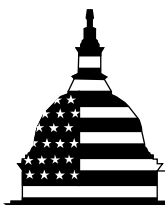


May 2012

DISASTER ASSISTANCE WORKFORCE

FEMA Could Enhance Human Capital Management and Training



G A O

Accountability * Integrity * Reliability

Highlights of [GAO-12-538](#), a report to congressional requesters

Why GAO Did This Study

Since fiscal year 2007 FEMA has obligated \$33 billion in disaster assistance payments. FEMA relies heavily upon its cadre of DAEs, a reserve workforce who interact with disaster survivors. GAO was asked to review the management and training of DAEs. Specifically, this report addresses the extent to which (1) FEMA has policies and procedures in place to govern the DAE program; (2) FEMA's human capital controls over the DAE workforce are consistent with internal control standards; and (3) FEMA's DAE training incorporates key attributes of effective training and development programs. In addition, GAO describes FEMA's initiative to transform the DAE program announced in April 2012. GAO reviewed management documents such as program-specific and human capital-related guidance, interviewed FEMA officials, and conducted 16 focus group sessions with DAEs in four selected joint field offices chosen to provide geographic dispersion, among other factors. The results of the focus groups are not generalizable, but provide valuable insight into DAE experiences.

What GAO Recommends

GAO recommends, among other things, that FEMA establish a mechanism to monitor both its regions' implementation of DAE policies and DAEs' implementation of disaster policies; criteria for hiring and compensating DAEs; and a plan to train DAEs within a set time frame. DHS concurred with the recommendations.

View [GAO-12-538](#). For more information, contact William O. Jenkins at (202) 512-8757 or jenkinswo@gao.gov.

May 2012

DISASTER ASSISTANCE WORKFORCE

FEMA Could Enhance Human Capital Management and Training

What GAO Found

The Federal Emergency Management Agency (FEMA) has taken steps to enhance its management of the Disaster Assistance Employee (DAE) program, such as through the establishment of a credentialing program, the FEMA Qualification System (FQS); however, management controls and training could be strengthened. For example, FEMA does not monitor how the regions implement DAE policies and how DAEs implement disaster policies across regions to ensure consistency. FEMA's Administrator noted that due to differences in how regions operate, it is problematic to deploy someone based in one region to another during a disaster. Establishing a mechanism to monitor both the regional implementation of DAE policies and procedures and DAE's implementation of disaster policies could help provide FEMA with reasonable assurance that disaster assistance is conducted in accordance with policy and implemented consistently.

FEMA's human capital controls could be strengthened. FEMA's regional DAE managers are responsible for hiring DAEs, but FEMA has not established hiring criteria and has limited salary criteria. By establishing standardized criteria for making hiring and salary decisions, FEMA would be better positioned to hire people with requisite skills and better ensure consistency across regions. Likewise, FEMA's performance appraisal system for DAEs is not consistent with internal control standards. FEMA does not have criteria for supervisors to assign DAEs satisfactory or unsatisfactory ratings. Thirteen of 16 regional DAE managers GAO interviewed stated that the appraisal process could be improved, such as implementing a rating scale instead of a pass/fail rating. FEMA officials noted that performance management is a critical component in DAE supervision and must be improved in fiscal year 2012. Establishing a more rigorous performance management system that includes criteria for given performance elements as well as guidance could help FEMA ensure that DAEs' performance appraisals more accurately reflect performance and provide needed information to managers.

FEMA's DAE training is not consistent with key attributes of effective training and development programs, such as a plan for training staff. FEMA does not have a plan to ensure DAEs receive necessary training such as FQS requirements. Further, 13 of 16 regional DAE managers GAO spoke to said that they would like more opportunities for DAEs to receive training. A plan to ensure that all DAEs have opportunities for training and completing FQS requirements with related milestones would provide FEMA with a roadmap and ensure accountability for qualifying DAEs under FQS. In addition, FEMA does not track how much of the Disaster Relief Fund is spent on training for DAEs. Developing a systematic process to track training costs could provide FEMA with information to help it determine whether it is allocating its resources effectively.

In an April 2012 memo, FEMA announced plans to transform the DAE program beginning in June 2012; however, this effort is still in the early stages and as a result, it is too soon to evaluate the effectiveness of FEMA's planned actions.

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Abbreviations

CORE	Cadre of On-Call Response/Recovery Employee
CR	Community Relations
DAE	Disaster Assistance Employee
DFTO	Disaster Field Training Office
DHS	Department of Homeland Security
DRS	Disaster Readiness and Support
EMI	Emergency Management Institute
FCO	Federal Coordinating Officer
FEMA	Federal Emergency Management Agency
FQS	FEMA Qualification System
HR	Human Resources
HSIN	Homeland Security Information Network
IA	Individual Assistance
IWMO	Incident Workforce Management Office
JFO	Joint Field Office
OCCHCO	Office of the Chief Component Human Capital Officer
OCIO	Office of the Chief Information Officer
OIG	Office of Inspector General
OPPA	Office of Program and Policy Analysis
PA	Public Assistance
PFT	Permanent Full Time
TED	Training, Exercise and Doctrine Office

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United States Government Accountability Office
Washington, DC 20548

May 25, 2012

The Honorable Daniel K. Akaka
Chairman
Subcommittee on Oversight of Government Management,
the Federal Workforce, and the District of Columbia
United States Senate

The Honorable Bennie G. Thompson
Ranking Member
Committee on Homeland Security
House of Representatives

The annual number of federal major disaster declarations has grown 44 percent from fiscal years 2007 to 2011.¹ Since fiscal year 2007, there have been 376 federal major disaster declarations in which the Federal Emergency Management Agency (FEMA) has obligated \$33 billion in major disaster assistance payments.² FEMA is tasked with leading the nation in mitigating, responding to, and recovering from major disasters, both natural and manmade. To meet its mission, FEMA relies heavily upon its cadre of Disaster Assistance Employees (DAE), a reserve workforce that interacts with disaster survivors.³ There were 9,981 DAEs, which comprised 57 percent of FEMA's workforce, as of February 2012.⁴

¹The number of major disasters increased each year, except for fiscal year 2009. FEMA has two main types of disaster declarations: major disaster declarations and emergency declarations. Major disaster declarations can be declared for any natural catastrophe, or regardless of cause, any fire, flood or explosion, in any part of the United States, that the President believes has caused damage of such severity and magnitude that warrants major disaster assistance to supplement the efforts and available resources of states, local governments, and disaster relief organizations. Emergency declarations can be declared for any occasion or instance when the President determines federal assistance is needed to supplement state and local efforts and capabilities to save lives and to protect property and public health and safety, or to lessen or avert the threat of a catastrophe in any part of the United States. 42 U.S.C. § 5122.

²This includes obligations for Individual Assistance, Public Assistance, and Hazard Mitigation, only for Major Disaster declarations declared from fiscal years 2007 to 2011.

³FEMA's disaster workforce uses the cadre structure to identify employees who perform a specific operational program or function in support of agency-wide disaster operations.

⁴We considered the FEMA workforce to include the following: DAEs, Cadre of On-Call Response/Recovery Employees (2,573), Temporary Full-Time (231) and Permanent Full-Time employees (4,784).

DAEs support joint field office (JFO) leadership that administers FEMA's disaster assistance programs, such as Individual Assistance (IA) and Public Assistance (PA). These programs provide financial assistance to individuals and local governments, respectively, after a disaster.

We and others have identified challenges related to FEMA's training and human capital management practices. For example, our prior work on FEMA's human capital efforts identified shortages of staff with the right skills, abilities, experience, and training. Specifically, in 2007 we reported that FEMA needed data, plans, and systems to effectively manage resources for its day-to-day operations and recommended that FEMA establish training and development requirements and tracking systems to ensure that staff had the necessary training to carry out their day-to-day and disaster response functions.⁵ The Department of Homeland Security (DHS) did not provide comments on GAO's recommendations; however, in 2008 FEMA issued its Strategic Human Capital Plan, 2008-2012, intended to address this recommendation. Moreover, the DHS Office of Inspector General (OIG) reported that, in the aftermath of Hurricane Katrina in 2005, FEMA new hires did not receive adequate training during FEMA's accelerated orientation process and FEMA did not have a central training records management system.⁶ Further, the DHS OIG noted that the shortage of qualified staff for key positions responding to Hurricane Katrina negatively impacted the effectiveness of FEMA's response and recovery operations.⁷ FEMA has taken a number of steps to address recommendations made by us and the DHS OIG, but key recommendations remain unaddressed as discussed later in this report. You asked us to review FEMA's management and training of DAEs. Specifically, this report addresses the following questions:

1. To what extent does FEMA have policies and procedures in place to govern the DAE program?
2. To what extent are FEMA's human capital controls over the DAE workforce consistent with internal control standards?

