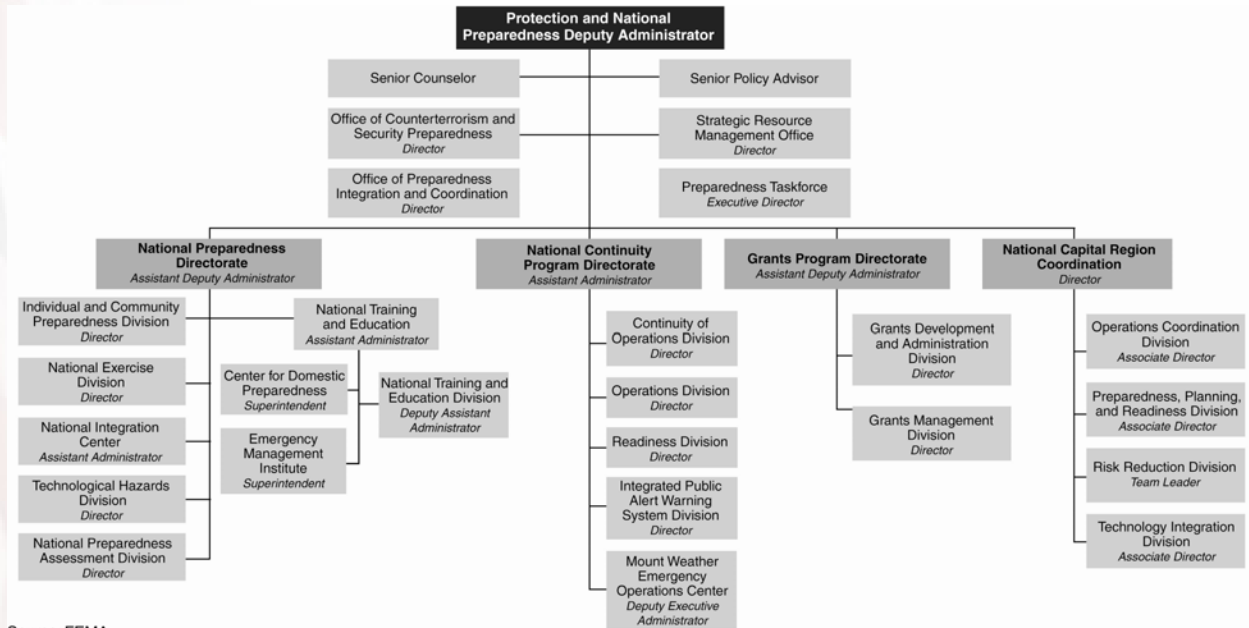
- Continuing refinement of the Comprehensive Assessment System and issuing the first National Preparedness Report.
- Implementing recommendations from the Reporting Requirements Working Group.

In addition, FEMA identified additional preparedness assessment efforts related to our recommendations for the National Preparedness System from April 2009 that it plans to take, including the following:

- Integrating HSPD-8 revisions into national preparedness system elements including the Integrated Planning System, Comprehensive Assessment System, and strategic planning efforts.
- Determining how to revise the Target Capabilities List and incorporate recommendations from the Local, State, Tribal, and Federal Preparedness Task Force.
- Revising the National Exercise Program.²¹

²¹The National Exercise Program provides an organized approach to set priorities for exercises, reflect those priorities in a multiyear schedule of exercises that serves the strategic and policy goals of the U.S. government, and address findings from those exercises through a disciplined interagency process.

Figure 4: FEMA’s Protection and National Preparedness Organization



Source: FEMA.

Appendix II

Table 1: National Preparedness Assessment Responsibilities

Organization	Define preparedness metrics/requirements	Data collection	Data analysis	Report products and outputs	FEMA—issued improvements and recommendations
Local, State, Tribal, and Federal Preparedness Task Force	Serve as a collaborative body for considering input from preparedness community about current policy, and FEMA’s strategic goals; recommend preparedness assessment metrics.	No Responsibility	No Responsibility	Provide feedback on the analysis and conclusions provided by FEMA.	Review current policy, communicate with internal stakeholders, make recommendations on how to better define preparedness.
Reporting Requirements Working Group ^a	Identify where duplicative efforts may exist among FEMA’s data—collection initiatives.	Consult on data collection approach.	No Responsibility	Provide feedback on the analysis and conclusions provided by FEMA.	Share feedback from stakeholders and provide recommendations for improved data collection.
FEMA’s National Preparedness Directorate	Define the overall preparedness assessment process, coordinate assessment efforts among internal stakeholders, identify data required to develop defined preparedness metrics.	Collect, manage and standardize data sets for analysis, coordinate data collection for all preparedness measurement.	Integrate the most applicable and effective methods of assessment into its analysis process.	Generate ad hoc and standard product and service outputs based on analysis of the preparedness data. Communicate findings based on analytic results.	Refine the approach and methodologies of the assessment process based on feedback from internal and external stakeholders, including the recommendations of the Reporting Requirements Working Group. Provide process and product improvement recommendations.

Source: GAO analysis of FEMA data.

^aNote: According to the Deputy Administrator for Protection and National Preparedness, in June 2010 FEMA discontinued the working group effort after achieving its purpose to consult with state, local, and tribal stakeholders related to streamlining efforts.



