

## FEMA's INTEGRATION OF PREPAREDNESS AND DEVELOPMENT OF ROBUST REGIONAL OFFICES



### An Independent Assessment

2009



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*A Report by a Panel of the*

**NATIONAL ACADEMY OF  
PUBLIC ADMINISTRATION**

*For the U.S. Congress and the Federal Emergency Management Agency*

October 2009

# **FEMA's Integration of Preparedness and Development of Robust Regional Offices An Independent Assessment**

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The views expressed in this report are those of the Panel. They do not necessarily reflect the views of the Academy as an institution.

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## FOREWORD

When Hurricane Katrina struck the Gulf Coast in 2005, it left a trail of unthinkable disruption and destruction to the lives and livelihoods of hundreds of thousands of families and communities. It also left a painful scar on our national psyche. The Post-Katrina Emergency Management Reform Act of 2006 represented our national commitment to do better, putting in motion the most significant set of changes affecting emergency management in nearly thirty years.

Although much has changed since another National Academy Panel released its 1993 report, *Coping with Catastrophe: Building an Emergency Management System to Meet People's Needs in Natural and Manmade Disasters*, many of the issues identified in that report remain relevant today: the need to build the Federal Emergency Management Agency's (FEMA) institutional capacity, to develop a more functional relationship between headquarters and the regional offices, and to manage the interrelationships among levels of government.

Congress recently requested that an independent Panel of the National Academy of Public Administration conduct a study of FEMA's new statutory mandates to integrate preparedness with other emergency management activities and to build robust regional offices. The Panel found that FEMA has made important progress in both areas, but concluded that the agency still faces significant challenges as it works to help build a prepared and resilient nation.

The National Academy was pleased to conduct this important study for Congress and FEMA. On behalf of the Academy, I extend my appreciation to the members of the Panel for their excellent and diligent work. I also thank FEMA's leadership and representatives of stakeholder groups for facilitating access to critical information and contributing their own insights through in-person interviews, a focus group session, an electronic survey, and an online stakeholder dialogue. Finally, many thanks to the study team for their significant contributions to this complex and important project.



Jennifer L. Dorn  
President and Chief Executive Officer





## ACRONYMS

<b>CONOPS</b>	Concept of Operations
<b>CONPLAN</b>	[National-Level Interagency] Concept Plan
<b>CRS</b>	Congressional Research Service
<b>DHS</b>	United States Department of Homeland Security
<b>DoD</b>	Department of Defense
<b>DOJ</b>	Department of Justice
<b>EMI</b>	Emergency Management Institute
<b>EMPG</b>	Emergency Management Performance Grant
<b>EOC</b>	Emergency Operations Center
<b>EPA</b>	Environmental Protection Agency
<b>ESF</b>	Emergency Support Function
<b>FEMA</b>	Federal Emergency Management Agency
<b>FPC</b>	Federal Preparedness Coordinator
<b>FTE</b>	Full Time Employee
<b>FY</b>	Fiscal Year
<b>GAO</b>	Government Accountability Office
<b>HSEEP</b>	Homeland Security Exercise and Evaluation Program
<b>IG</b>	Inspector General
<b>IMAT</b>	Incident Management Assistance Team
<b>IT</b>	Information Technology
<b>NAC</b>	National Advisory Council
<b>NIMS</b>	National Incident Management System
<b>NGO</b>	Non-Governmental Organization
<b>NPD</b>	National Preparedness Directorate
<b>NRF</b>	National Response Framework
<b>OIG</b>	Office of Inspector General
<b>PFT</b>	Permanent Full Time
<b>PKEMRA</b>	Post-Katrina Emergency Management Reform Act of 2006
<b>RA</b>	Regional Administrator
<b>RAC</b>	Regional Advisory Council
<b>SES</b>	Senior Executive Service
<b>TCL</b>	Target Capabilities List



## EXECUTIVE SUMMARY

During the first decade of the 21<sup>st</sup> Century, the American people experienced the terrorist attacks of September 11<sup>th</sup>, the devastation of Hurricane Katrina, and the threat of global health epidemics such as SARS and H1N1. Given the significance of past events and future threats, Americans are relying more than ever on the Federal Emergency Management Agency (FEMA) to “support our citizens and first responders to ensure that, as a nation, we work together to build, sustain and improve our capability to prepare for, protect against, respond to, recover from and mitigate all hazards.”<sup>1</sup>

Preparedness is essential to meet the nation’s increasingly complex emergency management challenges. Through preparedness, the nation is able to:

- Respond and recover more rapidly and effectively to disasters that will occur;
- Prevent and mitigate other disasters; and
- Reduce damage to life, property, and the environment.

Many observers identified the erosion of preparedness, both inside and outside of FEMA, as a critical factor in the nation’s inadequate response to Katrina.<sup>2</sup> Congress recognized the centrality of preparedness in its passage of Post-Katrina Emergency Management Reform Act (PKEMRA) in October 2006. This statute is intended to improve FEMA’s ability to prepare for, respond to, and assist recovery from disasters. PKEMRA expanded FEMA’s mission to include the integration of preparedness with protection, response, recovery, and mitigation; the development of a risk-based all-hazards preparedness strategy; the building of robust regional offices to work with stakeholders; and increased coordination with other federal agencies.

The National Academy was asked by Congress to conduct an independent assessment of FEMA’s implementation of several key PKEMRA mandates. At the most fundamental level, the goal of PKEMRA is to build a more resilient nation by improving America’s preparedness. In order to play its leadership role within the nation’s preparedness system, FEMA must not only integrate preparedness across all of its component programs, but also establish an effective division of responsibilities between headquarters and the regional offices. FEMA headquarters should focus on policy development and dissemination, the maintenance of effective business practices across the agency, and monitoring the system’s performance. FEMA’s regional offices should focus on implementing these policies and programs, as well as establishing and nurturing the critical relationships with stakeholders upon which preparedness is based. PKEMRA mandated that the agency develop robust regional offices to carry out this critical role.

National preparedness is not something that FEMA can achieve by itself. A resilient nation will need a system of preparedness that relies on many entities outside of FEMA to play key roles. On a day-to-day basis, individuals, families, and local and state governments take primary

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<sup>1</sup> U.S. Department of Homeland Security, Federal Emergency Management Agency, “FEMA Mission,” website, <<http://www.fema.gov/about/index.shtm>> (visited September 2009).

<sup>2</sup> Select Bipartisan Committee to Investigate the Preparation for and Response to Hurricane Katrina, *A Failure of Initiative* (Washington, DC: February 2006), p. 158.

responsibility for preparedness and emergency management. Because stakeholders possess most of the nation's emergency management resources and experience, FEMA must ensure that it not only engages these parties, but also develops effective working partnerships that improve preparedness.

Over the past three years, FEMA has taken significant steps in an effort to integrate preparedness and develop more robust regional offices. These efforts, undertaken by both the previous and current administrations, are documented throughout this report and should be recognized and applauded. However, FEMA has yet to define specific goals and outcomes that would permit it, Congress or the public to determine when preparedness has been fully integrated into all aspects of FEMA's work and whether the development and ongoing operation of robust regional offices has been achieved. In the absence of well-defined, measurable outcome indicators, the National Academy Panel has relied upon the assessments of FEMA leaders and staff, documentation provided by FEMA, and a review of secondary sources material to inform its findings and recommendations. Based upon this evidence, the Panel has concluded that, while progress has been made:

1. Preparedness is not fully integrated across FEMA.
2. FEMA's regional offices do not yet have the capacity required to ensure the nation is fully prepared.
3. Stakeholders are not yet full partners with FEMA in national preparedness.
4. FEMA has ineffective internal business practices, particularly with regard to human resource management.

This report presents the research and findings undertaken during the course of this study and presents seven recommendations that the Panel believes will enable FEMA to fulfill the promise of PKEMRA. Table 1, below, summarizes the Panel's recommendations, as well as key actions that FEMA must take to implement them. A second volume of supplemental materials is available that provides the more detailed research and analyses conducted during the course of this study.<sup>3</sup>

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<sup>3</sup> This volume includes a review of PKEMRA and its related mandates; reviews and analyses of the extensive set of current secondary materials and studies of FEMA by entities including the Government Accountability Office (GAO), the Department of Homeland Security, Office of Inspector General (OIG) and the Congressional Research Service (CRS); and reviews of policy and program guidance materials from DHS and FEMA. Primary research undertaken included interviews with key senior officials within FEMA at headquarters and in regional offices, representatives from stakeholder groups and outside experts; site visits to three regional offices (Regions One, Three, and Six); a focus group session with FEMA regional officials held in March 2009; an electronic survey of senior leadership within FEMA regional offices completed in April 2009; and, an online dialogue with state-level stakeholders completed in July 2009.

**Table 1**  
**Summary of Panel Recommendations and Key FEMA Implementation Actions**

<b>PREPAREDNESS INTEGRATION</b> <b>Panel Recommendations &amp; Key Implementation Actions</b>	
<i>RECOMMENDATIONS</i>	<ol style="list-style-type: none"> <li>1. Establish a cross-organizational process, with participation from internal and external stakeholders, to develop a shared understanding of preparedness integration.</li> <li>2. Establish a robust set of outcome metrics and standards for preparedness integration, as well as a system to monitor and evaluate progress on an ongoing basis.</li> <li>3. Work to eliminate organizational barriers that are adversely impacting the full integration of preparedness across the agency.</li> </ol>
<i>Key FEMA Actions Required for Implementation</i>	<ul style="list-style-type: none"> <li>• Engage internal and external stakeholders in the development and promulgation of a preparedness integration vision.</li> <li>• Designate an internal Implementation Team for Preparedness Integration to monitor progress and report to senior leadership, as well as to regularly engage internal and external stakeholders in order to develop common understanding of preparedness integration.</li> <li>• Establish a process to recommend outcome measures for preparedness and preparedness integration utilizing expertise from FEMA headquarters and regions, as well as stakeholders from the state, local, and tribal levels.</li> <li>• Identify actions needed to reduce the negative effects of continued “stove-piping” between directorates and within programs (at both the headquarters and the regional office levels).</li> </ul>
<b>ROBUST REGIONAL OFFICES</b> <b>Panel Recommendations &amp; Key Implementation Actions</b>	
<i>RECOMMENDATIONS</i>	<ol style="list-style-type: none"> <li>4. Continue to build regional office capacity and monitor implementation consistent with the Administrator’s recent policy guidance.</li> <li>5. Undertake steps to improve the ongoing working relationship between headquarters and the regions in accord with Panel-identified principles.</li> </ol>

<p><i>Key FEMA Actions Required for Implementation</i></p>	<ul style="list-style-type: none"> <li>• Determine whether additional transfer of authorities is warranted.</li> <li>• Develop a framework for evaluating how successful FEMA is in building robust regional offices.</li> <li>• Recommend metrics to assess regional office performance.</li> <li>• Incorporate regional expertise in task forces and working groups.</li> <li>• Establish temporary detail programs between headquarters and regional offices.</li> <li>• For SES and GS-15 positions, give preference to candidates who have experience at both the regional and headquarters levels.</li> <li>• Develop an appropriate mission, organization, and staffing for the Office of Regional Operations</li> </ul>
<p><b>STAKEHOLDER ENGAGEMENT</b>  <b>Panel Recommendations &amp; Key Implementation Actions</b></p>	
<p><i>RECOMMENDATION</i></p>	<p>6. Take steps to improve stakeholder engagement and relationships at all levels in accord with Panel-identified principles</p>
<p><i>Select FEMA Actions Required for Implementation</i></p>	<ul style="list-style-type: none"> <li>• Review existing stakeholder engagement policies.</li> <li>• Develop stakeholder councils in each region.</li> <li>• Review and assess efforts targeting the public as stakeholders.</li> <li>• Collaborate with agencies such as CDC that have effective practices in citizen engagement on preparedness issues.</li> </ul>
<p><b>INTERNAL BUSINESS PRACTICES</b>  <b>Panel Recommendations &amp; Key Implementation Actions</b></p>	
<p><i>RECOMMENDATION</i></p>	<p>7. Strengthen internal business practices, especially in the area of human capital planning.</p>
<p><i>Select FEMA Actions Required for Implementation</i></p>	<ul style="list-style-type: none"> <li>• Develop a valid five-year Strategic Human Capital Plan.</li> <li>• Develop a strategy to address and improve internal business practices.</li> <li>• Assess existing information systems, especially in the human capital area.</li> </ul>

## AGENCY HISTORY

FEMA was established in April 1979, but catastrophic events have long been part of the American landscape. The Constitution does not define a role for the federal government during disasters, and states and localities were originally left to their own devices. However, by the early 19th century the federal government was drawn in. In 1803, following a devastating fire in Portsmouth, New Hampshire, Congress acted to suspend the collection of federal tariffs until the community had recovered.

By the end of the 19<sup>th</sup> century, Congress had passed more than 100 pieces of ad hoc legislation in response to individual events that exceeded local and state governments' capacity to respond. As the size and impact of catastrophic events continued to mount, the federal government was faced with increasing calls for assistance. In 1900, 12,000 inhabitants perished in the Galveston hurricane, leading to further federal government involvement in disaster relief. Less than twenty years later, in 1918, the nation faced a new form of catastrophe: the Great Influenza Pandemic. This time national resources were mobilized to respond, but still, some 675,000 American lives were lost. By mid-century, a hodgepodge of disaster related programs and responsibilities were scattered across federal agencies. Drawing most of these programs together, President Carter established FEMA by Executive Order in 1979. By 1988, additional actions were taken under the Disaster Relief and Emergency Assistance Act of 1988 (Stafford Act), consolidating federal statutory authorities that continue to guide FEMA's actions and activities today. In 1992, Hurricane Andrew, a Category 5 hurricane, left a trail of destruction across southern Florida and the Gulf Coast, leading to calls for reform across the entire emergency management system.<sup>4</sup>

Less than ten years later, following the September 11, 2001 terrorist attacks, the United States Department of Homeland Security (DHS) was created, enfolding twenty-two federal entities into a single department. FEMA became part of DHS and faced structural and resource changes, as a number of functions were elevated to the departmental level. In August 2005, the Gulf coast of the United States was hit by three devastating hurricanes—Katrina, Rita, and Wilma—and, as the world watched, national, state, and local efforts fell short. Following extensive inquiry and debate, the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA) was passed by Congress and signed into law, ushering in new reforms and resources directed at FEMA and the entire emergency management system.

### FEMA's Mission and Role

FEMA has a critical mission, but it is narrower than much of the public perceives. FEMA's primary mission is "...to support our citizens and first responders to ensure that as a nation we work together to build, sustain, and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards."<sup>5</sup>

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<sup>4</sup> See the National Academy's report *Coping with Catastrophe: Building an Emergency Management System to Meet People's Needs in Natural and Manmade Disasters*, 1993.

<sup>5</sup> U.S. Department of Homeland Security, Federal Emergency Management Agency, "FEMA Mission," website, <<http://www.fema.gov/about/index.shtm>> (visited September 2009).

In the event of a disaster or other emergency, first response is the responsibility of local government emergency services, who may get assistance from nearby communities, the state government, and volunteer agencies. FEMA's role as a first responder is limited to emergencies involving a federal asset, such as the Oklahoma City bombing in 1995 or the Space Shuttle Columbia disaster in 2003.

If a catastrophic disaster occurs that is beyond the capacity of local and state authorities to handle, the governor may ask the President to declare a major disaster. In that case, FEMA assumes responsibility for marshalling and coordinating the needed federal resources for search and rescue, electrical power, food, water, shelter and other basic human needs. Funding becomes available from the President's Disaster Relief Fund (which is managed by FEMA) and the disaster aid programs of other federal agencies. A Presidential Major Disaster Declaration also triggers long-term federal recovery programs, some of which must be matched by state programs, that provide financial and other assistance to affected individuals, businesses and public entities in the declared area.

FEMA is most active in the realm of preparedness. Through preparedness grant programs, FEMA provides significant support for equipping and training emergency response personnel and units throughout the nation. PKEMRA reallocated selected preparedness functions and resources that had been centralized in DHS back to FEMA. FEMA became the clearly designated locus of responsibility for ensuring the nation's preparedness. Under PKEMRA, FEMA is required to:<sup>6</sup>

- Integrate its emergency preparedness, protection, response, recovery, and mitigation responsibilities to confront effectively the challenges of natural disasters, acts of terrorism, or other man-made disasters;
- Develop and coordinate implementation of a risk-based, all-hazards strategy for preparedness that builds common capabilities necessary to respond to natural disaster, acts of terrorism, and other man-made disasters;
- Develop and maintain robust regional offices that will work with state, local, and tribal governments; emergency response providers; and other appropriate entities to identify and address regional priorities; and
- Coordinate with the Commandant of the Coast Guard, Director of Customs and Border Protection, Director of Immigration and Customs Enforcement, National Operations Center, and other agencies to take full advantage of resources in DHS.

Against this backdrop of statutory and organizational change, Congress requested the National Academy of Public Administration undertake an independent assessment of FEMA's efforts to integrate preparedness activities across its mission-related programs and to build robust regions.

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<sup>6</sup> One FEMA official acknowledged HSPD-8 (a December 2003 Presidential Directive) for creating "a pathway for national preparedness," but contended "its shortcomings have contributed to some of the problems the [Academy Panel's] report identifies." According to the official, HSPD-8 "did not define a federal-state relationship that adequately incorporates states in homeland security policy and strategy formulation," focusing instead on "programmatic initiatives" as opposed to "requiring a comprehensive strategic approach to national preparedness, including a requirements definition and analysis process."