⁵GAO, *Budget Issues: FEMA Needs Adequate Data, Plans, and Systems to Effectively Manage Resources for Day-to-Day Operations*, [GAO-07-139](#) (Washington, D.C.: Jan. 19, 2007).

⁶Department of Homeland Security, Office of Inspector General, *FEMA's Preparedness for the Next Catastrophic Disaster-An Update*, OIG-10-123 (September 2010).

⁷OIG-10-123.

3. To what extent does FEMA's DAE training incorporate key attributes of effective training and development programs?

In addition, we describe FEMA's initiative to transform the DAE program announced in April 2012 as it relates to the three questions above.

To determine the extent to which FEMA has policies and procedures in place to govern the DAE program, and to determine the extent to which FEMA's human capital controls over the DAE workforce are consistent with internal controls, we analyzed both program-specific and human capital-related guidance, policies, and procedures produced by FEMA headquarters and regional offices. We also compared FEMA's human capital management controls with *Standards for Internal Control in the Federal Government*.⁸

To determine the extent to which FEMA's training of DAEs incorporates key attributes of effective federal training and development programs, we reviewed FEMA's data from fiscal 2007 to 2011 on training requirements, the location and frequency of training courses, course schedules, and the amount of training funds used from the Disaster Relief Fund, which funds disaster assistance operations. We determined that the data were sufficiently reliable for the purposes of this report based on interviews with officials responsible for the data. We also reviewed policies and procedures on training requirements, FEMA's learning management systems, JFO operations, and FEMA's new credentialing program, the FEMA Qualification System (FQS).⁹ In addition, we observed training

⁸GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999). Internal control is an integral component of an organization's management that provides reasonable assurance that the following objectives are being achieved: effectiveness and efficiency of operations, reliability of financial reporting, and compliance with applicable laws and regulations. These standards, issued pursuant to the requirements of the Federal Managers' Financial Integrity Act of 1982 (FMFIA), provide the overall framework for establishing and maintaining internal control in the federal government. Also pursuant to FMFIA, the Office of Management and Budget issued Circular A-123, revised December 21, 2004, to provide the specific requirements for assessing the reporting on internal controls. Internal control standards and the definition of internal control in Circular A-123 are based on GAO's *Standards for Internal Control in the Federal Government*.

⁹Credentialing involves the objective evaluation and documentation of an individual's current certification, license, or degree; training and experience; and competence or proficiency to meet nationally accepted standards, provide particular services and/or functions, or perform specific tasks under specific conditions during an incident.

attended by DAEs in a JFO. We compared FEMA's DAE training efforts with key attributes of effective training and development programs to determine the extent to which they were aligned.¹⁰

To address all three objectives, we reviewed previous DHS OIG reports, and a FEMA-sponsored study conducted by Booz Allen Hamilton on FEMA's disaster workforce.¹¹ We interviewed officials from various FEMA offices at its headquarters, including the Incident Workforce Management Office (IWMO), Office of the Chief Component Human Capital Officer (OCCHCO), and the Emergency Management Institute. In addition to interviews with officials in FEMA headquarters, we conducted site visits to four FEMA regions. We selected these regions because they were geographically dispersed and had a JFO with both Individual Assistance (IA) and Public Assistance (PA) programs operating as of September 2011.¹² In each of these four regions, we interviewed the Regional Administrator and Regional Cadre Managers. In addition, we visited one JFO in each of the selected regions, where we interviewed the Federal Coordinating Officer and Branch Chiefs. While the information we obtained on these site visits is not generalizable, it provided important insights into the structure and management of the DAE program.

To obtain the views of DAEs on issues related to all three of our objectives, we conducted 16 focus group sessions with a total of 125 DAEs across the four selected JFOs. These sessions involved facilitated small-group discussions designed to gain more in-depth information about issues that DAEs face. Each focus group involved 5 to 12 DAE participants. DAE participants were chosen by the management at each JFO. There were four types of focus groups based on DAE job titles: IA and PA supervisors, IA and PA non-supervisors, and supervisors and

¹⁰GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts for the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: March 2004).

¹¹The Booz Allen Hamilton report we reviewed was preliminary and FEMA could not locate the final report. FEMA stated that they are addressing the observations from this review.

¹²Individual Assistance provides the necessary expenses and serious needs of disaster victims that cannot be met through insurance or low-interest Small Business Administration loans. FEMA provides temporary housing assistance to individuals whose homes are unlivable because of a disaster. Public Assistance provides aid to state government agencies; local governments; and private nonprofit organizations or institutions that provide certain services otherwise performed by a government agency.

non-supervisors from other cadres other than IA and PA. Specifically, discussion topics included the hiring process, training, policies and procedures, including FQS, and communication by regional managers; however, not all focus group participants had observations about all topics discussed. While the results of the focus groups are not generalizable, the views we obtained from the focus groups provided us with valuable examples of DAE experiences. In addition, we conducted follow-up interviews with 16 regional cadre managers we previously interviewed during our site visits to obtain further perspectives from regional management on hiring, training, deployments, and policies and procedures. In addition, we reviewed FEMA's April 2012 memorandum announcing the transformation of the DAE program, but did not assess its planned actions to transform the DAE program because the agency is in the early planning stages. For more information on our scope and methodology see appendix I.

We conducted this performance audit from April 2011 through May 2012 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

FEMA's Disaster Assistance Authority and Declaration Process

The Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 (Stafford Act) generally defines the federal government's role during the response and recovery after a major disaster. It establishes the programs and processes through which the federal government provides disaster assistance to state and local governments, tribes, certain nonprofit organizations, and individuals.¹³ FEMA has steady-state and emergency organizational structures. Under a steady-state when FEMA is not in active response to a disaster, FEMA employees conduct activities

¹³42 U.S.C. § 5121 et seq.

that “strengthen the Homeland Security Enterprise”¹⁴ and perform functions that align with the Quadrennial Homeland Security Review (QHSR) goals¹⁵, which include strengthening capacity to withstand hazards, and improving preparedness in all levels and segments of society.¹⁶ However, when a disaster declaration is requested by a Governor and approved by the President, FEMA executes its emergency organizational structure as discussed below.

Individual Assistance (IA) DAEs

DAEs within the IA cadre provide assistance to individuals and families. They perform a range of services typically out of a disaster recovery center such as conduct applicant intake, provide referrals, assist survivors in finding temporary housing, and support state, local and tribal mass care feeding, sheltering, and clothing distribution operations.



Tornado damaged homes.



A disaster recovery center.

Source: GAO and FEMA.

The Stafford Act establishes the process for states to request a presidential major disaster declaration.¹⁷ Once a declaration has been declared by the President, FEMA may provide disaster assistance pursuant to the authorities in the Stafford Act. In order to request that the President issue a major disaster declaration, a Governor submits a declaration request certifying that the damage requires resources beyond the state’s capability. The request must also include an estimate of the amount and severity of damage and losses and preliminary estimates of the types and amount of disaster assistance needed, among other things.¹⁸ Once a disaster is declared, FEMA provides assistance primarily through one or more of the following three assistance programs: Individual Assistance, Public Assistance, and Hazard Mitigation.¹⁹ Not all programs are activated for every disaster. The determination to activate a program is based on the needs identified during the assessment conducted as part of the declaration request. The Disaster Relief Fund is the major source of federal disaster recovery assistance when a disaster

¹⁴The Homeland Security Enterprise is a partnership among DHS, other federal agencies, the public and private sectors, and communities across the country and around the world, who since 9/11 have worked to better mitigate and defend against dynamic threats, minimize risks, and maximize the ability to respond and recover from attacks and disasters of all kinds.

¹⁵QHSR outlines a strategic framework to guide the activities of homeland security participants. It outlines a vision, specifies mission priorities, and outlines goals for each of the mission areas.

¹⁶Homeland Security Studies and Analysis Institute: Federal Emergency Management Agency Workforce Baseline Assessment, Final Report, March 31, 2010.

¹⁷42 U.S.C. § 5170.

