Department of Homeland Security
Office of Inspector General

**FEMA's Management of
Disaster Assistance Employee
Deployment and Payroll Processes**

Homeland
Security

SEP 1 0 2010

Preface

The Department of Homeland Security (DHS) Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the department.

This report addresses the deployment and payroll processes of the Federal Emergency Management Agency (FEMA) Disaster Assistance Employee Program. It is based on interviews with FEMA officials, direct observations, and a review of applicable documents.

The recommendations herein have been developed to the best knowledge available to our office, and have been discussed in draft with those responsible for implementation. We trust this report will result in more effective, efficient, and economical operations. We express our appreciation to all of those who contributed to the preparation of this report.

Matt Jadacki
Assistant Inspector General
Office of Emergency Management Oversight

Table of Contents/Abbreviations

Abbreviations

ADD	Automated Deployment Database
DAE	Disaster Assistance Employee
DHS	Department of Homeland Security
FEMA	Federal Emergency Management Agency
FFC	FEMA Finance Center
GAO	Government Accountability Office
HQ	Headquarters
IFMIS	Integrated Financial Management Information System
JFO	Joint Field Office
OIG	Office of Inspector General
PKEMRA	*Post-Katrina Emergency Management Reform Act of 2006*

OIG

Department of Homeland Security
Office of Inspector General

Executive Summary

The Federal Emergency Management Agency's disaster assistance employee deployment and payroll processes need improvement. Disaster assistance employees are exempted-service intermittent employees hired to assist in disaster response and recovery and are a critical element in the agency's disaster operations. However, managers do not have adequate information on the deployments of such employees, duplicative time-reporting systems are in place, erroneous disaster cost code time entries can be made, and program benefits policies contain conflicting guidance.

System updates are needed for the agency's automated deployment system to allow managers to supervise disaster assistance employees, and monitor deployment readiness, length of deployment, and employee location.

The time and attendance process needs improvement for efficiency and prevention of errors. The duplicative paper and electronic time-reporting systems need to be reviewed to determine the necessary controls to provide reasonable assurance of accurate time submissions.

System control vulnerabilities need to be eliminated to ensure accountability for disaster costs. The payroll management system does not prevent time entries by disaster assistance employees to incorrect disaster cost codes for specific work assignments.

Disaster assistance employee program guidance needs to be updated to include new program benefits policies to avoid conflicting guidance to managers.

We are making four recommendations to strengthen the disaster assistance employee deployment and payroll processes.

Background

The Federal Emergency Management Agency (FEMA) is authorized under the *Robert T. Stafford Disaster Relief and Emergency Assistance Act*, as amended (Stafford Act), to temporarily expand its staff size to respond to major disasters and emergencies. Disaster assistance employees (DAEs) fulfill this role by performing key program, technical, and administrative functions during disasters. DAEs are excepted-service, intermittent employees, either cadre reservists or local hires. Cadre reservists have an initial appointment of 24 months, which is renewable. Local hires have an initial appointment of 120 days, which is also renewable.

The DAE Program has undergone several changes. *FEMA Instruction 8600.1, Disaster Assistance Employee Program,* was issued in June 1991 as the guiding administrative policy for the program. In 1999, *Director's Policy No. 1-99* (see appendix C) was issued to improve DAE workforce readiness to respond wherever needed, quickly and effectively. *Director's Policy No. 1-99* instituted the use of the Automated Deployment Database (ADD) as a management tool to monitor overall cadre readiness and capabilities. ADD tracks all FEMA deployable employees, including full-time employees, the cadres of on-call reserve employees, and local hire employees. Tracking also includes cadre readiness, initial disaster site location (duty station), and training.

In 2007, FEMA commissioned a disaster reserve workforce study by a national strategic consulting firm,[1] which determined that approximately 7,900 reservists were needed to support normal and high-demand periods based on projected deployment and risk tolerance data. The study noted that the optimal size of the DAE workforce depends, to an extent, on the degree of uncertainty that is acceptable concerning whether the workforce is properly sized to accomplish its mission.

DAE management challenges are not new. The March 1999 *Director's Policy No. 1-99* established the basis for a systematic, formalized approach to ensure readiness of the disaster cadre workforce to respond to disasters quickly and effectively, wherever needed. This directive described actions to achieve the desired readiness and capability. In the subsequent years, a number of these actions have been implemented to various degrees, such as expanding all disaster operations by locally hiring DAEs for

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[1] *FEMA: New Disaster Reserve Workforce Model*, Booz Allen Hamilton, 2007.

positions that do not require FEMA-specific expertise or when limited advance training or minimal on-the-job orientation or training is sufficient.

As of December 2009, the DAE Program consists of 22 cadres with 7,995 registered disaster reservists located in all 10 regions and at headquarters (see figure 1). Reservists are identified as deployable once they submit a statement through ADD that they are willing to deploy in the event of a major disaster.