## **STUDY BACKGROUND AND METHODOLOGY**

The Academy convened a seven-member Panel of National Academy Fellows to review FEMA's progress, guide the study team's research and make recommendations. Collectively, the Panel members have had extensive first hand experience in local, state, and federal government, including aspects of emergency management and preparedness, and have been recognized for their effective leadership within public administration and reform. Appendix A provides biographical sketches of the seven Panel members and key project staff.

The Panel focused on addressing two central questions within its scope of work:

1. What has FEMA done to integrate preparedness and to build robust regions?
2. What has resulted from these changes?

From October 2008 to August 2009, the Panel and study team have engaged in a wide range of research and analyses. Because FEMA has been the subject of extensive internal and external scrutiny, the study team began by reviewing secondary research. It also reviewed PKEMRA's statutory requirements and DHS/FEMA's recent policies and procedures. The study team's activities in these areas included:

- Reviews of recent reports by the General Accounting Office, DHS Inspector General, and the Congressional Research Service;
- Reviews of PKEMRA preparedness integration and regional office requirements; and
- Analyses of key FEMA policies and procedures.

Upon completing these activities the study team completed the following primary research:

- Analyses of workforce data from FY 2003 to April 2009 made available by FEMA;
- Interviews with headquarters and regional officials;
- Interviews with stakeholder representatives and experts;
- On-site reviews of three FEMA regional offices (Regions I, III, and VI);
- An electronic survey of senior officials in all FEMA regional offices; and
- An online stakeholder dialogue with state-level officials.

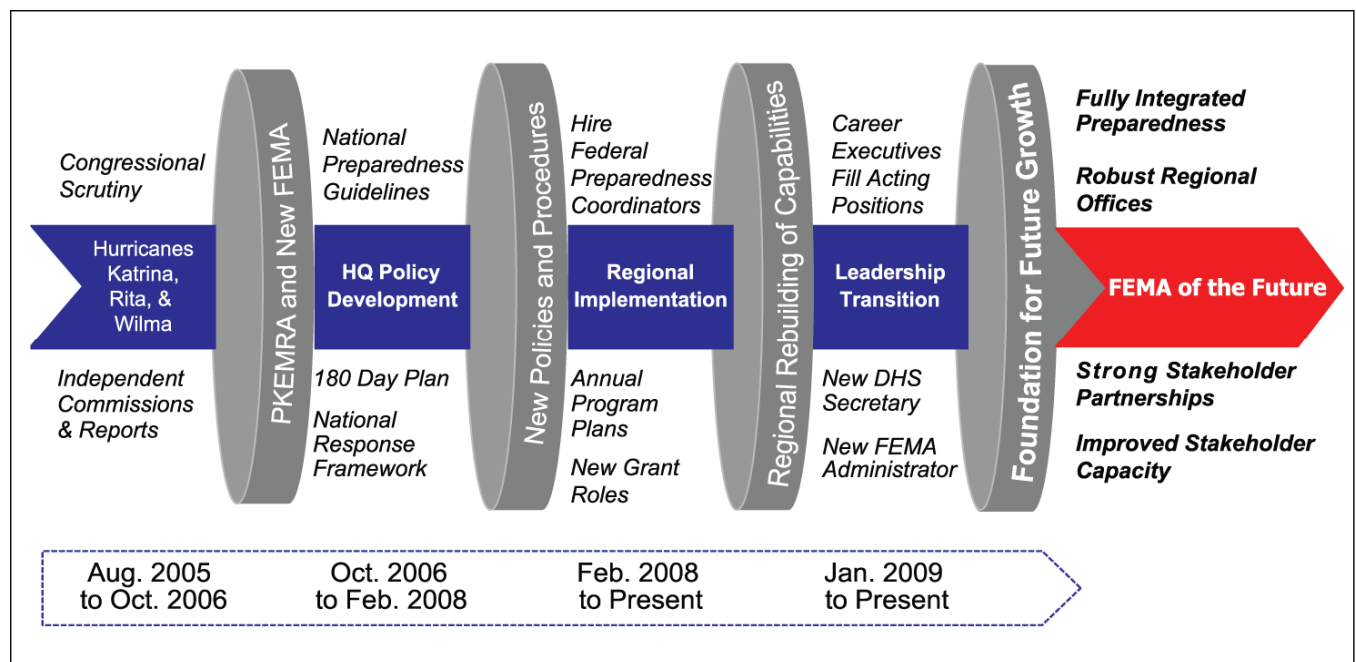
## **PANEL FINDINGS AND RECOMMENDATIONS**

Based on the research findings, the Panel noted that, while FEMA is making progress toward integrating preparedness and building more robust regional offices, there are significant ongoing challenges that adversely affect FEMA's ability to achieve the results mandated by PKEMRA.

The Panel has identified four major areas and made seven recommendations to address these challenges. Each recommendation includes specific actions that FEMA should undertake.

FEMA supported the principles and intent of PKEMRA, but implementation has been a long and difficult undertaking. Congress’s enactment of PKEMRA expressed the public’s renewed commitment to a strong FEMA. Even prior to its enactment, FEMA leadership was taking steps to create a “New FEMA,” and these efforts increased after the statute became law in December 2006. Once new policies and procedures were developed at the headquarters level, FEMA’s regions began implementation by hiring Federal Preparedness Coordinators, developing Annual Program Plans, and assuming new grant responsibilities. As shown in Figure 1, FEMA has been engaged in these activities while continuing to meet its ongoing emergency management responsibilities for prevention, preparedness, response, and recovery programs.

**Figure 1  
FEMA Actions to Date**



Based on the many positive steps taken by FEMA to date and described in detail throughout this report, the Panel believes that FEMA has established a good foundation for continuing to build a more resilient nation through improved preparedness. Nevertheless, FEMA has yet to define specific goals and outcomes that would permit it, Congress, or the public to determine when preparedness has been fully integrated into all aspects of FEMA’s work and whether the development and ongoing operation of robust regional offices has been achieved. In the absence of these key benchmarks, the Panel has relied on input from FEMA stakeholders and staff, as well as its own assessment of the agency’s documented progress, to conclude that the following challenges remain:

- Incomplete integration of preparedness;
- Insufficient capacity within FEMA regional offices;
- Limited partnerships with stakeholders; and
- Ineffective internal business practices.

Each challenge is discussed in detail in a section below. After summarizing FEMA’s relevant actions and their impacts, each section concludes with the Panel’s recommendations for improvement.

### **Challenge I. Preparedness Is Not Fully Integrated Across FEMA.**

Following the creation of the Department of Homeland Security, most preparedness functions and programs were moved from FEMA and placed in other DHS organizational units. In 2006, PKEMRA directed that most DHS preparedness programs and functions be transferred back to FEMA, and that the FEMA Administrator “...integrate FEMA’s emergency preparedness, protection, response, recovery, and mitigation responsibilities to confront effectively the challenges of a natural disaster, act of terrorism, or other man-made disaster.”

During PKEMRA implementation, FEMA described its legacy programs as stove-piped, and directed preparedness policies and initiatives be integrated across prevention, protection, response, and recovery programs for all-hazards. Beyond the general objective of reducing the stove-piping of legacy programs, FEMA has not established a clear vision of preparedness integration, nor has it established outcomes and measures related to this objective. Therefore, the Panel was unable to use agency-established standards to evaluate the extent of preparedness integration across FEMA. The Panel did not attempt to develop its own vision and set of measures for preparedness integration, not only because it was outside the scope of this project, but also because it is critical that the vision and measures are “owned” by FEMA and its stakeholders. In the absence of such benchmarks, the Panel used a series of interviews at headquarters and the regions, three regional office site visits, and a survey of senior regional officials to assess the level of preparedness integration. Based upon this research, the Panel concluded that preparedness is not yet fully integrated across functional areas in FEMA regional offices or at headquarters.

In the past, preparedness was considered a separate and distinct phase of the disaster management cycle, most often undertaken with incident response in mind. In that framework, officials, community stakeholders, and individuals might plan ahead, preposition supplies, and make arrangements to respond during the initial aftermath of an emergency. Now, with the PKEMRA mandate, a renewed focus on preparedness is expected to build more effective national capabilities within each of the traditional “phases” of emergency management, as well as for the system as a whole. To achieve this objective, FEMA’s mission programs should be engaging in a cross-organizational process of planning, organizing, training, equipping, exercising, and evaluating and improving. This integrated approach to preparedness will build, sustain, and enhance the operational capabilities required for prevention, protection, response, and recovery.

Among the steps that FEMA has taken to integrate preparedness activities across its mission-related programs are the following:

- Structural changes at headquarters and the regions to support national preparedness, including the establishment of Federal Preparedness Coordinators within each region;
- Policy and program guidance to implement preparedness integration;
- Headquarters development of an annual program plan template for regional preparedness activities; and
- Regional development and completion of FY 09 Annual Program Plans for each region's preparedness activities.

Although these are important actions, the Panel has concluded that preparedness is not fully integrated across FEMA and other stakeholder groups with preparedness responsibilities. The Panel has identified a number of challenges:

- Continuation of “siloed” mission-related programs:
  - A number of respondents commented on the perceived resistance to preparedness integration from other mission-related programs within FEMA regions.
- Less than 10 percent of regional survey respondents reported that preparedness was fully integrated in their region;
- Almost 80 percent of respondents reported that it would take over a year to fully integrate preparedness within their region;
- Limitations on FEMA's ability to use existing resources for preparedness activities related to statutory restrictions;
- Absence of a defined set of anticipated outcomes and measures for preparedness integration; and
- Limited monitoring and evaluation by headquarters.

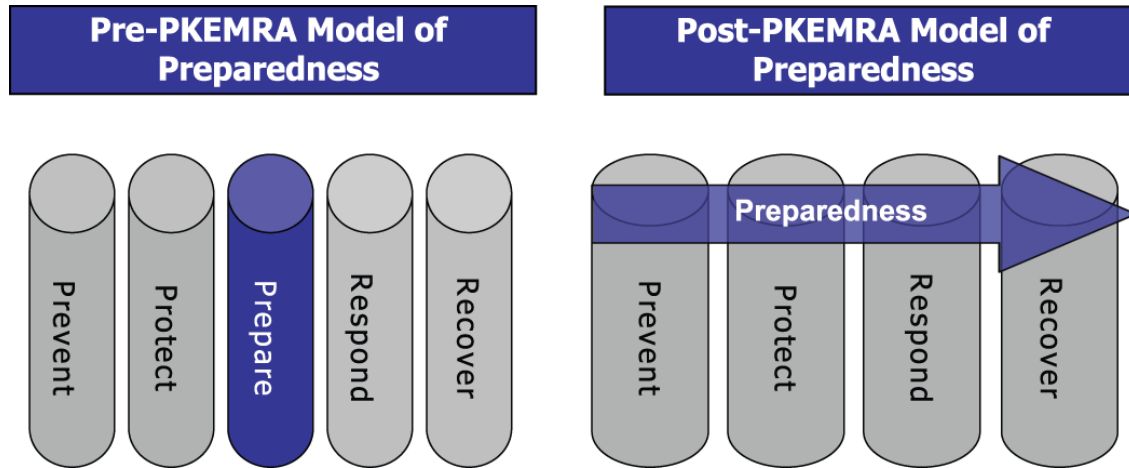
This section discusses FEMA's concept of integrated preparedness, the National Preparedness Guidelines, the National Response Framework and FEMA's recent organizational changes. It also cites key findings related to preparedness integration from the regional office survey. It concludes with findings and recommendations for how FEMA can address these challenges, thus building a more fully integrated system of national preparedness.

### **FEMA's Actions to Integrate Preparedness**

From October 2006 through February 2008, FEMA working groups completed plans and oversaw implementation of the key requirements of PKEMRA, including the transfer of most national preparedness programs and staff from elsewhere in DHS to FEMA. FEMA's actions included the creation of the National Preparedness Directorate within FEMA headquarters and the articulation of a concept of preparedness integration. FEMA acknowledges that preparedness

was previously stove-piped as a distinct “phase” of the emergency management process. As shown in Figure 2, it is now to be integrated across prevention, protection, response, and recovery.

**Figure 2**  
**FEMA’s Concept of Integrated Preparedness**



Source: Derived from FEMA’s PowerPoint, “Integrating Regional and National Preparedness through FEMA Regions” (May 12, 2008), slide 3.

According to FEMA, preparedness involves a cycle of planning, resource acquisition, training, exercising, and evaluating to build, sustain, and improve all operational capabilities. (See Figure 3.) One FEMA official noted that planning is the “keystone” of this cycle.

**Figure 3**  
**FEMA’s Preparedness Cycle**



Source: Derived from DHS’s National Response Framework. (September 2007), page 27.

In September 2007, DHS released the *National Preparedness Guidelines*<sup>7</sup> based on consultation with over 1,500 officials at various levels of government (federal, state, and local) and over 120 national associations, as well as lessons learned from Katrina and other reviews. The *Guidelines* were intended to organize and synchronize national preparedness, guide national investments, incorporate lessons learned from past disasters, facilitate a capabilities-based and risk-based investment planning process, and establish readiness metrics.<sup>8</sup>

The *Guidelines* contain four critical elements, discussed below:

1. **The National Preparedness Vision** is a concise statement of the core preparedness goal for the nation: “A nation prepared with coordinated capabilities to prevent, protect against, respond to, and recover from all hazards in a way that balances risks with resources and need.”
2. **The National Planning Scenarios** are a diverse set of high-consequence threat scenarios of both potential terrorist attacks and natural disasters. They are designed to identify the broad spectrum of tasks and capabilities needed for all-hazards preparedness.
3. **The Universal Task List** is a menu of approximately 1,600 tasks to facilitate prevention, protection, response, and recovery related to the major events identified in the scenarios. It is a library and hierarchy of tasks by homeland security mission area.
4. **The Target Capabilities List** contains a total of 37 capabilities that communities, the private sector, and all levels of government should collectively possess. It is a comprehensive catalog of capabilities to perform homeland security missions, including performance measures and metrics for common tasks.

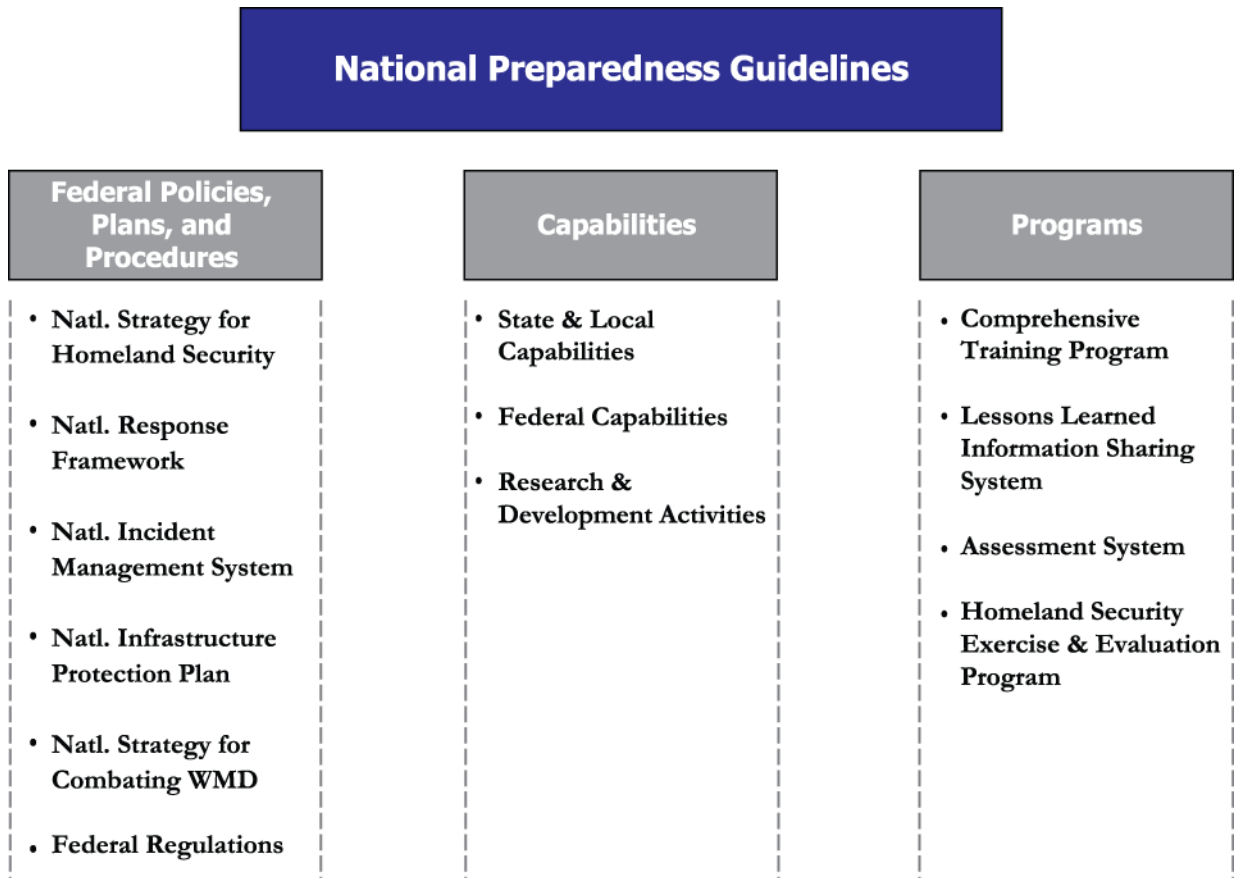
Figure 4 shows other key plans and capabilities that are subject to the National Preparedness Guidelines.

