



February 2016

FEDERAL EMERGENCY MANAGEMENT AGENCY

Strengthening Regional Coordination Could Enhance Preparedness Efforts

GAO Highlights

Highlights of [GAO-16-38](#), a report to congressional requesters

Why GAO Did This Study

DHS's FEMA is responsible for coordinating with state, local, and tribal governments to prepare for disasters. Specifically, FEMA provides preparedness grants to states and localities, and works to implement the National Incident Management System nationwide, among other things.

GAO was asked to review FEMA's efforts to enhance coordination for regional preparedness. This report addresses the extent to which FEMA and regional offices have (1) addressed preparedness grant management coordination challenges, (2) established a system to assess NIMS implementation, and (3) collaborated with RAC stakeholders. GAO analyzed FEMA documentation on grant management, NIMS evaluation, and RACs. GAO surveyed RAC members, visited 4 regional offices selected for their geographic representation, spoke with state emergency management officials from 10 states, and interviewed FEMA officials. The site visits cannot be generalized but provided insights.

What GAO Recommends

GAO recommended, among other things, that FEMA develop a plan for addressing long-standing coordination challenges with grant management, review after action reports to assess NIMS implementation, and improve coordination with RACs. Although DHS did not concur with the grants management recommendation, GAO continues to believe challenges documented in the report support the recommendation. DHS concurred with the other 4 recommendations and described the actions they planned to take in response.

View [GAO-16-38](#). For more information, contact Chris P. Currie at (404) 679-1875 or curriec@gao.gov.

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What GAO Found

GAO found that the Department of Homeland Security's (DHS) Federal Emergency Management Agency (FEMA) has taken some steps, but has not fully addressed, preparedness grant management coordination challenges between headquarters and its regions. For several preparedness grant programs, FEMA headquarters and regions share management and monitoring responsibilities. Assessments by FEMA and others since 2009 have recommended that FEMA regions manage and monitor preparedness grants to avoid confusion and duplication and strengthen coordination with state and local grantees. However, in 2012 FEMA changed course and decided to continue sharing grant management between headquarters and regions. Since then, FEMA officials said they are taking steps to address coordination challenges that exist in this structure. However, GAO found that challenges continue to exist. For example, states and FEMA regional officials told GAO that FEMA headquarters and regions did not always coordinate monitoring visits and provided inconsistent guidance to grantees. Further, while FEMA officials identified some steps to address the challenges, FEMA lacks a plan with time frames and goals for addressing them. Doing so will better enable FEMA to effectively address the long-standing challenges in managing preparedness grants.

FEMA uses states' self-assessments to determine if states have implemented the National Incident Management System (NIMS), as required, but does not assess NIMS implementation using the results of preparedness exercises. NIMS is a comprehensive, national approach to incident management and provides a framework to enable all levels of government and the private sector to work together to prepare for, prevent, respond to, and recover from incidents. Although states generally report high levels of NIMS implementation, officials from all four FEMA regional offices and 9 of 10 states GAO spoke with said that the NIMS self-assessments are perfunctory and do not measure whether, or how well, NIMS is being implemented. FEMA officials said they do not verify states' self-reported NIMS implementation information because of the scope and breadth of the information. All of the FEMA regions and 8 states said the best way to assess NIMS implementation is to review states' performance in after-action reports following exercises and real-world events. However FEMA officials do not review these reports to assess NIMS implementation. Doing so could allow FEMA to better assess NIMS implementation and identify areas for improvement.

All 10 FEMA regions established Regional Advisory Councils (RAC) to provide advice on emergency management issues specific to the region, and about 90 percent of RAC members reported in a GAO survey that meetings are useful for collaborating with their FEMA regional office. However, some regions do not routinely meet with their RACs, and some do not consistently report back to RAC members on the status of their recommendations to FEMA. By more routinely obtaining input from RAC members and by providing timely feedback on recommendations, FEMA regional offices could better ensure they are coordinating with key stakeholders and identifying areas for strengthening preparedness.

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Abbreviations:

AAR	after-action report
DHS	Department of Homeland Security
DLSGP	Driver's License Security Grant Program
EMPG	Emergency Management Performance Grant
EOC	Emergency Operations Center
FEMA	Federal Emergency Management Agency
FPC	federal preparedness coordinator
FY	fiscal year
GPD	Grant Programs Directorate
HSEEP	Homeland Security Exercise and Evaluation Program
HSPD-5	Homeland Security Presidential Directive-5
ICS	Incident Command System
NAC	National Advisory Council
NAPA	National Academy of Public Administration
NEP	National Exercise Program
NIC	National Integration Center
NIMS	National Incident Management System
NIMSCAST	National Incident Management System Compliance Assistance Support Tool
OIG	Office of Inspector General
OMB	Office of Management and Budget
OPPA	Office of Policy and Program Analysis
Post-Katrina Act	Post-Katrina Emergency Management Reform Act of 2006
RAC	Regional Advisory Council
RIG	Regional Implementation of Grants
SPR	State Preparedness Report
THIRA	Threat and Hazard Identification and Risk Assessment
URT	Unified Reporting Tool

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February 4, 2016

Congressional Requesters

The Federal Emergency Management Agency (FEMA), within the Department of Homeland Security (DHS), through its 10 regional offices is responsible for coordinating government-wide disaster response efforts and delivery of all of FEMA's programs and activities to state, tribal, and local partners; nongovernmental organizations; and citizens across the 56 states and territories.¹ According to FEMA, disaster response begins and ends with the affected FEMA regional office in the lead, and regional FEMA personnel have central roles throughout the life cycle of an incident.² We previously reported how regional coordination efforts of state and local stakeholders can enhance preparedness.³

FEMA regions coordinate with state and local stakeholders in various ways in order to strengthen national preparedness to prevent and respond to domestic terrorist attacks, major disasters, and other emergencies. For example, from fiscal years 2002 through 2015, DHS awarded over \$40 billion to state, local, tribal and territorial grant recipients in preparedness grants to strengthen national preparedness capabilities, and FEMA's regional offices are responsible for financial management and, for selected programs, programmatic management of these grants. The regional offices also work directly with states, tribes, and territories to implement the National Incident Management System (NIMS), a standardized approach to guide emergency responders at all levels of government and the private sector to coordinate efforts to respond to incidents and save lives and property.⁴ All states and territories must agree to adopt and implement NIMS and certify their

¹In addition to the 50 states and the District of Columbia, the 5 territories included in FEMA regions are: the Commonwealth of Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.

²FEMA, *Incident Management and Support Keystone*, (Washington, D.C.: Jan. 2011).

³GAO, *Homeland Security: Effective Regional Coordination Can Enhance Emergency Preparedness*, [GAO-04-1009](#) (Washington, D.C.: Sept. 14, 2004).

⁴According to FEMA officials, local jurisdictions are directed to their state, territorial, or tribal emergency management agency for guidance on NIMS implementation.

compliance with NIMS as a requirement to receive preparedness grant funding from FEMA.⁵ To enhance coordination with regional stakeholders, regional offices convene Regional Advisory Councils (RAC) to obtain insight into emergency management issues at the state and local levels.

The Post-Katrina Emergency Management Reform Act of 2006 (Post-Katrina Act) was enacted to address various shortcomings in the national response, including federal, state, and local preparedness capabilities, identified in FEMA's preparation for and response to Hurricane Katrina.⁶ The Post-Katrina Act included several requirements that address FEMA's regional coordination with state, local, and tribal governments. For example, the Post-Katrina Act called for the establishment of regional offices that would work with state, local, and tribal governments to ensure effective, coordinated, and integrated regional preparedness, among other things.⁷ As part of this effort and to address grant management coordination challenges between headquarters and the regions, FEMA developed plans to transfer grant management functions from headquarters to the FEMA regions (regionalization). The Post-Katrina Act also mandated that FEMA establish a comprehensive system to assess compliance with NIMS, among other things,⁸ and required that each FEMA regional office establish a RAC with members from state, local and tribal stakeholders to advise regional administrators in each of FEMA's 10 regional offices on emergency management issues specific to their regions.⁹

You requested that we review FEMA's efforts to enhance coordination for regional preparedness. This report assesses the extent to which FEMA

⁵Pursuant to the Homeland Security Presidential Directive-5 (HSPD-5), all federal departments and agencies shall make adoption of NIMS a requirement, to the extent permitted by law, for providing federal preparedness assistance through grants, contracts, and other activities.

⁶The 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 provisions of the Post-Katrina Act became effective upon enactment, October 4, 2006, with the exception of certain organizational changes related to FEMA, most of which took effect on March 31, 2007.

⁷6 U.S.C. § 317(c)(2)(A).

⁸6 U.S.C. § 749 (c)(1).

⁹6 U.S.C. § 317(c).

headquarters and regional offices have (1) addressed grant management coordination challenges between headquarters and the regions, (2) established a comprehensive system to assess NIMS implementation, and (3) collaborated with RAC members.

To address the first objective, we gathered and reviewed relevant documentation, such as FEMA assessments of grant management by the Grant Programs Directorate (GPD), FEMA's previous delegations of grant management responsibilities to regional offices, agency task force reports on advantages and disadvantages of regionalization, FEMA headquarters and regional office grant management roles and responsibilities, FEMA documentation on regionalization pilot programs, and other memoranda and internal documents. We also reviewed prior GAO reports on regional preparedness, grant management, and consolidation of management functions.¹⁰ In addition, we interviewed FEMA's Director of the Preparedness Grants Division within GPD and other senior GPD officials to discuss programmatic grant management as well as previous FEMA assessments of the impact of moving management responsibilities to FEMA regional offices. We also interviewed grant management officials from 4 FEMA regional offices to discuss financial grant management and coordination of monitoring activities with GPD. These offices were selected in order to provide a mix of geographic locations and whether the regional office had been selected to participate in FEMA grant management pilot programs. Similarly, we interviewed officials from 9 states in the 4 FEMA regions to discuss grant management within the states as well as interactions with FEMA grant management officials. These states were selected to reflect a diversity of experiences from FEMA regions we chose. While the information gained from these interviews cannot be generalized across all states, it provides useful insights into the nature of FEMA GPD and regional coordination with states with regard to grant management.

To address the second objective, we reviewed NIMS-related documents such as the NIMS Doctrine, NIMS Compliance Guidance, NIMS

¹⁰GAO, *FEMA Has Made Progress in Managing Regionalization of Preparedness Grants*, [GAO-11-732R](#) (Washington, D.C.: July 29, 2011); *Homeland Security: DHS Needs Better Project Information and Coordination among Four Overlapping Grant Programs*, [GAO-12-303](#) (Washington, D.C.: Feb. 28, 2012); and *Homeland Security: Effective Regional Coordination Can Enhance Emergency Preparedness*, [GAO-04-1009](#) (Washington, D. C.: Sept. 15, 2004).

implementation reports, and results of the NIMS implementation questions in the Unified Reporting Tool (URT). We also reviewed documents on the Homeland Security Exercise and Evaluation Program (HSEEP)¹¹ and on preparedness grants requirements. We compared FEMA's efforts in NIMS implementation and verification with Homeland Security Presidential Directive-5 (HSPD-5) and with language in OMB's Circular No. A-11, regarding data validation and verification.¹² We interviewed officials at FEMA's National Preparedness Directorate, which includes the National Integration Center (NIC)—the office responsible for coordinating and enabling NIMS implementation to discuss the NIC's efforts in implementing NIMS. To discuss NIMS implementation efforts at the regional and state levels, interactions between regional and state officials, and mechanisms for verifying how well NIMS is being implemented, we also interviewed officials from the 4 FEMA regional offices and 9 states mentioned above. In addition, because of the recommendation of officials in several regional offices and states, we interviewed an official from a 10th state from within the selected FEMA regions. While the information gained from these interviews cannot be generalized across all regions and states, it provided useful insights into the various efforts in implementing NIMS. Additionally, we analyzed all 35 full-scale exercise after-action reports (AAR) that FEMA received for exercises conducted during fiscal year 2014 in the 4 regions we visited. The purpose of the analysis was to determine if they could be used to assess the level of participants' implementation of NIMS. While the results of these exercises are not generalizable to the country as a whole, they do provide useful insights into their possible use to assess NIMS implementation.

To address the third objective—to assess regional offices' collaboration with RAC members—we interviewed officials at FEMA headquarters with responsibilities for regional operations and regional office officials from the 4 regions we visited. We also reviewed FEMA and DHS Office of Inspector General (OIG) reports with information and findings relevant to RACs. In addition, we contacted FEMA RAC liaisons from all 10 regions by e-mail to obtain information about their RACs and RAC members. We

¹¹HSEEP provides a set of guiding principles for exercise program management, design and development, conduct, evaluation, and improvement planning.

¹²OMB, Circular No. A-11, *Preparation, Submission, and Execution of the Budget* (Washington, D.C.: Aug. 3, 2012).

attended two RAC meetings in two regions that took place during the early part of our review, and obtained documentation of agendas and other relevant materials for the RACs in all 10 FEMA regions. In addition, we conducted a self-administered web-based survey from May 27 through June 29, 2015 of 110 RAC members FEMA identified as active from all 10 regions and 77 responded, for a response rate of 70 percent.¹³ For further information on our survey, see appendix I; for the survey questions and results, see appendix II. We also used information obtained from interviews with FEMA headquarters and regional office officials involved in communicating and collaborating with RACs. Further details on our objectives, scope, and methodology are contained in appendix I.

We conducted this performance audit from October 2014 to February 2016 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.

Background

Preparedness Grant Management

FEMA preparedness grant management is composed of different financial and programmatic management functions. FEMA created GPD in April 2007, to consolidate oversight of all FEMA grants. GPD, in FEMA headquarters, provides subject matter expertise in response to regional office and stakeholder inquiries; develops grant guidance; and delivers policy, training, and systems and data analysis. The 10 FEMA regions are responsible for financial monitoring, implementing corrective action plans, as well as other follow-up activities with grantees. Financial management functions include monitoring grantee expenditures, amending financial terms of grants, and closing out grants.¹⁴ Program management includes

¹³Three respondents answered an initial screening question that they were no longer members of the RAC in their region, which left a total of 74 respondents with usable questionnaires.

¹⁴Cash management analysis includes review of grantee-submitted quarterly Federal Financial Reports following grant program specifications.

developing grant application packages creating program standards, and monitoring grantee activities to ensure alignment with homeland security strategies.

FEMA's regional offices have program management responsibility for various legacy programs primarily because they managed those programs prior to the establishment of GPD. The largest of these legacy programs is the Emergency Management Performance Grant (EMPG), which provided over \$350 million in fiscal year 2015 to assist local, tribal, territorial, and state governments in enhancing and sustaining all-hazards emergency management capabilities. GPD has management responsibility for the Homeland Security Grant Program,¹⁵ which provides more than \$1 billion annually to help strengthen the nation against risks associated with acts of terrorism and other catastrophic events.¹⁶

National Incident Management System

FEMA works with state and local stakeholders to implement NIMS, a comprehensive, national approach to incident management that is applicable at all jurisdictional levels and across functional disciplines and the full spectrum of potential incidents, hazards, and impacts, regardless of size, location, or complexity. DHS established NIMS in 2004 to improve coordination and cooperation between public and private entities in a variety of incident management activities and provide a common standard for overall incident management.¹⁷ NIMS implementation consists of training,¹⁸ using a standardized way of defining and categorizing

¹⁵The Homeland Security Grant Program includes Urban Area Security Initiative grants, the State Homeland Security Grant program, and Operation Stonegarden.

¹⁶GPD also manages the Assistance to Firefighters Grant Program, the Port Security Grant Program, the Transit Security Grant Program, the Tribal Homeland Security Grant Program, and the Nonprofit Security Grant Program.