¹⁸44 C.F.R. § 206.36.

¹⁹Hazard Mitigation provides additional funding to states to assist communities in implementing long-term measures to help reduce the potential risk of future damages to facilities.

is declared. The Disaster Relief Fund is appropriated no-year funding which allows FEMA to direct, coordinate, manage and fund response and recovery efforts associated with domestic major disasters and emergencies.²⁰

FEMA's Disaster Reserve Workforce and Organizational Structure

Hazard Mitigation DAEs

DAEs within the mitigation cadre provide outreach and education to communities on reducing or eliminating losses due to natural disasters. They also work with state and local governments on mitigation planning and identify risk reduction opportunities.



Hazard Mitigation printed materials on display at a home supply store as part of an outreach effort.



A 5 foot high dike made of steel and concrete built to prevent flooding.

Source: GAO and FEMA.

Under the Stafford Act, FEMA has the authority to augment its permanent full-time staff with temporary personnel when needed, without regard to the appointment and compensation provisions governing Title 5 appointments of permanent full-time staff.²¹ Permanent full-time employees manage FEMA's day-to-day activities, and a portion of these employees are expected to deploy when a disaster is declared. The DAE is one type of temporary, on-call employee. See appendix II for a detailed description of categories of disaster workforce employees. DAEs comprise the largest portion of the disaster workforce employed under FEMA's emergency organizational structure. As of February 2012, there were 9,981 DAEs. DAEs are activated to perform disaster activities directly related to specific disasters, emergencies, projects, or activities of a non-continuous nature.²² DAEs serve two-year appointments, are only paid when they are deployed (including per-diem), and do not receive any Federal benefits with the exception of sick leave, holiday pay, and administrative leave. They are assigned to one of 23 functional disaster cadres. For example, the Individual Assistance cadre provides referrals and guides individuals through the FEMA assistance process, while the Hazard Mitigation cadre assists in educating the public and local governments on methods to reduce the risk of loss of property and life from a future disaster. See appendix III for a description of each cadre and their primary duties.

FEMA's organizational structure is decentralized and comprised of headquarters and ten regional offices. FEMA's Administrator, in accordance with the Post-Katrina Emergency Management Reform Act of 2006 (Post-Katrina Act), appoints a Regional Administrator to head each

²⁰No-year funds are available for obligation for an indefinite period of time.

²¹42 U.S.C. § 5149(b)(1). Under the provisions of Title 5 governing appointments in competitive service, recruitment of candidates is based on merit where selection is made after a fair and open competition assuring equal opportunity. The candidates are selected based on an application, interview process, and/or examination.

²²FEMA Instruction 8600.1 Disaster Assistance Employee Program.

regional office.²³ Regional Administrators—in partnership with state, local, tribal governments, and other nongovernmental organizations—provide emergency management within their respective geographical area. See appendix IV, FEMA's organizational chart, and figure 1 for a map of FEMA's regions.

²³6 U.S.C. § 317.

Figure 1: Map of FEMA Regions and the Number of Disaster Declarations and Disaster Assistance Employees Per Region in 2011



Source: FEMA 'Presidential Disaster Declarations' map 2011.

JFOs are temporary FEMA offices established to respond to declared disasters. JFOs are led by Federal Coordinating Officers and an incident management team that coordinates the activities of the functional disaster cadres deployed for a particular disaster. Once a disaster is declared, FEMA is to deploy DAEs and other FEMA employees as needed, and is to use the Automated Deployment Database to track deployments, training, the initial disaster site location (duty station), as well as monitor overall cadre readiness.

Public Assistance (PA) DAEs

DAEs within the PA cadre assist with the allocation of funds to state and local governments for the repair and replacement of roads, buildings, utilities, and bridges, and provide assistance for debris removal.



River bridge destroyed by heavy flooding.



Accumulated debris from extensively flooded homes.

Source: GAO and FEMA.

Each cadre has a national cadre manager based in headquarters in addition to a regional cadre manager, except for headquarters-based cadres such as the Comptroller and Alternative Dispute Resolution cadres. With respect to the management of DAEs, national and regional cadre managers are responsible for implementing recruitment, hiring, training, development and other administrative policies and procedures developed by the DAE program office.²⁴ Management of the DAE program has undergone structural changes over the last four years. See appendix V for a timeline of management changes. The Incident Workforce Management Office (IWMO) was established in June 2011, and is currently responsible for the operational elements of the DAE program. The office is organized into four functional units: Deployment, Readiness, FEMA Qualification System (FQS), and Cadre Coordination. See appendix VI for a description of its roles and responsibilities.

FEMA Qualification System and DAE Training

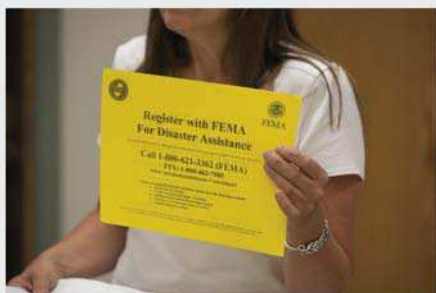
FEMA is undertaking efforts to credential DAEs and the rest of its workforce. Under the Post-Katrina Act, FEMA is responsible for developing standards for deployment capabilities including credentialing of personnel likely to respond to natural disasters, acts of terrorism, and other man-made disasters.²⁵ FQS is FEMA's recent effort to credential all employees in incident management or support positions, including the

²⁴FEMA Instruction 8600.1

²⁵6 U.S.C. § 320.

Community Relations (CR) DAEs

DAEs within community relations provide outreach to disaster victims and communities about state and federal recovery programs.



Display of a "Register with FEMA" flier at a community meeting.



Community relations specialist informing survivors of available recovery services.

Source: GAO and FEMA.

DAE workforce, and began development in July 2010.²⁶ According to FEMA, FQS is a performance-based system whereby employees are determined to be either in Trainee or Qualified status in one of 322 job titles, each of which has a related Position Task Book. Position Task Books outline required activities, tasks, and behaviors, and serve as a record for task completion. According to the Draft FQS Guide, under Trainee status employees meet minimum experience requirements outlined in Position Task Books. Employees can achieve qualified status, or certified, once they complete all the eligibility requirements in the Position Task Book outlined for the specified incident management or incident support positions.²⁷ FQS seeks to establish standardized position titles, improve job performance, and enable employees to pursue a specified career track. In June 2011, FEMA began the initial qualification determinations for DAEs and began notifying DAEs of their new job titles and status in December 2011.

DAEs currently receive almost all of their mandatory and cadre-specific training while deployed to JFOs. Mandatory courses include courses such as Ethics, Sexual Harassment, and Computer Security. In addition to mandatory courses, there are cadre-specific courses offered by FEMA's Emergency Management Institute. These courses are directly related to the DAE cadres. For example, DAEs in the Public Assistance Cadre have courses in cost estimates and public assistance eligibility. These courses can be delivered at the JFO, or can be taken at one of the Emergency Management Institute campuses; however, the majority of DAEs receive the courses at the JFO.

²⁶ Incident management and support positions are categories of disaster-related work performed in the field, in FEMA Regional Offices, and at FEMA headquarters related to specific incidents. Specifically, incident management positions involve the delivery of federal assistance in the field, operations, and the direct control and employment of resources. The responsibilities of support positions include the deployment of national-level assets, support of national programs affected during the disaster, and support of incident operations.

²⁷ FEMA will begin developing Position Task Books for incident support positions in 2012.

Opportunities Exist to Strengthen Policies and Procedures That Govern the DAE Program

FEMA has taken steps to enhance its management of the program, but has not developed or updated policies and procedures that align with the day-to-day management of the DAE program. FEMA has not provided guidance for how regional cadre managers should undertake their duties in the management of DAEs. Furthermore, FEMA could better monitor both its regions' implementation of DAE policies and DAEs' implementation of FEMA's disaster policies and procedures in order to reduce the risk of inconsistent application. In addition, FEMA does not have policies and procedures for how it communicates with DAEs when they are not deployed.