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<sup>7</sup> Department of Homeland Security, *National Preparedness Guidelines* (September 2007).

<sup>8</sup> The National Preparedness Guidelines commit DHS/FEMA and stakeholders at all levels to “focus on special needs populations, such as people with disabilities, language and cultural differences, economic barriers, and age-related issues and concerns.” This is a response to the PKEMRA mandate, as described by one FEMA official, that the agency address special needs populations by, among other things, “develop[ing] procedures for information the public of evacuation plans before and during an evacuation, including individuals with disabilities or other special needs; with limited English proficiency; or who might otherwise have difficulty in obtaining such information.”

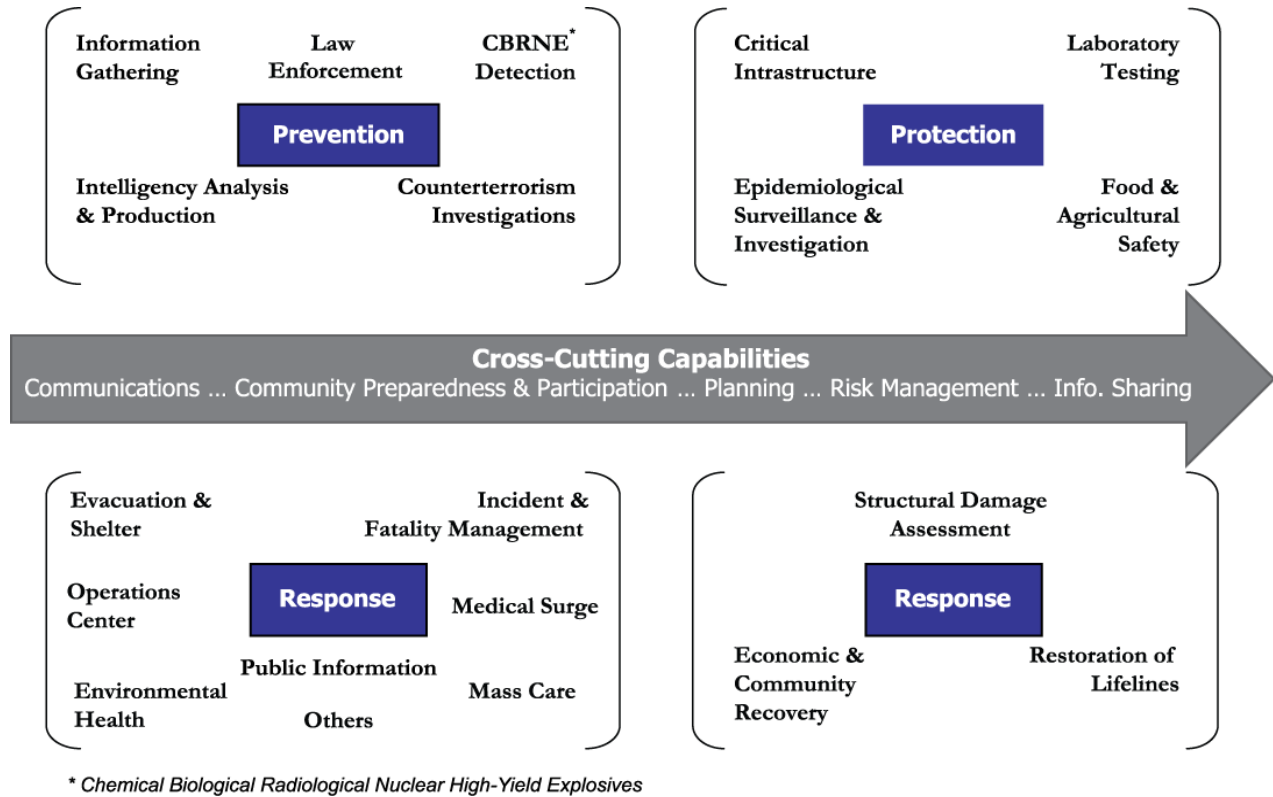
**Figure 4**  
**Key Plans and Capabilities Subject to the National Preparedness Guidelines**



Source: Derived from DHS’s National Preparedness Guidelines (September 2007), page 2.

The *Guidelines* establish a capabilities-based perspective for preparedness across the full range of homeland security missions, from prevention through recovery. DHS defines a capability as “the means to accomplish a mission.” Figure 5 shows the preparedness capabilities articulated for five major mission areas (prevention; protection; response; recovery; and common, or cross-cutting).

**Figure 5  
National Preparedness Capabilities**



Source: Derived from DHS's National Preparedness Guidelines (September 2007), pages 42-43.

In January 2008, DHS released the *National Response Framework*<sup>9</sup> after consulting with practitioners and policymakers at all levels. The *Framework* is important within the context of this study because it identifies the emergency management responsibilities of stakeholders at the national, state and local level.

The *Framework* sets forth five principles that are key to effective emergency response:

1. **Engaged partnership**—leadership and partnerships at all levels are essential to preparedness. Effective response activities begin with a host of preparedness activities conducted long before an actual incident.
2. **Tiered response**—incidents are managed at the lowest possible jurisdictional level, with support from additional capabilities when needed. It is not necessary that a level be overwhelmed prior to requesting resources from another level.
3. **Scalable, flexible, and adaptable operational capabilities**—response must adapt to meet new requirements as incidents change in size, scope, and complexity.

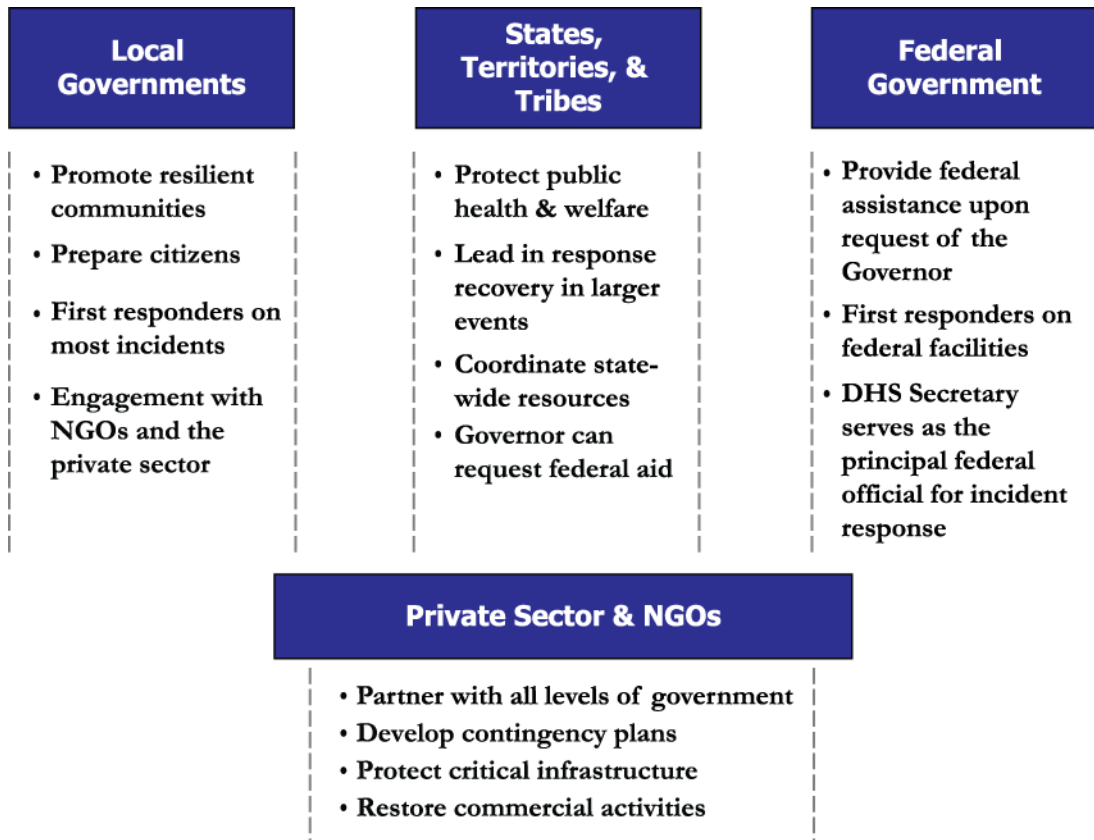
<sup>9</sup> Department of Homeland Security, *National Response Framework* (January 2008).



4. **Unity of effort through unified command**—the chain of command of each participating organization is respected, while harnessing seamless coordination across jurisdictions in support of common objectives. This is indispensable to response activities and requires a clear understanding of the roles and responsibilities of each participating organization.
5. **Readiness to act**—effective response requires readiness to act balanced with an understanding of risk. Once response activities have begun, on-scene actions are based on National Incident Management System principles. Acting swiftly and effectively requires clear, focused communication and supporting processes.

According to the *Framework*, stakeholders at all levels have responsibility for preparedness activities related to response. As shown in Figure 6, the responsibility for incident response begins at the local level with the individuals and public officials in the county, city, or town directly affected by the incident. The state government’s primary role is to supplement and facilitate local efforts before, during, and after incidents. The state provides direct and routine assistance to its local jurisdictions through emergency management program development and by routinely coordinating in these efforts with federal officials. The federal government becomes involved when an incident (1) occurs that exceeds or is anticipated to exceed local or state resources or (2) involves a federal asset, such as a federal building. Private sector and non-governmental organizations play key roles before, during, and after an incident. Businesses and emergency managers work together to provide water, power, communication networks, transportation, medical care, security, and other services during the response and recovery phases.

**Figure 6**  
**Responsibilities within the National Emergency Management System**  
**National Response Framework**

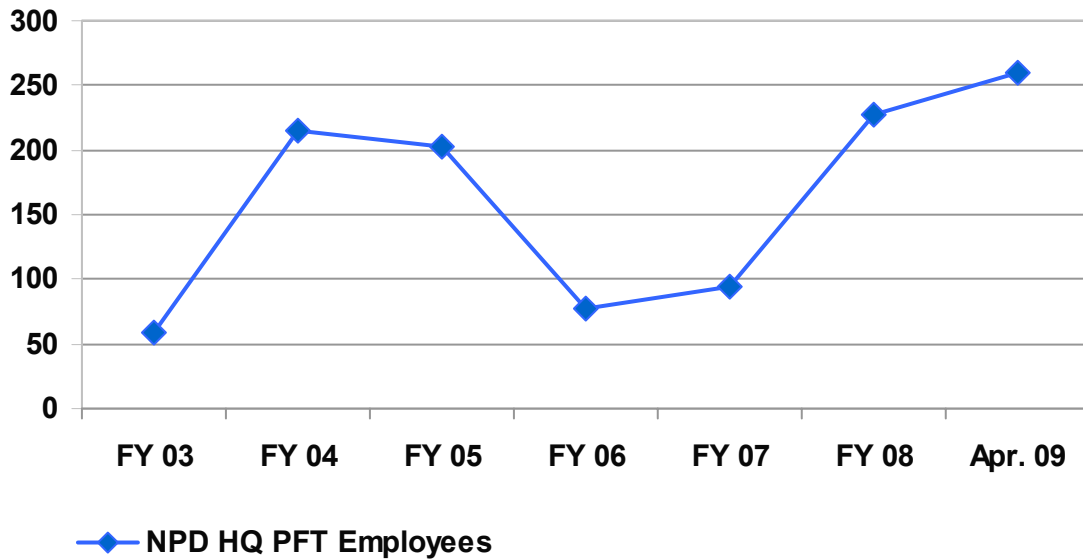


Source: Derived from DHS's *National Response Framework* (January 2008), pages 5-17.

In 2007, FEMA also made organizational structure changes to address issues related to preparedness and preparedness integration. The National Preparedness (NP) Directorate was established within FEMA, and is led by a Deputy Administrator, who is a Presidential Appointee subject to Senate Confirmation. Within the NP Directorate, FEMA has established a new National Integration Center.

As shown in Figure 7, the permanent full-time (PFT) workforce assigned to the National Preparedness Directorate has moved up and down over this period, as preparedness resources shifted between FEMA and the DHS Directorate of Preparedness. The six-year trend, however, is clear: the National Preparedness Directorate PFT workforce has increased more than three-fold between FY 2003 and April 2009 (from 59 to 260).

**Figure 7**  
**National Preparedness Directorate PFT Workforce<sup>10</sup>**  
**FY 2003 – April 2009**

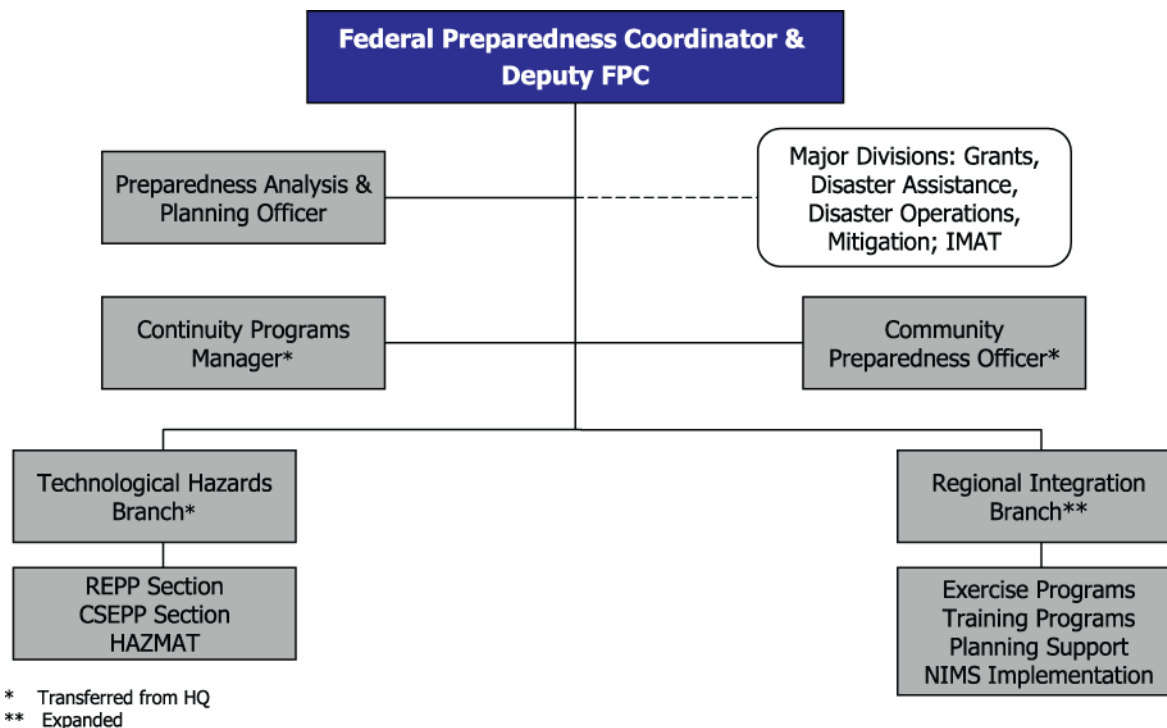


Source: FEMA Workforce Data, FY 2003 (April 2009)

In addition, FEMA made organizational structure changes in the regions in order to better address preparedness requirements. FEMA established a uniform regional preparedness structure, as shown in Figure 8, to ensure consistency in roles and responsibilities across the regions.

<sup>10</sup> This data includes all headquarters NPD employees categorized by FEMA’s FY 2003 to April 2009 Employee Count Spreadsheet as “PFT” and “SES-Career.”

**Figure 8  
Uniform Regional Preparedness Organizational Structure**



Source: Derived from FEMA’s PowerPoint entitled “Integrating Regional and National Preparedness through FEMA Regions” (May 12, 2008), slide 15.

The Panel was unable to conduct a workforce level analysis of the permanent full-time preparedness workforce in the FEMA regions from FY 2003 to April 2009 because only aggregate data on the regional workforce was available for these years; information about the number of employees in each directorate or division could not be provided. Since the enactment of PKEMRA in October 2006, however, the Panel is aware that FEMA has filled a number of the key preparedness positions in its regional offices:

- A **Federal Preparedness Coordinator** (FPC) has been established in each regional office to manage, strengthen, and integrate regional preparedness efforts across federal, state, and local levels, as well as across jurisdictional and bureaucratic boundaries. The FPC is a GS-15 position intended to promote the integration and synchronization of preparedness activities across Regional stakeholders. These individuals actively facilitate collaborative events with stakeholders and partners such as educational forums, workshops, training, and exercises.
- A **Preparedness Analysis and Planning Officer** has been established in each region to support the Federal Preparedness Coordinator in fulfilling broad national preparedness responsibilities. This is a GS-13/14 level position to serve as the critical link between the operational planning and administrative activities at the regional office and the preparedness initiatives of the National Preparedness Directorate.

- **Grants Management Specialists** (a total of 20 throughout the regions) have been added within the regional offices to support the business management of federal preparedness assistance program activities in the region by developing, delivering, and maintaining a variety of support activities related to the business administration of grants and cooperative agreements.<sup>11</sup>
- **Training and Exercise Specialists** (a total of 20 throughout the regions) have been added within the regional offices to work in partnership with Regional Training Managers to coordinate training and exercise requirements across the Regional Offices.