¹⁷DHS issued NIMS guidance in March 2004 in response to Homeland Security Presidential Directive (HSPD)-5: Management of Domestic Incidents, and issued an updated version in 2008.

¹⁸NIMS training is intended for all personnel who are directly involved in emergency management and response. This includes all emergency services-related disciplines such as Emergency Medical Services, hospitals, public health, fire service, law enforcement, public works/utilities, skilled support personnel, and other emergency management response, support and volunteer personnel. This training is intended to aid people who do not usually work together or even know each other to seamlessly respond to and recover from a disaster either natural or man-made.

emergency resources known as resource typing,¹⁹ and incorporating a standardized organizational emergency response structure called the Incident Command System into emergency management plans, policies and procedures, among other things.²⁰ States, tribes, and local jurisdictions are required to adopt and self-assess their level of NIMS implementation, and certify their compliance and report it to FEMA through the URT in order to receive preparedness grant funding from FEMA.²¹ Additionally, states receiving preparedness grants are required to develop and maintain an exercise program consistent to the degree practical with HSEEP in support of the National Exercise Program.²² HSEEP exercises identify exercise objectives and align them to FEMA's 32 "core capabilities" for evaluation during the exercise. In order to report on the required exercises, states receiving preparedness grants are required to prepare after-action reports—evaluations of performance—on core capabilities assessed in the exercise, and to submit those to FEMA.

FEMA established the NIC in 2004. The NIC, a division of FEMA's National Preparedness Directorate, is responsible for the ongoing management and maintenance of NIMS, including developing guidance to define and categorize the resources and job position qualifications requested, deployed, and used in incidents. Specifically, the NIC is to coordinate with state and local stakeholders to develop national standards, guidelines, and protocols for incident management.

¹⁹Resource typing is defining and categorizing, by capability, the resources requested, deployed, and used in incidents. Resource typing definitions establish a common language and defines a resource's (for equipment, teams, and units) minimum capabilities. NIMS resource typing definitions serve as the common language for the mobilization of resources.

²⁰The Incident Command System is a management system 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.

²¹HSPD-5 states: "Beginning in Fiscal Year 2005, Federal departments and agencies shall make adoption of the NIMS a requirement, to the extent permitted by law, for providing Federal preparedness assistance through grants, contracts, or other activities. The Secretary shall develop standards and guidelines for determining whether a State or local entity has adopted the NIMS."

²²Department of Homeland Security Notice of Funding Opportunity: Fiscal Year 2015 Emergency Management Performance Grant Program.

In 2008, FEMA established new regional positions for federal preparedness coordinators (FPC), who direct and coordinate the activities of each regional national preparedness division to ensure regional implementation of national preparedness programs, policies, goals, and objectives. FPCs are to evaluate preparedness program activities to assess their effectiveness; changes in risk or capability; and the performance of preparedness program activities including after-action reports, training evaluations, lessons learned, and corrective actions. For example, FPCs are responsible for monitoring NIMS compliance and implementation, in addition to other national preparedness initiatives. Further, FPCs are to proactively engage stakeholders and acquire an understanding of their preparedness efforts and also assist in the planning, design, execution, and evaluation of federal, state, local, and regional exercises. FEMA regional NIMS coordinators act as subject matter experts regarding NIMS for the local, state, territorial, and tribal nation governments within their FEMA regions, as well as for the FEMA regional administrator and staff.

Regional Advisory Councils

The Post-Katrina Act requires that each FEMA regional administrator establish a RAC with members from state, local, and tribal entities to provide advice on emergency management issues specific to the region.²³ While the Post-Katrina Act does not specify how many members a RAC should have, the law states that a state, local, or tribal government located within the geographic area served by the regional office may nominate officials, including emergency managers, to serve as members. Each of the 10 FEMA regional offices established a RAC after the Post-Katrina Act was enacted in 2006. In August 2011, FEMA developed a RAC charter template that each of the regional offices voluntarily adopted; the charters require that RACs meet twice annually in order to

²³6 U.S.C. § 317(e). The Post-Katrina Act also calls for the RACs to identify any geographic, demographic, or other characteristics peculiar to any state, local, or tribal government within that region that might make preparedness, protection, response, recovery, or mitigation more complicated or difficult. In addition, the RACs are to advise the regional administrator about weaknesses or deficiencies in preparedness, protection, response, recovery, and mitigation for state, local, and tribal government within the region of which the RAC is aware.

provide the types of advice on emergency preparedness in their regions to the FEMA regional administrators listed in the Post-Katrina Act.²⁴

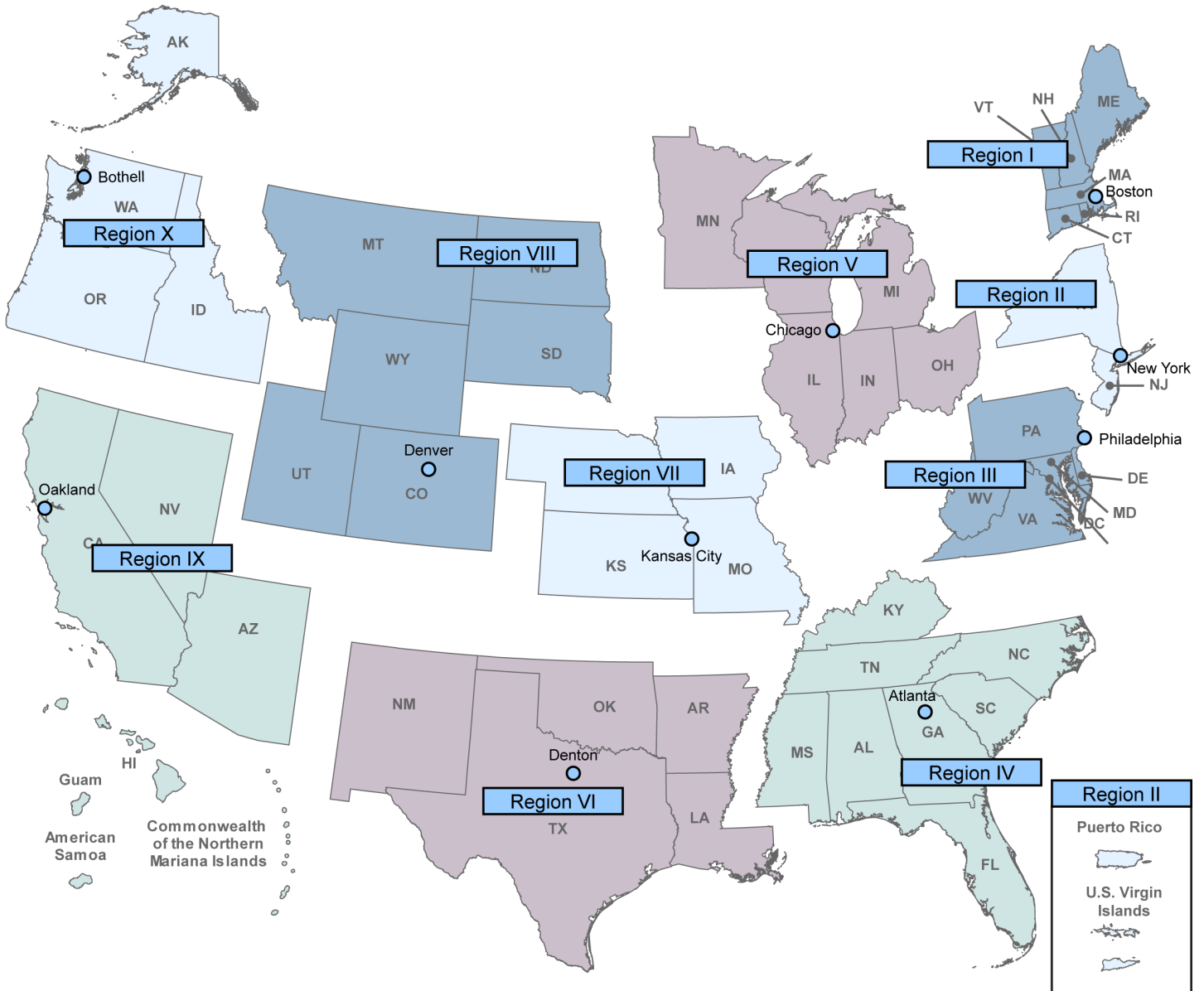
In addition to the RACs, the Post-Katrina Act also required that FEMA establish the National Advisory Council (NAC) to ensure effective and ongoing coordination of federal preparedness efforts, among other things.²⁵ The NAC advises the FEMA Administrator on all aspects of emergency management, and incorporates state, local, and tribal governments; nonprofit; and private sector input in the development and revision of the National Preparedness Goal, the National Preparedness System, the National Incident Management System, and other related plans and strategies.

FEMA's 10 regional offices are the principal conduit for delivery of preparedness programs and activities to state, tribal, and local partners; non-governmental organizations; the private sector; and citizens. Such preparedness activities include, among other things, stakeholder coordination and information sharing, consulting, planning support, capability assessments and reporting, exercise performance and evaluation, and internal and external training. Figure 1 shows FEMA's 10 regions and the states and territories that compose each region (the District of Columbia is in Region III).

²⁴The RACs may add language or make other changes to the general template, such as with regard to the term length of service for RAC members. In 1 region, the RAC added language to the template to specify the number of RAC members to be appointed from separate levels of government and occupations.

²⁵3 U.S.C. § 318.

Figure 1: Federal Emergency Management Agency's 10 Regions and Their Member States and Territories



Source: Federal Emergency Management Agency. | GAO-16-38

GPD Lacks a Plan to Address Long-standing Challenges in Coordinating Preparedness Grants between FEMA Headquarters and Regions

Past Assessments Supported Moving Grant Management Functions to the Regions to Address Oversight and Coordination Problems, but FEMA Decided Not to Change Its Approach

Currently FEMA uses a hybrid management model for preparedness grant programs, with shared responsibilities between headquarters and the regions.²⁶ In October 2009, in response to a congressional request, the National Academy of Public Administration (NAPA) conducted a study and recommended that FEMA transfer all preparedness grant authorities to its regional offices.²⁷ Similarly, in May 2010, FEMA's Office of Policy and Program Analysis (OPPA) reported that FEMA's hybrid grants management model created significant inconsistencies in managing preparedness grants, and recommended that programmatic management functions for preparedness grants should be transferred to the regional offices.²⁸ In September 2010, GPD's Regional Implementation of Grants (RIG) task force also reported that programmatic grant management functions for grants should be moved to the 10 regional offices, because of considerations of customer service, efficiency, people, processes, and

²⁶In the hybrid management model, FEMA headquarters has responsibility for grant management functions such as budget review, award approval, and site visits, whereas FEMA regions have responsibility for financial monitoring, cash management analysis, and audit resolution.

²⁷National Academy of Public Administration, *FEMA'S Integration of Preparedness and Development of Robust Regional Offices, An Independent Assessment for the U.S. Congress and the Federal Emergency Management Agency* (Washington, D.C.: Oct. 2009).

²⁸According to FEMA, OPPA supports the Administrator in agency-wide management efforts and "fosters strategic coherence; ensures availability of critical resources; leads Agency policy, strategy, and innovation; provides objective analysis; drives strategy, budget, execution, performance integration and accountability."

systems.²⁹ In July 2011, we reported that GPD's efforts to regionalize management responsibilities for preparedness grants were consistent with internal control standards.³⁰ On the basis of the results of our review of FEMA's plans and efforts to regionalize grant management functions, we did not make recommendations at that time.

FEMA's Deputy Administrator for Protection and National Preparedness, in consultation with FEMA's Administrator, decided in early 2012 against pursuing further regionalization of grant management functions, according to FEMA's Assistant Administrator for Grant Programs. The Assistant Administrator said their decision was based on, among other things, estimates that the costs of regionalization would be greater than the annual savings identified in the earlier OPPA study and FEMA management's belief that risks associated with the change, such as inconsistent program implementation across the regions, outweighed the potential benefits. As a result, FEMA continues to use its hybrid management model for preparedness grant programs, with shared responsibilities between headquarters and the regions.

FEMA Regional Offices and Grantees Identified Challenges with FEMA's Hybrid Management Model

Long-standing challenges associated with the separation of management functions under the hybrid model of grant management, including the lack of coordination of grant-monitoring visits, and coordination and implementation of guidance provided by headquarters officials to state officials, continue to create challenges.

In 2010, GPD's RIG task force report cited examples of how programmatic and financial monitoring visits, conducted by FEMA GPD

²⁹FEMA, *Regional Implementation of Grants Task Force Workshop Outcomes*, (Washington, D.C.: Sept. 2, 2010). The Regional Implementation of Grants task force composed of FEMA officials in headquarters and regional offices as well as state, local, and port grantees assessed advantages and disadvantages of management functions located in FEMA headquarters or the regions based on resources, training, and processes.

³⁰GAO, *FEMA Has Made Progress in Managing Regionalization of Preparedness Grants*, [GAO-11-732R](#), (Washington, D.C.: July 29, 2011). We reported, for example, that FEMA established a task force as an oversight and evaluation mechanism and developed an implementation plan, which includes a phased approach to piloting and delegating specific grants administration functions for preparedness grants to the regions and delineates an approach, including roles and responsibilities, for key implementation activities such as training and communications.

staff and regional offices respectively, occurred independently of one another and were disruptive to the state emergency management agency's day-to-day operations.³¹ In response to the lack of coordination in monitoring site visits, GPD's Deputy Assistant Administrator sent a memorandum to staff in 2011 citing concerns that it had become "apparent GPD HQ staff continue to do program monitoring visits without proper notification to the regional offices" and directing that headquarters personnel conduct all monitoring visits in conjunction with regional staff, changing the dates of any planned headquarters visits to accommodate regional staff schedules. While the memorandum called for disciplinary action against any GPD personnel who did not follow the directive, GPD officials did not identify any instances where disciplinary action had been taken.

We also found challenges in the coordination of site visits. Officials in 3 of 9 states we talked with on grants issues stated that monitoring visits from FEMA GPD and the regional offices do not appear to be well coordinated. For example, officials in 1 state said that in September 2014, GPD and regional grants staff conducted site visits during the same week; however, neither the GPD staff nor the regional staff knew that the other was conducting a monitoring visit that week. The state officials stated that they had to leave one monitoring meeting early to go to another monitoring meeting by a different group of grant management staff. Similarly, regional grants officials in 2 of the 4 regions we visited said in 2015 that they may or may not receive information on monitoring activities undertaken by GPD officials, depending on who is conducting the monitoring activities. A grant official in 1 region we visited stated that GPD conducted a site monitoring visit as recently as September 2015, but did not inform regional staff of this visit. Regional grants management officials in all 4 regions we visited stated that not having the results of programmatic monitoring creates challenges in financial monitoring. For example, financial monitoring may identify a significant drawdown of grant funds; however, without program information, regions cannot determine if this corresponds to significant progress in program implementation.