FEMA Has Not Yet Provided Guidance to Cadre Managers Related to DAE Management

FEMA has not yet developed guidance for cadre managers that outlines how they should manage DAEs in their cadre such as guidance for understanding and handling reserve pay and benefits, the deployment process, training procedures, and evaluation techniques. Specifically, 14 of 16 regional cadre managers we interviewed said that they have not seen or are not aware of documented guidance for their duties as cadre manager such as hiring, training, and developing DAEs from headquarters, and 10 of 16 stated that having written guidance would be beneficial to their job.²⁸ For example, one regional cadre manager said that there are inconsistencies across regions with how cadre managers hire, train, and utilize their DAEs. Another cadre manager added that inconsistent hiring processes affect morale among DAEs. Instructions on how to manage are handed down from experienced colleagues, but are not documented for consistent use, according to another cadre manager. FEMA stated in 1999 that it planned to establish guidelines and requirements for cadre management functions and intended this guidance to be applied consistently at headquarters and in the regions, but this effort was not completed.²⁹ In 2008, FEMA officials drafted a cadre manager's handbook; however, the handbook was not finalized or officially adopted across FEMA. The director of IWMO stated that he did not know why the cadre manager's handbook had not been completed since 2008. In February 2012, during the course of our review, FEMA

²⁸Of the other 2 regional cadre managers, 1 said that he has not received guidance from headquarters, but has received guidance from the Individual Assistance national cadre manager. The other manager did not provide a response. Regarding the issue of whether having written guidance would be beneficial, the remaining 6 cadre managers did not mention this issue.

²⁹FEMA Director's Policy No. 1-99.

began its Disaster Workforce Transformation.³⁰ According to FEMA, this effort includes creating a National Disaster Reservist Program intended to overhaul the current DAE program and examine issues such as cadre management. Further, IWMO officials stated that in fiscal year 2012, they intend to develop a new cadre management handbook, revise FEMA DAE policy, conduct regularly scheduled meetings and conference calls with cadre managers, and conduct a national conference designed to educate cadre managers on their roles. However, FEMA does not have time frames or milestones for completing and disseminating cadre manager guidance as part of its Disaster Workforce Transformation and related activities.

In the absence of cadre manager guidance, IWMO officials stated that FEMA Instruction 8600.1, issued in 1991, is the best source for information and guidance on the roles and responsibilities of cadre managers. The document outlines DAE policy for recruitment and hiring, reappointment, appraisals, and benefit eligibility. However, many of its sections are obsolete or inoperative. For example, FEMA Instruction 8600.1 states that the office directors are responsible for the recruitment, selection, training, use, and management of their DAE cadres. According to FEMA, the regional cadre managers currently have these responsibilities; however the 8600.1 policy is not updated to reflect this change in responsibility. In addition, 9 of 16 regional cadre managers we interviewed stated that FEMA Instruction 8600.1 was either outdated, in need of revision, or not applied consistently across the organization.³¹ One regional cadre manager said that he would like anything from headquarters with respect to guidance, but all that he has seen is FEMA Instruction 8600.1, which is outdated. This manager added that it was unclear whether any steps have been taken to ensure that FEMA Instruction 8600.1 is applied consistently across regions. Another regional manager said when they have to give new hires a copy of FEMA Instruction 8600.1, they amend the document to reflect recent policy changes.

³⁰FEMA's Disaster Workforce Transformation initiative is intended to improve how FEMA prepares, trains, informs, and engages its disaster workforce.

³¹Of the remaining cadre managers we interviewed, 2 said that they were not sure whether FEMA Instruction 8600.1 was applied consistently across regions, and 5 did not mention the issue.

A 2010 DHS OIG report recommended that FEMA review and update key DAE program benefit policies, procedures, and guidance to eliminate conflicts and inconsistencies between interim policies and permanent overall guidance.³² In response to the IG's report, FEMA officials stated that FEMA Instruction 8600.1 was under revision. In March 2012 during the course of our review, FEMA officials stated that the revision of FEMA Instruction 8600.1 has been placed on hold pending the results of FEMA's fiscal year 2012 workforce transformation initiative to ensure all issues that result from the transformation effort are identified. According to standard practices for program management, an organization should develop a program schedule that establishes the timeline for program milestones and deliverables.³³ Given that FEMA has not completed previous efforts to create guidance for cadre managers, establishing time frames and milestones could help FEMA ensure accountability for completing and disseminating the cadre manager handbook and a revised FEMA Instruction 8600.1.

FEMA Could Better Monitor Implementation of Policies and Procedures

FEMA's decentralized structure allows for flexibility in responding to disasters; however, FEMA does not monitor how the regions implement DAE policies, and how DAEs implement disaster policies and procedures. Without such a mechanism, it will be difficult for FEMA to provide assurance that both its regions and DAEs implement DAE policies and disaster policies and procedures consistently. For example, DAEs in focus groups we conducted and regional cadre managers we interviewed expressed concerns about the inconsistency across regions in interpreting FEMA policy. Specifically, they raised concerns about inconsistencies across regions or cadres in how supervisors interpret both DAE administrative policies and/or cadre-specific disaster policies. For example, one focus group participant said that although there are standard policies and procedures, each disaster is different, with different supervisors that interpret these policies differently. Another focus group participant reiterated this point, stating that the regions and cadres direct their DAEs on how to approach disaster tasks differently, which lead to inefficiencies in providing disaster assistance. Participants in the public assistance cadre, for example, raised concerns about the variability that

³²DHS-OIG, *FEMA's Management of Disaster Assistance Employee Deployment and Payroll Processes*, OIG-10-115 (September 2010).

³³Project Management Institute, *The Standard for Program Management*, 2006.

exists in how supervisors and managers interpret public assistance policy on documenting damage assessments, leading to differences in how well the worksheets are prepared. One participant stated that there are inconsistencies across regions when preparing the project worksheets used to document disaster damage and provide cost estimates and plans for repair. Specifically, this focus group participant stated that in certain regions DAEs are instructed to focus on the number of worksheets passed through the system. Although it is not referred to as a quota, the participant stated that if a DAE does not achieve this number, he or she will be sent home before completing his deployment. Conversely, in other regions, supervisors and other managers do not apply a goal for the number of worksheets to be completed and are concerned with quality rather than quantity. These variations can lead to inconsistencies in how the worksheets are completed. Another focus group participant stated that the inefficiencies and inconsistencies that run across the board were problematic adding that when determining eligibility for public assistance, sometimes things are made eligible in one state that are not eligible in another state. Moreover, a 2007 Booz Allen Hamilton preliminary report entitled Restructuring and Enhancement of the Intermittent Disaster Workforce System also identified inconsistencies in the application of policies and standard operating procedures across regions and cadres.³⁴

In March 2012 during the course of our review, FEMA officials stated that the agency intends to establish a centralized management structure responsible for the development of FEMA disaster assistance policies and procedures. FEMA policy states that headquarters is responsible for developing the agency's policies and procedures for disaster assistance and the regional offices are responsible for the implementation of these policies and procedures. We recognize that FEMA's decentralized structure allows for flexibility in handling disasters as each region can encounter different types of disasters and the regional structure can facilitate disaster assistance. In a February 2012 FEMA town hall meeting, FEMA's Administrator acknowledged that there are inconsistencies across the FEMA regions, and noted that due to differences in how regions operate, it is problematic to deploy someone

³⁴Booz Allen Hamilton, Restructuring and Enhancement of the Intermittent Disaster Workforce System: Preliminary Findings Report (Herndon, Va.: Booz Allen Hamilton, 2007). The Booz Allen Hamilton report we reviewed was preliminary and FEMA could not locate the final report. FEMA stated that they are addressing the observations from this review.

based in one region to another during a disaster.³⁵ Moreover, a regional cadre manager we interviewed cited inconsistency in policy application saying, “there is an ongoing problem of the right hand not knowing what the left hand is doing with respect to when policies are implemented or are in conflict with one another”. Without routinely monitoring how disaster policies and procedures are being implemented across regions by DAEs and how the regions implement DAE policies, FEMA lacks reasonable assurance that it is administering its disaster assistance consistently across regions in accordance with its mission.

Standards for Internal Controls in the Federal Government call for an organization’s controls to be designed to assure that ongoing monitoring occurs in the course of normal operations and that it includes regular management and supervisory activities, comparisons and reconciliations.³⁶ Moreover, according to FEMA’s Capstone Doctrine, which describes FEMA’s mission, purpose, and defines the agency’s principles, FEMA advocates the practice of consistent decision making by those with authority to act.³⁷ Establishing a mechanism to ensure routine monitoring of the regional implementation of DAE policies and procedures, as well as how DAEs implement disaster policies, could help provide FEMA with reasonable assurance that disaster assistance is being implemented by DAEs in accordance with policy and consistently across regions.