In June 2008, FEMA headquarters released a template for the Annual Program Plans (APP) to be completed by the FPC in each region. The APP template serves as a guide for FPCs in identifying plans, activities, resource gaps, and success measures across ten preparedness areas:

- Planning and Continuity Capabilities;
- Exercises;
- National Incident Management System;
- Training;
- Transition Planning;
- Citizen Corps and Community Preparedness;
- Chemical Stockpile Emergency Preparedness Program;
- Radiological Emergency Preparedness Program;
- Assessments; and
- Capabilities Development.

The National Academy review found that the 2008 Annual Program Plans created by the regional offices were solid efforts, and the regions have committed to a wide range of preparedness activities. Some regions identified preparedness program areas in addition to the ten standard ones. The depth and breadth of planned activities varied by region, with some planning more activities than others. Each preparedness area identified by headquarters except Chemical Stockpile Emergency Preparedness Program was deemed applicable in every region.<sup>12</sup>

Based on the activities identified in the Annual Program Plans, the FEMA regions have a significant role in facilitating interactions between key stakeholders through planning, training, workshops, and reviews of state/local/tribal plans. As shown in Table 2, many of the challenges identified by the regions in their Annual Program Plans are related to insufficient staffing and budget for their preparedness responsibilities. Moreover, some regions expressed concerns about their capabilities, as well as the need for headquarters to finalize various policies/plans and to set more realistic expectations.

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<sup>11</sup> In comments on the agency review draft, a FEMA reviewer reported that “an additional 10 CORE Grants Management Specialist positions were approved in September 2009 and are being sent to the regions.”

<sup>12</sup> Only half of the regions have responsibilities for chemical stockpile emergency preparedness.

**Table 2**  
**Planned Regional Activities/Challenges in Select Preparedness Areas**  
**Analysis of FY 2009 Annual Program Plans**

Area	Activities	Identified Regional Challenges
<i>Planning and Continuity Capabilities</i>	<ul style="list-style-type: none"> <li>• Review and approval of preparedness grant applications</li> <li>• Monitor grants</li> <li>• Analyze preparedness/readiness plans</li> <li>• Partner with stakeholders</li> <li>• Working group meetings on catastrophic planning</li> <li>• Preparedness exercises</li> <li>• Conduct regional capability assessment</li> </ul>	<ul style="list-style-type: none"> <li>• Weak planning in preparedness cycle</li> <li>• Unclear roles and responsibilities for Regional Catastrophic Planning Grant</li> </ul>
<i>Exercises</i>	<ul style="list-style-type: none"> <li>• National conferences</li> <li>• Regional workshops</li> <li>• Participation in exercises, evaluations, and after-action reviews</li> <li>• Review of state Concept of Operations (CONOPS) and Concept of Operations Plan (CONPLANS) documents</li> <li>• Exercise planning assistance to states</li> </ul>	<ul style="list-style-type: none"> <li>• Need bi-lingual materials</li> <li>• National Exercise Division (NED) should let regions approve applications</li> <li>• Need improvements to development and delivery of National Incident Management System (NIMS) compliance courses to improve conduct of exercises</li> <li>• Need more post-exercise support and Homeland Security Exercise and Evaluation Program (HSEEP) needs specific federal Emergency Support Function (ESF) templates and guidance</li> <li>• The number of requests for FEMA regional participation in exercises far exceeds time and staff.</li> </ul>
<i>Training</i>	<ul style="list-style-type: none"> <li>• National Training and Exercise Conference</li> <li>• Regional Training and Exercise Conference and other workshops.</li> <li>• Course reviews and updates</li> <li>• Publication of Regional Training and Exercise Plan</li> <li>• Identification of regional gaps through visits to state offices</li> <li>• Revise and enhance new employee orientation</li> <li>• Emergency Management Institute's (EMI) management of FEMA training and development needs</li> <li>• EMI delivery of training courses</li> </ul>	<ul style="list-style-type: none"> <li>• Regions do not fully control training programs, though this cannot be developed to any great extent without additional staffing and funding in the regional training office.</li> <li>• Need bilingual course materials for full participation in Puerto Rico training events.</li> <li>• Low regional funding allocation for employee development.</li> <li>• Procedures should be revised to more accurately reflect regional goals and objectives within the program area.</li> <li>• Disaster reserve workforce is a second priority to external customers in training programs</li> <li>• Minimal resources dedicated to training FEMA full time employees</li> </ul>

Area	Activities	Identified Regional Challenges
<i>Assessments</i>	<ul style="list-style-type: none"> <li>• All-hazards-gap analysis</li> <li>• Review of state preparedness reports</li> <li>• Threat assessment reviews</li> <li>• Joint FEMA-state implementation plans to respond to identifies gaps</li> <li>• Technical assistance</li> <li>• Grants Monitoring</li> <li>• Assessment of cadre readiness</li> <li>• Identify training shortfalls</li> </ul>	<ul style="list-style-type: none"> <li>• FEMA needs to develop a strategy to establish an All-Hazards Assessment and Information repository at HQ or the regions to identify gaps.</li> <li>• Region and HQ need to reduce burden on states and ensure assessments-requirements are coordinated among FEMA divisions and the federal sector.</li> <li>• New documents coming from FEMA HQ typically have a short review and comment period, and adherence is often required prior to finalization.</li> <li>• Funding and human resource gaps in several regions.</li> </ul>
<i>Capabilities Development</i>	<ul style="list-style-type: none"> <li>• Work related to the Integrated Planning System</li> <li>• Flu planning workshops</li> <li>• Target Capabilities List initiatives and workshops</li> <li>• Gap analyses and technical assistance</li> <li>• Develop regional safety policy</li> <li>• Ensure that Federal Preparedness Coordinators (FPC) and other officials become experts on the planning doctrine.</li> </ul>	<ul style="list-style-type: none"> <li>• FEMA needs to develop a national flu plan with coordination between National Continuity Programs (NCP) Directorate and Department of Defense</li> <li>• Regions need to have their Preparedness Analysis and Planning Specialist on board by the first quarter of the FY, otherwise their ability to develop capabilities are significantly impaired.</li> <li>• Regions lack sufficient technical expertise in geospatial analysis, mapping and risk assessments.</li> </ul>

In April 2009, the National Academy developed a survey of senior regional officials to obtain their input on questions related to five issues:

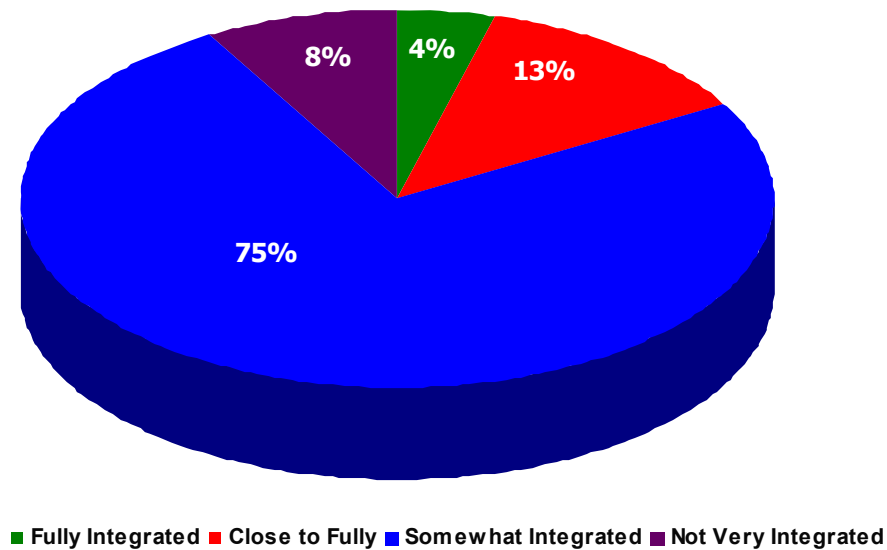
1. Robust regional offices;
2. Preparedness integration;
3. Stakeholder relationships;
4. Regional-headquarters relationship; and
5. Recommendations to improve preparedness.<sup>13</sup>

As shown in Figure 9, three-quarters of regional survey respondents reported that their region has made some progress in integrating preparedness. Nearly 80 percent, however, reported it would take more than a year to fully integrate preparedness into every area. Over 70 percent of respondents reported that preparedness in their functional area was “somewhat integrated.” Only

<sup>13</sup> FEMA headquarters distributed the survey electronically to approximately 70 officials who were in the following positions: Regional Administrator; Deputy Regional Administrator; Federal Preparedness Coordinator; Director, Management Division; Director, Disaster Assistance Division; Director, Disaster Operations Division; and Director, Mitigation Division. Some of these individuals were in acting positions. FEMA headquarters sent participants a National Academy email explaining the purpose of the survey, ensuring confidentiality of data, and a link to open the survey. At least one response was received from 7 of the 10 regions. A full 70% of the Federal Preparedness Coordinators responded, resulting in strong input on the preparedness integration questions. In total, 26 officials responded, which was a response rate of 37% across all the senior officials.

one respondent reported that it was “fully integrated,” and no one reported that it was “not at all integrated.”

**Figure 9**  
**Level of Reported Integration of Preparedness**  
**Regional Office Survey, April 2009**  
(N = 24)



Source: National Academy’s FEMA Regional Office Survey (April 2009)

Despite this reported progress, the study team’s research and site visits found that Federal Preparedness Coordinators are encountering resistance to preparedness integration efforts. The resistance appears to stem from the perceived burden of the other responsibilities facing mission programs, continued organizational barriers between mission programs, and differences between the homeland security culture and the emergency management culture.

In the regional office survey, the most frequently recommended action to improve preparedness was to establish a vision for preparedness integration and to increase commitment to this goal.

Respondents were asked how long they think it will take to achieve preparedness integration in their respective regions. As shown in Figure 10, nearly 8 in 10 respondents (79 percent) reported that it would take over a year; 12 percent of respondents believe preparedness integration will take one year to achieve; 4 percent said it would take six months; and 4.2 percent said they do not know. No one said preparedness integration is unachievable.

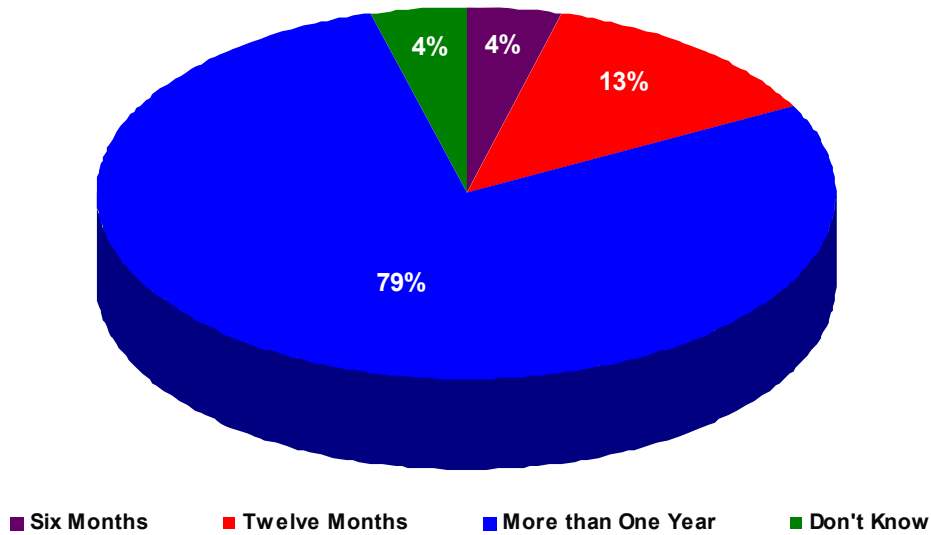
**Comments from the FEMA Regional Office Survey**

1. *“The legacy generation of FEMA need(s) to step back a little and develop an appreciation for what a robust preparedness program can do for FEMA and its partners.”*
2. *“Make the new Preparedness vision match reality ...”*
3. *“Define a clear mission and vision for preparedness.”*

(Survey April 2009)



**Figure 10**  
**How Long Will It Take for Preparedness to Be Integrated?**  
**Regional Office Survey, April 2009**  
**(N = 24)**



Source: National Academy’s FEMA Regional Office Survey (April 2009)

Respondents were also asked to identify specific challenges or barriers they had experienced in trying to integrate preparedness. As Table 3 shows, the respondents identified challenges in 14 major areas.

**Table 3**  
**Regional Views of Preparedness Integration Challenges**  
**Regional Office Survey, April 2009**

Rank	Challenge Area	Responses (#)
1.	Internal resistance to preparedness integration (PI) across FEMA divisions; problematic restrictions on use of certain types of personnel.	17
2.	Staffing levels viewed as inadequate to perform needed PI tasks.	9
3.	Stakeholders need to be more actively engaged, but recognize that stakeholder capabilities limited.	5

Rank	Challenge Area	Responses (#)
4. (TIED)	FEMA headquarters/regional office relationship needs to be improved.	4
	Regions are closer to grantees and should be authorized to make programmatic decisions on preparedness grants.	4
	Increased responsibilities for regions require improving staff capabilities in specific areas.	4
	Increased responsibilities and expectations for regions require additional regional authorities.	4
8. (TIED)	FEMA hiring processes too lengthy and inefficient.	2
	FEMA/Department of Homeland Security Relationship within regions must be improved.	2
10. (TIED)	Regional budget and financial authorities need to be established.	1
	Meaningful performance goals and accountabilities need to be established.	1
	Senior leadership commitment needed to support PI.	1
	Increase availability of training; increase use of exercises.	1
	Make funds available to support necessary travel.	1

Source: National Academy’s FEMA Regional Office Survey (April 2009)

The following illustrative comments were provided by survey respondents, and provide additional context for the top three challenge areas identified in the survey.

*1. Internal Resistance to Preparedness Integration and Administrative Challenges*

- “All divisions must embrace the preparedness message.”
- “[Preparedness faces] a huge education effort—who we are, what we can offer, our role even with other federal agencies as well as states and locals.”
- “Program development is still stove-piped within single program areas.”
- “Too much HQ stove-piping of programs”
- “The National Preparedness Directorate is focused on improving state and local capabilities, and not focused on increasing FEMA and federal capabilities.”
- “National Preparedness Divisions in the regions do not ‘own’ many of the major elements of Preparedness.”

## 2. *Staffing Levels*

- “FEMA HQ needs to increase funding for personnel and programs.”
- “We have never attained full or adequate staffing [for preparedness].”
- “Regions do not have staff to integrate/administer programs.”

## 3. *Stakeholders*

- “All staff [are] located in the regional office, limiting stakeholder engagement.”
- “National Preparedness (NP) works with Disaster Operations planners but Disaster Operations, Disaster Assistance, and Incident Management Assistance Teams are sometimes displeased with NP's disaster response restrictions.”
- “From a regional perspective, it is critical that we are actively involved in the program aspects of the grants, yet the staff for that responsibility is in the Grants Branch of the Management Division. This significantly degrades NP's capability to monitor and assist the state and local governments in meeting their goals.”

## **Panel Findings and Recommendations**

Based on the data and information examined during the course of this study, the Panel concluded that FEMA faces key challenges in fully imbuing the new concept of preparedness integration across FEMA programs and stakeholder groups, and in utilizing outcome metrics to determine whether preparedness strategies and activities are achieving desired objectives. In addition, FEMA faces organizational barriers to preparedness integration, as its main programs still operate as though they are independent of one another.

Meeting the PKEMRA mandate to integrate preparedness will require an organizational transformation in FEMA. Based on the National Academy's work on organizational transformation in the Coast Guard and other agencies, the Panel believes that to successfully integrate preparedness across the agency FEMA will need to:

1. Ensure that top leadership drives the transformation activities;
2. Establish a clear vision for preparedness integration;
3. Ensure that the organizational structure enables the vision;
4. Create a sense of urgency to complete preparedness integration;
5. Communicate frequently on needs, expectations, and progress through multiple channels to multiple stakeholders;
6. Designate an implementation team to manage the transformation process;
7. Engage FEMA and stakeholders to seek ideas, build momentum, and gain their ownership for the transformation; and
8. Sustain the effort by nurturing a new culture oriented toward the desired outcomes.

## RECOMMENDATION 1

The Panel found that FEMA has not established and effectively communicated a shared vision for preparedness integration.<sup>14</sup> FEMA must describe the agency’s vision for preparedness and align the organization and its mission-related programs around this vision. Through this effort, FEMA can foster a culture of preparedness that is understood and shared by all internal and external stakeholders.<sup>15</sup>

**The Panel recommends that FEMA establish a collaborative cross-organizational process, with participation from internal and external stakeholders, to develop a shared understanding of preparedness integration.**

To implement this recommendation, FEMA leadership should take the following actions:

- Restate the agency’s commitment to the goal of preparedness integration and identify how it will hold itself, headquarters and regional staff accountable for achieving this goal;
- Engage internal and external stakeholders in the development and promulgation of the vision; and
- Designate an internal Implementation Team for Preparedness Integration to:
  - Monitor progress and report to senior leadership; and
  - Regularly engage internal and external stakeholders to develop common understanding of preparedness integration.

## RECOMMENDATION 2

The Panel found that FEMA does not yet have appropriate outcome measures to determine whether its preparedness integration efforts are successful. The guidance to date is focused on process or output measures, and does not describe the desired outcome to be achieved or realized as a result of preparedness integration. While outputs are important, and can indicate the completion of a specific activity, clear *outcome* measures communicate the expected results or impacts of those actions. Outcome metrics will allow FEMA to understand whether the program

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<sup>14</sup> The Panel notes that definitions for preparedness are found in documents pertaining to the National Incident Management System (NIMS) and the National Preparedness Guidelines. Specified actions for preparedness integration are found within the CONOPS and other documents. However, there is no widely shared understanding across all mission program areas of what outcomes need to be achieved through preparedness integration.