Figure 1. DAE Cadre Listing[2]

Cadre Name	Managing Organization	FEMA HQ	FEMA Regions
Alternative Dispute Resolution	Office of Chief Counsel	√	
Field Attorney	Office of Chief Counsel	√	
Contracting/Acquisition	Office of Chief Procurement Officer	√	
Equal Rights	Office of Equal Rights	√	
Safety	Office of Safety, Health, and Environment	√	
Security	Office of the Chief Security Officer	√	
Disaster Generalist Group	Office of the Chief Component Human Capital Officer	√	
External Affairs (Community Relations, Congressional Affairs, and Public Affairs)	Office of External Affairs	√	√
Comptroller	Office of Management	√	
Disaster Field Training Operations	National Preparedness Directorate	√	√
Environmental/Historical Preservation	Federal Insurance and Mitigation Administration	√	√
Federal Coordinating Officer	Office of Federal Coordinating Officer Operations	√	√
Financial Management	Office of the Chief Financial Officer	√	√
Human Resources	Office of the Chief Component Human Capital Officer	√	√
Individual Assistance	Recovery Directorate	√	√
Information Technology	Office of Chief Information Technology	√	√
Logistics	Logistics Management Directorate	√	√
Mitigation	Federal Insurance and Mitigation Administration	√	√
Operations	Response Directorate	√	√
Planning	Response Directorate	√	√
Public Assistance	Recovery Directorate	√	√
Long Term Community Recovery (Added Cadre)	Recovery Directorate	√	

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[2] In December 2009, FEMA realigned its DAE Cadre listing reducing the number of cadres from 23 to 22. These changes have been made to this chart.

Results of Review

To provide managers accurate and timely information on the deployments and payroll costs for disaster assistance employees, improvements are needed to the ADD system, the time and attendance process, the disaster cost code management process, and the DAE program guidance and benefit policies. These areas for improvement are discussed in the following sections.

Automated Deployment Database

DAE deployment activities are managed through FEMA's ADD. However, this database does not capture all current information, such as current location if different from initial deployment and current readiness for deployment, needed by regional and Joint Field Office (JFO) staff members. Regional and JFO staff are consequently forced to use compensatory information collection procedures to manage and deploy DAEs.

FEMA's *Director's Policy No. 1-99* directed the use of the ADD to monitor overall cadre readiness and the capabilities of individual DAEs. ADD's usefulness in tracking these items is limited because regional and JFO staff members frequently do not have full ADD access rights to update the system because they have not received the mandatory training. In response to this limitation, regional and JFO disaster cadre managers and staff have developed other information collection and tracking procedures.

DAE cadre managers are responsible for ensuring that critical program areas have experienced and deployable DAEs available when a disaster is declared. Several cadre managers said that they had limited access to ADD and used telephone and email communications to make management decisions concerning DAE availability, certified job title, and experience. Procedures used include calling DAEs for deployment availability before or after an ADD-assigned deployment and collecting copies of training certificates.

The JFOs' Human Resources Sections require DAEs to provide contact information logs upon arrival; however, these contact information logs often do not document a DAE's current location or daily assignment. To compensate, JFO section chiefs, in conjunction with the JFO Human Resources Section, use a "muster list" to track daily DAE location and activities. The muster list procedure requires that DAEs, on a daily basis, report their status, job assignment, and location to their JFO section chiefs.

Conclusion

Incomplete DAE deployment data and limited ADD access for FEMA managers hinders their ability to accurately and efficiently manage and track DAEs prior to and during a disaster.

Recommendation

We recommend that the Associate Administrator, Mission Support:

Recommendation #1: Implement ADD enhancements in the current system or incorporate these specifications in the replacement system to enable cadre managers and program staff to monitor DAE's current readiness, current location, and capabilities and provide additional training opportunities to all appropriate FEMA managers to allow ADD access.

Management Comments and OIG Analysis

FEMA concurred in part with the original recommendation and realizes today's ADD users require more and different system capability than is afforded by the present system. FEMA said plans for replacement of the 1996 ADD legacy system were underway. Even with the acknowledged limitations of the legacy ADD, they said that over 560 users have access to specific functions within ADD appropriate to their respective user group. In addition, the ADD Reports Utility allows managers to run reports on key workforce data elements, including DAE availability, duty location and duty status, and capabilities. FEMA also recognizes the need to offer training for new users and refresher training for more experienced users.

We generally agree with the FEMA response to the recommendation. We modified the original recommendation to include either enhancements to the current system or to incorporate these specifications in the replacement system. Depending on the timeline for the replacement system, it could preclude additional ADD enhancements to the current system. Therefore, we will review the detailed corrective action plan in FEMA's 90 day letter for either legacy system enhancements or new system specifications and implementation timeline to determine the status of this recommendation.

## Disaster Assistance Employee Payroll Processes

Key elements of the DAE payroll management process, including time and attendance reporting, disaster cost code management, and guidance and leave policies are not sufficiently integrated to enable effective oversight and program coordination.

<u>Time and Attendance Process</u>

A deployed DAE currently enters time worked in two separate systems, a paper-based timesheet and an electronic timekeeping system, WebTA.