Further, challenges related to coordination and implementation of guidance provided by GPD (headquarters) officials, FEMA regional officials, and state officials has been a long-standing problem. For

³¹FEMA, *Regional Implementation of Grants Task Force Workshop Outcomes*.

example, in 2009, NAPA identified regional challenges associated with assessment activities including grant monitoring, noting that FEMA regional and headquarters units “need to reduce burden on states and ensure assessments-requirements are coordinated among FEMA divisions and the federal sector” and that new documents from FEMA headquarters “typically have a short review and comment period, and adherence is often required prior to finalization.”³² Similarly, the May 2010 RIG Task Force Report noted that “the timeliness of communication and information distribution with the grantee community needs to be improved” and the need to “formally establish regional liaisons to support the consistent prioritization of communication within GPD and with grantees.”³³

We found that these issues related to coordinating guidance provided by headquarters officials to state officials continue to create challenges. Officials from all 4 FEMA regions we visited said that GPD officials had provided guidance to state grantees that contradicted guidance given by the regional staff. Further, officials in 2 of the 4 regional offices we visited stated that incorrect guidance given by GPD officials to state grantees resulted in deficiencies during financial monitoring conducted by regional grants personnel. Specifically, according to FEMA grant management officials in 1 region, a grantee, at the advice of GPD officials, shifted funds from one grant program into other grant programs, but regional grants personnel later found, as part of their financial monitoring, that this was a violation of regulations and required that the funding be returned. Similarly, FEMA grant officials in another region stated that a new grantee that received transit grants drew down the entire grant amount soon after the grant was awarded, which is a violation of FEMA grant management regulations. Regional officials asked the grantee to return the funds; however, the grantee stated that GPD officials had told him he could draw down these funds. Regional officials added that had the grantee not returned the funds, the next step would have been to do an official collection; however, regional offices do not have the authority to do this because the grant program is managed from FEMA headquarters by GPD. Officials from 3 of the 9 states we visited told us that they had received contradictory information from regional staff and GPD staff regarding the management of grant programs.

³²National Academy of Public Administration, (Washington, D.C.: Oct. 2009).

³³*Regional Implementation of Grants Task Force Workshop Outcomes.*

GPD officials agreed that there were continuing opportunities to improve coordination and communications in their management of preparedness grants and said that FEMA had taken steps during the course of our review to facilitate coordination and communication. For example, GPD officials said that they had taken steps to improve coordination of site visits and that, beginning in fiscal year 2013, GPD made integrated financial and programmatic monitoring a priority, and incorporated this into its monitoring plans. According to FEMA's fiscal year 2014 grants monitoring plan, GPD officials are to contact regional grant staff when monitoring activities are initiated and document this interaction. GPD officials did not provide any documentation that such coordination had occurred. Nonetheless, they identified two joint GPD and regional office monitoring visits that took place during the summer of 2015 (at the request of the regions).

GPD officials also noted that, in a February 2015 meeting with regional officials, GPD and the regional offices agreed to the following:

- elevate grant-related issues to regional administrators and to the Assistant Administrator for Grant Programs,
- provide regional grants staff visibility on programmatic grant reviews performed by GPD staff,
- conduct desk reviews in coordination with the regions and provide copies of the final reports to the regional offices,
- provide GPD's annual monitoring plan to the regional offices and conduct joint monitoring of the same states for programmatic and financial issues when possible,
- provide quarterly analytical reports of grant-monitoring-related issues to all regional offices, and
- schedule regular calls between GPD management and regional grants division directors.

These most recent efforts to improve coordination of preparedness grant management functions are not significantly different from the historical efforts GPD has taken. For example, GPD cited monthly coordination calls between GPD and the regional offices as a coordinating effort meant to address challenges we identified. However, FEMA also cited these calls as a coordination mechanism in 2012 and noted that these calls had been a recurring effort since 2008. Similarly, providing copies of GPD's

annual monitoring plan and copies of reviews performed by GPD do not appear to have resolved the underlying challenges associated with GPD's hybrid grants management model.

GPD officials also said they intend to look at FEMA's overall grants monitoring efforts to see what can be done to improve the program for fiscal years 2016 and beyond, including risk assessments, general assessments, on-site desk reviews, reports with real-time data and metrics, and corrective action plans. However, FEMA has not developed a plan with time frames, goals, metrics, or milestones for how and when it will address long-standing coordination challenges associated with the existing hybrid grants management model identified in previous FEMA assessments and in our review. According to FEMA's Assistant Administrator, GPD has involved the regions in performance measure development since September 2011 and has communicated the measures and results to the regions. These performance measures include, among other things, percentage of preparedness grant funds monitored and percentage of grants award determined to be low risk. However, these performance measures do not address the deficiencies in coordination identified in our review.

According to effective program management practices, specific goals and objectives should be conceptualized, defined, and documented in the planning process, along with the appropriate steps, time frames, and milestones needed to achieve those results.³⁴ Given the longstanding coordination challenges, establishing a plan with time frames, goals, metrics, and milestones could help FEMA headquarters and regional offices address these challenges.

³⁴Project Management Institute, Inc., *A Guide to the Project Management Body of Knowledge*.

FEMA Could Have Better Visibility into NIMS Implementation by Using the Results of Preparedness Exercises

The NIC Relies on States' Self-assessments to Determine NIMS Implementation

The NIC uses a self-assessment tool to determine if all states and territories have adopted and implemented NIMS elements into their emergency response planning and training. The NIC relies on a self-assessment tool, as the Post-Katrina Act requires that FEMA develop an assessment system to determine compliance with NIMS but does not require that FEMA physically verify compliance. Since 2005, all 56 states and territories have been required to meet NIMS compliance and implementation requirements to be eligible to receive federal preparedness grants. The NIC began using the latest version of its tool for states to submit self-assessments—the URT—in 2013.³⁵ In the URT spreadsheet, states and territories fill in responses to a series of questions aimed at determining the level of NIMS implementation.³⁶ Generally, states and territories gather this information from their jurisdictions and consolidate the information at a state level to report to FEMA.³⁷ (For a list of questions, see app. III.)

³⁵Prior to 2013, FEMA used a web-based self-assessment instrument called the National Incident Management System Compliance Assistance Support Tool (NIMSCAST). According to FEMA officials, FEMA stopped using NIMSCAST in 2012 because of technical challenges and budget constraints.

³⁶FEMA also uses the URT to collect states' Threat and Hazard Identification and Risk Assessments (THIRA) and the State Preparedness Reports (SPR). FEMA added NIMS compliance questions to the SPR section of the tool in 2014. FEMA started with 10 NIMS implementation assessment questions in the URT in fiscal year 2013 and increased the number to 16 questions in fiscal year 2015.

³⁷A jurisdiction is a geographical subdivision of a jurisdiction that provides input on its local threats/hazards and capability levels to its parent jurisdiction. The jurisdictional level varies from one state to another. For example, some states use counties as jurisdictions, but may also include tribes or large urban areas as jurisdictions.

Federal Emergency Management Agency (FEMA) identified six National Incident Management System (NIMS) elements that should be incorporated into training and exercises. These are

1. interoperable and compatible communications, technology, and information management;
2. resource management, typing, and credentialing;
3. mutual aid or assistance agreements;
4. Incident Command System;
5. multiagency coordination systems; and
6. public information.

Source: FEMA Unified Reporting Tool. | GAO-16-38

Although states generally report high levels of NIMS implementation in their URTs, officials from all four FEMA regional offices we spoke with and from 9 of the 10 states we spoke with said that the NIMS self-assessments are perfunctory and do not necessarily measure whether, or how well, NIMS is being implemented. For example, in fiscal year 2013, 100 percent of the states and territories reported having “formally adopted” NIMS, and incorporated NIMS principles and concepts into training and exercises.³⁸ Similarly, in fiscal year 2014, states and territories reported that 93 percent of their subjurisdictions had formally adopted NIMS, about 91 percent had incorporated NIMS concepts and principles into training, and about 93 percent incorporated NIMS into exercises.³⁹ FEMA regional and state officials we spoke with said there is an incentive to report compliance with NIMS regardless of the actual status of implementation since it is a requirement for receiving preparedness grants. According to preparedness grant guidance, there is no requirement for states to verify NIMS compliance or implementation at the subjurisdiction level. However, of the states we spoke with on NIMS implementation, 1 had implemented its own NIMS compliance check program. Specifically, a state emergency management official in 1 state we spoke with said that his state has initiated its own reviews of NIMS implementation and found that some reporting of full NIMS implementation by subjurisdictions were questionable. For example, in one subjurisdiction, state officials found the following:

- The subjurisdiction could not produce training records to show that emergency management personnel had received NIMS training.
- The requirement to incorporate NIMS principles into the subjurisdiction’s emergency operations plans had not been completed.

³⁸To formally adopt NIMS means that a state, territory, tribe, or local entity has established legislation, executive orders, resolutions, ordinances, or other formal action to adopt the NIMS.

³⁹The percentage of states reporting adoption of NIMS and incorporation into training and exercises in fiscal year 2014 is lower because FEMA changed the questions in 2014 to focus on implementation of NIMS on the subjurisdiction level rather than the overall state or territory level.

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- There were no records of exercises or corrective action plans available to identify if NIMS had been incorporated into the subjurisdiction’s exercise program.

While this particular example cannot be generalized to other states, it shows that in some cases, subjurisdictions within one state with a NIMS compliance check program are reporting levels of NIMS implementation that may not fully reflect the status of local NIMS efforts.

Existing Assessments after Exercises and Real-World Events Provide a Means of Further Assessing States’ Self-reporting on NIMS Implementation

Officials from all 4 regional offices and from 8 of the 10 states we spoke with said that the best way to assess how well NIMS has been implemented is by assessing states’ performance in preparedness exercises and real-world events. They all agreed that if NIMS principles have been well implemented, responses to disasters will be more effective because the objective of NIMS is to ensure that all levels of government across the nation work together efficiently and effectively using a single, national approach to an incident. Further, according to the NIMS doctrine, using a comprehensive national approach improves the effectiveness of emergency management personnel’s responses to the full spectrum of potential incidents and hazard scenarios, including natural hazards, terrorist activities, and other manmade disasters. To capture information on states’ performance during preparedness exercises and real-world events, states generally develop after-action reports. The EMPG grant program, under which all states and territories receive funding, specifically requires participants to develop and maintain an exercise program, consistent to the degree practical with HSEEP in support of the National Exercise Program,⁴⁰ and to conduct preparedness exercises and submit AARs that evaluate the state or territory’s performance during the exercises based on one or more core capabilities.⁴¹ Under HSEEP—which provides a common approach to designing, developing, conducting, and evaluating exercises—planners

⁴⁰The purpose of the program is to design, coordinate, conduct, and evaluate exercises that test the United States’ ability to perform missions and functions that prevent, protect against, respond to, recover from, and mitigate all hazards.

⁴¹All states receive annual Emergency Management Performance Grants that require that states conduct at least five exercises annually and submit AARs to FEMA. Generally, exercises are structured to test one or more core capability. According to HSEEP guidance, an AAR should include an overview of performance related to each exercise objective and associated core capabilities, while highlighting strengths and areas for improvement.

identify exercise objectives and align them to core capabilities.⁴² In some cases, the exercise objectives test one or more of the NIMS elements identified by FEMA that should be incorporated into training. As such, exercises could also allow for identifying areas of needed improvement in NIMS implementation, one of the legislative bases for establishing the National Exercise Program.⁴³

FEMA regional officials we spoke with stated that some of FEMA's national core capabilities are good proxies for how well NIMS is being implemented, and that AARs—which states submit to the National Exercise Division—can provide insight into the level of NIMS implementation when certain of these core capabilities are assessed.⁴⁴ NIC officials stated if an exercise objective includes testing an element of NIMS, then it is possible to assess NIMS implementation. For example, evaluating a state's performance related to the core capability of operational coordination could include as an exercise objective to evaluate the command and control of an incident according to NIMS principles.⁴⁵ Similarly, the core capability for operational communications could provide an assessment related to the NIMS elements for interoperability of compatible communications, technology, and information management.⁴⁶

⁴²Exercise objectives are distinct outcomes that an organization wishes to achieve during an exercise and should be specific, measurable, achievable, relevant, and time-bound. According to the HSEEP guidance, aligning exercise objectives to a common set of capabilities enables systematic tracking of progress over the course of exercise programs and cycles, standardized exercise data collection to inform preparedness assessments, and fulfillment of grant or funding-specific reporting requirements.

⁴³The National Exercise Program was established by 6 U.S.C. § 748(b)(1) in order to, among other things, test and evaluate NIMS.

⁴⁴The core capabilities are the 32 distinct critical elements needed to achieve the National Preparedness Goal. The capabilities include, among others, planning, operational coordination, cybersecurity, critical transportation, and fatality management services.

⁴⁵Operational coordination is the capability to establish and maintain a unified and coordinated operational structure and process that appropriately integrates all critical stakeholders and supports the execution of core capabilities. The 2014 and 2015 URT used the NIMS implementation questions as an assessment of operational coordination for the State Preparedness Report.

⁴⁶Operational communication is the capability to ensure the capacity for timely communications in support of security, situational awareness, and operations by any and all means available, among and between affected communities in the impact area and all response forces.

We analyzed AARs for 35 full-scale exercises that were conducted in fiscal year 2014 in 4 FEMA regions, 33 of which assessed at least one, if not two or all three, of the core capabilities we identified as proxies for NIMS elements—operational coordination, operational communication, and public information and warning.⁴⁷ Of the 35 reports we reviewed, 30 assessed operational coordination, 22 assessed operational communication, and 12 assessed public information and warning. Generally, for the capabilities assessed, the AARs identified strengths as well as issues and challenges in performing related activities and tasks.⁴⁸ Specifically, 24 of the 30 exercises that assessed operational coordination, 21 of the 22 exercises that assessed operational communication, and 8 of the 12 exercises that assessed public information and warning identified areas for improvement with those capabilities. While exercises are meant to assess the ability to meet exercise objectives by documenting strengths, areas for improvement, core capability performance, and corrective actions in an AAR, some of the AARs documented problems with NIMS-related exercise objectives, indicating that there is room for improvement in NIMS implementation. For example, four of the AARs found that an Incident Command System (ICS) was not established among responding agencies, even though NIMS calls for using such a structure. Similarly, another AAR concluded that responding staff were unfamiliar with their position-specific roles and responsibilities, even though NIMS calls for emergency management and response personnel to have a clear understanding of their roles and responsibilities. The report noted that the staff displayed difficulty in monitoring, gathering, receiving, organizing, and sharing incident information—all activities that implementation of NIMS is designed to facilitate. Another exercise evaluating operational communication found that there was no communication among the different law enforcement agencies and officers during the exercise. These examples demonstrate

⁴⁷Public information and warning is the capability to deliver coordinated, prompt, reliable, and actionable information to the whole community through the use of clear, consistent, accessible, and culturally and linguistically appropriate methods to effectively relay information regarding any threat or hazard and, as appropriate, the actions being taken and the assistance being made available. While we used these three core capabilities for the purposes of our analysis, there are other core capabilities that could provide information on NIMS implementation. For example, according to NIC officials, some NIMS elements could be addressed through the core capability of situational awareness.

⁴⁸According to FEMA, exercises are designed to provide an objective assessment of gaps and shortfalls within plans, policies, and procedures to address areas for improvement prior to a real-world incident.

that AARs can provide a basis for FEMA to develop a more comprehensive and sophisticated understanding of states' NIMS implementation, and suggests that there is room for improvement in NIMS implementation for some jurisdictions.