<sup>15</sup> According to one FEMA official, “the absence of a formal preparedness requirements definition and analysis process (as part of an end-to-end resource allocation system)” is a “systemic problem.” This means that FEMA components often “implement initiatives without adequate preparedness requirements definition and analysis,” which causes “preparedness programs, activities, and services [to] lag implementation.”

is yielding the necessary benefits for the nation. Development of relevant outcome measures is challenging, but a critical element of FEMA’s transformation.<sup>16</sup>

**The Panel recommends that FEMA establish outcome metrics and standards for preparedness integration, as well as a system to monitor and evaluate progress on an ongoing basis.**

In implementing this recommendation, FEMA should:

- Establish a process to recommend outcome measures for preparedness and preparedness integration, utilizing the expertise from FEMA headquarters and regions as well as stakeholders from state, local, and tribal levels;
- Align these outcome measures to the performance standards of units and individuals, as appropriate; and
- Regularly review progress and take corrective action where needed.

### RECOMMENDATION 3

The Panel found that FEMA has undertaken steps to break down the barriers between and among mission program areas, including cross-program collaboration on policy development.<sup>17</sup> However, significant barriers continue to exist that impede the integration of preparedness. Until these organizational barriers are reduced, full integration of preparedness will be difficult to achieve.

**The Panel recommends that FEMA work to eliminate the organizational barriers that are adversely impacting the full integration of preparedness across the agency.**

To implement this recommendation, the Implementation Team for Preparedness Integration should:

- Convene mission program directorates to identify the actions needed to reduce the negative effects<sup>18</sup> of continued stove-piping among directorates and programs, at

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<sup>16</sup> One FEMA official noted that an impediment to identifying outcomes has been the absence of operational plans and the fact that the Integrated Planning System (IPS) is in its early stages of implementation. In comments on the agency review draft, a FEMA reviewer noted that the agency’s National Continuity Programs Directorate (NCP) has developed Regional Continuity Metrics (FEMA CORE Competencies with Performance Metrics for Regions). The National Continuity Programs Directorate (NCP) is conducting on-site Continuity assessments of all ten Regions. The assessments review the Region’s ability to activate, mobilize, and perform primary mission essential functions during any emergency or situation that may disrupt normal operations, as addressed in the Region’s continuity plan.

<sup>17</sup> Other reported cross-organizational efforts include the PKREMRA directed comprehensive assessment tool and implementation planning for the Integrated Planning System.

<sup>18</sup> One FEMA official reported that the “impact of ‘stove-piping’ is more a function of not inviting preparedness staffs at HQ or the regions to assist ... in the requirements definition and analysis process,” which is one reason

headquarters as well as regional offices, and commit to establishing a more cooperative and collaborative means of operating.

- Identify any statutory or policy restrictions that prevent FEMA’s mission directorates from working together to accomplish preparedness integration, and make recommendations to FEMA leadership to modify the policies or ameliorate the impacts.

## **Challenge II. Insufficient Capacity in FEMA Regional Offices**

The FEMA regional offices are the critical points of interface with non-federal stakeholders who have primary responsibility for emergency management, including preparedness. Under PKEMRA, the regional offices have been given greater responsibility for implementing FEMA’s emergency management programs. State and local governments use FEMA programs to build capacity through training, planning and equipment grants, exercises, and technical assistance. Regional offices are FEMA’s front line in supporting these stakeholders. Indeed, FEMA’s CONOPS document designated the regions as “the principal conduit for delivery of all preparedness programs and activities to state, tribal, and local partners, non-governmental organizations, the private sector, and citizens.”

Congress’s mandate in the Post-Katrina Emergency Management Reform Act (PKEMRA) that FEMA develop “robust” regional offices reflected its determination that these organizational units did not have the capabilities needed to perform their expected role in the nation’s preparedness system. Although FEMA has not yet articulated a definition of “robust regional offices” or developed a framework with a set of metrics to assess this goal across all aspects of emergency management, the Panel believes that fully robust regional offices at a minimum would have the following general characteristics:

- Sufficient capacity to support stakeholders at the state, local, and tribal levels;
- Optimally sized workforce with the requisite skills to implement headquarters policies and guidance;
- Strong working relationships with headquarters components; and
- Strong working relationships with stakeholders at the state, local, and tribal levels.

The Panel assessed current “robustness” through a combination of in-person interviews, visits to three regional offices, a regional office survey, a state-level stakeholder dialogue, and workforce analyses. This review found that FEMA has taken significant steps to strengthen its regional offices, including:

- Developed and promulgated guidance to identify the preparedness responsibilities of headquarters and the regional offices;
- Implemented a uniform organizational structure across all ten regional offices;

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FEMA “placed a ‘preparedness estimate’ process in Comprehensive Preparedness Guide 101” (released in March 2009).

- Created new national preparedness and grants management units in each region;
- Revised reporting relationships to strengthen the accountability of regional administrators;
- Increased headquarters-regional office interactions;
- Allocated additional permanent full-time positions to each of the ten regions, and increased the grade for permanent full-time Regional Continuity Managers' positions in each region to GS 13/14;
- Created ten Regional-State Continuity Working Groups within each region, with quarterly meetings;<sup>19</sup>
- Created a regional advisory council in each of the ten regions to represent stakeholders; and
- Delegated ten additional authorities to regional administrators, pursuant to a July 2009 memorandum from the Administrator.

FEMA has also made progress in improving headquarters/regional office relations and has begun to expand the capacity of regional offices by increasing their workforce and decentralizing certain authorities. However, the FEMA regional offices identified a number of areas where improvements are still needed:

- Over 90 percent of the regional survey respondents reported that moderate or considerable change was still needed to become fully robust;
- The actions most often mentioned by regional survey respondents as necessary for regions to become fully robust were:
  - Increased personnel;
  - More active stakeholder engagement;
  - Increased staff capabilities; and
  - Increased regional authority.
- At the time of the site visits and survey, regional offices reported serious delays in receiving the paperwork from headquarters required to meet new grants management responsibilities; and
- Regional Administrators reported that they lacked authority over a region-wide budget.

This section provides more detailed information about the steps FEMA has taken thus far to enhance the capacity of its regional offices, and concludes with the Panel's findings and recommendations to further strengthen these critical operating units.

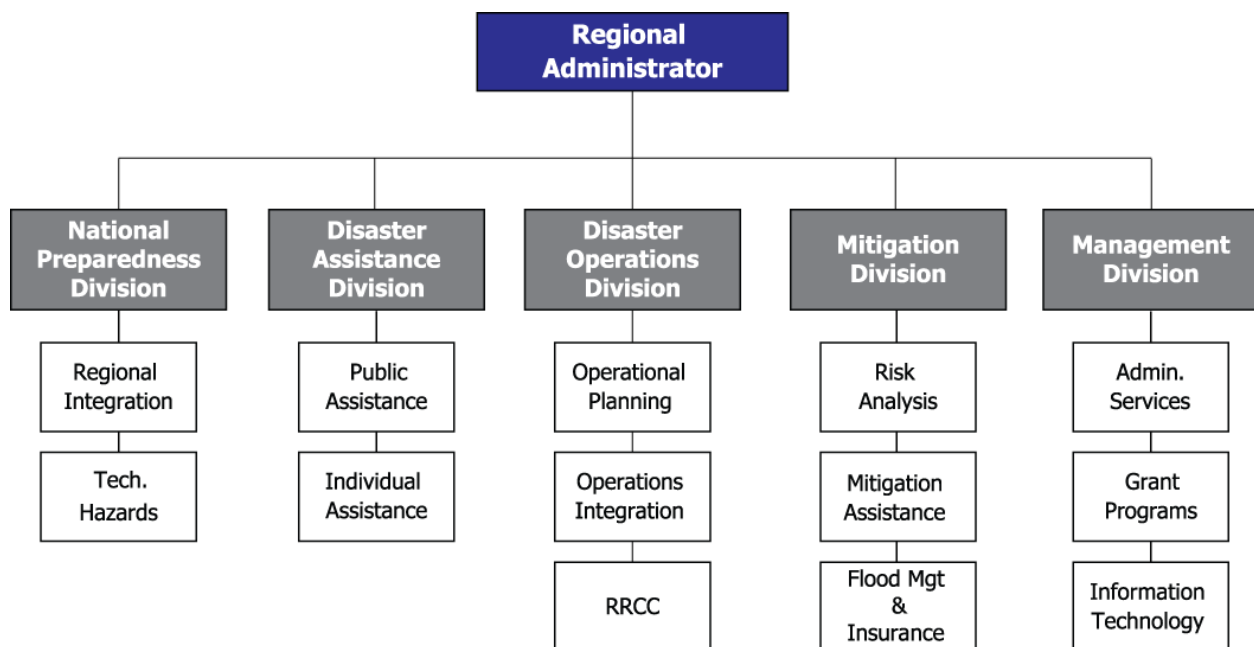
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<sup>19</sup> One FEMA official noted that the agency also hosts an annual Continuity of Operations Strategic Planning Conference for States, Territories, and the District of Columbia.

## FEMA's Actions to Build Robust Regional Offices

In 2007, FEMA began its effort to enhance the capabilities of regional offices by reviewing the organizational structures that had evolved in each of its ten regional offices. As a result of that review, FEMA established and has implemented a new uniform regional structure that includes a National Preparedness Division, as shown in Figure 11. This division has two branches: Regional Integration and Technological Hazards.

**Figure 11**  
**New Uniform FEMA Regional Structure**  
**FY 2008**

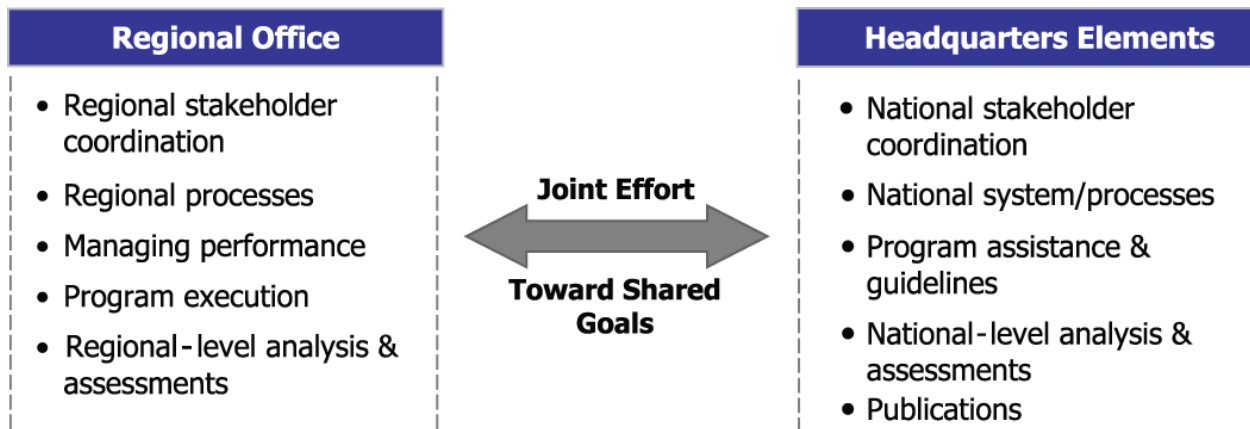


Source: FEMA's PowerPoint entitled "Integrating Regional and National Preparedness through FEMA Regions" (May 12, 2008), slide 16.

In February 2008, FEMA's CONOPS that established a basic division of responsibilities between headquarters and the regions. Headquarters establishes policy and provides program guidance to set the national agenda, while the regions are responsible for implementing the policies and programs. In addition, the CONOPS designates regions as responsible for assisting states and urban areas in developing and implementing preparedness strategies, and headquarters provides assistance to regional offices faced with complex, high profile activities. Figure 12 shows the CONOPS' depiction of the distribution of responsibility between headquarters and the regions.



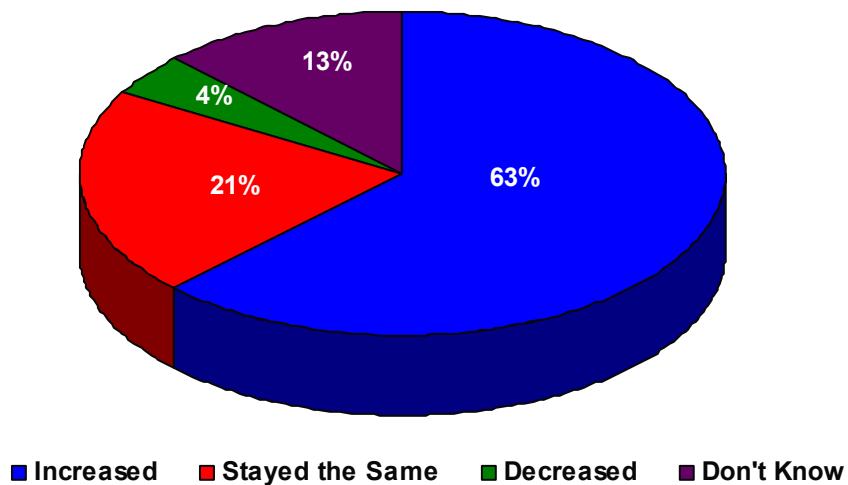
**Figure 12**  
**CONOPS' Distribution of Responsibility between Headquarters and the Regions**



Source: FEMA's Regional-National Preparedness Concept of Operations (February 8, 2008), page 7.

Survey respondents were asked whether FEMA headquarters and regional offices' interactions had changed as a result of preparedness integration activities. As shown in Figure 13, the majority of respondents (63 percent) reported that their interactions with headquarters have increased. Some respondents reported that interactions have not changed (21 percent), or did not know (13 percent).

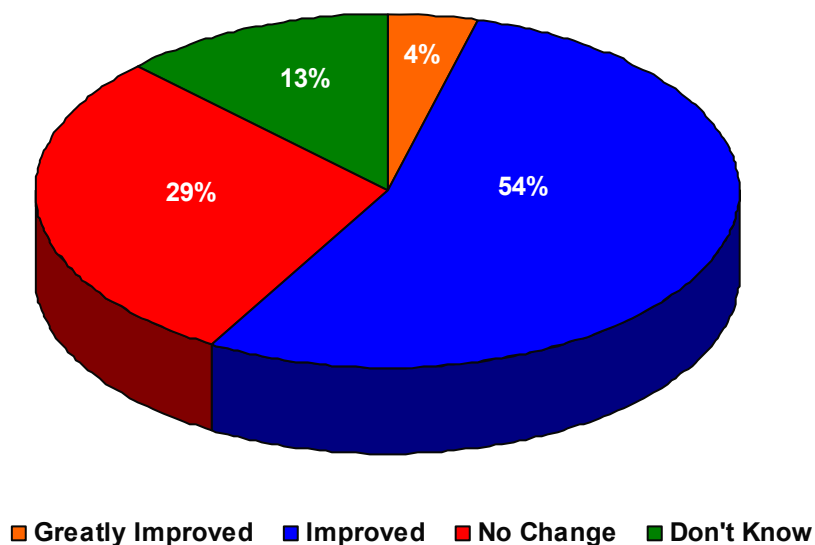
**Figure 13**  
**Reported Level of Headquarters Interaction**  
**Regional Office Survey, April 2009**  
**(N = 24)**



Source: National Academy's FEMA Regional Office Survey (April 2009)

Respondents were asked how the level of interaction with headquarters reported in the previous question had affected regional preparedness. As shown in Figure 14, the majority reported that it had either improved or greatly improved preparedness (58 percent). Some respondents reported that the interaction had no impact on preparedness (29 percent), while 13 percent did not know.

**Figure 14**  
**Impact of HQ-Regional Interaction on Preparedness**  
**Regional Office Survey, April 2009**  
(N = 24)



Source: National Academy's FEMA Regional Office Survey (April 2009)

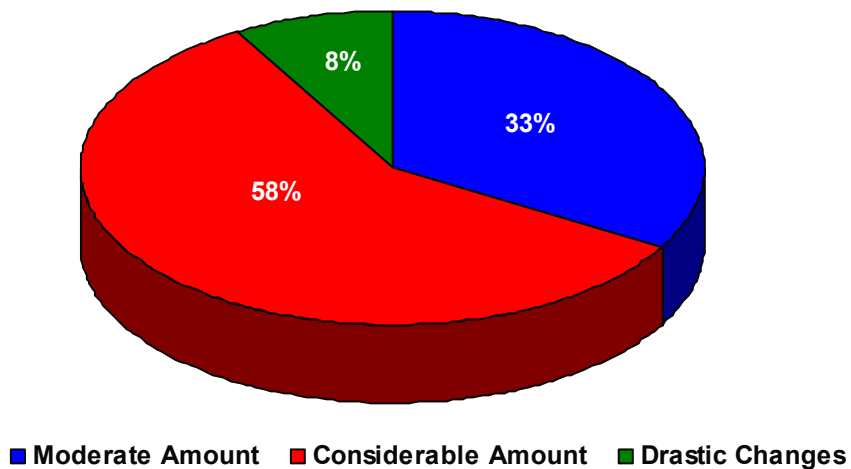
Because FEMA had not established a definition of what is meant by “robust” regional offices, regional survey respondents were asked what a robust regional office meant to them. Based on the responses, the Panel identified three key characteristics of robust regional offices:

- Appropriate levels of authority
  - General decision-making
  - Grant-making
  - Regional budget
- Adequate human capital
  - Number of employees
  - Skilled, experienced staff
- Strong partnerships
  - Headquarters
  - Stakeholders

Even these characteristics, however, represent inputs and outputs, rather than outcome measures that could be used to determine whether the goal of having robust regional offices has been achieved.