The paper-based process, illustrated in figure 2, requires that a completed copy of FEMA Form 30-50A, signed by both the DAE and the disaster field supervisor, be submitted to the JFO Human Resources Section for processing each pay period or at the end of a DAE deployment. The Human Resource staff members process the Form 30-50A and send a facsimile copy to the DAE's assigned timekeeper for validation. Program officials said that timekeepers archive the 30-50A forms to maintain documentation that time was approved by the JFO supervisor.

Figure 2. FEMA Paper-Based Process

Source: FEMA Instruction 8600.1
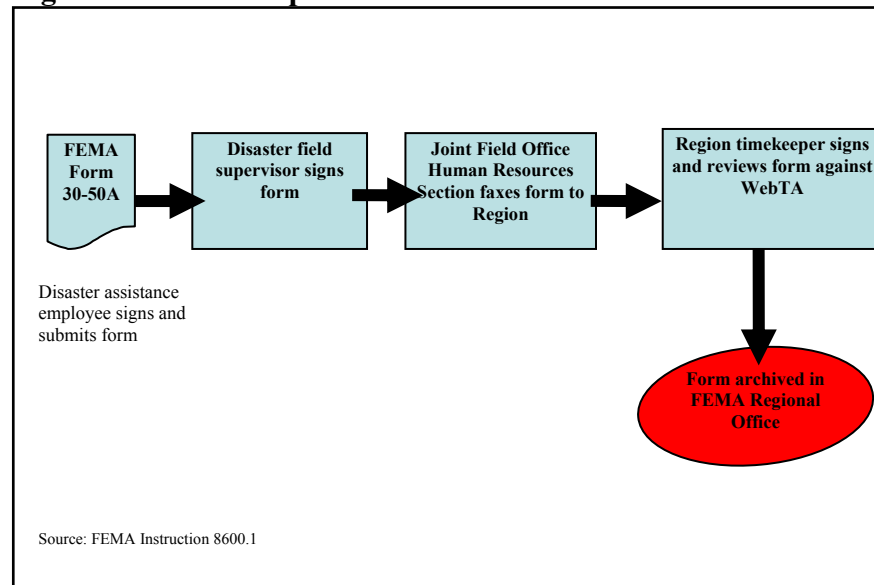
DAEs are also required to submit a validated electronic time and attendance worksheet in WebTA. Once the DAE submits the electronic worksheet, a notice is transmitted to the DAE's assigned timekeeper for validation. Once this is done, the DAE's Regional supervisor receives and certifies the timesheet for processing by

the Office of Mission Support, Management Division. Figure 3 illustrates the WebTA process.

Figure 3. The WebTA (Electronic) process
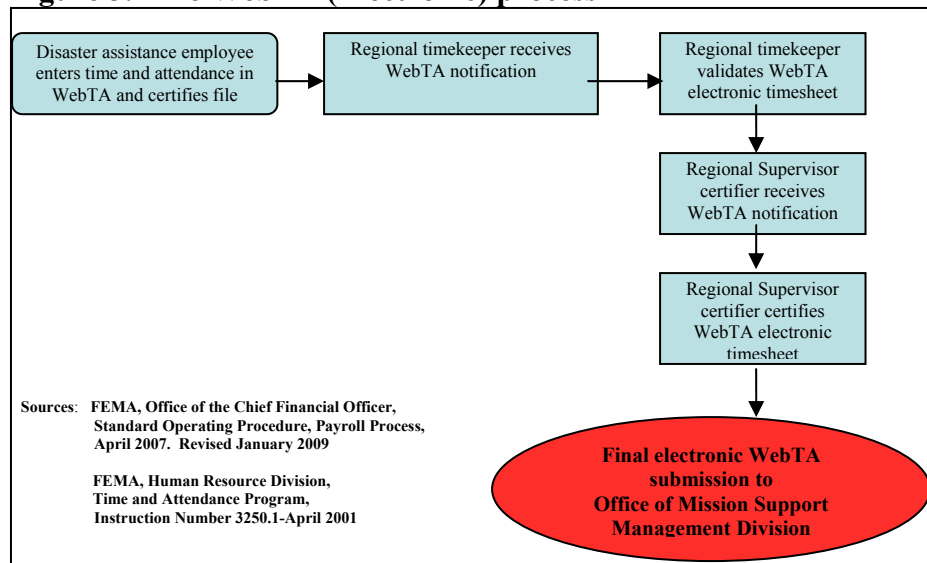
The benefit of the two independent time and attendance tracking systems is unclear. There is no formal guidance regarding how each tracking system should be used to validate the reported data. Several regional timekeepers said that they use Form 30-50A to confirm time entered into WebTA.

Conclusion

DAEs are subject to redundant time-reporting requirements. The WebTA system offers the most efficient and effective time submission approach; however, the WebTA system does not provide the needed verification for FEMA managers to have reasonable assurance that the time submitted by the DAE accurately reflects the time worked. If appropriate WebTA guidance existed requiring the confirmation of electronic time entries, there could be reasonable management assurance that time submitted by the DAE is accurate.

Recommendation

We recommend that the Associate Administrator, Mission Support:

Recommendation #2: Review time and attendance processes to eliminate unnecessary duplicative reporting and implement management controls to ensure that the time and attendance entries reflect work performed.