Opportunities Exist to Communicate Cadre-Specific Information More Consistently with DAEs When Not Deployed

FEMA does not have policies and procedures for how it will communicate cadre-specific information to DAEs when not deployed. Most DAEs do not have access to cadre-specific information when not deployed, although FEMA has recently taken steps to increase communication. The majority of the cadre-specific information for DAEs is housed on FEMA’s internal website and is not accessible by DAEs when they are not deployed. This is because when DAEs are not deployed, they do not have access to their FEMA-issued equipment such as laptops, as well as their FEMA e-mail accounts. As a result, DAEs are not able to access information directly, including changes in policies and procedures that may occur while they

³⁵In February 2012, FEMA conducted a series of town hall meetings for all FEMA employees, including DAEs, in all 10 FEMA regions and headquarters.

³⁶[GAO/AIMD-00-21.3.1](#).

³⁷The Federal Emergency Management Agency Publication 1, November 2010.

are not deployed, and may not immediately be prepared to provide assistance to survivors during a disaster. Once DAEs are deployed to a disaster, they are typically provided equipment, such as laptops, and FEMA e-mail addresses, which are used to receive policy and procedural updates. However, DAEs in the focus groups we conducted raised concerns about their inability to access this type of information prior to being deployed to a disaster. For example, one focus group participant told us that it is difficult to keep up with changes as they happen when they are not deployed because they receive very little information when they are not deployed. Another focus group participant told us that they cannot access policy changes because they do not have access to information behind FEMA's firewall. We also heard from one DAE that because she was not provided program information related to her job, it was difficult for her to feel comfortable representing FEMA to disaster victims without access to information such as materials related to applicant services.

Thirteen of 16 regional cadre managers we interviewed said that they communicate policy and procedural updates to DAEs when they are not deployed via personal e-mail accounts, however, not all cadre managers believe that it is their responsibility to convey policy updates to their DAEs when they are not deployed. For example, one cadre manager who is responsible for 180 DAEs told us she believes that policy changes should come from FEMA headquarters and should be posted on FEMA.gov. Consequently, this cadre manager does not forward policy changes to personal e-mail accounts.

According to another cadre manager, communicating policies and procedures to DAEs when they are not deployed is difficult because DAEs are completely disconnected from the mechanisms typically used to share information with FEMA staff during non-deployment. Further, he added that this proved to be a problem during disasters in 2010 where DAEs that had not been deployed for a while were unfamiliar with FEMA's recent policy updates. The manager said this situation was problematic because management did not always have the time to walk these DAEs through policy changes. Ultimately, this lack of access to information among DAEs had an impact on DAE readiness because it extended their learning curve and potentially created delays in providing service in some cases.

According to an official from FEMA's Office of the Chief Information Officer, cadre managers have developed their own strategy for communicating with DAEs when they are not deployed. In addition,

officials from IWMO told us that cadre managers are best suited to determine the precise information and content that will meet the needs of their respective cadre. Therefore, cadre managers are encouraged by IWMO to develop informative resource pages for their DAEs. For example, we found that the Hazard Mitigation cadre has developed a platform to communicate and share a vast array of resources with DAEs without access to FEMA's internal website. Specifically, Hazard Mitigation's disaster workforce resources are available on both FEMA's internal website as well as the Hazard Mitigation Disaster Workforce portal on the Homeland Security Information Network (HSIN), which can be accessed via any Internet connection with a login and password. The portal provides resources for each of the different functional areas of Hazard Mitigation, including web links, contact information, tasks books, job aids, policies, publications, and training materials for the Hazard Mitigation workforce. However, as of March 2012, these tools were limited to the Hazard Mitigation Cadre. According to IWMO, other cadres, including Alternate Dispute Resolution, Community Relations, Individual Assistance, and Environmental & Historic Preservation have internal websites that contain programmatic policies and procedures. However, these sites are not readily available to DAEs who do not have access to FEMA's internal website. In a budget-constrained environment, leveraging existing mechanisms can help agencies achieve efficiencies. While our prior work has identified issues with the HSIN platform, it could be used to provide DAEs greater access to FEMA resources.³⁸ According to FEMA's Office of the Chief Information Officer, HSIN would be an

³⁸In April 2007, we reported that when coordinating efforts between HSIN and other state and local information-sharing initiatives, DHS did not fully adhere to key practices aimed at enhancing information sharing, collaboration, and avoiding duplication nor did it develop compatible policies, procedures, and other means to operate across organizational boundaries. We recommended, among other things, that DHS assess whether there are opportunities for HSIN to improve information sharing and avoid duplication of effort; and where there are opportunities, implement effective coordination and collaboration practices. DHS largely agreed with our recommendations and initiated actions to implement them including creating the HSIN Advisory Council—a HSIN user group composed of representatives from state, tribal, and local governments and the private sector—which met to discuss HSIN information-sharing activities and provided strategic-level recommendations. DHS also created the HSIN Mission Coordinating Committee—a user group composed of representatives from DHS's components (e.g., the Office of Infrastructure Protection, the Coast Guard, and the Federal Emergency Management Agency)—to address their respective users' requirements for HSIN. GAO, *Information Technology: Numerous Federal Networks Used to Support Homeland Security Need to Be Better Coordinated with Key State and Local Information-Sharing Initiatives*, [GAO-07-455](#) (Washington, D.C.: Apr. 16, 2007).

appropriate tool for DAEs to use to stay connected to FEMA because it would allow them access to pertinent information from anywhere and would not represent an additional cost to FEMA.

Inconsistent access to information among non-deployed DAEs, in addition to inconsistent communication strategies with DAEs among regional cadre managers, may hinder FEMA's mission of providing assistance to disaster survivors, by extending the amount of time it takes DAEs to familiarize themselves with the most current cadre-specific policies and procedures when they are deployed. However, FEMA has taken some steps to improve DAEs' access to information when they are not deployed. For example, part of FEMA's Disaster Workforce Transformation includes plans intended to increase communication to DAEs. FEMA stated that it plans to have consistent, two-way communication with DAEs even when they are not deployed. According to FEMA, this communication will include sending weekly e-mails about agency activities to each of the personal e-mail addresses it has on file for its entire workforce and developing a dedicated employee-focused website accessible to all of its employees. However, the employee-focused website contains a minimal amount of cadre-specific information. Since FEMA will rely on its cadres to provide their own content, the extent to which FEMA's new centralized employee-focused website will include cadre-specific policies and procedures that DAEs need to perform their duties while deployed, such as those provided by the Hazard Mitigation cadre via its HSIN portal, is not clear. For example, as of March 2012, FEMA's publicly available website for its employees included an Employee Information and Resource Center that houses general information such as travel policies, newsletters, and information related to the FEMA's Disaster Workforce Transformation and FQS. Unlike the Hazard Mitigation portal on HSIN, FEMA's employee website did not include cadre-specific information such as Concept of Operations documents that describe how specific cadre efforts are conducted in the pre- and post-disaster environment, or field office guides and Go Kits which contain cadre-specific guidance, which are resources that DAEs can access to better prepare themselves for future disasters while they are not deployed.

As part of FEMA's Disaster Workforce Transformation efforts, it developed an employee-focused website; however, according to FEMA, the new employee website was not intended to be a long-term solution, nor was it intended to replace FEMA's internal website used to communicate with its workforce. FEMA has not developed a plan with milestones for how it will communicate not only general information but

cadre-specific information to DAEs when they are not deployed. According to FEMA, the agency is examining other solutions that would allow the agency's entire workforce to have access to all information, but a specific time frame has not been determined. According to standard practices for program management, an organization should develop a program schedule that establishes the timeline for program milestones and deliverables.³⁹ As FEMA implements its Disaster Workforce Transformation, developing a plan with time frames and milestones for how it will better communicate cadre-specific policies, procedures, and other information to DAEs when they are not deployed would provide FEMA with a roadmap to help ensure that it is providing DAEs the tools they need to be prepared for disaster deployments.

FEMA Could Strengthen Human Capital Management Controls

FEMA has not established standardized hiring or salary criteria to help ensure that basic qualifications are met by prospective DAEs, and that regional managers consistently determine initial DAE salaries and award promotions. Moreover, FEMA's performance appraisal system for DAEs does not adhere to internal control standards, which would help ensure that managers have information to better inform performance management decisions.