NIC officials said they do not verify the self-reported NIMS implementation information that states submit because of the scope and breadth of the information. However, in reviewing AARs to help inform FEMA's understanding of NIMS implementation, FEMA regional office staff could be in a better position to assess how well states have actually implemented NIMS, as regional staff have more direct responsibilities related to states' NIMS implementation. Specifically, FPCs—who lead regional efforts to implement the National Preparedness System across the federal, state, tribal, and local jurisdictional levels—are responsible for monitoring NIMS compliance and implementation. FPCs are also responsible for assisting in planning, design, execution, and evaluation of exercises. In addition, each regional office has a NIMS coordinator who is responsible for working with states to provide NIMS information and technical assistance to support, facilitate, and enhance their implementation of NIMS. One FPC stated that officials in his region review state AARs within the region to identify needed corrective actions that could be taken by states. Similarly, one regional NIMS coordinator developed a checklist to perform NIMS implementation state monitoring visits and said he visits 2 states each year in his region to ask questions about implementation of various NIMS principles and provide assistance. However, while some of these officials have taken independent steps to assess some level of NIMS implementation, the regional offices we spoke with do not systematically assess states' level of NIMS implementation by, for example, reviewing AARs because there are no policies or procedures that call for these activities. Specifically, while states are to submit AARs to FEMA's National Exercises Division,⁴⁹ and to the regional EMPG Program Manager, as a requirement for receiving EMPG grants, FPCs and NIMS coordinators are not required to review them to provide validation of the NIC's NIMS implementation assessment.

FEMA regional office officials we spoke with, along with several state emergency management officials, agreed that assessing NIMS implementation using AARs could provide FEMA a way to further assess

⁴⁹FEMA's National Exercise Division oversees the National Exercise Program.

and elaborate on the information states and territories currently provide. For example, the National Exercise Division, another division within the National Preparedness Directorate, conducted an assessment of NIMS in 2013 by reviewing AARs and found that failures in NIMS performance were predominantly due to failures in implementation of NIMS. The report recommended, among other things, that the agency modify existing training and exercises to allow responders to integrate NIMS concepts and improve assessments of the ICS (as a component of NIMS performance) by incorporating relevant principles as criteria of performance.⁵⁰ According to a NIC official, FEMA has been working on the recommendations and expects to implement the actions when FEMA releases an update to the NIMS doctrine. Finally, while the National Exercises Division did assess NIMS implementation issues in 2013 by analyzing AARs, regional offices and the NIC do not systematically or regularly assess NIMS implementation. Using AARs to systematically assess NIMS implementation over time could allow the regions and the NIC to identify recurring issues in jurisdictions.

HSPD-5 calls for FEMA to (1) establish a mechanism for ensuring ongoing management and maintenance of the NIMS, including regular consultation with other federal departments and agencies and with state and local governments, and (2) develop standards and guidelines for determining whether a state or local entity has adopted NIMS. In addition, OMB Circular No. A-11 states that data limitations can lead to bad decisions resulting in lower performance or inaccurate performance assessments, and data limitations can include imprecise measurement and recordings, incomplete data, and inconsistencies in data collection procedures. Consistent verification and validation of performance data support the general accuracy and reliability of performance information, reduce the risk of inaccurate performance data, and provide a sufficient level of confidence to Congress and the public that the information presented is credible as appropriate to its intended use.⁵¹ As we have previously reported, FEMA's reliance on self-reported data from states and lack of verification for FEMA preparedness grants has presented

⁵⁰FEMA, National Exercise Division *Incident Command System and National Incident Management System Assessment Report*, (Washington, D.C.: Sept. 13, 2013).

⁵¹OMB Circular No. A-11, *Preparation, Submission, and Execution of the Budget* (Washington, D.C.: Aug. 3, 2012). The circular also states that agencies should have cost-effective verification and validation techniques in place to ensure the completeness and reliability of reported performance data.

reliability concerns.⁵² While AARs are also self-reported, they use a narrative format that includes analyses of the various aspects of actions following an exercise or actual event. State officials from two states we spoke with said that they review AARs within their state in order to evaluate NIMS implementation. For example, officials from one state said they use AARs to identify gaps in NIMS implementation so they can align resources to support better implementation. This is because exercises enable stakeholders to identify both capability gaps and areas for improvement. Further, the purpose of exercises is to provide a low-risk environment to test capabilities, familiarize personnel with roles and responsibilities, and foster meaningful interaction and communication across organizations. As such, evaluating AARs could provide an additional opportunity to look for areas of NIMS implementation that could be improved.

According to NIC officials, they meet the requirements of HSPD-5 through ongoing discussions with NIMS stakeholders, including state emergency managers, to ensure ongoing management and maintenance of NIMS, and by obtaining self-assessment information provided by states on NIMS implementation in the URT that provides standards and guidelines. Additionally, in order to meet the requirements of HSPD-5, in 2006 the NIC developed implementation guidance through the NIMS Compliance Objectives and Metrics for states and territories, tribal nations, and local governments, which was last updated in 2010.⁵³ However, NIC officials said that, given the large number of states and their jurisdictions that have adopted NIMS, any efforts to validate the information states provide on their implementation efforts would be prohibitively difficult and costly. While verifying each state and jurisdiction's self-reported information may

⁵²GAO, *Grants Performance: Justice and FEMA Collect Performance Data for Selected Grants, but Action Needed to Validate FEMA Performance Data*, [GAO-13-552](#) (Washington, D.C.: June 24, 2013). In this report, we found that in two FEMA preparedness grants programs, grant recipients provided self-reported performance data and FEMA had no process to validate program data. We recommended that FEMA ensure that there are consistent procedures in place at the program office and regional levels to promote verification and validation of grant performance data that allow the agency to attest to the reliability of grant data. As of October 2015, FEMA is still working on addressing this recommendation.

⁵³The NIMS Compliance Objectives and Metrics documents provide a detailed list of NIMS compliance objectives by NIMS components. States, territories, tribal nations, and local governments can still access the guidance through FEMA's website; however, there is no requirement to use this implementation guidance.

not be feasible, states are already required to develop AARs under the EPMG program, which could provide a source in addition to the URT by which FEMA could assess progress made on implementation of NIMS, as the 2013 assessment by the National Exercise Division demonstrates. States are already required to develop AARs following their preparedness exercises, based on grant program requirements. Moreover, FEMA's regional offices have multiple positions with responsibilities for NIMS implementation, as well as preparedness exercises. Therefore, developing policies and procedures for regional office staff to review and assess information on states' NIMS implementation, gleaned through a review of exercise AARs, would not only help FPCs and NIMS coordinators better meet their responsibilities for supporting and enhancing regional preparedness, but also provide the NIC a means, in addition to the URT, to further evaluate states' self-reported assessments of NIMS implementation.

Additional Opportunities Exist for FEMA Regional Offices to Enhance Collaboration with Regional Advisory Council Members

RAC Members and Liaisons View RAC Meetings as Useful and Well Run

As described earlier, the Post-Katrina Act required that each FEMA region establish a Regional Advisory Council (RAC) in order to provide the types of advice on emergency preparedness in their regions listed in the Post-Katrina Act to the FEMA regional administrators.⁵⁴ RAC members who responded to our survey reported that they found RAC meetings to be a useful collaborative experience, allowing them to obtain good information, have interactions with other RAC members and FEMA

⁵⁴6 U.S.C. § 317(e).

officials, and to offer advice to FEMA on regional emergency-related issues. For example:

- About 90 percent said that the RAC meetings were moderately or very effective in providing information on how to make the region better prepared for emergencies; the information communicated at RAC meetings was moderately or very effective (89 percent); coordination between the RAC and the regional office was moderately or very effective (89 percent); the quality of the communications from their FEMA regional office was good or excellent (91 percent); their regional office was effective in asking members about their concerns or suggestions about emergency preparedness issues in their region (93 percent); and their participation was encouraged (93 percent).
- About 81 percent said that the meetings provide a useful forum in which to offer advice to FEMA on regional emergency-related issues; most said that they likely would serve another term, if invited (81 percent); the overall preparedness of the region increased moderately or greatly as a result of RAC meetings (69 percent); and, in general, the meetings were well run, on time, on topic, and relevant to regional emergency-related issues (89 percent).

Many of those FEMA regional offices that convene RAC meetings (see below for a discussion of the variations in the occurrence of meetings) prepare and send out agendas in advance of the meetings and collaboratively involve RAC members in planning. Conducting early outreach to participants and stakeholders to identify shared interests is an effective collaborative implementation approach identified in GAO's *Implementation Approaches Used to Enhance Collaboration in Interagency Groups*.⁵⁵ RAC members who responded to our survey reported that they appreciated the information provided to prepare them for the RAC meetings. For example, 96 percent reported that they were notified in advance about the meetings, 86 percent stated that the agendas provided information necessary for preparing for the RAC meetings, and 79 percent believed that distributing the minutes after the meeting was a moderately or very effective approach.

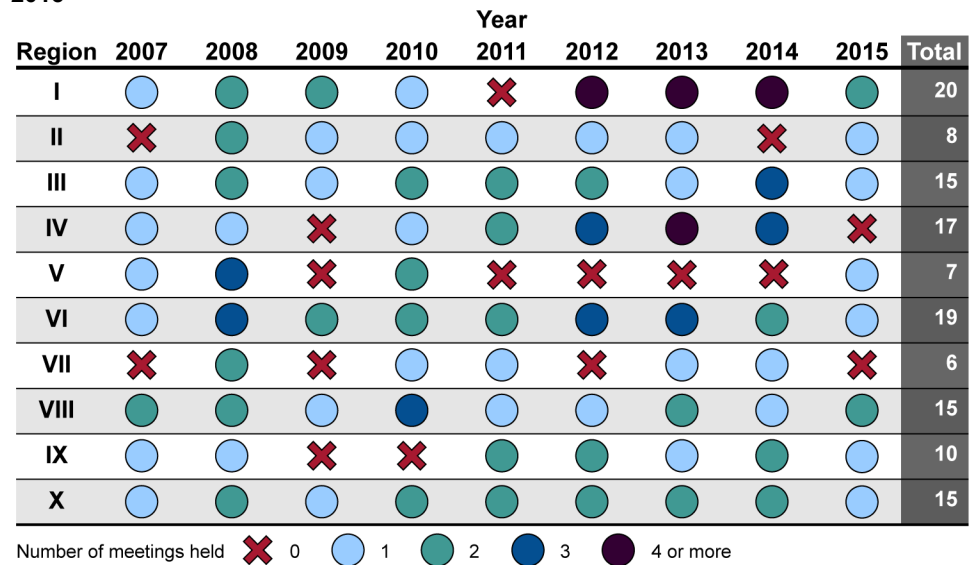
⁵⁵GAO, *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*, [GAO-14-220](#) (Washington, D.C.: Feb. 14, 2014). In this report, we identified specific implementation approaches that interagency groups use to overcome common challenges when collaborating.

Some FEMA Regions Do Not Routinely Meet with RACs to Collaborate on Emergency Preparedness

Although the RAC charters adopted by each of the 10 regions require that their RACs meet twice annually, some RACs have not met routinely in recent years to collaborate with FEMA regional officials to provide advice and input from regional stakeholders. The DHS Inspector General reviewed the FEMA Region IX Office in 2012 and the Region V Office in 2015 and concluded that because the RACs in those regions had not met for a period of years, FEMA’s regional offices could be “missing opportunities to identify and remediate weaknesses or deficiencies in preparedness, protection, response, recovery, and mitigation activities.”⁵⁶

Figure 2 summarizes the number of RAC meetings in each region since 2007 through August 2015 (including both in-person meetings and meetings conducted as interactive webinars).

Figure 2: Number of RAC Meetings in Each FEMA Region by Year for 2007-August 2015



Source: GAO analysis of Federal Emergency Management Agency data. | GAO-16-38

Note: Meetings for 2015 are for those that occurred through August 3, 2015. Several regions reported that they were planning additional RAC meetings later in calendar year 2015. For example, Region IV had a RAC meeting in November 2015.

⁵⁶DHS Office of Inspector General (OIG), *Inspection of FEMA’s Regional Offices—Region IX*, OIG-12-43 (Washington, D.C.: Feb. 24, 2012); and *Inspection of FEMA’s Regional Offices—Region V*, OIG-15-120 (Washington, D.C.: Aug. 7, 2015).

One region cited the fact that they did not have funds to reimburse RAC members for travel expenses, and another cited travel costs as a problem for RAC members in a region as geographically large as theirs. Another region stated that while they paid for the travel expenses, this necessarily had to come from their available funds and that therefore, it meant having less for other potential needs.

In our survey of RAC members, respondents cited several reasons why they did not attend RAC meetings. For example, 68 percent of respondents cited scheduling commitments and conflicts, 26 percent cited insufficient or no funding for travel, and 11 percent said that the meeting locations were inconvenient. Some RAC members said that their RAC should definitely or probably meet more frequently (41 percent), while others did not (30 percent said “probably” or “definitely not” and 23 percent said they were unsure or had no opinion). In open-ended comments on RAC meetings attended by RAC members, 6 RAC members stated that they would prefer having more in-person meetings versus teleconferences or videoconferences.

FEMA Region V, in which the RAC did not meet for several years, took steps starting in August 2014 to address a lack of interest from the majority of the members. For example, regional officials invited RAC members to other regional meetings with other federal agencies—a process used by some other regions. In 2015, the regional office resumed having RAC meetings, with one taking place in mid-January with 11 of 12 members attending. According to the regional RAC liaison, the high attendance was the result of the regional administrator having personally reached out to the individuals who had been recommended for RAC membership and inviting them to participate. He said this individualized communication with each person on the team helped to instill interest and motivate involvement in the meeting, in the view of the liaison, and that the personal involvement of the regional administrator makes the RAC more effective.

The Post-Katrina Act requires FEMA regional offices to establish RACs in order to provide input to each regional administrator on regional emergency management issues by identifying any geographic, demographic, or other characteristics peculiar to any state, local, or tribal government within the region that might make preparedness, protection, response, recovery, or mitigation more complicated or difficult, among other things. Additionally, GAO’s *Key Considerations for Implementing Interagency Collaborative Mechanisms* identified meetings that bring stakeholders together as an effective collaborative practice, noting

particularly that such relationship-building is vital in responding to disasters.⁵⁷

By routinely obtaining input from RAC members—whether through in-person meetings or via remote connection or other means—FEMA regional offices could better ensure they are identifying geographic, demographic, or other issues within the region to enhance emergency preparedness. Additionally, for those FEMA regional offices that face participation challenges, assessing the reasons for these barriers and identifying targeted solutions, such as consistently offering remote participation, or, as used by one region, direct communication from the regional administrator to RAC members, could better ensure they are able to obtain such input from the RACs effectively and on a regular basis.

FEMA Regional Offices Are Responsive to RAC Suggestions but Do Not Regularly Provide Feedback on Their Recommendations

RAC members who responded to our survey generally indicated that FEMA regions were responsive to their suggestions.

- Seventy-five percent of the RAC members said that they had made suggestions concerning issues related to emergency management at RAC meetings or between RAC meetings; 79 percent stated that their overall sense that FEMA was listening to their concerns increased moderately or greatly during the time on which they had served on their RAC; and 74 percent stated that FEMA was acting to address their concerns.
- Sixty-seven percent of the respondents said FEMA had taken action to a moderate, great, or very great extent in response to suggestions made by RAC members.⁵⁸

FEMA RAC liaisons we contacted by e-mail reported having taken action in response to RAC member suggestions. Specifically, 9 of the 10 FEMA

⁵⁷GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012). In this report, we identified the mechanisms that the federal government uses to lead and implement interagency collaboration, as well as issues to consider when implementing these mechanisms.

⁵⁸Seven percent of the respondents said that actions had been taken to a little or some extent; 22 percent said they had no opinion or basis on which to judge, and 4 percent said no advice or suggestions had been made to the regional office during their time on the RAC.

RAC liaisons reported that input from their RACs had either led to changes in specific FEMA policies or led to generally better informing FEMA about members' concerns.⁵⁹ For example, at the suggestion of their RACs, regional offices created a regional training and exercise coordination website to share information; forwarded a suggestion from a RAC to revise FEMA national policy to include ice storms as a reimbursable emergency;⁶⁰ and developed and distributed monthly preparedness themes to help synchronize federal, state, and local officials' focus on common topics, among other things.