Management Comments and OIG Analysis

FEMA agrees that it must identify an electronic way to allow multiple certifications of hours actually worked during a pay period. FEMA will forward this issue to the Department's Time and Attendance User Group for discussion/suggestions and research current industry practices to identify possible options.

We agree with FEMA's approach to research available options and to raise the issue with the Department's Time and Attendance User group. We will determine the status of this recommendation once we receive the detailed corrective action plan in FEMA's 90 day letter.

WebTA Disaster Cost Code Management

Disaster cost code management processes are not adequate to prevent older disaster or surge cost codes from being applied to new disaster deployments. This could lead to inaccurate disaster cost information reports distributed to FEMA managers, Congress, and the public. In addition, inaccurate payroll expenses associated with DAEs could lead to flawed management decisions concerning DAE resources used for past disasters, DAE resources needed for current disasters, and DAE resources estimates for future disasters.

As shown in figure 4, the Mission Support Directorate is responsible for managing disaster costing for declared disasters in the Disaster Relief Fund. Once funds are allocated, the FEMA Finance Center (FFC) enters disaster funding codes into the Integrated Financial Management Information System (IFMIS) and generates WebTA disaster cost codes. The Office of Management, Human Capital Division enters the codes into WebTA.

Figure 4. Office of Mission Support WebTA Cost Code Actions
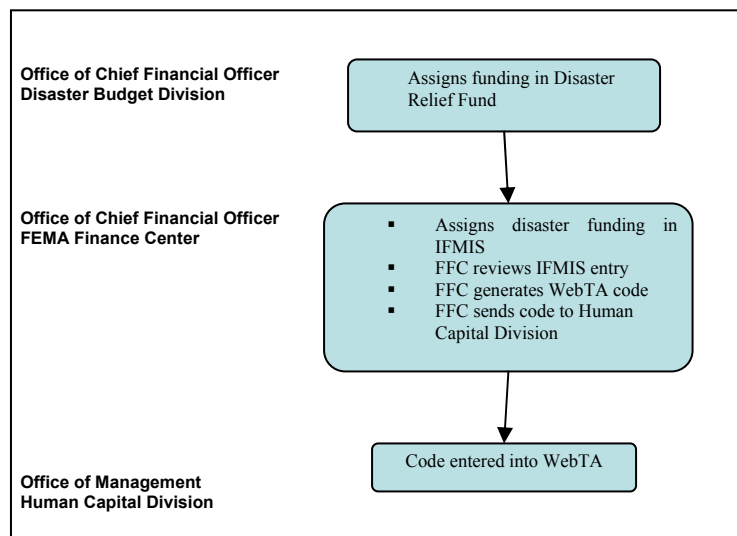
The disaster budget is administered at each JFO by a disaster comptroller, part of the Chief Financial Officer DAE cadre. At the regional offices, assigned timekeepers and Management Division employees monitor all WebTA funding code entries. Program officials said that at the beginning of declared disasters, some timekeepers are not given the declared disaster cost codes in a timely manner. In this situation, the timekeeper will either use disaster surge funding codes or old disaster cost codes for DAE payroll expenses. That places the timekeepers and managers at

risk of charging time to incorrect disaster cost codes for specific work assignments.

Conclusion

The disaster payroll cost code management process does not have adequate controls or program guidance to ensure that DAE payroll expenses are charged to the correct disaster cost codes.

Recommendation

We recommend that the Associate Administrator, Mission Support:

Recommendation #3: Implement and document procedures to ensure timekeepers receive disaster cost codes in a timely manner and charge payroll expenses to the correct disaster cost code.

Management Comments and OIG Analysis

FEMA Office of the Chief Component Human Capital Officer is currently scheduling training with FEMA's Office of the Chief Financial Officer, in order to grant staff the access to directly administer WebTA accounting codes. This will result in more timely updates to the codes available in WebTA to employees. FEMA agrees that there is a need to review its current timekeeping procedures, to promulgate new Agency-wide timekeeping procedures, and to increase awareness among timekeeping user groups.

We agree with FEMA's responses and the actions they are taking. We will determine the status of this recommendation once we receive the detailed corrective action plan in FEMA's 90 day letter.

DAE Program Benefits Policies and Guidance

In recent years, FEMA has issued new DAE Program benefits policies and guidance; however, the new policies have not been permanently incorporated into the existing overall DAE administrative program guidance.

FEMA Instruction 8600.1 outlines the Stafford Act's special hiring authority, including DAE salary and benefits. The instruction states that DAEs must work on a holiday to be entitled to pay for that day and are not eligible for annual or sick leave. However, since the issuance of *FEMA Instruction 8600.1*, conflicting interim salary and benefit policies have been issued.