FEMA Has Not Established Standardized Hiring and Salary Criteria for DAEs

Hiring Criteria

FEMA has not established standardized hiring criteria for prospective DAEs, and FEMA headquarters provides limited guidance to regions on which to base DAE salary determinations.

According to FEMA Instruction 8600.1 of 1991, the primary document outlining DAE program policies, regional cadre managers are responsible for the recruitment, selection, use, and management of their respective DAE cadres. Our review of policies and interviews with regional cadre managers as well as officials in FEMA headquarters indicate that DAEs are hired by regional cadre managers without being assessed against established criteria to determine their qualification for the position. Regional cadre managers make the initial hiring selection, and then send a hiring package with the individual's qualifications and a proposed salary to the Office of the Chief Component Human Capital Officer (OCCHCO). OCCHCO officials stated that they then review the individual's package to

³⁹Project Management Institute, *The Standard for Program Management*, 2006.

verify that the selected individual is qualified for the position and that the proposed salary is appropriate based on experience and skills described in the individual's resume. However, criteria used by OCCHCO officials in assessing the qualifications and pay of a DAE applicant are not documented; rather, OCCHCO officials stated that these decisions are based on general knowledge. An OCCHCO official who reviews the hiring package containing the applicant's paperwork said that she believes that regional cadre managers do not always use the same criteria for evaluating qualifications and selecting a DAE candidate as the OCCHCO official uses in approving the proposal. In addition, a regional cadre manager from Hazard Mitigation said that the national cadre manager at headquarters provides guidance for hiring. In contrast, another regional manager said that there is no written guidance available, and that regional cadre managers are on their own in making hiring decisions.

According to OCCHCO, the agency's hiring criteria for DAEs is contained within FEMA Instruction 8600.1.⁴⁰ This policy states that "consideration should be given to the specific job functions, the qualifications required to perform those jobs, and Equal Employment Opportunity requirements." However, the policy does not provide explicit information on the qualifications for different cadres or positions, such as the relevant experience, education, or skills. For example, there is no FEMA-wide guidance on the preferred skills and experience of prospective DAEs for a given position in the IA cadre or the PA cadre, which focus on different aspects of assistance, and thus, require different expertise. OCCHCO officials agreed that it would be useful to have a list of bulleted skills and qualifications that are desired by each cadre for making hiring decisions. An OCCHCO official who reviews hiring and salary recommendations said there is no specific guidance provided to regions related to hiring criteria, other than FEMA Instruction 8600.1, because they believe that the regions have competent people hiring DAEs.

⁴⁰In addition, FEMA officials stated that the Position Task Books created for the credentialing process prior to FQS are being used to provide guidance and direction to the regions regarding hiring DAEs. FEMA officials said that as the agency implements the FEMA Disaster Workforce Transformation, meetings will be held between OCCHCO, IWMO, and the cadre managers to discuss how the FQS Position Task Books will be used to determine qualifications and set salaries. However, as of April 2012 there was no written policy or guidance instructing the regions to use the Position Task Books for hiring purposes.

Guidance for Salary Determinations

The 2007 preliminary report by Booz Allen Hamilton on FEMA's disaster workforce stated that the lack of standardization in recruitment standards, interviewing processes, and hiring practices led to a wide disparity in the qualifications of DAEs across the regions, which the report noted may impair FEMA's ability to effectively respond to a disaster.⁴¹ Moreover, one regional cadre manager said that morale is lowered when unqualified DAEs are hired, and another said that many DAEs complain that there is significant variation across regions in terms of the skills required for different positions. In addition, a DAE who participated in our focus group stated that if FEMA had asked the right questions, he would not have been hired, since he did not have the necessary technological skills to use the laptop, GPS, and digital camera that FEMA provided to him.

Standards for Internal Controls in the Federal Government call for agencies to identify appropriate knowledge and skills needed for various jobs. According to FEMA, when FQS is implemented in 2012, position-specific training and position task requirements will be defined for each of the 322 positions to provide more specificity; however, FEMA could not provide details about how or if this will translate into better hiring criteria for prospective DAEs.⁴² By standardizing hiring criteria, FEMA would be better positioned to hire people with the requisite skills and have reasonable assurance that hiring decisions are being made consistently across regions.

In addition, FEMA headquarters provides limited guidance for regions to use to make DAE salary determinations. According to a FEMA official, in addition to FEMA Instruction 8600.1, the "Grant C. Peterson Memo" (Peterson Memo) of 1992 put forth guidance for pay levels and promotions.⁴³ This guidance outlines five pay grades (A through E), as well as the three levels within each pay grade and relates these pay grades to their approximate GS or GM federal grade level.⁴⁴ The

⁴¹Booz Allen Hamilton, Preliminary Findings Report, 27.

⁴²FEMA could not provide details about how FQS will translate into better hiring criteria for prospective DAEs in addition to identifying the requisite training and skills needed by newly hired DAEs to become qualified under FQS.

⁴³See appendix VII for DAE pay scale.

⁴⁴The General Schedule (GS) system is a graded pay system established under the Classification Act of 1949. GM (General Manager) employees were formerly paid under the Performance Management and Recognition System (PMRS). GM employees are now paid under the GS system.

Peterson Memo states that all DAEs will be given a tentative pay grade at the time of the initial appointment, and within 90 days a decision will be made as to whether or not that tentative grade is appropriate or should be changed to a different grade. The Peterson Memo lists position titles that would be assigned to Grades A through E, but it does not clarify how a DAE is to be assigned to one of the three levels within each grade.⁴⁵ In addition, the memo does not establish criteria on which to base initial salary decisions or reconsiderations within the 90-day window.

An OCCHCO official stated that it is possible that cadre managers have developed their own criteria for placing DAE hires in certain pay categories. For example, the OCCHCO official noted that some cadre managers bring everyone in on a C-1 level (approximately \$21/hour) until they are able to “learn about the organization,” a process which is not quantified or measured. We noted variation among regional cadre managers with respect to pay determinations, with some managers proposing pay according to the candidate’s experience, and others basing pay determinations solely on the job title. For example, six regional cadre managers said that pay determinations depend on the candidate’s experience, education, and background and one added that individuals with the same job title could be paid differently depending on their experience. In contrast, three different regional cadre managers said that pay is based on the job title or position the DAE is hired to fill; for example, one said that a data entry DAE would start in the A or B pay grade, while construction managers would be assigned to the C pay grade. Variation in salaries across regions and cadres can lower morale among DAEs who are deployed in multiple regions and notice DAEs that are paid more despite having less responsibility, according to two regional cadre managers. A senior FEMA official in a recent “town hall meeting” acknowledged that there have been issues with the pay and promotion system for DAEs for many years, and that leadership will be looking at the issue. In addition, the Assistant Administrator for Response said that there is currently no consistency with pay determinations or raises, and that changes to the pay system will be a part of FEMA’s Disaster Workforce Transformation. Additionally, 8 of 16 regional cadre managers we interviewed stated that they do not receive guidance or would like to

⁴⁵For example, the Peterson Memo states that a Data Entry Clerk is to be considered a Grade A; a Program Assistant (PA) is to be considered a Grade B; a PA Inspector is to be considered a Grade C; a Program Officer (IA) is to be considered a Grade D; and an Audit Manager is to be considered a Grade E.

receive more guidance related to salary determinations, including the criteria used by headquarters.⁴⁶ FEMA headquarters could clarify what kind of professional experience gained prior to joining FEMA is considered relevant for different positions and cadres or to what extent disaster-specific responsibilities may factor into salary determinations. Ten of 16 regional cadre managers said that headquarters has previously denied pay determinations proposed by the region, and two of these regional cadre managers responded by asking the applicant to revise his or her resume and re-send it to headquarters.⁴⁷ One of these regional cadre managers noted that he did not know what headquarters was looking for when making decisions regarding whether to place a candidate in pay Grade B or C.

During recent town hall meetings between agency leadership and employees, a FEMA official acknowledged that pay grade distribution and pay raise inconsistencies are an issue in the DAE program. The Assistant Administrator for Response noted that more than 90 percent of DAEs are in the C category or above, and as a result there are DAEs in higher pay grades performing work that should be done by lower-paid DAEs. According to FEMA officials, they will be looking into these issues as part of FEMA's Disaster Workforce Transformation. In addition, FEMA officials noted that FQS will institutionalize pay determinations for DAEs based on job title, but as of March 2012, they could not provide details regarding this effort. Standards for Internal Control in the Federal Government state that good human capital policies and practices should include establishing appropriate practices for compensating and promoting personnel. We have reported that agencies may abide by these standards by basing compensation on achievements and performance. By establishing standardized criteria for making DAE salary and promotion determinations, FEMA could increase transparency around salary determinations and reduce unnecessary variation across regions.