Appendix III

Table 2: FEMA Has Fully Implemented 3 of the 11 Actions Recommended in Our April 2009 Report

2009 GAO report recommendations for executive action	Current status of recommendation
Action 1: Develop a program management plan to ensure the completion of the key national preparedness policies and plans.	<input type="radio"/>
Action 2: Develop policies and procedures for issuing after-action reports for National Level Exercises in 6 months or less.	<input type="radio"/>
Action 3: Establish policies and procedures for documenting corrective actions from Principal—Level Exercises.	<input type="radio"/>
Action 4: Obtain information from past principal—level exercises and conduct remedial action tracking and long-term trend analysis	<input checked="" type="radio"/>
Action 5: Revise FEMA's grant monitoring guidance to ensure states' compliance with Homeland Security Exercise and Evaluation Program requirements.	<input type="radio"/>
Action 6: Involve the National Council on Disability on committees involved in the design and execution of national—level exercises, especially on issues related to populations with special needs.	<input checked="" type="radio"/>
Action 7: Develop internal control policies and procedures that validate the completeness and accuracy of data used to measure National Exercise Program performance.	<input type="radio"/>
Action 8: Revise the National Exercise Program implementation plan to require the use of FEMA's Corrective Action Program for all federal exercises	<input type="radio"/>
Action 9: Develop procedures for including "lessons learned" from real-world incidents in the Corrective Action Program system.	<input type="radio"/>
Action 10: Enhance FEMA's project management plan for developing a comprehensive assessment system.	<input checked="" type="radio"/>
Action 11: Develop a strategic plan for implementing the national preparedness system that includes the key characteristics of a strategic plan	<input type="radio"/>

Action fully implemented
 Action fully implemented
 Action fully implemented

Source: GAO analysis of FEMA data.

Note: Our April 2009 report was: GAO, *National Preparedness: FEMA Has Made Progress, but Needs to Complete and Integrate Planning, Exercise, and Assessment Efforts*, GAO-09-369 (Washington, D.C.: Apr. 30, 2009).

Enclosure II: Comments from the Department of Homeland Security

U.S. Department of Homeland
Washington, DC 20528



**Homeland
Security**

Mr. Bill Jenkins
Director, Homeland Security and Justice
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Jenkins:

Subject: Draft Report GAO-11-51R, *FEMA Has Made Limited Progress in Efforts to Develop and Implement a System to Assess National Preparedness Capabilities* (Job Code 440843)

The Department of Homeland Security (DHS) appreciates the opportunity to review and comment on the draft report referenced above. As the Federal Emergency Management Agency (FEMA) works towards refining its programs, the GAO's analysis of our program performance greatly benefits our ability to continually improve our activities.

FEMA believes that it has made much progress since 2009 in meeting the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA) and other legislative requirements and would like to take this opportunity to highlight some of its specific achievements. FEMA has taken the following actions since GAO's original assessment to address many of GAO's findings:

- Established a congressionally-mandated Local, State, Tribal and Federal Task Force that is charged with "making recommendations for all levels of government regarding: disaster and emergency guidance and policy; federal grants; and federal requirements, including measuring efforts. The task force will also evaluate... the most appropriate way to collectively assess our capabilities and our capability gaps."
- Put an immediate moratorium on any new reporting/assessment systems.
- Established a Reporting Requirement Working Group (RRWG) with representatives from each FEMA Directorate/Office, the Regions, and national stakeholder groups to work toward consolidation of the various reporting requirements/systems and to develop an integrated approach for assessing national preparedness.

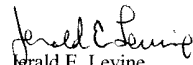
- The RRWG has since concluded its work, and FEMA is working on implementing the recommendations, including the following examples:
 - Combining all FEMA data into a central data warehouse that may be easily queried by multiple jurisdictions. This will reduce redundancy.
 - Putting a policy in place restricting new data collections as well as establishing a new process internal to FEMA.
 - Analyzing the approximately 102 data requirements for redundancy and opportunities for consolidation.
- Halted all activity on the Cost to Capability (C2C) project, and consolidated it with the Comprehensive Assessment System, as outlined in the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA).
- While the Target Capabilities List (TCL) 2.0 is still in use (through grant guidance, exercises, state preparedness reports, etc.), halted further development of TCL 3.0 pending recommendations from the Preparedness Task Force.
- Transitioned the FEMA/Response Gap Analysis Program (GAP) from an assessment/reporting system to a tool that assists in the development of catastrophic, evacuation, transportation, emergency communications, and other planning initiatives.
- Transformed the State Preparedness Reports from narrative based reports to more quantitative assessments.
- Consolidated five congressionally mandated reporting requirements into one National Preparedness Report, which is currently in the clearance stage.
- Working with the National Security Staff to ensure revisions to preparedness policy reconcile past conflicts and more clearly articulate assessment requirements.
- Recently reorganized the National Preparedness Directorate (NPD), including:
 - Transferring the preparedness policy, planning and technical assistance staff, resources, and functions out of NPD's Preparedness Policy, Planning and Analysis, and renaming it to the National Preparedness Assessment Division which: 1) focuses the division strictly on assessments and reporting; and 2) more closely aligns programs such as the TCL with similar activities (e.g., resource typing, credentialing, etc.) in NPD's National Integration Center.
 - Transferring the grant assessments staff and activities from Grant Programs Directorate (GPD) to NPD to more closely align activities such as grant effectiveness with preparedness assessments.
- Consolidating the TCL with the National Incident Management System (NIMS) Resource Typing and Credentialing to develop better performance measures that are more output-based, and are based on hazard identification and risk assessments.

**Enclosure II: Comments from the Department of
Homeland Security**

3

Thank you again for the opportunity to comment on this Draft Report. We look forward to working with you on other issues as we both strive to improve FEMA.

Sincerely,



Jerald E. Levine

Director

Departmental GAO-OIG Liaison Office

(440843)

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