The *Disaster Reservist Holiday and Administrative Leave Policy* issued in October 2008 provides deployed DAEs with pay for holiday and administrative leave. This interim policy was developed to eliminate a disparity in the administration of FEMA's competitive and excepted hiring authorities. The disparity was resolved by allowing officials to offer DAEs (1) a maximum of 8 hours of holiday pay when a disaster worksite is closed to observe a federal holiday or when management provides employees the day off in observance of the holiday, within a 40-hour workweek and (2) a maximum of 8 hours of administrative leave such as during emergency closures of the worksite or during inclement weather, within a 40-hour workweek. Although this interim policy conflicts with *FEMA Instruction 8600.1*, it remains in effect until superseded by permanent instruction.

The *Interim Policy for DAE Sick Leave*, issued in July 2009, provided DAEs with sick leave benefits for the first time. FEMA anticipated that this new benefit would increase DAE productivity, reduce the spread of workplace illnesses, and reduce DAE turnover. Like the *Disaster Reservist Holiday and Administrative Leave Policy*, this interim policy conflicts with *FEMA Instruction 8600.1*, but remains in effect until superseded by permanent instruction. The inconsistencies between the interim leave policies and the overall permanent DAE program guidance leads to confusion for managers. Program personnel said these policy inconsistencies hinder them in making appropriate DAE salary payments.

Conclusion

Recently issued, DAE benefits policies have not been integrated with the permanent DAE program guidance in *FEMA Instruction*

8600.1 and *Director's Policy No. 1-99.* Any new program benefit polices should be incorporated into that existing overall guidance to ensure consistent application.

Recommendation

We recommend that the Associate Administrator, Mission Support:

Recommendation #4: Review and update key DAE program benefits policies, procedures, and guidance to eliminate conflicts and inconsistencies between interim policies and permanent overall guidance.

Management Comments and OIG Analysis

FEMA fully concurs with the recommendation and currently has efforts underway to finalize policies and increase awareness of the new guidance on DAE leave policies. In addition, *FEMA Instruction 8600.1* is currently under revision and FEMA expects the revised publication to eliminate any inconsistencies between new policies and permanent overall guidance.

We agree with FEMA's approach and the actions they are currently taking. We will determine the status of this recommendation once we receive the detailed corrective action plan in FEMA's 90 day letter.

This audit was originally intended to determine the effectiveness of FEMA's internal controls to provide reasonable assurance that salary, travel, and other expenses associated with disaster assistance employees are charged to the appropriate presidentially declared disaster or administrative account. The original scope of this audit covered the DAE Program's polices and guidance and the payroll and travel processes for DAE expenses. Owing to FEMA's inability to provide timely, complete, and accurate information to our audit team, we modified our scope.

The revised scope reviewed DAE deployment and payroll processes. We analyzed the DAE Program policies, procedures, and guidance; interviewed FEMA headquarters, regional, and Joint Field Office officials; and sampled FY 2005 through FY 2009 DAE time and attendance, and ADD records from four FEMA regions to determine the effectiveness of these processes. The fieldwork was conducted from February through October 2009. Since the end of fieldwork, FEMA officials have provided additional information to clarify key process areas.

We conducted this performance audit under the authority of the *Inspector General Act of 1978*, as amended, and according to generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained supports the findings and conclusions based on our audit objectives.

Appendix B
Management Comments to the Draft Report

U.S. Department of Homeland Security
500 C Street, SW
Washington, DC 20472

FEMA

JUL 1 9 2010

MEMORANDUM FOR: Matt Jadacki
                   Assistant Inspector General
                   Office of Emergency Management Oversight
                   Department of Homeland Security

FROM: David Garratt
                   Associate Administrator
                   Mission Support
                   Federal Emergency Management Agency

SUBJECT: Response to *Draft Report: FEMA's Management of Disaster
                   Assistance Employee Deployment and Payroll Processes*

Attached for your review are the Federal Emergency Management Agency's (FEMA) comments on
*Draft Report: FEMA's Management of Disaster Assistance Employee Deployment and Payroll
Processes*. Comments provided are both general in terms of the information contained within the
report and specific to the report recommendations.

Overall, I find no reason for concern regarding the public release of information contained within
this report. If you have questions regarding the comments provided, please have a member of your
staff contact Mr. Phil Nowak, Deputy Chief Component Human Capital Officer. He can be reached
on 202-646-1955 or via email at Philip.Nowak@dhs.gov.

Attachment

cc: OPPA

www.fema.gov

Agency Comments on OIG *Draft Report: FEMA's Management of Disaster Assistance*
Employee Deployment and Payroll Processes

<u>General Comments</u>

Updating FEMA's Disaster Assistance Employee Program Guidance. Beginning in
September 2007, when FEMA completed its assessment of the Disaster Reserve Workforce,
FEMA has recognized the need to renew its Agency-wide program and policy guidance for
Disaster Assistance Employees (DAEs). Those efforts continue at this time. FEMA fully agrees
with the draft report's findings that updated policy is needed to eliminate conflicting and
inconsistent policies and, worse, conflicting and inconsistent application of those policies
throughout the Agency.

FEMA Realignment and DAE Cadre Listing. In December 2009, FEMA realigned its
Headquarters organization. For purposes of this draft report, Headquarters realignment bears
directly on this draft report in the following ways.