Although some FEMA regional offices have incorporated various recommendations made by RAC members, 50 percent of the respondents in our survey of RAC members said that FEMA should provide more detailed feedback to them on suggestions or advice they made at RAC meetings.⁶¹ Of the 10 regional offices, 7 reported that they tracked outcomes of RAC efforts; 3 said they posted suggestions on FEMA's internal website (which is not accessible to non-FEMA employees, including RAC members), and 4 said they used e-mail to forward meeting notes to RAC members.⁶² One RAC member from our survey commented on the need for a tracking system for the status and resolution of issues raised, and another RAC member commented on the need for better follow-up on recommendations. Developing a mechanism, such as a Listserve or a dedicated website, to periodically notify all RAC members in all 10 regions about the status of suggestions made by RACs to regional administrators or to FEMA could help FEMA keep RAC

⁵⁹We did not determine how many suggestions had been made since RACs were established in 2007 or how many of these suggestions were implemented, or to what extent. As discussed below, such suggestions are not systematically tracked by either the regional offices or by FEMA headquarters.

⁶⁰According to the Region VI RAC liaison, the issue was raised sometime in early 2014 and discussed at the September 2014 RAC meeting, at which time it was forwarded to FEMA for consideration. As of September 2015, the policy had not been changed and the region had not heard back from FEMA headquarters with regard to the proposed change. FEMA officials noted that changing national policy is not a quick process and must be reviewed by multiple levels within the agency.

⁶¹Thirty percent said they were unsure or had no opinion on whether FEMA should provide more detailed feedback to RAC members on suggestions or advice they made at RAC meetings, and 19 percent said they did not see this as needed.

⁶²Regions III, VI, and VIII said that they regularly reported back to RAC members by e-mail on the status of suggestions as a way of keeping them up to date.

members aware of the status of their recommendations and thereby address the concerns of those who wanted more detailed feedback.

In March 2014, FEMA's NAC identified the need for FEMA to re-examine the outcomes of its existing regional committees and councils, including the RACs. Reporting the outcomes of RACs' suggestions to the NAC could help FEMA address this identified need. The NAC's recommendation to FEMA also reflects the key considerations for implementing interagency collaborative mechanisms found in GAO's *Implementation Approaches Used to Enhance Collaboration in Interagency Groups*.⁶³ As the report stated, many of the meaningful results that the federal government seeks to achieve, such as national preparedness, require the coordinated efforts of more than one federal agency, level of government, or sector. Implementation approaches for interagency collaborative mechanisms include developing a plan to communicate outcomes and track progress, and developing methods to report on the group's progress that are open and transparent. As noted previously, while some regions have taken steps to track outcomes of RAC efforts, none of the regional offices has a process for regularly providing feedback on the status of recommendations. Providing feedback to RAC members on their suggestions could enhance FEMA regional offices' collaboration with their RACs.

Although Many RAC Members Say Their Concerns Are Communicated to the NAC, Others Want More Feedback on Responses to Suggestions

The NAC, established by the Post-Katrina Act, incorporates state, local, and tribal governments, nonprofit, and private sector input with regard to improving emergency preparedness and response to natural and manmade emergencies.⁶⁴ Although almost two-thirds of RAC members who responded to our survey said they believed their concerns were communicated by FEMA to the NAC, some RAC members commented that they wanted more feedback on the NAC's responses to suggestions. However, FEMA has not established policies and procedures to communicate RACs' regional concerns directly to their national-level counterparts on the NAC, as proposed in 2011. Almost two-thirds of

⁶³[GAO-14-220](#).

⁶⁴The NAC consists of 35 members, appointed by the FEMA Administrator, who are, to the extent practicable, geographically diverse and who represent a substantive cross-section of officials, emergency managers, and emergency response providers from state, local, and tribal governments; the private sector; and nongovernmental organizations.

respondents said FEMA was (very or moderately) effective in communicating RAC concerns and issues to the NAC. However, in open ended comments, six RAC members stated they that would like to receive more information about the NAC and what it was addressing.

In September 2010, a FEMA local, state, tribal, and federal task force for improving national emergency preparedness recommended that communications between the RACs and the NAC be more robust.⁶⁵ Specifically, the task force recommended that RACs receive policy information briefings directly from the NAC and provide input directly to the NAC in order to provide local, state, tribal, and territorial officials with influence across stages of the preparedness policy process and to create an informational exchange between the NAC and the RACs to make local, state, tribal, and territorial officials fuller partners in the preparedness policy process.⁶⁶

In June 2011, FEMA responded to the recommendation from the task force with an implementation plan, stating that, by November 24, 2011, it would revise its policies and procedures to systematically link the RACs to each other, the NAC, and FEMA headquarters, to help RACs influence national emergency management policy. FEMA officials said they held a meeting of all the RAC regional liaisons in August 2011 to propose options to create a “NAC-RAC interface,” among other things. However, they did not identify any additional subsequent actions they had taken to implement the plan. For example, although FEMA stated that the August 2011 RAC liaison meeting had resulted in adding a “RAC Report Out” by a regional administrator as a standing agenda item for the NAC meetings, none of the NAC meeting agendas for any NAC meeting between August 2011 and September 2015 showed “RAC Report Out” as an agenda item.⁶⁷ In addition, our review of the minutes for all the NAC meetings held between August 2011 and September 2015 found only an

⁶⁵The task force consisted of local, state, tribal, and territorial government representatives convened by FEMA in response to the conference report accompanying the Department of Homeland Security Appropriations Act, 2010. H.R. Rep. 111-298, at 102 (Conf. Rep.).

⁶⁶Local, State, Tribal, and Federal Preparedness Task Force (convened by FEMA), *Perspective on Preparedness: Taking Stock Since 9/11: Report to Congress of the Local, State, Tribal, and Federal Preparedness Task Force* (Washington, D.C.: Sept. 2010).

⁶⁷NAC meeting notes are not available on-line for meetings prior to 2012.

occasional mention of issues of concern to RACs reported on by FEMA regional administrators or others present.

Officials from FEMA's Office of Regional Operations said that individual RACs can transmit their concerns to the NAC, such as by letter or through FEMA. The FEMA Office of the NAC provided a detailed summary of the status of recommendations made by the NAC to FEMA since 2008 to NAC members at the September 2015 NAC meeting. However, this summary did not include the status of recommendations or suggestions or communications made by RACs to the NAC. As such, these processes do not appear to provide a systematic way in which to ensure that issues raised in RAC meetings are consistently brought to the attention of the NAC for its consideration or to provide a consistent feedback mechanism for RAC members.

In November 2015, FEMA's Office of the NAC said that although it is precluded from establishing a formal mechanism between the RACs and the NAC,⁶⁸ it is working with FEMA's Office of Regional Operations to informally enhance coordination between the NAC and the RACs, such as distributing NAC recommendation memoranda with the RACs for informational purposes. Establishing policies and procedures, as suggested by FEMA's task force and 2011 implementation plan, to enhance coordination and communication between the RACs and the NAC could create greater opportunities for regional insights about preparedness to inform national preparedness policies and a two-way informational exchange between the NAC and the RACs to make local, state, tribal, and territorial officials fuller partners in the preparedness policy process.

Conclusions

Because of the key role FEMA's regional offices play in national disaster preparedness efforts, effective regional coordination and collaboration between FEMA headquarters, FEMA regions, and state and local stakeholders is essential. Multiple external and internal assessments and our work have identified challenges, such as lack of coordination in grant-monitoring visits and inconsistent guidance, in FEMA's grant management. These challenges continue to hamper the effectiveness of interactions between FEMA and state officials in implementing the

⁶⁸See Pub. L. No. 92-463, 86 Stat. 770 (1972).

preparedness grants program. A plan with time frames, goals, metrics, and milestones for addressing these challenges would better enable GPD officials to monitor and improve their efforts to resolve long-standing problems in coordination of monitoring activities and the consistency of guidance given to state grantees. Regarding oversight of FEMA's efforts to implement the national system for managing incidents, there are opportunities to access more sophisticated and comprehensive information using FEMA regional staff to better assess NIMS implementation. Further, using AARs that are already required to be developed and submitted could provide a better opportunity to assess NIMS implementation, including areas of success as well as areas where improvement is needed. However, without policies and procedures that call for systematically evaluating these reports, regional offices and the NIC are missing a key opportunity to better assess national NIMS implementation, which could enhance regional preparedness. Finally, FEMA regional offices could more consistently and systematically take steps to fully leverage RACs that can provide important inputs to national preparedness efforts. For example, by ensuring that RACs provide feedback to RAC members on the status of their recommendations, FEMA could enhance RACs' collaborative efforts and satisfaction of RAC members. Similarly, by enhancing RACs' connectivity with the NAC, FEMA could increase the potential value of regional coordination and collaboration and the resulting contributions to regional preparedness efforts.

Recommendations for Executive Action

To promote more effective grant management coordination, the Secretary of Homeland Security should direct the FEMA Administrator to develop a plan with time frames, goals, metrics and milestones detailing how GPD intends to resolve longstanding challenges associated with its existing hybrid grants management model, which divides responsibilities between regional and headquarters staff.

To enable more sophisticated and comprehensive awareness of states' NIMS implementation, the Secretary of Homeland Security should direct the FEMA Administrator to develop policies and procedures for regional staff to review AARs from preparedness exercises within their region, and headquarters staff to review these evaluations in order to have a better understanding of NIMS implementation.

To enhance the value of RACs, the Secretary of Homeland Security should direct the FEMA Administrator to take the following three actions:

-
1. Ensure that all regional offices routinely obtain input—whether in person, by teleconference or by other remote connection—from their RAC members on ways to enhance overall emergency preparedness in their regions. In cases where RAC member participation is low, regional offices should assess and identify targeted solutions for increasing member participation, such as offering remote participation or alternative forums;
 2. Develop a mechanism to update RAC members on the status of recommendations made by RACs to FEMA; and
 3. Establish processes for enhanced coordination and communication between the RACs and the NAC.

Agency Comments and Our Evaluation

We provided a draft of this report to DHS for comment. DHS provided technical comments, which we incorporated as appropriate. On January 15, 2016, DHS also provided written comments, reproduced in full in appendix IV. DHS concurred with four of our recommendations and did not concur with one.

DHS did not concur with our first recommendation that the Secretary of Homeland Security direct the FEMA administrator to develop a plan with time frames, goals, metrics, and milestones detailing how GPD intends to resolve longstanding challenges associated with its existing hybrid grants management model. In its comments, DHS stated that it disagreed with GAO's characterization of longstanding challenges in managing preparedness grants. As we stated in the report, multiple assessments dating back to 2009 have reported challenges with the hybrid model that splits management of preparedness grants between FEMA's headquarters and regional offices. As also noted in the report, officials from 4 FEMA regional offices and officials from 3 states within those regions provided numerous examples of a lack of coordination between headquarters and regional staff in managing preparedness grants, including instances that took place in 2014 and as recently as September 2015. Based on our review of the past assessments and the audit work we performed, we believe that these long-standing challenges have yet to be resolved.

In its written comments, DHS also stated that FEMA already empowers its ten regions to coordinate and communicate with headquarters and other regional offices to facilitate working relationships. While FEMA has taken various actions since 2008 to improve coordination related to preparedness grants—some actions as recent as February 2015—these steps have not resolved these challenges, as described in the report.

When we spoke with GPD officials in September 2015, they agreed that there were continuing opportunities to improve coordination and communications in their management of preparedness grants. Therefore, we continue to believe that FEMA would benefit from a more strategic approach that a plan, with time frames, goals, metrics, and milestones detailing how officials intend to resolve longstanding challenges associated with the existing hybrid model, could provide.

DHS also expressed concern about the wording of our recommendation and how the recommendation, as worded, could be closed.⁶⁹ Specifically, DHS stated that FEMA is not aware of nor did the recommendation provide any specific criteria that could be used to gauge the success of any proposed plan. While we recommended that DHS develop a plan with time frames, goals, metrics, and milestones for resolving its longstanding coordination challenges, we did not prescribe specific actions to address these challenges. However, our work across the federal government has identified implementation approaches used to enhance collaboration that could inform GPD officials' efforts to clearly define short-term and long-term outcomes and track and monitor their progress.⁷⁰ Nevertheless, FEMA could implement this recommendation by developing a plan and we believe that doing so would address the intent of this recommendation.

Regarding our second recommendation that the Secretary of Homeland Security direct the FEMA Administrator to develop policies and procedures for regional staff to review AARs from preparedness exercises within their region, and headquarters staff to review these evaluations in order to have a better understanding of NIMS implementation, DHS concurred and said it recognizes that joint efforts by regional and headquarters staff are essential to enable more sophisticated and comprehensive awareness of NIMS implementation. However, DHS expressed concerns about overstating the value of AARs

⁶⁹GAO closes a recommendation when actions that satisfy the intent of the recommendation have been taken, when it is no longer valid because circumstances have changed, or implementation cannot reasonably be expected.

⁷⁰GAO, *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*, GAO-14-220 (Washington, D.C.: Feb. 14, 2014). While these practices were based on our review of collaboration across federal agencies, we believe they could inform GPD's efforts to enhance collaboration with grants management staff in FEMA's regional offices.

as a means to improve understanding of NIMS implementation. Specifically, DHS stated that FEMA does not agree that the “best way to assess how well NIMS has been implemented is by assessing states’ performance in preparedness exercises and real-world events.” As noted in the report, most all of the officials we spoke with believed that the current method of determining NIMS implementation—states self-certification via the URT—was not an effective method of determining NIMS implementation, and officials in all of the FEMA regions and 8 of the states we interviewed said that looking at how effectively a jurisdiction responds during an exercise or real world event is the best way to assess NIMS implementation. DHS also stated that the extent to which a jurisdiction has implemented NIMS is nuanced and therefore impossible to assess accurately from an AAR. The report does not suggest that reviewing AARs would give a comprehensive and definitive assessment of NIMS implementation but rather that it could provide FEMA an additional way to assess and elaborate on the information states currently provide. In fact, FEMA used AARs to conduct an assessment of NIMS in 2013, which resulted in some recommendations to help improve NIMS implementation. Finally, as we have previously reported, the Post-Katrina Act requires FEMA to carry out the National Exercise Program.⁷¹ The Act established the Program, among other things, as a means for FEMA to test and evaluate NIMS implementation efforts.⁷² As a result, we continue to believe that AARs, an essential part of the National Exercise Program, are an important part of FEMA’s efforts to assess NIMS implementation and we added a reference to this requirement to our final report. DHS did not identify any specific steps to address this recommendation but said that the National Preparedness Directorate would work with regional NIMS coordinators and the states to explore options during calendar year 2016, with potential changes to be implemented in calendar year 2017.

In its written comments, DHS concurred with our third, fourth, and fifth recommendations related to enhancing the value of RACs. Specifically, regarding the third recommendation that the Secretary of Homeland Security direct the FEMA administrator to ensure that regional offices routinely obtain input from their RAC members, DHS concurred and

⁷¹GAO, *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).

⁷²The National Exercise Program was established by 6 U.S.C. § 748(b)(1) in order to, among other things, test and evaluate NIMS.

stated that the regions will conduct two meetings a year with their RAC members; that a RAC coordinator within each region will be responsible for the oversight of these meetings; and that open dialogue will be encouraged between RAC members and the regions, with each region establishing a RAC coordinator to facilitate this communication. If implemented as planned, these actions should help address the intent of the recommendation to ensure that regional offices routinely obtain input from their RAC.