In response to a question about how much change was required for their regional office to become fully robust, all respondents agreed that changes were needed to achieve this goal. As shown in Figure 15, over 70 percent believed that a considerable amount of change (59 percent) or a moderate amount (33 percent) was required. Less than 10 percent said that drastic changes would be required.

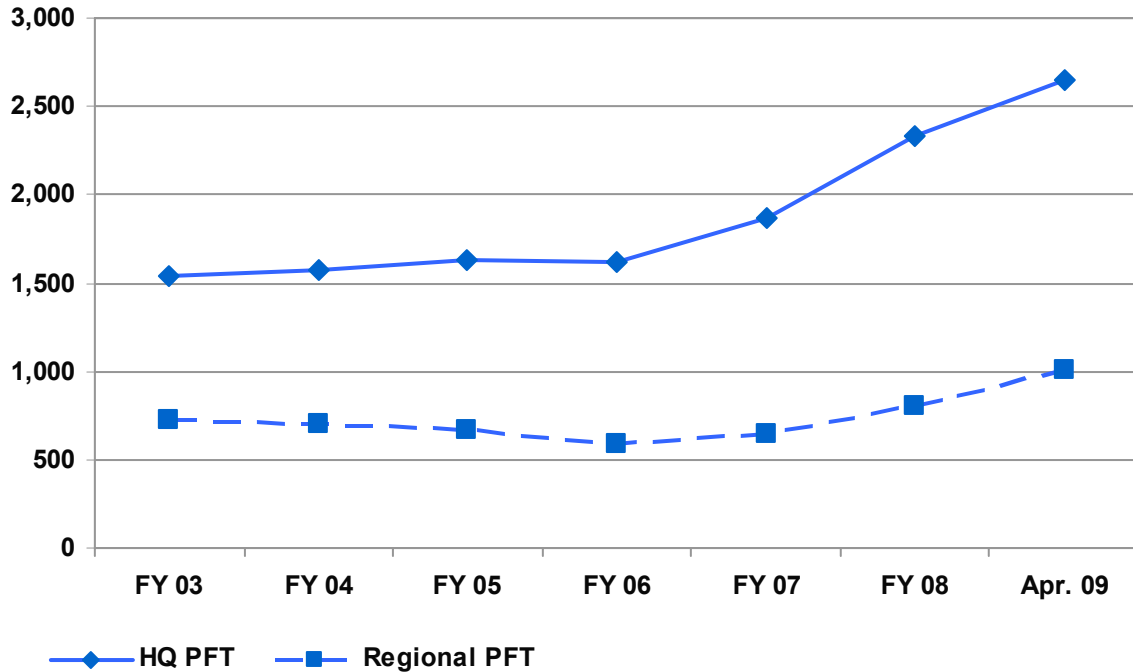
**Figure 15**  
**Reported Level of Change Required to Become “Fully Robust”**  
**Regional Office Survey, April 2009**  
(N = 24)



Source: National Academy’s FEMA Regional Office Survey (April 2009)

In response to questions about their major challenges, regional survey respondents routinely cited lack of sufficient staff. Further, a considerable number of respondents said they did not have enough people in their region or program area with the right skill set. As shown in Figure 16, the permanent full-time (PFT) regional workforce increased by 40 percent (427 PFT positions) between FY 2003 and FY 2009. By comparison, the PFT workforce at FEMA headquarters increased by 72 percent (1,031 PFT positions) over the same period. Given the centrality of the regions described in FEMA’s Concept of Operations and PKEMRA’s expectations, FEMA may want to consider shifting some headquarters resources to regional offices.

**Figure 16**  
**Number of Permanent Full-Time FEMA Regional Office and Headquarters Employees**  
**FY 2003 – April 2009**



Source: FEMA Workforce Data, FY 2003 (April 2009)

### Recent Policy Changes

During the summer of 2009, the new Administrator ordered an internal agency review to determine whether additional authorities should be transferred to the regional offices. His goal was to “significantly enhance and solidify regional authorities” to improve FEMA’s service to state, local, and tribal governments. Of the thirteen authorities identified for possible transfer from headquarters to the regions, the Administrator directed that ten be delegated to the regions:<sup>20</sup>

- Approval for mission assignments of \$25 million or more to expedite regional disaster assistance to state and local governments;
- Contracting for airlifts;
- Ability to add counties to a major disaster declaration already approved by the President;
- Approval of dual lodging costs during disasters;
- Approval of FEMA Form 40-1 “Requisition and Commitment for Services and Supplies” for non-disaster acquisitions;

<sup>20</sup> Memorandum from the FEMA Administrator to Delegate Authorities to Regional Administrators (July 21, 2009).

- Determination of the annual grants monitoring requirements and schedule;
- Post-award fiscal oversight of grantees for additional grant programs;<sup>21</sup>
- Oversight of the Regional Exercise Support Program;
- Selection and approval of individuals for GS-15 positions; and
- Review and approval of funding for state administrative costs for the Public Assistance and Hazard Mitigation Grant Program.

FEMA headquarters is continuing to review the possible transfer of two additional authorities to the regions: (1) ordering supplies directly from FEMA warehouses in the region; (2) approval of Fire Management Assistance Grants. The Administrator decided not to give regions the authority to make additional FEMA programs available in a declared disaster area because there did not appear to be sufficient need for such a delegation.

### **Panel Findings and Recommendations**

The Panel notes that in recent months FEMA has demonstrated new commitment to the PKEMRA mandate of robust regional offices. The Panel supports recent actions by FEMA leadership to delegate more authority to the regions as an important first step. The Panel is concerned that the capacity of the regions to accept additional authorities and responsibilities may be compromised by the size and capabilities of their workforce. FEMA headquarters will need to carefully assess progress and performance of the regions. Based upon this continued monitoring, headquarters should determine whether the regions need additional resources to support their increased responsibilities.

As robust regions become a reality, the Panel recognizes the importance of a strong and active headquarters function. FEMA headquarters has the lead responsibility for relating to Congress and national-level stakeholders, assuring agency-wide mission-support functions such as managing agency-wide budgets and accountability metrics, developing strategic plans, and conducting evaluation and assessments including policy changes based upon lessons learned. In addition, requirements within PKEMRA direct FEMA headquarters to develop more robust national and regional disaster response teams and capabilities to provide the critical support needed to help state, local, and tribal governments respond to disasters.

## **RECOMMENDATION 4**

The Panel found that the development of robust regions, as mandated by PKEMRA, is essential to FEMA’s ability to achieve its mission. In the Panel’s view, fully robust regional offices would have the following key attributes:

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<sup>21</sup> These grant programs are the Driver’s License Security Grant Program, Emergency Management Performance Grant, Emergency Operations Center Grant Program, and Regional Catastrophic Preparedness Grant Program.

- Sufficient capacity to support stakeholders at the state, local, and tribal levels;
- An optimally sized workforce with the requisite skills to implement headquarters policies and guidance;
- Strong working relationships with headquarters components;
- Strong working relationships with stakeholders at the state, local, and tribal levels;

Headquarters should encourage regions to be incubators of innovation in approaches to stakeholder engagement and regional management. Regions should also be viewed as a place where current and future agency leaders are nurtured.

**The Panel recommends that FEMA continue to build regional capacity and monitor implementation actions consistent with the Administrator’s recent policy guidance.**

To implement this recommendation, FEMA should establish an Implementation Team for robust regional offices to:

- Determine if transfer of additional authorities to the regional offices is warranted;
- Develop and recommend a framework for evaluating how successful the agency is in building robust regional offices; and
- Recommend outcome metrics to assess regional office performance.

**RECOMMENDATION 5**

Strengthening and improving the headquarters-regional office relationship is central to achieving FEMA’s mission. Based upon site visits and interviews, as well headquarters observations, the Panel found that the existing relationship between headquarters and the regional offices is not as effective as it needs to be to achieve the nation’s preparedness goals. Although positive steps have recently been taken in delegating certain requested authorities to the regions, additional engagement between headquarters and the regions is required. This engagement should be developed with the goal of building an effective partnership between the regions and headquarters that is based upon mutual cooperation, ongoing involvement and communications and supportive leadership at all levels.

The dynamics between a central “hub” and “spokes” are complex and, whether in government or the private sector, are typically challenging. Thoughtful attention must be paid to ensuring these relationships function optimally, and their effectiveness should be regularly monitored. Based upon recent research conducted on the U.S. Environmental Protection Agency,<sup>22</sup> the Panel offers

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<sup>22</sup> Working Relationships in the National Superfund Program: The State Administrators’...  
Cline *J Public Adm Res Theory*.2008; 0: mun023v1-mun023.

a number of attributes and elements in the table below that may help guide FEMA as it works to build more effective headquarters and regional office relationships.

**Table 4**  
**Suggested Attributes and Elements to Improve Headquarters-Regional Office Relations**

Attribute	Elements
<i>Cooperation</i>	<ul style="list-style-type: none"> <li>• Accountability</li> <li>• Behavior exhibits respect as a partner</li> <li>• Ongoing information sharing</li> <li>• Reasonable requests/ deadlines</li> <li>• Mutual understanding of role</li> <li>• Valuing good ideas</li> <li>• Mutual commitment to mission</li> </ul>
<i>Ongoing Involvement &amp; Communication</i>	<ul style="list-style-type: none"> <li>• Ongoing two-way communication</li> <li>• Regular two-way feedback</li> <li>• Dialogue valued and desired</li> <li>• Value skills/expertise across all FEMA levels</li> <li>• Respect expertise/experience</li> </ul>
<i>Supportive Leadership</i>	<ul style="list-style-type: none"> <li>• Demonstrated commitment to the partnership</li> <li>• Recognition of the roles of headquarters and the regional offices</li> </ul>

These attributes are equally applicable to building and maintaining strong relationships between FEMA and its stakeholders, particularly as FEMA moves forward in creating an effective system of national preparedness.

**The Panel recommends that FEMA’s senior leadership undertake steps to improve the ongoing working relationship between headquarters and the regions in accord with the attributes and elements identified above.**

To implement this recommendation, FEMA should:

- Build agency-wide understanding and appreciation of the roles and functions of both headquarters and the regions by:
  - Establishing a rotational program of temporary details between HQ and the regional offices, as well as among the regional offices, themselves; and
  - For SES and GS-15 positions, give preference to candidates who have experience at both the regional and headquarters levels.

- Incorporate regional expertise in task forces and working groups to include the perspective of the implementing entity and ensure consideration of practical and feasible policy alternatives.
- Develop appropriate mission, organization, and staffing for the Office of Regional Operations to ensure it is able to effectively carry out the following duties:
  - Serve as an advocate for the development of robust regional offices;
  - Consider the regional implications of headquarters policy discussions; and
  - Work collaboratively across FEMA to solve problems facing the regions.
- Provide regions with timely feedback on the status of submitted materials and requests.
- Recognize and build upon regional topical expertise, such as wildfire management, hurricane preparedness, response and recovery, earthquakes and floods.
  - Provide temporary details for headquarters and regional staff to select regions to expand agency-wide expertise.

### **Challenge III. Limited Partnerships with Stakeholders**

While reviewing FEMA’s actions to integrate preparedness and build robust regional offices, the Panel identified stakeholder engagement as a critical cross-cutting issue. FEMA has taken steps and made progress in increasing stakeholder engagement. Stakeholders include state, local and tribal government offices and officials, first responders, other members of the emergency management community, businesses and non-governmental organizations and citizens.<sup>23</sup> Each stakeholder group has a critical role within the national preparedness system, as well as an investment and interest in the successful performance of the system.

This section describes in more detail the following key steps that FEMA has taken to engage stakeholders:

- Established the National Advisory Council, developed its mission statement and now holds regularly scheduled meetings;
- Established Regional Advisory Councils;
- Engaged national stakeholders during development of the National Response Framework and the National Preparedness Guidelines;
- Increased stakeholder engagement by regional offices, particularly with state governments and private business;
- Included a broader range of stakeholders in national and regional exercises;
- Expanded preparedness activities to reach stakeholders through:
  - Technical assistance;

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<sup>23</sup> In this document, when reporting on survey and interview results, the term stakeholder reflects the view of the respondents themselves with regard to who and what groups are stakeholders. The terms “stakeholders” and “stakeholder groups” are sometimes used by FEMA to denote “partners” or “target audiences” for FEMA programs. The Panel concurs with comments on the agency review draft that the term stakeholder should be more clearly and consistently defined and used by FEMA.



- State level gap analyses;
  - Expanded communication and information-sharing;
  - Joint exercises, including the provision of “table-top” continuity templates and exercises;
  - Training; and
  - Major preparedness grants.
- Reached more citizens through the Citizen’s Corps and Ready.gov programs.

While FEMA has made progress in stakeholder engagement, the Panel believes that further improvements can be made and notes the following challenges in this area:

- Variability in Regional Advisory Councils;
- Limited increase in regional engagement with local, tribal, and non-governmental stakeholders;
- Public misunderstanding of FEMA’s role;
- Public reluctance to assume responsibility for their own preparedness; and
- Limited stakeholder capacity in some instances.

This section concludes with findings and recommendations for how FEMA can address these challenges and develop stronger partnerships with the array of stakeholders that are necessary to build and maintain a resilient national preparedness system.

### **FEMA’s Actions to Engage Stakeholders and the General Public**

Pursuant to PKEMRA, FEMA has established a National Advisory Council (NAC) and ten Regional Advisory Councils (RAC). PKEMRA mandated that the NAC advise the Administrator “on all aspects of emergency management” and required FEMA to “incorporate state, local, and tribal government and private sector input in development and revision of national preparedness goals, the national preparedness system, the National Incident Management System, the National Response Plan, and other related plans and strategies.” PKEMRA also directed that each RAC advise the Regional Administrators on “emergency management issues specific to that region.” FEMA headquarters developed mission statements for the NAC and the RACs that are consistent with the statutory requirements, and has selected members to serve on these councils.

In June 2008 testimony to Congress, GAO’s Director for Homeland Security and Justice said that DHS and FEMA need to improve their integration of stakeholders in the revision of key policy documents such as the National Response Framework. When developing the Framework, DHS “did not provide the first full revision draft to non-federal stakeholders for their comments and suggestions before conducting a closed, internal federal review of the draft.” GAO recommended that the FEMA Administrator “develop and disseminate policies and procedures describing the conditions and time frames under which the next NRF revision will occur and how FEMA will conduct the next NRF revision.” These policies should describe how the

agency will “integrate all stakeholders ... into the revision process and the methods for communicating to these stakeholders.” FEMA agreed with GAO’s recommendation.<sup>24</sup>

In addition to engaging with organized stakeholder groups, FEMA reaches out to the general public for involvement in both preparedness and response activities through several initiatives including Ready.gov and the Citizen Corps. Ready.gov serves to inform the public on how to be prepared to respond to disaster. Individuals are urged to be ready for disasters by creating a plan based on the needs of their own household and local communities. FEMA uses its grassroots organization, Citizen Corps, to emphasize the importance of readiness at the individual level and to volunteer in emergency relief efforts and community safety, and to “bring together government and community leaders to involve citizens in all-hazards emergency preparedness and resilience.”

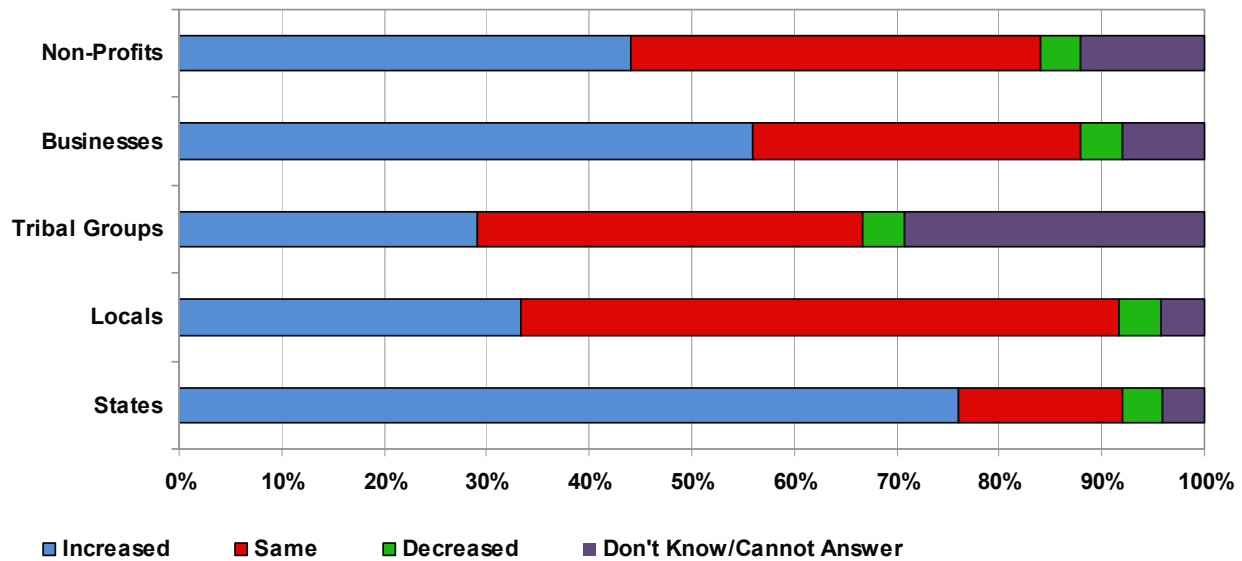
As part of its general engagement with citizens, FEMA has been taking steps to incorporate social media into its operations. For example, it was the first federal agency to negotiate an agreement with the video-sharing website YouTube. In January 2009, FEMA’s Administrator held a press conference on Twitter. FEMA also creates podcasts for use on computers, iPods, and phones. FEMA recognizes that collaborating with citizens can help “manage expectations” of what FEMA can do in an emergency and encourage Americans to be more prepared in the event of a disaster.