- The Disaster Reserve Workforce Division was integrated into the new Office of the Chief
  Component Human Capital Officer (HC). This realignment enabled FEMA to consolidate
  functions and to deliver human capital service for the entire workforce. Policy, system, and
  business management functions were integrated elsewhere into HC; disaster workforce
  readiness and deployment functions were retained in a new entity named simply the Disaster
  Workforce Division.

- Headquarters realignment resulted in a realignment of cadres to new management
  organizations. Please update figure 1 of the draft report by inserting this listing of cadres and
  managing organizations:

Cadre Name	Managing Organization
Alternative Dispute Resolution	Office of the Chief Counsel
Community Relations, Congressional Affairs, and Public Affairs cadres have been consolidated into one **External Affairs Cadre**	Office of External Affairs
Comptroller	Office of the Chief Financial Officer
Contracting/Acquisition	Office of the Chief Procurement Officer
Disaster Field Training Operations	National Preparedness Directorate
Disaster Generalist Group	Office of the Chief Component Human Capital Officer
Environmental and Historic Preservation	Federal Insurance and Mitigation Administration
Equal Rights	Office of Equal Rights
Federal Coordinating Officer	Office of Federal Coordinating Officer Operations
Field Attorney	Office of the Chief Counsel
Financial Management	Office of the Chief Financial Officer

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Cadre Name	Managing Organization
Human Resources	Office of the Chief Component Human Capital Officer
Individual Assistance	Recovery Directorate
Information Technology	Office of the Chief Information Officer
Logistics	Logistics Management Directorate
Long Term Community Recovery	Recovery Directorate
Mitigation	Federal Insurance and Mitigation Administration
Operations	Response Directorate
Planning	Response Directorate
Public Assistance	Recovery Directorate
Safety	Office of Safety, Health and Environment
Security	Office of the Chief Security Office

Note: The Comptroller Cadre is centrally managed by the Headquarters Office of the Chief Financial Officer (OCFO), and the check mark indicating that there is a Regional cadre management role should be removed from figure 1 of the draft report.

Time and Attendance Process: While FEMA differs in its analysis of root causes which result in dual entry timekeeping procedures, FEMA fully concurs with the OIG's recommendation to review the process, and to identify reasonable measures to improve the integrity, accuracy and timeliness of timekeeping information.

The report implies that all Disaster Assistance Employees (DAEs) enter their time worked under two separate systems, and that the pay system pays a substantial number of DAEs based solely on a paper-based form. This is incorrect. Virtually all time is processed solely in the WebTA system.

While the FEMA Form 30-50A is no longer part of the Agency's forms library, it is commonly used in the field only for those exceptional situations where an individual cannot access the WebTA system. Examples of access issues include lack of physical access to WebTA (remote location or lack of system access for the DAE), or timing-related access (the DAE leaves the Joint Field Office early in a new pay period before the WebTA cycle has been opened for input).

In addition to occasions when DAE access to WebTA is limited, manual timekeeping processes also result from the need of timekeepers and supervisors to have reasonable assurance that the employee actually performed the duty for the days, times and disasters charged on the time card. In the program's present configuration in FEMA, WebTA is not flexible enough to accommodate the numerous changes in supervisory personnel who monitor work activity at a Joint Field Office (JFO). Timekeepers and supervisors are accountable for the accuracy of WebTA entries for work performed by deployed DAEs even though they are located in Regional or Headquarters offices hundreds of miles from the JFO. Manual processes operated by on-site JFO staffs provide these far distant timekeepers and supervisors the reasonable assurance needed to properly execute their payroll related responsibilities.

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WebTA Disaster Cost Code Management: Once an account code is established in the menu of possible codes available to each employee, it is true that the employee can select any code listed. It is incumbent on the "timekeeper" and the "certifier" (who is normally a supervisor) to ensure through visual inspection that only the correct code is cited on each time card. FEMA concurs that increased awareness training and other measures should be (and will be) undertaken to prevent validation and certification of WebTA time cards citing erroneous account codes.

Response to Recommendations

Recommendation #1: Implement ADD enhancements to enable cadre managers and program staff to monitor DAE current readiness, current location, and capabilities and provide additional training opportunities to all appropriate FEMA managers to allow ADD access.

Response: FEMA concurs in part with the OIG. The legacy ADD system was established in 1996, and today's ADD users require more and different system capability than is afforded by the present system. Plans for a replacement to the legacy ADD system are underway within FEMA. However, within the acknowledged limitations of legacy ADD, users have access to a broad array of data and system support.

Currently there are over 560 employees who have access to specific functions within ADD appropriate to their respective user group. ADD users have access to a Reports Utility which allows managers to run reports on key workforce data elements, including DAE availability, DAE duty location and duty status, and DAE capabilities (i.e., job titles and proficiency levels).

FEMA's Office of the Chief Component Human Capital Officer (HC) recognizes the need to offer training for new users, as well as the need to provide refresher training for highly experienced system users. These experienced Staffing Points of Contacts exist in all Regions and HQ Cadres. FEMA managers with authorization and a need to know are invited on a continual basis to request greater system access and ADD system training both from assigned Staffing Points of Contact as well as from the HC Deployment Branch.