Regarding the fourth recommendation that the Secretary of Homeland Security direct the FEMA administrator to develop a mechanism to update RAC members on the status of recommendations made by RACs to FEMA, DHS concurred and stated that it will build into each RAC meeting a briefing by regional personnel on the status of recommendations, if any, made during the previous meeting. The regional administrator or RAC coordinator within the region will be responsible for the brief. Additionally, if RAC members are not satisfied with the implementation of RAC recommendations, it will be expected that the regional office will provide information on why a specific recommendation was not adopted or why implementation is delayed. DHS further stated that each region may have its own method of dispensing updates to its RAC members between meetings, including monthly email updates, posting on their website, or informational calls. If implemented as planned, these actions should help address the intent of the recommendation to update RAC members on the status of its recommendations to FEMA.

Regarding our fifth recommendation that the Secretary of Homeland Security direct the FEMA administrator to establish processes for enhanced coordination and communication between the RACs and the NAC, DHS concurred and stated that regional administrators will continue to attend NAC meetings and provide FEMA regional updates that include RAC activities with the regions. Moreover, regional coordinators will ensure that RAC members are aware of any NAC meeting occurring in their own region, and that the RAC sharepoint site will be used as a platform to update RAC coordinators on impending NAC meetings to share with their RAC members. If implemented as planned, these actions should help address the intent of the recommendation to establish processes for enhanced coordination and communication between the RACs and the NAC.

We are sending copies of this report to Secretary of Homeland Security, appropriate congressional committees, and other interested parties. This report is also available at no charge on GAO's website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (404) 679-1875 or at CurrieC@gao.gov. Contact points for our Office of Congressional Relations and Office of Public Affairs can be found on the last page of this report. Other major contributors to this report are listed in appendix V.

A handwritten signature in black ink that reads "Chris P. Currie". The signature is written in a cursive, flowing style.

Chris P. Currie
Director, Homeland Security and Justice

List of Requesters

The Honorable Ron Johnson
Chairman
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Michael McCaul
Chairman
The Honorable Bennie Thompson
Ranking Member
Committee on Homeland Security
House of Representatives

The Honorable Martha McSally
Chairman
The Honorable Donald M. Payne, Jr.
Ranking Member
Subcommittee on Emergency Preparedness, Response, and
Communications
Committee on Homeland Security
House of Representatives

The Honorable Susan Brooks
House of Representatives

Appendix I: Objectives, Scope, and Methodology

The objectives of this study were to assess the extent to which the Federal Emergency Management Agency (FEMA) headquarters and regional offices have (1) addressed grant management coordination challenges between headquarters and the regions; (2) established a comprehensive system to assess National Incident Management System (NIMS) implementation; and (3) collaborated with Regional Advisory Council (RAC) members.

To address the first objective, we gathered and reviewed relevant documentation, such as FEMA assessments of grants managed by Grant Programs Directorate (GPD), FEMA's previous delegations of grant management responsibilities to regional offices, agency task force reports on advantages and disadvantages of regionalization, FEMA headquarters and regional office grant management roles and responsibilities, FEMA documentation on regionalization pilot programs, and other memoranda and internal documents. We also reviewed prior GAO reports on regional preparedness, grant management, and consolidation of management functions.¹ We interviewed FEMA's Director of the Preparedness Grants Division within GPD and other senior GPD officials to discuss programmatic grant management as well as previous FEMA assessments of the impact of moving management responsibilities to FEMA regional offices. We also interviewed grant management officials from 4 FEMA regional offices—Regions III, IV, VI, and IX—to discuss financial grant management and coordination of monitoring activities with GPD. These offices were selected in order to provide a mix of geographic locations, types of disasters typically experienced, and whether the regional office had been selected to participate in FEMA grant management pilot programs. Similarly, we interviewed officials from 9 states or territories (Arkansas, California, Florida, Georgia, Louisiana, Nevada, Texas, Virginia, and Washington, D.C.) from the 4 FEMA regions to discuss grant management within the states as well as interactions with FEMA grant management officials. These states were selected to reflect a diversity of experiences within the 4 FEMA regions we chose. While the information gained from these interviews cannot be generalized across all states, it

¹GAO, *FEMA Has Made Progress in Managing Regionalization of Preparedness Grants*, [GAO-11-732R](#) (Washington, D.C.: July 29, 2011); *Homeland Security: DHS Needs Better Project Information and Coordination among Four Overlapping Grant Programs*, [GAO-12-303](#) (Washington, D.C.: Feb. 28, 2012); and *Homeland Security: Effective Regional Coordination Can Enhance Emergency Preparedness*, [GAO-04-1009](#) (Washington, D. C.: Sept. 15, 2004).

provides useful insights into the nature of FEMA GPD and regional coordination with states with regard to grant management.

To address the second objective, we reviewed NIMS-related documents such as the NIMS Doctrine, NIMS Compliance Guidance, NIMS implementation reports, and results of the NIMS implementation questions in the Unified Reporting Tool (URT). We also reviewed documents on the Homeland Security Exercise and Evaluation Program (HSEEP) and on preparedness grants requirements. We compared FEMA's efforts in NIMS implementation and verification with Homeland Security Presidential Directive-5 and Office of Management and Budget (OMB) Circular No. A-11, regarding data validation and verification.² We interviewed officials at FEMA's National Preparedness Directorate, which includes the National Integration Center (NIC)—the office responsible for NIMS implementation—to discuss the NIC's efforts in implementing NIMS. To discuss NIMS implementation efforts at the regional and state levels, interactions between regional and state officials, and mechanisms for verifying how well NIMS is being implemented, we also interviewed officials from the 4 FEMA regional offices and the 9 states or territories mentioned above. In addition, because of the recommendations of officials in several regional offices and states, we interviewed an official from a 10th state (Oklahoma) from within the selected FEMA regions. Again, while the information gained from these interviews cannot be generalized across all states, it provided useful insights into the various efforts in implementing NIMS. Additionally, we analyzed all 35 full-scale exercise after-action reports (AAR) that FEMA received for exercises conducted during fiscal year 2014 and in the 4 regions we visited. We used the AARs as they provide qualitative analysis of outcomes of exercises, which are conducted in order to identify capability gaps and areas for improvement. The purpose of the analysis was to determine if they could be used to assess the level of participants' implementation of NIMS. We did this by developing a crosswalk that linked the six NIMS elements listed in the URT, and that states should incorporate into exercises, to a core capability—the unit by which exercises are evaluated. In developing this crosswalk, we found three core capabilities that we used as proxies for the six NIMS elements that are to be incorporated into exercises—operational coordination, operational communication, and

²OMB, Circular No. A-11, *Preparation, Submission, and Execution of the Budget* (Washington, D.C.: Aug. 3, 2012).

public information and warning.³ While aspects of NIMS implementation could be gleaned from other core capabilities, for the purposes of this analysis we used the three core capabilities identified through our crosswalk. Of the 35 reports we analyzed, 33 assessed at least one, if not two or all three, of the core capabilities we identified as proxies. In those reports where one or more of the core capabilities were addressed, we looked to see if there were issues associated with those core capabilities, and the nature and extent of the issues, by reviewing various sections of the reports. For the core capability of operational coordination, we also looked at the exercise objectives to see if they aligned with some element of NIMS components. If an AAR reported that the core capability that we assessed either was performed with some challenges, was performed with major challenges, or was unable to be performed, we included it in our count of a capability that encountered some issues. From this we could glean the extent to which various NIMS elements are working well and those that still have room for improvement. While results of these exercises are not generalizable to the country as a whole, they do provide useful insights into NIMS implementation in some areas.

To address the third objective, we interviewed FEMA headquarters and regional office officials and analyzed FEMA and Department of Homeland Security (DHS) Office of Inspector General (OIG) reports with information and findings relevant to RACs. We attended two RAC meetings in 2 regions that took place during the early part of our review, and obtained documentation of agendas and other relevant materials for RAC meetings that occurred between 2007 and 2014 for the RACs in all 10 FEMA regions. We also reviewed agendas and meeting minutes for NAC meetings that took place between August 2011 and September 2015. We reviewed relevant federal laws and regulations, federal internal controls standards, and leading practices for program management.

To identify the extent to which RAC members view their RAC experiences as effective in conveying their concerns to FEMA, we conducted a self-administered, web-based questionnaire survey of RAC members of each FEMA region's RAC; FEMA's 10 regional offices identified an initial

³We also determined that operational coordination was a good proxy for NIMS implementation, as the 2014 and 2015 Unified Reporting Tool uses the NIMS implementation questions as an assessment of operational coordination for the State Preparedness Report.

population of 133 active RAC members.⁴ (See app. II for a copy of the survey questionnaire and the results.)

Using e-mail addresses provided by each of the FEMA regions for their RAC members (which included the RAC members' names and, in most cases, their place of work or other occupational identifier), we e-mailed each RAC member a link to a secure survey website, along with a unique identifier and password to control access to each member's questionnaire. Most survey questions were closed-ended, in which RAC members selected from a list of possible responses. To obtain additional narrative and supporting context, survey respondents were given opportunities to provide additional open-ended comments throughout the survey.

The survey began on May 27, 2015, and data collection ended on June 29, 2015. We e-mailed the survey link to 126 of the RAC members identified by FEMA regional offices. Of these 126 e-mail contacts, e-mails to 14 were initially undeliverable and 2 were e-mails for FEMA employees who had been incorrectly listed as RAC members (FEMA employees cannot be RAC members). Of the 14 non-FEMA RAC members, we determined that 12 were no longer RAC members. Of the remaining 2, one informed us that she had only recently been appointed to a RAC and had not attended any RAC meetings, and the other told us in a follow-up telephone call that he had not been a RAC member for at least 4 years. On the basis of this information about RAC membership status, we defined all 16 cases as ineligible and excluded them from the survey population. Of the 110 contacted that were still presumed to be eligible members, 77 responded to the survey, resulting in a 70 percent response rate. Of the 77 respondents, 3 answered an initial screening question stating that they were not currently members of the RAC in their region, which left a total of 74 respondents whose responses were usable for our analysis of the rest of the questions. During the course of survey data collection, we sent periodic reminder e-mails to all nonrespondents to encourage participation in the survey. We also conducted tailored follow-ups by e-mail or telephone with selected nonrespondents, for example, those only partially completing their questionnaires.

⁴Through a transcription error, we omitted 7 persons of 13 who were identified as active members from the Region IV RAC. We therefore excluded these RAC members from our survey population.

Because our survey was designed to include the entire population of RAC members, our results are not subject to sampling error. However, the practical difficulties of conducting any questionnaire survey may introduce a variety of non-sampling errors. For example, differences in how a particular question is interpreted, the sources of information available to respondents, or the types of people who do not respond to the survey or a particular question can introduce error into survey results. We included steps in the survey design, data collection, and analysis stages to minimize these types of non-sampling errors. To minimize measurement error and nonresponse error, we designed draft questionnaires in collaboration with GAO survey specialists. We conducted pretests by telephone with three RAC members from three regions. On the basis of survey specialist input and these pretests, we made revisions to questionnaire drafts as necessary to reduce the likelihood of measurement and nonresponse errors (the types of nonresponse associated with the perceived burden, lack of question clarity or relevance to the respondent). In addition, our analysts answered respondent questions and resolved difficulties that respondents had in completing our questionnaire. We asked open-ended comment questions at various points in the questionnaire to allow respondents to explain or provide context for their answers, which helped inform and corroborate our interpretation and analysis of the survey results. We examined survey results to identify and remediate any inconsistencies or other indications of response error. Finally, we made multiple follow-up contacts with non-respondents throughout data collection to reduce nonresponse. To minimize the possibility of data processing error, a second data analyst independently verified the accuracy of all computer analyses. In addition, RAC members made their responses directly into an automated web survey instrument, preventing errors associated with manual data entry of written answers.

We conducted our work from October 2014 to February 2016 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.

Appendix II: Results of GAO Survey of Federal Emergency Management Agency (FEMA) Regional Advisory Council Members

Below is the text of the survey as it was sent to Regional Advisory Council (RAC) members. Following the cover page, the questions are shown, along with the results in percentages. Narrative answers to open-ended text questions are not displayed to prevent the identification of individual respondents. Percentages may not always sum to 100 percent because of rounding of decimal figures.

Note: Seventy-seven individuals responded to the survey. Three individuals indicated in question 1 that they were no longer RAC members, and as such did not answer questions 2-27 as instructed in the survey. Seventy-four RAC members were directed to answer questions 2-27, although in a few cases individual questions were not answered



United States Government Accountability Office

Survey of FEMA Regional Advisory Council (RAC) Members

Introduction

The U.S. Congress has asked the Government Accountability Office (GAO) to review regional coordination between FEMA's Regional Offices (ROs) and the Regional Advisory Councils (RACs) in each region. This includes both the quantity and quality of the interactions between FEMA ROs and their RAC members, as well as interactions among RAC members between RAC meetings. As part of this review, GAO is surveying all current RAC members of each of FEMA's ten regions. You are receiving this electronic questionnaire because you have been identified by your FEMA RO as a member of your region's RAC. (If you are no longer a RAC member, there is a place early in the questionnaire to indicate that.)

Please answer the questions based on your individual experience during your tenure as a member of your region's RAC. Answering these questions will help us inform Congress about coordination, communication and collaboration between FEMA ROs and RACs, as well as among RAC members from the view of RAC regional stakeholders such as yourself.

Responding to these questions should take about 30 minutes. Your responses can be saved and accessed at a later date if you need to stop partway or if you wish to revise them before finalizing them. To learn more about completing the questionnaire, or printing your responses, [click here for help](#). If you are unsure of how to respond to a question, or have any other question, please contact (GAO contact information provided).

We will not release outside of GAO any individually identifiable data obtained from responding to this questionnaire, unless required by law or requested by a member of Congress. We will generally report only the summary results of this survey. If we incorporate examples of individual survey responses into the report, we will do so in a manner that prevents the identification of the respondents.

Thank you for your time and assistance.

SURVEY QUESTIONS AND RESULTS

Section 1: Demographic Information and RAC Attendance History

1. Are you currently a member of the RAC in your FEMA region?

Yes, I am currently a member - <i>Continue with question 2.</i>	96%
No, I am no longer a member - (Click here to skip to question 28)	4%

2. To the best of your memory, for about how long have you been a member of your region's RAC?

Less than 1 year	23%
1 to less than 2 years	18%
2 to less than 3 years	18%
3 to less than 4 years	18%
4 years or more	23%
Did not answer question	1%

3. In which FEMA region is your RAC located?

Region 1	12%
Region 2	0%
Region 3	30%
Region 4	7%
Region 5	9%
Region 6	16%
Region 7	4%
Region 8	14%
Region 9	4%

**Appendix II: Results of GAO Survey of Federal
Emergency Management Agency (FEMA)
Regional Advisory Council Members**

Region 10	4%
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4. What type of jurisdiction or organization do you represent? (Please check all that apply.)

	Percent of respondents checking response
a. City	26%
b. County or equivalent	14%
c. State	46%
d. Law enforcement (city, county or state)	5%
e. Tribal	4%
f. Private Sector	1%
g. Health Services Sector (e.g., hospital; public health organization)	3%
h. Non-governmental Organization (NGO)	1%
i. University or other educational entity	3%
j. Other	7%

If you selected "Other," please specify: *[text data intentionally not reported]*

5. During your time as a RAC member, have you ever served on a RAC working group? Examples of working groups could be: "to come up with proposals to FEMA on streamlining reimbursements for emergency expenditures," or "to identify shortfalls in flood control systems" or "to propose more reliable communication methods during electrical outages," or "to enhance interdisciplinary collaboration among emergency preparedness providers."