⁴⁶Of the other 8 cadre managers, 3 had received some guidance related to salary determinations, and the remainder did not indicate whether or not they had received guidance.

⁴⁷Of the other 6 cadre managers, 3 said that they had not received any denials from headquarters and 3 did not mention whether they had received any denials or their response was inconclusive.

Performance Appraisals for DAEs Do Not Adhere to Internal Control Standards

FEMA's performance appraisal system for DAEs is not consistent with internal control standards, which would help ensure that managers have information to better inform performance management decisions.⁴⁸ Standards for Internal Control in the Federal Government state that agencies should establish appropriate practices for evaluating, counseling, and disciplining personnel.⁴⁹ In addition, these standards state that effective management of an organization's workforce include identifying appropriate knowledge and skills needed for various jobs and providing candid and constructive counseling, and performance appraisals. We have previously reported that agencies could adhere to these internal control standards through a number of actions, such as ensuring that:

- promotions and compensation of employees are based on periodic performance appraisals;
- employees are provided with appropriate feedback and given suggestions for improvement; or that
- employment is terminated when performance is consistently below standards.⁵⁰

Performance appraisal systems are intended to provide agencies with information related to the effectiveness of employees and serve as a mechanism to identify and improve performance deficiencies. FEMA's performance management system for DAEs is based on a performance appraisal form that is not consistent with internal control standards, which state that counseling should be candid and constructive. According to FEMA Instruction 8600.1, supervisors are required to complete a performance appraisal form for DAEs at the end of each DAE's deployment. As shown in figure 2, all DAE reservists are rated on seven

⁴⁸According to FEMA, the DAE performance process is not an OPM-approved program. However, we have reported in [GAO/AMD-00-21.3.1](#) that implementing effective internal controls is a key factor in achieving agencies' missions and program results.

⁴⁹[GAO/AMID-00-21.3.1](#).

⁵⁰GAO, *Internal Control Management and Evaluation Tool*, [GAO-01-1008G](#), August 2001. This is a guide that GAO produced to assist agencies in maintaining or implementing effective internal controls. This tool is not required to be used, but it is intended to provide a systematic and structured approach to assessing the internal control structure.

elements, and supervisors are rated on an additional seven elements.⁵¹ In addition, there is a narrative portion of the performance appraisal form where supervisors are required to include written comments.

Figure 2: Disaster Assistance Employee Performance Appraisal Elements

The following definitions are to be used:

S SATISFACTORY - Consistently meets normal requirements

U UNSATISFACTORY - Fails to meet normal requirements

N/A UNABLE TO EVALUATE - No opportunity to observe performance

PART I - ALL EMPLOYEES		PART II - ALL SUPERVISORS	
ELEMENTS	RATING	ELEMENTS	RATING
1. Knowledge of Job, Rules, Regulations and Policies - Understands duties and responsibilities and applies skills in conformance with applicable guidance.	_____	1. Planning and Organizing - Effectively utilizes staff time and skills and develops priority-driven work schedule.	_____
2. Quality/Timeliness/Sense of Priorities - Produces useful volume of work, meets deadlines, organizes/prioritizes work.	_____	2. Leadership - Inspires teamwork and productivity; delegates responsibility.	_____
3. Quality of Work - Finished product is accurate, complete, and in compliance with procedures.	_____	3. Develops, Motivates, and Counsels Staff - Identifies employee potential; encourages and assists in employee development.	_____
4. Initiative - Assumes responsibility; completes assignments with minimal supervision.	_____	4. Personnel Management - Achieves program goals within the limitations of staff and personnel budget; controls overtime usage.	_____
5. Dependability - Gets the job done efficiently, adhering to procedures; is supportive and reliable.	_____	5. Equal Opportunity/Affirmative Action - Complies with regulations; displays fairness in selections; encourages/recognizes employees' achievement.	_____
6. Communication Skills - Gets ideas across clearly, concisely, and effectively both orally and in writing.	_____	6. Technical Ability - Provides sound, timely advice and inspires action.	_____
7. Cooperativeness - Works well with others to achieve a common goal.	_____	7. Resources Management - Efficient management of funds, equipment, and supplies.	_____

Source: GAO and FEMA.

⁵¹FEMA Form 90-106, the Performance Appraisal for the Disaster Assistance Program, may be used to evaluate the performance of any FEMA employee deployed to a disaster, including Permanent Full-Time, Cadre of On-Call Response/Recover Employees and DAEs.

For each element, a DAE may be given an “S” for Satisfactory, “U” for Unsatisfactory, or “N/A” if a supervisor had no opportunity to observe the DAE’s performance; these ratings are essentially a pass/fail system. However, it is unclear what constitutes successful completion of each element, and FEMA headquarters has not provided any written guidance to regions for assigning ratings. For example, FEMA lacks criteria that can be used to make the determination that a DAE should receive an S or a U for a given element. FEMA Instruction 8600.1 addresses what cadre managers should do with the appraisal form, but not specifically how to assign a rating and what content managers should include in the narrative portion. Eleven of 16 regional cadre managers we interviewed stated that DAEs are not given honest appraisals.⁵² These regional cadre managers stated that ratings are not always an accurate reflection of performance because currently there is a conflict of interest because supervisors (who are also DAEs) must evaluate subordinate DAEs who could be their supervisors in the next deployment. According to the Director of IWMO, when FQS is implemented in fiscal year 2012, DAEs will continue to supervise other DAEs in the field. This official said that the qualification requirements under FQS will help ensure that the supervising DAEs have the professionalism to manage other DAEs. However, given the fact that DAEs may continue to serve at levels below the one for which they are qualified, the conflict of interest could continue. While we recognize that ensuring supervisors provide candid ratings can be challenging for agencies, strengthening the controls in place for developing performance ratings could help FEMA provide both managers and DAEs more meaningful performance information.

In addition, the performance appraisal system could be more transparent by providing managers with additional information to use when making performance management decisions. For example, because the appraisal form usually provides little information to managers regarding a DAE’s performance during a disaster, one regional cadre manager noted that branch directors contact the regions and let them know of any problems with their cadre members. The manager added that instead of or in addition to reviewing the performance appraisal forms, supervisors and managers must make phone calls and send e-mails to give a picture of a DAE’s performance and areas for improvement. In addition, it is not clear

⁵²Of the other 4 regional cadre managers, 2 said that they had given unsatisfactory ratings or that ratings were honest, and 2 did not mention this issue.

how performance appraisals are utilized in decisions related to reappointment, performance deficiencies, pay, and promotions for DAEs. FEMA headquarters has not provided guidance to regions to clarify these issues, according to 13 of 16 regional cadre managers and OCCHCO.⁵³ According to an IWMO official, the office previously known as Disaster Reserve Workforce Division had been actively involved in redesigning the performance appraisal process, including improving the appraisal form and maintenance of performance records. However, he said that when the office was revamped and realigned into IWMO, the effort languished. IWMO and OCCHCO officials noted in March 2012 that performance management is a critical component of the supervision of DAEs and stated that it must be improved in fiscal year 2012 during FEMA's Disaster Workforce Transformation effort. However, FEMA does not currently have specific plans to revamp the performance appraisal system.⁵⁴

We have previously reported that one of the key practices for effective performance management is making meaningful distinctions in performance, including providing management with the objective and fact-based information it needs to recognize top performers and providing the necessary information and documentation to deal with poor performers.⁵⁵ Similarly, we have previously reported that performance appraisals should provide meaningful distinctions in performance for staff, which is difficult to accomplish with a pass/fail system.⁵⁶ We also reported that a limited number of performance categories may not provide managers with the information they need to reward top performers and address performance issues, as well as deprive staff of the feedback they need to improve.⁵⁷ In addition, 13 of 16 regional cadre managers stated that the

⁵³Of the other 3 regional cadre managers, 2 said that FEMA had provided guidance and 1 did not mention this issue.

⁵⁴According to FEMA, FQS will not replace performance appraisals, and the system being identified to support FQS does not store performance appraisal documentation.

⁵⁵GAO, *Results-Oriented Cultures, Creating a Clear Linkage between Individual Performance and Organizational Success*, [GAO-03-488](#) (Washington, D.C.: Mar. 14, 2003).