Recommendation #2: Review time and attendance processes to eliminate unnecessary duplicative reporting and implement management controls to ensure that the time and attendance entries reflect work performed.

Response: FEMA HC must identify an electronic way to allow multiple certifications of hours "actually" worked during a pay period. The current system only allows one certifier and one timekeeper per employee record for any given pay period even though a DAE's remote deployed duty may require multiple entities to verify time and attendance. FEMA HC will forward this issue to the Department's Time and Attendance User group for discussion/suggestions and research current industry options to see what's available.

3

FEMA
MSB-CH
7/15/2010

Recommendation #3: Implement and document procedures to ensure timekeepers receive disaster cost codes in a timely manner and charge payroll expenses to the correct disaster cost code.

Response: FEMA HC is currently scheduling training with FEMA's OCFO, the purpose of which will be to grant OCFO staff the access to directly administer WebTA accounting codes. This change will eliminate the need for OCFO to request accounting codes to be added to WebTA by FEMA HC staff, resulting in more timely updates to the codes available to employees in WebTA. However, as noted in FEMA's general comments above concerning WebTA Disaster Cost Code Management, FEMA HC agrees that there is a need to review its current timekeeping procedures, to promulgate new Agency-wide timekeeping procedures, and to increase awareness among timekeeping user groups.

Recommendation #4: Review and update key DAE program benefits policies, procedures, and guidance to eliminate conflicts and inconsistencies between interim policies and permanent overall guidance.

Response: FEMA fully concurs with OIG and the draft report, as noted above in the general comments section of this reply. With respect to Recommendation #4, FEMA offers the following additional information.

Two specific interim policies were issued that address concerns raised in the OIG Draft Report "FEMA's Management of Disaster Assistant Employee Deployment and Payroll Processes." They are the Disaster Reservist Holiday and Administrative Leave Policy issued in October 2008, and the Interim Policy for DAE Sick Leave issued in July 2009. Both of these policies achieved permanent policy status in 2010.

The Disaster Reservist Holiday Pay and Administrative Leave Policy Directive 253-4, and accompanying Manual 253-4-1, were signed on April 7, 2010 and May 7, 2010, respectively. They are posted on the FEMA Directives webpage under the cognizance of FEMA's Records Management Division. The Disaster Workforce Division (DWD – formerly Disaster Reserve Workforce Division) has used various avenues to increase awareness of this important guidance to include publishing in the Disaster Reservist On Call newsletter, DWD Regional Liaisons, web page, and email distribution.

The proposed Disaster Reservist Sick Leave Policy Directive and Manual were forwarded to the Agency's directives system for finalization on February 17, 2010. Both documents have been vetted through the Agency for comments. FEMA's Records Management Division indicated, on June 30, 2010, that the documents were being prepared for final signature.

The above policies constitute current Agency policy, and they supersede the applicable sections of Disaster Assistance Employee Program, FEMA Instruction 8600.1, dated June 21, 1991. FEMA Instruction 8600.1 is currently under revision and its publication will eliminate any inconsistencies between new policies and permanent overall guidance.

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OFFICE OF THE DIRECTOR

Federal Emergency Management Agency

Washington, D.C. 20472

March 3, 1999

DIRECTOR'S POLICY NO. 1-99

SUBJECT: Disaster Cadre Guidance and Direction

1. This policy establishes the basis for a systematic, formalized approach to ensure readiness of FEMA's disaster cadre workforce to respond wherever needed, quickly and effectively. The workforce covered by this policy is all FEMA employees – regardless of their type of appointment who are rostered to a position to support FEMA's emergency organizational structures and surge staffing requirements. It does not cover employees assigned disaster responsibilities in FEMA's existing day-to-day organizational structure, or those employees temporarily activated to support disaster operations on a short-term, periodic, as-needed basis in an emergency organizational structure.

2. FEMA has in place emergency organization structures and supporting systems that are activated when needed to conduct its disaster operations. FEMA employees will be organized and aligned in agencywide functional disaster cadres consistent with those emergency structures. Agencywide cadres will be staffed based on operational requirements at headquarters, regional offices, and the field. Cadres also will be established to meet surge staffing requirements at disaster fixed facilities.

3. Headquarters and regional senior officials are responsible for ensuring agencywide functional cadres are organized and managed based on agency requirements and policies. They will be held accountable for overall cadre and individual member readiness, and cost effectiveness of cadre operations.

4. FEMA will establish guidelines and requirements for cadre management functions to be performed by designated headquarters and regional cadre managers. National standards for training, performance, and deployment will be applied to develop cadre-specific policies, standards, guidelines and implementing procedures to be applied consistently at headquarters and in the regions. Effective cadre management is a shared responsibility, with headquarters and regional cadre managers working in partnership to organize and manage agencywide disaster cadres. Based on the agency's operating philosophy, headquarters will provide support and guidance for cadre management and regional offices are responsible for implementing and managing cadre operations consistent with the guidance.