Yes - Continue with question 5a.	12%
No - Skip to question 6.	88%

5a. On which working group(s) have you served? (Please be as specific as possible.)

**Appendix II: Results of GAO Survey of Federal
Emergency Management Agency (FEMA)
Regional Advisory Council Members**

Name of working group: *[text data intentionally not reported]*

Name of working group: *[text data intentionally not reported]*

Name of working group: *[text data intentionally not reported]*

6. Over the past 2 years (i.e., since about May 2013), to the best of your recollection, have you generally been notified in advance of your region's RAC meetings?

Yes, I was notified in advance about <u>all</u> the meetings	96%
Yes, I was notified in advance about <u>some</u> of the meetings	1%
No, I was not notified about any of the meetings	0%
Do not know	3%

7. Over the past 2 years (i.e., since about May 2013), to the best of your recollection, how many of your region's RAC meetings have you attended either in person or by telephone or other remote connection (e.g., video telephone conference)? (Enter number. If none, enter zero.)

Please check this box if, as far as you know, the RAC in your region has not met in the past two years (i.e., since about May 2013). 4%

Number of meetings attended in-person:

No meetings	20%
1 meeting	24%
2 meetings	18%
3 meetings	11%
4 meetings	9%
5 meetings	5%
6 meetings	1%
7 meetings	1%
8 meetings	1%

**Appendix II: Results of GAO Survey of Federal
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Did not answer question	8%
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Number of meeting attended by telephone, or other remote connection:

No meetings	16%
1 meeting	19%
2 meetings	15%
3 meetings	8%
4 meetings	1%
5 meetings	3%
6. meetings	1%
7 meetings	1%
8 meetings	3%
15 meetings	1%
Did not answer question	31%

8. When your current term on the RAC is over, and if you are invited to serve for another term, do you think you will do so?

Definitely yes	53%
Probably yes	28%
Unsure	11%
Probably no	5%
Definitely no	1%
Did not answer question	1%

IF "PROBABLY NO:" If you wish, please indicate why you would probably not wish to serve another term: *[text data intentionally not reported]*

IF "DEFINITELY NO:" If you wish, please indicate why you would definitely not serve another term: *[text data intentionally not reported]*

Section 2 – Communication, Collaboration and Coordination

**Appendix II: Results of GAO Survey of Federal
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This section asks for your assessment of the communications, collaboration and coordination efforts by your region's RO with you and other members of your region's RAC, as well as by the RAC to you (which may be sent through FEMA).

For the questions in this section, effective communications can be defined as communications that provide information on a timely basis. Communications include meetings (in person or virtual), emails, newsletters, telephone calls, or any other mode of conveying information.

9. Thinking over the time period that you have been a RAC member, would you say that the number or volume of communications that you have received from FEMA (HQ and/or RO) between RAC meetings has been adequate to keep you informed about each of the following? (Select one answer in each row.)

	More than adequate	Adequate	Less than adequate	No basis to judge	Did not answer question
a. The issues raised at your RAC's meetings	38%	57%	0%	5%	0%
b. The issues raised at your RAC's working group discussions	28%	31%	5%	34%	1%
c. The status of recommendations or suggestions or advice from you or other RAC members made to FEMA at or between RAC meetings	27%	55%	7%	9%	1%

10. In your view, how effective or ineffective have the communication efforts of your FEMA RO been with you as a RAC member?

Very effective	59%
Moderately effective	30%
Neither effective nor ineffective	3%
Moderately ineffective	1%
Very ineffective	0%
No basis to judge	7%

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11. In your view, overall, how effective or ineffective have the RAC meetings been in terms of accomplishing each of the following activities? (Select one answer in each row.)

	Very effective	Moderately effective	Neither effective nor ineffective	Moderately ineffective	Very ineffective	No opinion or no basis to judge	Did not answer question
a. Contacting RAC members in advance of meetings to develop an agenda	65%	28%	4%	0%	0%	3%	0%
b. Distributing an agenda in advance of meetings	70%	24%	3%	0%	0%	1%	1%
c. Asking members about their concerns or suggestions about emergency preparedness issues	65%	28%	4%	1%	0%	1%	0%
d. Asking members about how to make RAC meetings more useful	58%	34%	7%	0%	0%	1%	0%
e. Providing information on how to make your region better prepared for emergencies	55%	35%	5%	1%	0%	1%	1%
f. Distributing the minutes after the meeting	53%	26%	15%	3%	0%	3%	1%
g. Communicating RAC members' suggestions to FEMA	43%	28%	11%	3%	0%	14%	1%
h. Asking RAC members to assess the utility of the meeting (e.g., using a short questionnaire)	26%	30%	24%	3%	0%	18%	0%
i. Communicating RAC concerns and issues to the National Advisory Council (NAC) (See note below.)	28%	35%	11%	3%	0%	22%	1%

Note: The National Advisory Council (NAC) was established by the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA) to ensure effective and ongoing coordination of federal

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preparedness, protection, response, recovery, and mitigation for natural disasters, acts of terrorism, and other manmade disasters. The NAC advises FEMA on all aspects of emergency management. The NAC incorporates state, local, and tribal governments; nonprofit and private sector input in the development and revision of the National Preparedness System, the National Incident Management System, and other related plans and strategies.

11a. Please provide any additional comments you may wish to make with regard to the RAC meetings you attended.

[text data intentionally not reported]

12. During your time as a RAC member, about how often, if at all, do you receive the following types of communication from your FEMA RO? (Select one answer in each row.)

	Never received any of this type	Daily or almost daily	About once a week	About once every two weeks	About once a month	About once every 3 months	About once every 6 months	About once a year or less	Did not answer question
a. Newsletters (electronic or hard copy)	32%	3%	12%	8%	26%	9%	1%	7%	1%
b. Teleconference and/or VTC	24%	1%	1%	0%	18%	20%	16%	15%	4%
c. Emails	1%	15%	9%	11%	39%	12%	3%	3%	7%
d. Hard copy letter (e.g., via USPS)	34%	0%	0%	0%	7%	7%	9%	39%	4%
e. Telephone calls to you personally	26%	0%	3%	3%	19%	12%	15%	22%	1%
f. Non-email social media communications (e.g., Twitter, Facebook, other).	66%	4%	0%	4%	5%	3%	3%	7%	8%
g. Other (e.g., meeting with RAC working group)	57%	1%	0%	1%	5%	15%	7%	7%	7%

If you selected "Other," please specify: *[text data intentionally not reported]*

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Information can typically be communicated by a variety of methods, such as meetings (in person or virtual), emails, newsletters, websites. The types of information that could be communicated with regard to RACs might include the following:

- providing meeting agendas in advance;
- explaining how FEMA, the FEMA RO and the RAC interact and how they can help you and your entity;
- explaining how you can contribute as a RAC member to advising FEMA;
- distributing meeting minutes; explaining how RAC meetings are run;
- advising members with information that is potentially useful to enhancing the emergency preparedness of their entities or in obtaining services or compensation from FEMA;
- and providing updates on changes to FEMA rules or regulations that could affect you, your entity or your region in general.

13. Thinking over the time period that you have been a RAC member, how effective or ineffective would you say the following types of communication from your FEMA RO have been? (Select one answer in each row.)

	Has not occurred	Very effective	Moderately effective	Neither effective nor ineffective	Moderately ineffective	Very ineffective	No opinion or no basis to judge	Did not answer question
a. Information communicated at RAC meetings	3%	53%	36%	3%	0%	1%	4%	0%
b. Telephone calls to me from FEMA RO	22%	34%	22%	8%	0%	0%	14%	1%
c. FEMA's public website (www.fema.gov)	5%	18%	31%	15%	5%	3%	22%	1%
d. Emails from FEMA RO	4%	50%	36%	4%	0%	1%	4%	0%
e. Hard copy letters	30%	11%	20%	9%	1%	1%	27%	0%
f. FEMA RO newsletters (electronic or hard copy)	16%	22%	26%	9%	1%	0%	20%	5%
g. FEMA RO communications about RAC's working groups	11%	20%	31%	11%	3%	1%	20%	3%

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h. FEMA RO webinars	20%	11%	30%	8%	3%	0%	28%	0%
i. Other	39%	4%	0%	1%	0%	0%	23%	32%

If you selected "Other," please specify: *[text data intentionally not reported]*

For the following questions, coordination refers to any joint action by two or more individuals, groups, or organizations (participants) that is intended to produce more public value than could be produced when one individual, group or organization acted alone. Coordination may include:

- repeated contacts with other participants, rather than one-time interactions;
- a balanced exchange of substantive information among participants; and
- participants taking meaningful actions in response to information received from other participants.

Coordination may also include a spirit of collaboration and a willingness to work with others as a team.

14. In your view, how effective or ineffective is the coordination between your RAC and the FEMA Regional Office of which it is a part?

Very effective	59%
Moderately effective	30%
Neither effective nor ineffective	3%
Moderately ineffective	0%
Very ineffective	0%
No opinion or no basis to judge	8%
No coordination has occurred	0%

According to the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA), one purpose of RACs is to advise the Regional Administrator on emergency management issues specific to that region.

15. Thinking over your time on the RAC, about how many specific suggestions concerning issues related to emergency management (including FEMA policy changes), have you presented to FEMA either at RAC meetings, or between meetings?

1-2 suggestions	39%
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3-4 suggestions	24%
5 or more suggestions	12%
Do not know or cannot remember precisely	23%
Did not answer question	1%

16. Thinking over your time on the RAC, to what extent has FEMA or your FEMA RO taken action with regard to advice, suggestions or recommendations that the RAC or its members have presented? (Action can include partial implementation of a suggestion or request for taking a specific action.)

To a very great extent	9%
To a great extent	34%
To a moderate extent	24%
To little or some extent	7%
To no extent	0%
No opinion or no basis to judge	22%
No advice, suggestions, or recommendations have been made to the RO	4%

Also according to PKEMRA, another purpose of RACs is to advise the FEMA Regional Administrator of any weaknesses or deficiencies in preparedness, protection, response, recovery, and mitigation within the region of which the RAC members are aware.

17. In your view, thinking over your time on the RAC, about how effective or ineffective have the interactions between your RAC and your FEMA RO been in advising the Regional Administrator with regard to weaknesses or deficiencies in preparedness, protection, response, recovery, and mitigation within the region?

Very effective	34%
Moderately effective	35%
Neither effective nor ineffective	1%
Moderately ineffective	4%

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Very ineffective	0%
No opinion or no basis to judge	26%
No interactions have occurred	0%

18. Thinking of your time on the RAC, as a result of the RAC meetings did each of the following generally increase, stay about the same, or decrease? (Select one answer in each row.)

	Increased greatly	Increased moderately	Stayed about the same	Decreased moderately	Decreased greatly	No opinion or no basis to judge	Did not answer question
a. Your understanding of your role as a member of the RAC	39%	28%	23%	1%	0%	8%	0%
b. Overall preparedness of your region or tribal organization for emergencies	19%	50%	19%	0%	0%	11%	1%
c. Your overall sense that FEMA was listening to the RAC members' concerns	41%	38%	11%	3%	0%	7%	1%
d. Your overall sense that FEMA was acting to address the RAC members' concerns	28%	46%	12%	4%	0%	9%	0%
e. Your overall sense of the roles and responsibilities of the FEMA RO how the RAC interacts with it	32%	41%	14%	3%	0%	11%	0%

19. Would you agree or disagree with the following statements as they pertain to the RAC meetings you have attended? (Select one answer in each row.)

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	No opinion or no basis to judge	Did not answer question
a. The agendas provided the information necessary for preparing	47%	39%	7%	0%	0%	7%	0%

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for the meeting.							
b. Briefings were informative and relevant to regional emergency management issues.	46%	42%	3%	0%	1%	7%	1%
c. Participation was encouraged.	59%	34%	1%	0%	0%	5%	0%
d. The meetings provide a useful forum in which to offer advice to FEMA on regional emergency-related issues.	47%	34%	5%	1%	1%	7%	4%
e. In general, the meetings were well run -- on time, on topic, relevant to regional emergency-related issues.	55%	34%	3%	0%	1%	7%	0%

20. In your view, and based on your experience on the RAC, should the following changes be adopted by the RAC over the next several years? (Select one answer in each row.)

	Definitely yes	Probably yes	Unsure or no opinion	Probably no	Definitely no	Did not answer question
a. The RAC should meet more frequently.	9%	32%	23%	27%	3%	5%
b. RAC meetings should be attended by the RO Regional Administrator (barring emergencies).	57%	34%	5%	0%	3%	1%
c. The number of RAC members should be increased.	7%	15%	35%	36%	4%	3%
d. The FEMA RO should provide quicker feedback to RAC members on suggestions or advice made by RAC members to FEMA at RAC meetings.	4%	32%	39%	20%	3%	1%
e. The FEMA RO should provide more detailed feedback to RAC members on suggestions or advice made by RAC members to FEMA at RAC meetings	5%	45%	30%	18%	1%	1%
f. The RAC should have a public website.	4%	24%	34%	28%	8%	1%
g. Compensation should be provided by FEMA for travel expenses incurred to attend RAC meetings	42%	38%	11%	3%	5%	1%

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h. My RAC and other RACs should interact with the NAC to increase the likelihood that RAC members' concerns are identified to FEMA.	42%	42%	11%	1%	1%	3%
i. RAC meeting locations should be rotated among Members' states or tribal organizations	31%	41%	16%	7%	3%	3%
j. Other suggestions – please see question #20a below	8%	1%	15%	0%	5%	70%

20a. If you would like to explain any of your answers to question 20, or if you have suggestions about changes with regard to the RAC that you believe could be useful to its purposes, please use the following space:

[text data intentionally not reported]

21. How would you assess the current level of quality of the communications that you receive from your FEMA RO?

Excellent	50%
Good	41%
Fair	5%
Poor	0%
Very poor	0%
No opinion or no basis to judge	4%

22. In your view, overall, since you have been a RAC member, would you say that the quality of the communications you have received from your FEMA RO has improved, stayed about the same, or worsened?

Greatly improved	18%
Somewhat improved	41%
Stayed about the same	28%
Somewhat worsened	1%

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Greatly worsened	0%
No opinion or no basis to judge	11%
Did not answer question	1%

23. During your time on the RAC, if you have been unable to attend one or more RAC meetings each year, or have chosen not to attend, please select the reason(s) listed below that most closely explain why. (Select all that apply.)

	Percent of respondents checking response
a. Insufficient or no funding to cover travel expenses was provided by the entity I represent, or by FEMA, thereby making it too expensive for me to attend	26%
b. Meeting locations inconvenient or undesirable	11%
c. Travel distance too far	8%
d. Scheduling commitments and conflicts	68%
e. Presentations, discussions and materials do not seem relevant or useful to my job	3%
f. FEMA is not required to accept RAC advice, so it does not seem worth the time to travel to and attend meetings	3%
g. FEMA takes too long to act on RAC suggestions or advice	0%
h. FEMA only partially (or not at all) implements RAC suggestions or advice	3%
i. Meeting sessions are generally too long, making it difficult to remain in the room or on-line for an entire session, or increasing the likelihood of being interrupted by home office or entity.	1%
j. Other	9%

If you selected "Other," please specify: *[text data intentionally not reported]*

24. Thinking overall of your service as a RAC member, what are the three things you have enjoyed the most about being on the RAC or which have been the most important benefits to you or your organization? (You may list up to three benefits.)

[text data intentionally not reported]

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25. Thinking overall of your service as a RAC member, what are the top three things that you would like to see improved or changed with regard to the RAC, or FEMA, or related issues? (You may list up to three issues you'd like to see improved.)