As shown in Figure 17, many regional office survey respondents reported an increase in their interactions with stakeholders. Most respondents reported an increase in interaction with states (76 percent) and businesses (56 percent). While over 30 percent of respondents said interaction with local governments had increased, most said that their interaction had remained the same. 44 percent of respondents reported that their interaction with non-profit organizations had increased, while 40 percent said it had stayed the same. With respect to interaction with tribal governments, the most common response (38 percent) was that it had remained the same, while 29 percent of respondents reported increased interaction and 27 percent reported that they did not know or could not answer.

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<sup>24</sup> Government Accountability Office, *Emergency Management: Observations on DHS’s Preparedness for Catastrophic Disasters* (GAO-08-868T), pp. 8 – 9.

**Figure 17**  
**Reported Level of Regional Interaction with Stakeholders**  
**Regional Office Survey<sup>25</sup>**

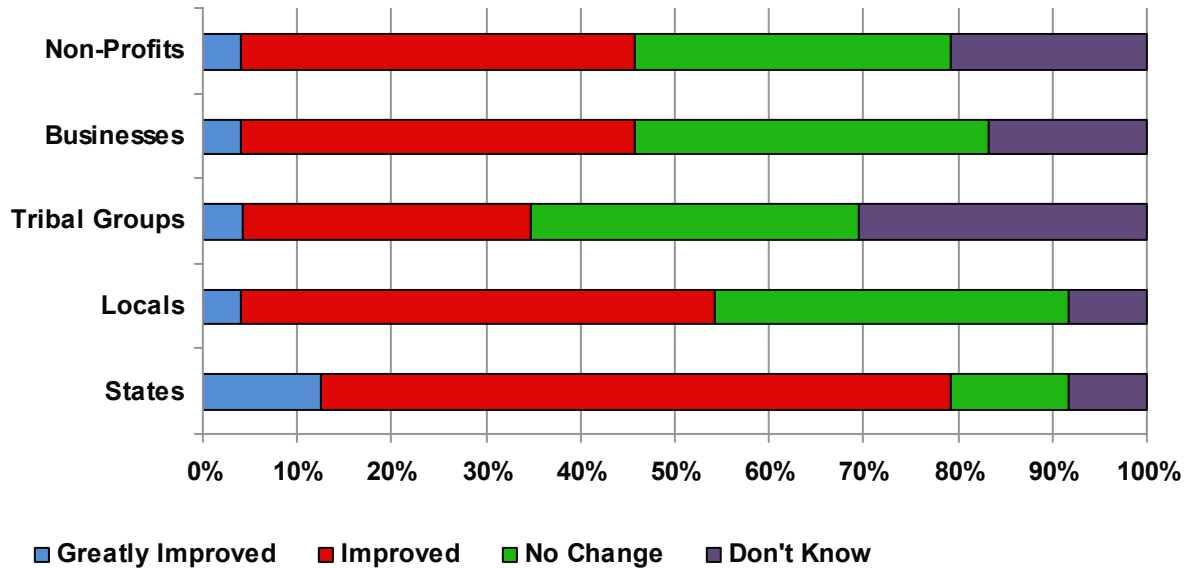


Source: National Academy’s FEMA Regional Office Survey (April 2009)

Survey participants were also asked how the level of interaction with stakeholders has affected the preparedness of those stakeholder groups, including state, local, tribal, businesses and non-profit and non-governmental organizations. Figure 18 shows that nearly 8 in 10 respondents (79 percent) reported that states’ preparedness had either improved or greatly improved. A majority of respondents (54 percent) reported that local preparedness had either improved or greatly improved; 46 percent reported that businesses’ preparedness had either improved or greatly improved; 46 percent reported that non-profits’ preparedness had either improved or greatly improved. Nearly a third (30 percent) said that they were unsure of the impact on preparedness on tribal organizations.

<sup>25</sup> States (N = 25); locals (N = 24); tribes (N = 24); businesses (N = 25); non-profits (N = 25).

**Figure 18**  
**Reported Impact of Interaction with Stakeholders on Preparedness<sup>26</sup>**



Source: National Academy's FEMA Regional Office Survey (April 2009)

### Stakeholder Input

As part of its research, the National Academy hosted an online dialogue in July 2009 for state-level stakeholders to gain their perspective on three key issues:

- How can preparedness be improved?
- How can partnerships between states and FEMA regional offices be improved?
- How can stakeholders be more effectively engaged in preparedness?

Participants were able to post ideas and review the responses of other participants, provide comments on the responses of others, and indicate their level of agreement or disagreement with these ideas. Through this process, state-level stakeholders identified the following key ideas:

- **Empower FEMA Regions to work more effectively with states and others.** FEMA should identify regional successes to promulgate best practices engaging states and others; decentralize all FEMA/DHS grant authorities to FEMA regions; and devolve appropriate decision-making authority to regions to negotiate with State and other partners and to resolve issues in a timely manner.

<sup>26</sup> States (N = 24); Locals (N = 24); Tribal (N = 23); Businesses (N = 24); Non-profits (N = 24)

- **Improve public awareness.** Government at all levels should target individuals, families, and businesses; an emphasis should be placed on individual responsibility as “the cornerstone of the emergency management preparedness, response and recovery process”; stakeholder outreach efforts such as Citizen Corps and Ready.gov should be organized more effectively to coordinate messages and media use; and a “culture of preparedness” should be established throughout the nation.
- **Allow federal agencies with Emergency Support Function (ESF) responsibility to budget for preparedness activities.** The National Security Special Events (NSSE) are not a budget line-item, which means that departments must absorb these costs in their regular budget. This is a disincentive to invest in preparedness efforts. In addition, it was noted that, unless the Stafford Act is invoked, FEMA does not pay for the ESFs costs incurred by other agencies or organizations.
- **Articulate a clearer vision for the nation on preparedness integration that describes how all the pieces work together.** Plans should include real world descriptions of the roles of various federal agencies; establish how states and federal agencies will work together before disasters strike and why preparedness integration is important; and describe what the public can expect from effective preparedness integration.
- **Remove barriers that continue to exist between FEMA organizations and programs that impede preparedness integration.** Participants said that silos exist at all levels of government and have resulted in a lack of cooperation and collaboration among agencies. Overlapping and duplicative efforts have wasted preparedness funds.
- **Engage stakeholders in the early stages of policy and program development.** Existing FEMA engaged efforts to date must be assessed and revised when needed. Additional effort and new methods should be developed to listen to, acknowledge, and act upon stakeholder comments and concerns.

## Panel Findings and Recommendations

The Panel found that active engagement with stakeholder groups and the general public is critical to preparedness and can help FEMA improve agency operations, policies, and programs.

### RECOMMENDATION 6

Based upon the results of the regional office survey and the stakeholder dialogue, the Panel found that FEMA needs to expand and improve its engagement of stakeholders. In order to make stakeholders true partners in the national preparedness mission, FEMA should:

- Establish clear processes for stakeholder engagement at all levels.
- Provide assistance to regional offices in developing their stakeholder engagement.

- Promote free and effective exchanges on the emergency management issues under discussion.
- Provide stakeholders with the opportunity to give input on proposed emergency management policies, plans, and programs, as well as on headquarters and regional office services.
- Provide timely feedback to stakeholders about how their input has been used.

**The Panel recommends that FEMA take steps to improve stakeholder engagement and relationships at all levels, in accordance with these principles.**

To implement this recommendation, FEMA should:

- Review existing stakeholder engagement practices in light recent administration guidance to promote “transparency, public participation, and collaboration” in government and to “strengthen our democracy and promote efficiency and effectiveness.”
- Review and assess the status of existing relationships with stakeholders to:
  - Define key values and principles that should guide engagement and relationships;
  - Include stakeholders in development processes; and
  - Use all available tools, including collaborative technologies, for stakeholder engagement.
- Review and assess efforts targeting members of the public to:
  - Expand strategies to build public awareness;
  - Integrate messaging across all programmatic areas.
- Develop stakeholder working groups in each region to help improve FEMA’s activities, policies, and programs.
- Engage the general public in personal preparedness by utilizing known effective behavior change strategies already in use by other federal agencies.
- Collaborate with other federal agencies, such as CDC, that have developed effective practices in citizen engagement on preparedness issues.

#### **Challenge IV. Ineffective Internal Business Practices**

While focusing on preparedness integration and robust regional offices, the Panel encountered outmoded internal business practices consistent with the findings of previous studies by GAO and DHS/OIG. These inadequate business practices undercut mission-support functions and jeopardize FEMA’s ability to develop and maintain a national preparedness system. Among the problems identified during the course of this study were:

- FEMA’s Five-Year Strategic Human Capital Plan does not meet PKEMRA specifications and was submitted a year late;

- FEMA does not track the number of on-site contractors supporting permanent full-time employees;
- FEMA’s Human Capital Plan does not describe a strategy for building a diverse high-quality workforce;<sup>27</sup>
- The reported length of time in recruiting, securing clearance and hiring new employees is unacceptable;
- An “over-hire” situation in FY 2009 required a several-month hiring “slowdown”; and
- A “command and control” orientation at FEMA headquarters that impedes efficient and effective operations.

This section discusses the steps FEMA has taken to address these issues, outlines the remaining challenges, and concludes with the Panel’s findings and recommendations.

### **FEMA’s Actions to Improve Internal Business Processes and Develop a Strategic Human Capital Plan**

A number of GAO and DHS IG reviews of FEMA business practices have been conducted since PKEMRA was enacted in 2006. Table 5 summarizes the relevant findings of several GAO studies, which highlight the importance of sound internal business practices to the successful accomplishment of the FEMA mission.

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<sup>27</sup> FEMA’s plan includes a table to demonstrate diversity by race and national origin, but does not break this information down by gender. Nearly 71 percent of the FEMA PFT workforce is Caucasian. Noting that the representation of African Americans and Native Americans in the PFT workforce “is above the average of the rest of government and the CLF,” the plan also acknowledges that these groups are under-represented in leadership positions.<sup>27</sup> Hispanics and Asian/Pacific Islanders are under-represented in the agency as a whole and in leadership positions. The plan includes a table showing that FEMA’s workforce is older than the federal government’s as a whole. By February 2010, over 20 percent of the agency’s PFT workforce will be eligible to retire. Over the next five years, an increasing number of FEMA’s employees not only will become eligible to retire, but will actually do so.

**Table 5**  
**Summary of Key Internal Business Process Findings from Recent GAO Reports<sup>28</sup>**

GAO Report Topic	Summary of FEMA Actions and Issues
<i>National Preparedness (April 2009)</i>	<ul style="list-style-type: none"> <li>FEMA has developed program guidance and systems to track corrective actions that federal/state governments need to take to implement the National Exercise Program; it has also established reporting guidance for state preparedness programs.</li> <li>FEMA needs to establish a program management plan, ensure exercises follow program guidance, include an assessment of capabilities within its project management plan, and integrate system elements.</li> </ul>
<i>Emergency Management (March 2009)</i>	<ul style="list-style-type: none"> <li>Due to weak internal controls, FEMA made improper and potentially fraudulent payments to Hurricane Katrina disaster assistance applicants who used invalid information.</li> <li>Pursuant to PKEMRA, FEMA developed an electronic database to counter improper payments.</li> <li>FEMA needs to improve its leadership, capabilities, and accountability controls for disaster management. Additional steps must be taken to ensure that applicant information is integrated with disbursement and payment records.</li> </ul>
<i>Disaster Recovery-Gulf Coast (December 2008)</i>	<ul style="list-style-type: none"> <li>FEMA is working to improve the timeliness of the public assistance process and hired more long-term staff to function as a single point of contact for Hurricane Gustav and Ike.</li> <li>FEMA needs to improve information sharing within the public assistance process and enhance continuity/communication regarding staff rotation on public assistance projects.</li> <li>FEMA needs to develop a more accurate system to count the number of ongoing projects and estimate project costs.</li> </ul>
<i>Actions to Implement the Post-Katrina Act (November 2008)</i>	<ul style="list-style-type: none"> <li>FEMA is working to transform business processes and identify IT development opportunities to achieve a more seamless information sharing environment among its three distinct personnel and asset tracking systems.</li> <li>FEMA is increasing National Emergency Management Information System (NEMIS) to process concurrent requests and intends to complete alignment of IT systems with mission needs in FY 2010.</li> <li>FEMA's actions in this area are a work-in-progress.</li> </ul>
<i>Budget Issues (January 2007)</i>	<ul style="list-style-type: none"> <li>FEMA has multiple and disparate systems managed by different offices to gather information about staffing levels—resulting in inadequate data on resource allocation among programs, projects, and activities, as well as inadequate data on staffing levels and appropriations allocated for grant programs.</li> <li>FEMA needs to collect data that enables managers to monitor progress and support resource priorities, as well as develop business continuity plans.</li> </ul>

The DHS Office of the Inspector General completed a review in March 2008 that assessed FEMA's preparedness for the next catastrophic disaster.<sup>29</sup> This review covered the following issues:

<sup>28</sup> Each of these reports is cited in the Appendix C ("Resource and Reference Materials").

<sup>29</sup> Department of Homeland Security Office of the Inspector General, OIG-08-34, *FEMA's Preparedness for the Next Catastrophic Disaster*. Washington, D.C.: 2008.



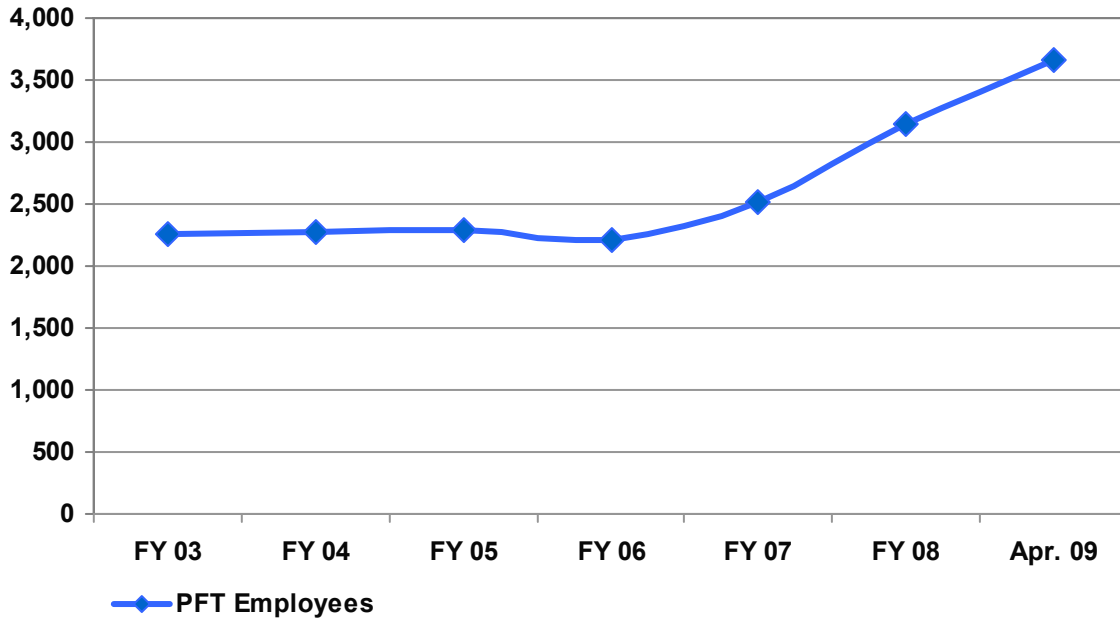
- Overall Planning;
- Coordination and Support;
- Interoperable Communications;
- Logistics;
- Evacuations;
- Housing;
- Disaster Workforce;
- Mission Assignments; and
- Acquisition Management.

Two of the IG's three March 2008 recommendations dealt with the need to improve FEMA's internal management practices. The IG recommended that FEMA develop and sustain a system for tracking the progress of programs, initiatives, and enhancements using project management tools such as Quad charts or Gantt charts. This could be used to share information with both internal and external stakeholders, as well as provide decision makers with necessary information to meet their management responsibilities. The IG also recommended that FEMA provide regular updates regarding progress on all major preparedness initiatives and projects.

Although the Panel was not tasked with conducting an examination of FEMA's information systems, it became clear that the agency faces some information systems challenges. There appear to be opportunities for automation of agency operations. For example, regional personnel are unable to track the status of grants and disaster declarations through an automated system. In addition, regional grant officials reported that they do not have electronic access to all of the records on existing grants that are needed to fulfill their post-award auditing function.

While reviewing FEMA's actions to integrate preparedness and build robust regional offices, the Panel became especially concerned about FEMA's human capital planning. As the agency worked to meet the requirements of PKEMRA over the last several years, it has significantly increased the size of the permanent full-time (PFT) FEMA workforce. After hovering at the 2,200 level between 2003 and 2006, the number of PFT staff increased by 14 percent in FY 2007, 25 percent in FY 2008, and 17 percent in the first seven months of FY 2009. As shown in Figure 19, FEMA's permanent full-time workforce increased by 66 percent between from October 2003 to April 2009.