5. Agency resources will be committed to support basic levels of implementation of this policy for all cadres. Support will be provided for developing and managing cadres, training for cadre managers, establishing agencywide training standards for all cadres, and conducting cadre evaluations. Based on availability of funds, additional budget allocations will address priority requirements and incremental support for each cadre.

6. All FEMA employees with an emergency assignment to a position in one of the emergency structures are considered members of a disaster cadre. They will be rostered consistent with cadre-specific guidance and the knowledge, skills, and abilities required for a particular position. Any employee assigned to a cadre is

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R(RIAnivChiefs)

eligible for placement in program management and/or supervisory positions for which they are qualified in the emergency organizational structure. Employees will have an organizational identity, and will be provided guidance and support by the specific organization to which they are assigned.

7. FEMA cadre employees must be highly skilled, well trained, and available to respond when and where needed nationwide for timely and consistent delivery of FEMA programs and services. Demands are placed on employees to provide broad program information and exemplary customer service, thus requiring comprehensive program knowledge and positive communications and people skills. They must be held accountable for high standards of performance, consistent with established requirements and criteria for the emergency positions to which they are assigned.

8. FEMA will establish and support a system that ensures employees have the credentials and training that qualify them for the positions to which they are assigned. Agencywide basic standards and proficiency levels will be established for all cadre members. A credentials and training plan will be developed for each cadre as the basis for consistent program and personnel management.

9. Authorized baseline staffing levels will be established for each cadre. The staffing levels will be based on such considerations as: anticipated number and severity of disasters annually; geographic and other regional considerations that impact staffing needs; agencywide operational requirements; and, analysis of projected functional staffing requirements for each organizational structure. A staffing template will be defined for each level of response (Level I, massive; Level II, moderate; and, Level III, minimal) that will be used as the basis for staffing decisions made by disaster officials. The template will project staffing requirements during the initial operating phase (72 hours) and for sustained operations for key positions and functions which require significant FEMA expertise. Authorized cadre staffing levels will be adjusted periodically to reflect changing and projected disaster responsibilities and processes.

10. The number of Disaster Assistance Employees(DAEs) appointed by FEMA will be specified, consistent with agency guidelines and authorized cadre staffing levels. FEMA will focus on developing cadres of well-qualified, more frequently deployed DAEs in key positions and functions which require FEMA expertise. FEMA will also continue to ensure diversity of its employees by expanding hiring programs and seeking suitable candidates from its locally hired workforce.

11 The disaster cadre workforce will be augmented for all disaster operations by locally hiring DAEs for positions that do not require FEMA-specific expertise, or when limited advance training or minimal on-the-job orientation or training is sufficient. FEMA employees who are not cadre members (because they do not have an emergency assignment to a disaster cadre position) will also be activated on a disaster-by-disaster basis as needed or to support their organizational responsibilities. Staffing requirements above the baseline or in periods of extensive disaster activity will be met through mission assignment to other Federal agencies, one-time DAE recruitment efforts, special appointments, and standby service and support contract arrangements.

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12. The Automated Deployment Database (ADD) will be used for all disaster deployments, and will be the official source of agency data for deployment selection, staffing of the emergency structures, and staffing reports. The ADD will also serve as a management tool to monitor overall cadre readiness and capabilities of individual cadre members, and to track DAE travel and activations not specifically related to disaster deployment.

13. DAE terms of employment are temporary, intermittent or regular schedule, non-competitive one-year renewable appointments in the excepted service. FEMA will establish levels of compensation for DAEs similar to the grade structure and pay schedule (excluding locality pay) of the General Schedule. DAEs are appointed to a primary cadre functional position for which they are qualified, which determines their grade level, compensation, and performance and credentialing requirements. They may also be assigned secondary job titles in the same or other cadres for which they are qualified but which are not grade or pay determining.

14 FEMA will institutionalize a personnel management system that provides policies and guidelines for management of the DAE workforce. Whenever possible, the DAE personnel management system will be consistent with the policies and guidelines governing the permanent workforce.

15 Cadres will be approved and validated by the Director based on defined evaluation criteria. Each cadre will undergo an annual review and approval process that assesses cadre effectiveness, status, size and composition, priority requirements, and budget support needs.

16. The Office of Policy and Regional Operations is assigned responsibility for providing guidance and direction to implement and oversee the provisions of this policy. The Office of Human Resources Management is assigned responsibility for developing and implementing personnel guidance that supports program management and provisions of this policy. Other organizational responsibilities for implementing this policy will be outlined in agency implementing instructions.

17. This policy provides guidance and direction to revise existing program management and personnel policies and systems related to disaster cadres. Implementing guidance and documentation will be developed and maintained to create a solid foundation for managing and supporting   disaster cadre workforce. Provisions of existing policies and instructions are superseded, and will be rescinded or modified as relevant documents to implement this policy are issued.

James L. Witt

Kaye McTighe, Mitigation and Disaster Assistance Division
Nigel Gardner, Audit Manager
Donald Norman, Audit Manager
Eric Hostelley, Program Analyst
Nathaniel Nicholson, Auditor

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