[text data intentionally not reported]

26. Thinking about your time on the RAC, how would you rate its overall effectiveness in terms of achieving its purposes according to PKEMRA, which include: advising FEMA on emergency management issues specific to your region and pointing out and any weaknesses or deficiencies in preparedness, protection, response, recovery, and mitigation for any State, local, and tribal government within the region.

Very effective	28%
Moderately effective	53%
Neither effective nor ineffective	5%
Moderately ineffective	3%
Very ineffective	1%
No opinion or no basis to judge	9%

Section 3 - Interactions with other RAC Members

27. As part of your participation in the Regional Advisory Council, you likely interact with other participants. Please list the organizations and occupations of up to five RAC members with whom you have had the most meaningful interactions during your RAC tenure. This is intended to cover your interactions at both RAC meetings and between meetings. Also, please indicate how useful the interaction with each individual has been in the work you do in your own organization. *(Please note that none of this information will be shared with other RAC members or FEMA officials.)*

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Individual #1

Name of organization in which this individual is employed: *[text data intentionally not reported]*

Individual's occupational title: *[text data intentionally not reported]*

How useful has the interaction with this contact been in the work you do in your own organization with regard to emergency-related issues?

Very useful	50%
Moderately useful	8%
Slightly useful	3%
Not useful	0%
No opinion or no basis to judge	18%
Did not answer question	22%

Individual #2

Name of organization in which this individual is employed: *[text data intentionally not reported]*

Individual's occupational title: *[text data intentionally not reported]*

How useful has the interaction with this contact been in the work you do in your own organization with regard to emergency-related issues?

Very useful	34%
Moderately useful	11%

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Slightly useful	0%
Not useful	0%
No opinion or no basis to judge	16%
Did not answer question	39%

Individual #3

Name of organization in which this individual is employed: *[text data intentionally not reported]*

Individual's occupational title: *[text data intentionally not reported]*

How useful has the interaction with this contact been in the work you do in your own organization with regard to emergency-related issues?

Very useful	27%
Moderately useful	9%
Slightly useful	0%
Not useful	0%
No opinion or no basis to judge	14%
Did not answer question	50%

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Individual #4

Name of organization in which this individual is employed: *[text data intentionally not reported]*

Individual's occupational title: *[text data intentionally not reported]*

How useful has the interaction with this contact been in the work you do in your own organization with regard to emergency-related issues?

Very useful	20%
Moderately useful	1%
Slightly useful	1%
Not useful	0%
No opinion or no basis to judge	16%
Did not answer question	61%

Individual #5

Name of organization in which this individual is employed: *[text data intentionally not reported]*

Individual's occupational title: *[text data intentionally not reported]*

How useful has the interaction with this contact been in the work you do in your own organization with regard to emergency-related issues?

Very useful	16%
Moderately useful	1%
Slightly useful	0%

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Not useful	0%
No opinion or no basis to judge	16%
Did not answer question	66%

28. Are you ready to submit your final completed survey to GAO? *(This is equivalent to mailing a completed paper survey to us. It tells us that your answers are official and final.)*

29.

Yes, my survey is complete - To submit your final responses, please click on "Exit" below	100% (77 respondents)
No, my survey is not yet complete - To save your responses for later, please click on "Exit" below	0%

You may view and print your completed survey by clicking on the Summary link in the menu to the left.

Thank you very much for your assistance.

Appendix III: National Incident Management System (NIMS) Implementation Questions Asked of States and Territories in the Unified Reporting Tool

1a. How many of the following jurisdiction types are reflected in your response?

- Tribal Nations:
- Counties/Parishes/Townships/Boroughs:
- Cities/Urban Areas:
- Other:

1b. If all components of your jurisdiction are not accounted for, please explain:

2. What percentage of your State or Territory's sub-jurisdictions have formally adopted and/or maintained adoption of the National Incident Management System as their all-hazards incident management system for Fiscal Year (FY) 2015?

3. What percentage of the following types of plans within your State or Territory are reviewed and revised to incorporate NIMS components, principles, and policies?

- Emergency Operations Plans
- Standard Operating Procedures
- Standard Operating Guidelines
- All Hazard Plan
- Mitigation Plan
- Training Plan
- Continuity Plan

4. Has your State or Territory, including sub-jurisdictions, established (and/or have in development) the following types of mutual aid agreements, compacts, and/or assistance agreements?

- Intrastate Agreements
 - Throughout the State/Territory? (y/n)
 - That include the Private Sector? (y/n)
 - That include NGOs? (y/n)
 - That include Tribal Nations? (y/n)
- Interagency and Interstate Agreements
 - Throughout the State/Territory? (y/n)
 - That include the Private Sector? (y/n)
 - That include NGOs? (y/n)
 - That include Tribal Nations? (y/n)

5a. Have NIMS concepts and principles been incorporated into appropriate training within your State or Territory?

5b. If yes, which of the following has been incorporated?

- Interoperable and Compatible Communications, Technology, and Information Management
- Resource Management, Typing, and Credentialing
- Mutual Aid or Assistance Agreements
- Incident Command System
- Multiagency Coordination System
- Public Information

Appendix III: National Incident Management System (NIMS) Implementation Questions Asked of States and Territories in the Unified Reporting Tool

6. Has your State or Territory implemented a training program to ensure that the appropriate emergency/incident response personnel, as identified in the NIMS Training Program, receive NIMS training in accordance with their incident management responsibilities?

7. Which, if any, of the following are priorities for your State or Territory to incorporate into training in the coming year? Please choose up to three options from the list below.

- Interoperable and Compatible Communications, Technology, and Information Management
- Resource Management, Typing, and Credentialing
- Mutual Aid or Assistance Agreements
- Incident Command System
- Multiagency Coordination System
- Public Information
- Other (please specify)

8a. Have NIMS concepts and principles been incorporated into appropriate exercises within your State or Territory?

8b. If yes, which of the following has been incorporated?

- Interoperable and Compatible Communications, Technology, and Information Management
- Resource Management, Typing, and Credentialing
- Mutual Aid or Assistance Agreements
- Incident Command System
- Multiagency Coordination System
- Public Information

9. Which, if any, of the following are priorities for your State or Territory to incorporate into exercises in the coming year? Please choose up to three options from the list below.

- Interoperable and Compatible Communications, Technology, and Information Management
- Resource Management, Typing, and Credentialing
- Mutual Aid or Assistance Agreements
- Incident Command System
- Multiagency Coordination System
- Public Information
- Other (please specify)

10. What percentage of your State or Territory's sub-jurisdictions maintain an inventory of its response resources and assets?

11. What percentage of your State or Territory's sub-jurisdictions use an interoperable tool, such as the Incident Resource Inventory System (IRIS), to inventory response resources and assets?

12. What percentage of your State or Territory's sub-jurisdictions have typed and inventoried their response and recovery resources and assets consistent with available national NIMS resource typing definitions and job titles/position qualifications, available through the Resource Typing Library Tool at <https://rtlt.preptoolkit.org/Public>?

Appendix III: National Incident Management System (NIMS) Implementation Questions Asked of States and Territories in the Unified Reporting Tool

13. Does your State or Territory have a process to determine availability of response resources and assets in accordance with national NIMS resource typing definitions and job titles/position qualifications, available through the Resource Typing Library Tool at <https://rtlt.preptoolkit.org/Public?>

14. What priorities has your State or Territory identified to enhance your implementation of NIMS in the coming year? Please check up to three.

- Incorporate NIMS concepts and principles into existing plans and/or planning efforts
- Update training to ensure all applicable NIMS concepts and principles are incorporated
- Incorporate additional NIMS concepts and principles into exercises
- Make communication and information management practices consistent with NIMS
- Increase efforts to inventory all response assets consistency with available NIMS national resource typing definitions
- Increase adoption of the Incident Command System
- Increase adoption of Multiagency Coordination Systems
- Make public information practices consistent with NIMS
- Other (please specify)

15. What percentage of your jurisdictions has an access and re-entry plan in order to control the flow of resources and personnel into the area of an incident?

16. Please list any tools, training, guidance, or support that would be helpful in further enhancing your State or Territory's implementation of NIMS:

Appendix IV: Comments from the Department of Homeland Security



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

**Homeland
Security**

January 15, 2016

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

Re: Draft Report GAO-16-38, "FEDERAL EMERGENCY MANAGEMENT AGENCY: Strengthening Regional Coordination Could Enhance Preparedness Efforts"

Dear Mr. Currie:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

The Department appreciates GAO's in-depth review of Federal Emergency Management Agency's (FEMA's) Grants Program Directorate's (GPD) grants administration in the ten FEMA regions, the implementation of the National Incident Management System (NIMS), and the Regional Advisory Councils (RACs). FEMA evaluates these programs on an ongoing basis. In coordination with its regions, FEMA strives to deliver its services in a way that best meets stakeholders' needs and enhances the nation's preparedness. For instance, GPD has worked with regional staff to strengthen collaboration and improve program coordination and management. For example, GPD and FEMA Regions collaborated on developing robust training on 2 CFR Part 200, which was provided to more than 1,000 grantees in 2014 and 2015; GPD holds twice-weekly executive-level meetings with FEMA regions; and GPD leadership participates in periodic joint meetings with Regional Administrators.

FEMA already empowers its ten regions to coordinate and communicate with federal, state, local, territorial, and tribal governments so they can work more efficiently and effectively to prepare for and respond to disasters, and is committed to further strengthening these efforts, as appropriate.

The draft report contained five recommendations. The Department concurs with four recommendations, and non-concurs with one. Specifically, GAO recommended that the Secretary of Homeland Security direct the FEMA Administrator to:

Recommendation 1: Develop a plan with time frames, goals, metrics, and milestones detailing how GPD intends to resolve longstanding challenges associated with its existing hybrid grants management model, which divides responsibilities between regional and headquarters staff.

Response: Non-Concur. FEMA agrees that a robust, transparent and collaborative relationship among headquarters elements and Regional offices is critical for the effective and efficient delivery of programs to state and local grant recipients. Along these lines, it is important to recognize that FEMA already empowers its ten regions to coordinate and communicate with all of these entities to help facilitate the working relationships needed to effectively and efficiently prepare for and respond to disasters.

As recognized in the draft report, FEMA senior leadership has made a management decision to use a more centralized hybrid grants management model, with shared responsibilities between headquarters and its regions, as opposed to a more decentralized management model. This was done to promote more consistent nationwide program implementation while helping to manage associated costs at the same time.

FEMA does not agree with GAO's characterization of "longstanding challenges" in managing preparedness grants. FEMA is also concerned about how this recommendation, as written, could be closed out. For example, FEMA is not aware of nor does the recommendation provide any specific criteria that could be used to gauge the success of any proposed corrective action plan.

FEMA has and will continue to actively identify ways to strengthen its overall grants program management with all parties involved in the process, implementing enhancements as appropriate. FEMA requests that GAO consider this recommendation resolved and closed.

Recommendation 2: Develop policies and procedures for regional staff to review after-action reports from preparedness exercises within their region, and headquarters staff to review these evaluations in order to have a better understanding of NIMS implementation.

Response: Concur. The Assistant Administrator, National Preparedness Directorate (NPD) agrees that joint efforts by regional and headquarters staff are essential to enable more sophisticated and comprehensive awareness of NIMS implementation. FEMA will continue to work to improve the assessment of NIMS implementation and strengthen regional preparedness. FEMA believes that review of exercise after-action reports (AARs) can provide some insight into NIMS implementation; however FEMA does not agree that the "best way to assess how well NIMS has been implemented is by assessing states' performance in preparedness exercises and real-world events." Homeland Security Exercise and Evaluation Program (HSEEP) guidance states: "The main focus of the AAR

is the analysis of core capabilities. Through HSEEP, organizations can use exercises to examine current and required core capability levels and identify gaps.” Those capability levels and gaps are unique for each organization. If NIMS isn't part of an exercise objective, it likely won't be mentioned in an AAR, even if it was part of the exercise.

Many aspects of NIMS implementation do not fit neatly within an HSEEP compliant “SMART objective,” or are better measured through existing processes, such as the annual submission of the State Preparedness Report. Additionally, while NIMS principles are universal, NIMS is adaptable to the unique constraints of jurisdictions across the Nation. The extent to which a jurisdiction has implemented NIMS is nuanced and therefore impossible to assess accurately from an AAR. Exercises may be designed to test certain aspects of NIMS and not others. A given exercise or series of exercises, therefore, is unlikely to test every aspect of NIMS that a jurisdiction would demonstrate during an actual event.

Exercise AARs can provide insight into NIMS implementation, but FEMA wants to be careful to not overstate the value of AARs as a means to improve understanding of NIMS implementation. The State Preparedness Report and Unified Reporting Tool submissions, due annually from the States, are the means by which NIMS implementation is reported. NPD will work with the Regional NIMS Coordinators and the States to explore options for updating this process during Calendar Year (CY) 2016. Any potential changes will be implemented for the CY2017 submittal. Estimated Completion Date (ECD): December 31, 2016.

Recommendation 3: Ensure all regional offices routinely obtain input – whether in person, by teleconference or by other remote connection – from their RAC [Regional Advisory Council] members on ways to enhance overall emergency preparedness in their regions. In cases where RAC member participation is low, regional offices should assess and identify targeted solutions for increasing member participation; such as offering remote participation or alternate forums.

Response: Concur. The Regions will conduct two meetings each year with their RAC members. This has been mandated by the RAC charter that has been signed by each Regional Administrator. A RAC coordinator within each region will be responsible for the oversight of these meetings and ensure they happen on a semi-annual basis. These meetings can be conducted in-person, via teleconference, on Adobe Connect, or another platform. Through these meetings, open dialogue will be encouraged between RAC members and the Regions with each Region establishing a RAC coordinator to facilitate this communication. RAC members will be made aware of the time commitment when selected, the meeting schedules, and the various methods provided by the Region to connect to the meetings to elicit full participation. ECD: December 31, 2016.

Recommendation 4: Develop a mechanism to update RAC members on the status of recommendations made by RACs to FEMA.

Response: Concur. Built into each RAC meeting will be a briefing by regional personnel on the status of recommendations, if any, made during the previous meeting. The Regional Administrator or RAC coordinator within the region will be responsible for the brief. If RAC members are not satisfied with the implementation of RAC recommendations, it will be expected that the Region will provide information on why a specific recommendation was not adopted or why implementation is delayed. If there are obstacles to implementation that prevent a Region from moving forward before the next gathering of RAC members, the report by regional personnel may occur at a subsequent meeting. Each Region may have their own method of dispersing updates to their RAC members between meetings including monthly email updates, posting on their public facing website, or informal calls between RAC meetings. This requirement will be written into the RAC standard operating procedure. ECD: December 31, 2016.

Recommendation 5: Establish processes for enhanced coordination and communication between the RACs and the NAC.

Response: Concur. Regional Administrators will continue to attend NAC meetings and provide FEMA regional updates that include RAC activities within the Regions. RAC members can access the notes from every NAC meeting, the NAC recommendation memos and FEMA's written response to the recommendations on the FEMA public website. RAC members may attend any public portion of the NAC meetings, and regional coordinators will ensure that RAC members are made aware of any NAC meeting occurring in their own Region. The RAC sharepoint site will be used as a platform to update RAC coordinators on impending NAC meetings to share with their RAC members. ECD: December 31, 2016.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,



Jim H. Crumpacker, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact named above, Chris Keisling (Assistant Director), David Alexander, Chuck Bausell, David Dornisch, Eric Hauswirth, Susan Hsu, Valerie Kasindi, Stuart Kaufman, Tracey King, Marvin McGill, Carl Ramirez, Robert Rivas, and Jonathan Tumin made key contributions to this report.

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