**Figure 19**  
**Growth in FEMA’s Permanent Full-Time Workforce**  
**FY 2003 – April 2009**



Source: FEMA, Workforce Data, FY 2003 - April 2009

This workforce growth occurred without the benefit of a comprehensive human capital plan and during a period of significant change in leadership and direction for the agency.

Compounding these significant challenges, FEMA’s workforce is highly differentiated. Compared to many other federal agencies, FEMA uses a large number of workforce categories. Table 6 lists the multiple workforce categories used by FEMA.<sup>30</sup>

<sup>30</sup> The FY07 appropriation included authority to convert up to 250 designated Stafford Act (i.e. 4-Year CORE) positions, which are funded out of the Disaster Relief Fund (DRF), to permanent full-time (PFT) positions that would be funded out of the agency’s Administrative and Regional Operations account. The goal over the next three years is to convert all 799 4-Year CORE positions to PFT positions.

**Table 6  
FEMA Workforce Categories**

<b>Category</b>	<b>Description</b>
<i>PAS</i>	Presidential appointments made with the advice and consent of the Senate to positions in which the incumbent serves at the pleasure of the President.
<i>SES Non-Career</i>	White House Office of Presidential Personnel must approve appointment; appointed without regard to competitive requirements; serve at the pleasure of the agency head; have no appeal rights; are not eligible for SES performance awards (may receive other agency awards).
<i>Schedule C</i>	Appointments to positions in which the incumbent serves at the pleasure of the agency head; these positions are excepted from the competitive service by law, by Executive order, or by the Office of Personnel Management (OPM) based on their responsibility for determining or advocating agency policy or their confidential character.
<i>SES Career</i>	Established by the Civil Service Reform Act of 1978; fill managerial, supervisory, and policy positions above grade 15 of the General Schedule; major link between Presidential appointees and the rest of the federal workforce.
<i>GS Permanent Full-Time Employees</i>	Appointed under Title 5; protected by civil service rules; work full-time.
<i>GS Permanent Part-Time Employees</i>	Appointed under Title 5; part-time employee working between 16 and 32 hours a week (or 32 to 64 hours during a biweekly pay period in the case of a flexible or compressed work schedule); protected by civil service rules.
<i>Temporary Full-Time</i>	Employee working full-time on a temporary appointment lasting no more than one year the agency anticipates no permanent need for the employee.
<i>Temporary Part-Time</i>	Employee working full-time on a temporary appointment lasting no more than one year the agency anticipates no permanent need for the employee.
<i>TIE</i>	Temporary Intermittent Employee.
<i>STEP</i>	Student Temporary Employment Program. These are employees who are students that generally serve on temporary appointments limited to 1 year or less, working part-time during the school year and full-time during summers and vacations.
<i>DAE (Currently "Reservists")</i>	Disaster Assistance Employees only used to perform DAE-related work on specific disasters, emergencies, projects, and activities of a non-continuous nature; DAE-Ls are local hires for 120 days, paid at prevailing local rates, that may be renewed for an additional 120 days; DAE-Rs are on FEMA personnel roles for 24 months, activated when need arises, and may not work more than 18 months in a 24 month period.
<i>DTE</i>	Disaster Temporary Employees; FEMA no longer uses this category.
<i>CORE</i>	Cadre of On-Call Response and Recovery Employees funded under the Stafford Act; two-year COREs serve for twenty-four months and are eligible for renewal; four-year COREs serve for forty-eight months and are eligible for renewal; FEMA has been converting the four-year COREs into PFT positions.

Table 7 shows the number of FEMA employees by category from FY 2003 to April 2009. Individuals in the DAE/DTE (“Reservists”) and CORE categories have constituted over 70 percent of the workforce each year. As of April 2009, the Reservists and CORE employees constituted over 77 percent of the total workforce.

**Table 7**  
**FEMA Total Workforce by Category**  
**FY 2003 – April 2009**

Category	FY 03	FY 04	FY 05	FY 06	FY 07	FY 08	April 09
<i>Political</i>	31	29	22	20	23	30	15
<i>PFT</i>	2,264	2,274	2,290	2,204	2,517	3,142	3,662
<i>PPT</i>	10	8	9	5	7	8	7
<i>TFT</i>	172	138	197	438	215	0	286
<i>TPT</i>	0	0	0	0	0	210	0
<i>TIE</i>	5	2	2	2	0	0	0
<i>STEP</i>	16	18	9	40	46	2	6
<i>DAE</i>	3,498	6,156	6,527	10,258	8,606	8,092	8,891
<i>DTE</i>	1,918	2,373	3,669	344	3	0	0
<i>CORE</i>	732	725	704	4,802	5,441	4,807	4,069
<i>Other</i>	12	9	0	2	0	2	2

Source: FEMA, Workforce Data, FY 2003 – April 2009

Reservists and CORE employees are generally unavailable for preparedness or other ongoing activities because the Stafford Act restricts their work to specific designated and declared disasters. As shown in Table 8, the vast majority of the headquarters National Preparedness Directorate workforce are permanent full-time staff. Compared to the FEMA workforce as a whole, Reservist and CORE employees constitute a much smaller proportion (currently 7 percent) of the preparedness workforce. Reservist and CORE employees have constituted between 0 percent (FY 2003) and 23.6 percent (FY 2007) of the national preparedness workforce.

**Table 8**  
**FEMA NPD Preparedness Workforce by Category**  
**FY 2003 – April 2009**

Category	FY 03	FY 04	FY 05	FY 06	FY 07	FY 08	April 09
<i>Political</i>	1	2	2	0	0	2	0
<i>PFT</i>	59	215	203	77	95	228	260
<i>PPT</i>	0	0	0	0	1	1	1
<i>TFT</i>	8	14	11	3	0	0	10
<i>TPT</i>	0	0	0	0	0	10	0
<i>TIE</i>	0	2	1	0	0	0	0
<i>STEP</i>	0	9	5	3	1	0	0

Category	FY 03	FY 04	FY 05	FY 06	FY 07	FY 08	April 09
<i>DAE</i>	0	5	10	11	13	15	14
<i>DTE</i>	0	0	0	0	0	0	0
<i>CORE</i>	0	6	5	12	17	15	7
<i>Other</i>	0	0	0	0	0	0	0
<b>Total</b>	<b>68</b>	<b>253</b>	<b>237</b>	<b>106</b>	<b>127</b>	<b>271</b>	<b>292</b>

Source: FEMA, Workforce Data, FY 2003 – April 2009

With PKEMRA implementation underway, FEMA should consider whether the existing allocation across these categories is sufficient to meet its objectives for the present and its vision for the future. Despite the complexity of the workforce and the other human capital challenges discussed in this report, FEMA has not made sufficient progress in developing a strategic human capital plan that meets the requirements of PKEMRA. These requirements include:

- A workforce gap analysis that addresses the following areas:
  - Critical skills and competencies that will be needed in the workforce for 10 years after enactment of the law;
  - Skills and competencies of the FEMA workforce on the day before the date of enactment of PKEMRA and projected trends in that workforce based on expected losses due to retirement and other attrition; and
  - Staffing levels for each category of employee, including gaps that must be addressed to ensure that FEMA’s workforce continues to possess the critical skills and competencies needed.
- A plan of action to address the gaps in critical skills and competencies identified by the workforce gap analysis, including:
  - Specific goals and objectives for recruiting and retaining employees, including the use of recruitment and retention bonuses;
  - Specific strategies and program objectives to develop, train, deploy, compensate, motivate, and retain employees;
  - Specific strategies to recruit staff with experience serving in multiple state agencies responsible for emergency management; and

### Key Principles of Workforce Planning

- ✓ **Set strategic direction.** Involve top management, employees, and other stakeholders.
- ✓ **Workforce gap analysis.** Determine the critical skills and competencies needed to achieve current and future programmatic results.
- ✓ **Workforce strategies to fill the gaps.** Develop tailored strategies to address gaps in number, deployment, and alignment of human capital approaches.
- ✓ **Build capability to support workforce strategies.** Build the capability needed to address administrative, educational, and other requirements important to support workforce planning strategies.
- ✓ **Evaluate and revise strategies.** Monitor and evaluate the agency’s progress toward its human capital goals and the contribution that human capital results have made toward achieving programmatic results.

- Specific strategies to develop, train, and rapidly deploy a Surge Capacity Force.

Like other outside reviewers, the Panel and study team have found it difficult to obtain complete and accurate human capital data from FEMA. The Panel believes this is due to the challenges associated with the frequent shifting of organizational resources over the past six years; the lack of a single system to track and account for the workforce; the complexities associated with tracking multiple workforce categories; and challenges with FEMA’s human resource management systems.

These shortcomings had significant consequences in the spring of 2009, as FEMA had to establish an informal hiring freeze because it had “over-hired.” The Senate Appropriations Committee Report expressed disappointment that “a lack of internal controls has led to significant discrepancies in data sets for staff on-board and the funding level needed to support those staff.”<sup>31</sup>

### **Panel Findings and Recommendation**

The Panel has observed that FEMA faces challenges in handling routine business process and management tasks. In particular, the Panel found that FEMA’s human capital planning, processes, and systems should be significantly improved, and FEMA should invest in data systems that will support human capital planning and management.

## RECOMMENDATION 7

**The Panel recommends that FEMA strengthen its internal business practices, especially in the area of human capital planning.**

To implement this recommendation, FEMA should:

- Develop a valid five-year Strategic Human Capital Plan, consistent with the key principles of workforce planning described above, that includes the following elements:
  - Workforce gap analysis;
  - Strategies to fill identified gaps;
  - Strategies to recruit and retain the knowledge, skills, and abilities required to meet the agency’s preparedness integration mission;
  - Strategies to ensure that the regions have a workforce with the necessary knowledge, skills, and abilities;
  - Strategies to build a diverse, high-quality workforce;

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<sup>31</sup> Senate Appropriations Committee, Department of Homeland Security Appropriations Bill Report (June 18, 2009), p. 99.

- Strategies to maintain critical institutional knowledge in the wake of the looming retirement of a considerable portion of the workforce over the next five years;
  - Mechanisms, such as training programs, to build capacity to support workforce strategies;
  - Mechanisms to determine an appropriate allocation of personnel resources between headquarters and the regions; and
  - Mechanisms to monitor and evaluate progress.<sup>32</sup>
- Develop a strategy to address and improve other internal business practices, including a timetable and performance expectations.
  - Assess existing information systems—especially in the human capital area—to ensure that accurate, reliable, and timely data are available to drive management planning and decision-making.

## CONCLUSION

As noted in the introduction to this report, emergency management in the 21<sup>st</sup> Century is a daunting task. The threats this nation faces are more numerous and more extreme than at any time in our history. As the FEMA Administrator has recently articulated, the stakes could not be higher:

An incident of catastrophic proportions has the potential to imperil thousands of people, devastate hundreds of communities, and produce far-reaching economic and social effects. The scope of needs will be large, immediate, novel and profound, and the entire national emergency management, public health, security, law enforcement, critical infrastructure, medical and all other components that

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<sup>32</sup> In comments on the agency review draft, FEMA noted that recent actions should “address the issues raised.” Responding to Congressional direction in the FY 2009 Homeland Security Appropriations Act, FEMA began working with the Homeland Security Institute in September 2009 to develop a comprehensive workforce plan by late FY 2011. According to FEMA, “The assessment will provide an overview of workforce demographics, determine the kinds of work currently performed by FEMA employees, and assess the agency’s operational capabilities. It also will provide a crosswalk between various HR data sources (e.g., National Finance Center Data, Automated Deployment Database, Manpower Database, etc.). The ‘As Is’ Assessment is the first phase of a four phase FEMA-wide strategic workforce planning initiative. Phases II, III, and IV will address the Key Principles of Workforce Planning [identified by the Academy]. Phase II will set the strategic direction, determining the hazards and environmental factors FEMA must be able to address to meet the emergency management needs of the future. Phase III successfully address the hazards/environmental factors defined in Phase II. It will also include a gap analysis between the “As Is” workforce and the workforce of the future. Phase IV will identify the strategies to close the gaps (including recruitment, development, retention and engagement strategies) and begin strategy implementation. It also will define the optimum mix of positions (appointment status, job series, etc.) and organizational structure. And it will lay the groundwork for institutionalizing workforce planning to ensure FEMA monitors and measures progress; assesses results; revises its strategies, as necessary; and maintains a sound understanding of workforce issues.”

make up community must be prepared to respond, and respond in ways that lie outside the normal paradigms in which we traditionally operate.<sup>33</sup>

In this challenging environment, FEMA is working to build a prepared and resilient nation—a task that depends upon the concerted actions of a large, diverse, and diffuse group of partners, stakeholders, and citizens. The national preparedness system is, both literally and figuratively, only as strong as its weakest link—a lesson learned the hard way when two levee breaches in New Orleans left more than 80 percent of the city under water. FEMA must view the system holistically, recognizing its component parts and interdependencies. FEMA cannot and should not try to exert full control over the nation’s emergency management system, but it has a critical leadership role to play in this system by providing *a results-oriented framework* that:

- Provides new opportunities to leverage the resources, capabilities, and energy of the population across the country;
- Relies on headquarters and regional offices as repositories of expertise;
- Builds more transparency into its operations;
- Becomes more open in its relations with external groups; and
- Engages the public as key stakeholders in all phases of preparedness.<sup>34</sup>

Based upon the research conducted for this study, the Panel determined that FEMA has made significant progress in achieving PKEMRA’s mandate for preparedness integration and robust regional offices, but it faces continuing challenges in certain areas. It must build upon progress to date to fully integrate preparedness, to strengthen the capacity of the regional offices, establish working partnerships with stakeholders, and improve internal business practices that support mission-related programs. With new leadership and a charge from the President to be “open,” “participatory,” and “collaborative,”<sup>35</sup> FEMA has the opportunity to develop a shared vision for national preparedness that actively engages and empowers partners, stakeholders, and citizens.

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<sup>33</sup> Written Statement of Craig Fugate, Administrator, Federal Emergency Management Agency, Department of Homeland Security, “*Post-Katrina: What it Takes to Cut the Bureaucracy and Assure a More Rapid Response After a Catastrophic Disaster*”, before the House Committee on Transportation and Infrastructure, Subcommittee of Economic Development, Public Buildings and Emergency Management U.S. House of Representatives Washington, DC, July 27, 2009, p. 4.

<sup>34</sup> Derived from, *The Next Government of the United States: Why Our Institutions Fail Us and How to Fix Them*, Donald F. Kettl, New York: W. W. Norton & Co., 2009.

<sup>35</sup> Presidential Memorandum for the Heads of Executive Departments and Agencies on Transparency and Open Government, January 21, 2009.



## PANEL AND STAFF

### PANEL

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**INDIVIDUALS INTERVIEWED OR CONTACTED<sup>36</sup>**  
(Titles and locations listed are as of the time of the Academy's contact.)

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 W. Russell Webster—Federal Preparedness Coordinator  
 Lynn Wright—Branch Chief, Grant Services Branch

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<sup>36</sup> As part of this study, the Academy conducted a regional office survey and online stakeholder dialogue. These anonymous respondents/participants are not included in this contact list.

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**Region VIII**

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Jeffrey Runge—former Chief Medical Officer, U.S. Department of Homeland Security  
Diane Rothe-Smith—Executive Director, National Voluntary Organizations Active in  
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# IMAGE CREDITS

Photos courtesy of the Federal Emergency Management Agency (left to right)

## **FEMA Safety and Preparedness Expo**

Oakland, CA, June 25 2008—Four-year old golden retriever and current member of the California Urban Search and Rescue Team 4 (USAR) “Sandy” is present at the FEMA Safety Preparedness Expo tent. The expo had themes of safety and preparedness highlighted with search and rescue capabilities, recovery tools, and mitigation procedures to assist in preparing for and responding to disasters. Photo by FEMA/Adam DuBrowa.

## **Mitigation Assistance and Flood Insurance**

Houston, TX, September 23, 2008—At a Disaster Recovery Center, a FEMA Mitigation Specialist talks to a victim of Hurricane Ike about ways to minimize damage to her home and property from future storms. Photo by FEMA/Greg Henshall.

## **Disaster Preparedness in Colorado**

Denver, CO, June 13, 2009—A FEMA staff member helps a child learn about disaster preparedness during an event sponsored by West Metro Fire Rescue in Denver. The family event—now in its 15th year—features a range of safety and preparedness activities, including practice 911 calls, evacuation from an inflated Fire House, and hands-on events and search-and-rescue demonstrations by the Colorado Urban Search and Rescue Task Force 1 (US&R TF-1). Photo by FEMA/Jerry DeFelice.

## **FEMA Facility**

New Orleans, LA, February 13, 2006—FEMA Federal Coordinating Officer Scott Wells and Brigadier General Robert Crear Commander of U.S. Army Corps of Engineers, who is in charge of the construction at Southern University at New Orleans campus, greet each other at the Grand Opening Ribbon cutting of the Facility FEMA is providing for them. FEMA provided the Southern University at New Orleans (SUNO) with 45 Modular Buildings for instructional classrooms, offices, cafeteria, and facilities staffed for student education and FEMA travel trailers to house students and staff. Southern University at New Orleans is the only campus in the United States to be built by FEMA and a state. Photo by FEMA/Marvin Nauman.



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