⁵⁶GAO, *Financial Regulators: Agencies Have Implemented Key Performance Management Practices, but Opportunities for Improvement Exist*, [GAO-07-678](#) (Washington, D.C.: June 18, 2007).

⁵⁷GAO, *Veterans' Benefits: Improvements Needed in VA's Training and Performance Management Systems*, [GAO-08-1126T](#) (Washington, D.C.: Sept. 18, 2008).

appraisal process could be improved in various ways, such as implementing a rating scale instead of a pass/fail rating.⁵⁸ Specifically, using multiple rating levels provides a useful framework for making distinctions in performance by allowing an agency to differentiate, at a minimum, between poor, acceptable, and outstanding performance. We have reported that two-level rating systems by definition will generally not provide meaningful distinctions in performance ratings, with possible exceptions for employees in entry-level or developmental bands.⁵⁹ Similarly, a 2007 preliminary report by Booz Allen Hamilton on the DAE program found that there was a lack of standardization and fairness in the performance review system, specifically that the system was not managed evenly and did not distinguish between levels of performance.⁶⁰ The report noted that an inadequate performance review system affects the development and assignment of DAEs, as well as their contribution to FEMA's overall response to disasters. Taking steps to establish a more rigorous performance management system that addresses the weaknesses we identified could help provide FEMA with more information regarding how effectively DAEs are performing and a mechanism to identify and improve any performance deficiencies. By providing clear criteria and guidance for assigning ratings, as well as how the ratings are to be used, FEMA could help to ensure that DAEs' performance appraisals better reflect actual performance and provide managers with information to better inform performance management decisions.

FEMA's DAE Training Is Not Consistent with Key Attributes of Effective Training and Development Programs

FEMA's DAE training is not consistent with key attributes of effective training and development programs that could help to ensure that its training and development investments are targeted strategically. FEMA does not have a plan to ensure that all DAEs receive required training under FQS, which would ensure accountability for qualifying DAEs. In addition, FEMA does not track how much it spends on DAE training, which hinders FEMA's ability to plan for future training.

⁵⁸The other 3 regional cadre managers did not provide a response regarding how the performance appraisal process could be improved.

⁵⁹[GAO-07-678](#).

⁶⁰Booz Allen Hamilton, Preliminary Findings Report, 7.

FEMA Does Not Have a Plan to Ensure DAEs Receive Required Training

FEMA does not have a plan with time frames and milestones to ensure DAEs receive training, including required training for its new credentialing program, FQS. FEMA provides the majority of its training to DAEs in the field during disasters. Under FQS, DAEs must complete required training and demonstrate successful performance in specific areas in order to be qualified in their job title. Therefore, DAEs' career track will be aligned to their deployments, and subsequently tied to their opportunities to participate in field training. Regional cadre managers and DAEs we spoke with had concerns about the amount of training DAEs received during disasters as well as FEMA's reliance upon on-the-job training for new DAEs due to limited training opportunities. Thirteen of 16 regional cadre managers said that they would like more opportunities for DAEs to receive training.⁶¹ For example, one Human Resource cadre manager said that required training courses were not available the past year, and that some courses, such as those developed for human resource managers, had not been offered for 3 or 4 years. In addition, one DAE said that the amount of training they received was insufficient and added that it was a disservice to the applicants for FEMA assistance because DAEs may not know how to properly assist the public. Another DAE, who also holds a management position, told us that half of the DAEs deployed in Community Relations in his current disaster did not have any training other than on-the-job training. Furthermore, IWMO officials said some regions provide general pre-deployment orientation materials, such as instructions on completing certain administrative tasks; otherwise, it is up to the cadre manager to provide DAEs information pertinent to their assignment prior to their deployment. Therefore, the extent to which a DAE receives orientation depends on the cadre, the region, and the timing of deployments.

Under FQS, DAEs will be assigned job titles, and each DAE will either be designated as a trainee or qualified for that job title. For a DAE to become qualified, they must complete required training and meet the minimum number of deployments and various deployment experiences. According to FEMA, approximately 20 percent of the current DAEs (2,005 of 9,981) are considered trainees and will need training and future deployments to become qualified. However, according to FEMA, as of March 2012, 136 courses were not available because they were being revised or not yet

⁶¹None of the remaining 3 cadre managers provided a response concerning the topic of providing more opportunities for DAEs to receive training.

developed. In addition, FEMA stated that of the 136 courses, 83 are in various stages of pilot testing and they have developed a schedule to revise or develop courses through the end of fiscal year 2012. Officials said that if a course will not be developed in the foreseeable future, exemptions can be made for the DAE to be fully qualified if they have completed the remaining requirements.

According to key attributes for federal training programs, agencies should have agency planning documents such as training plans, and training and development design and evaluation documents, which focus on identifying targeted performance improvements and report on progress in achieving results.⁶² As previously mentioned, successful organizations should also establish timelines for program milestones and deliverables.⁶³ According to FEMA officials, the agency has begun an initiative intended to identify the number of personnel, by position, needed to respond to and manage various incidents. It is also intended to determine the number of training courses they will need based on the number of open position task books. In fiscal year 2012 FEMA plans to implement this initiative as well as FQS in order to develop a plan to train DAEs, according to the agency. However, FEMA officials also said that qualifying all DAEs under FQS will depend on each DAE's commitment to making themselves available for deployments and the level of disaster activity. DAEs are required to update their availability for deployments at least every 30 days, and must be available for deployments for at least 60 days a year. FEMA does not have a plan or time frames in place to ensure that all DAEs are qualified under FQS and receive required training; instead, FEMA is depending on DAEs to commit to be deployed. A plan with time frames and milestones for how and when it will train all of its DAEs will provide FEMA with a roadmap and ensure accountability for qualifying DAEs under FQS.

Systematically Tracking Training Cost Could Allow FEMA to Better Plan for Future Training Expenses

FEMA does not track how much of the Disaster Relief Fund is spent on training for DAEs while deployed to JFOs. As a result, FEMA does not have a comprehensive picture of costs and expenses, and other financial information related to training and development activities. All expenses incurred at a JFO, including training costs, are funded by the Disaster Relief Fund. Comptrollers at the JFO are responsible for approving and

⁶²[GAO-04-546G](#).

⁶³Project Management Institute.

monitoring all the funds used at a JFO; however, they are not required to track the training costs. The Disaster Field Training Operations cadre is responsible for developing a training plan based on the training needs of the DAEs deployed to a particular JFO. The training plan then must be approved by the Federal Coordinating Officer. FEMA's Deputy Director for Field Operations said the plan does not include the costs associated with the recommended courses unless the training is being provided by a contractor. Costs associated with training—such as travel expenses, per diem for the instructors, and copy materials—are all included in the administrative costs of the JFO. FEMA's Deputy Director for Field Operations further stated that there is no accounting code specific to training costs, therefore, the agency does not currently have the needed information to identify those costs specific to completed courses. The official added that FEMA maintains a few codes that have some relationship to training, such as a code for training-related office supplies and printing costs. The official noted that it may be possible to accumulate all of the training-related codes that are currently in existence and come up with an estimate of the total cost associated with training; however, this figure would not provide a complete picture of training costs.

FEMA's Disaster Readiness and Support account is part of the Disaster Relief Fund. It funds generalized, non-disaster specific initiatives such as training that provides disaster readiness and preparedness support across FEMA. In fiscal year 2011, the Disaster Readiness and Support account totaled \$304.7 million, of which \$9 million was dedicated to disaster-related training for all FEMA employees, including DAEs. Of the \$9 million, \$3 million of this is dedicated to pay for the salaries and benefits of DAEs while they are deployed solely for training. According to FEMA, the amount of the Disaster Readiness and Support account is determined by working with FEMA offices annually to review their requirements. A spend plan is created and then reviewed and approved by FEMA's Deputy Administrator, DHS and the Office of Management and Budget before transmittal to Congress.

Prior to fiscal year 2012, the Emergency Management Institute was responsible for managing the \$9 million in disaster specific training funds. This responsibility is now with IWMO; however, according to IWMO officials, they are still coordinating their efforts with the Emergency Management Institute. According to the Emergency Management Institute, it cannot separate how much of the Disaster Readiness and Support account is spent on DAE training, except for the \$3 million allocated for salaries and benefits. According to IWMO officials, in fiscal

year 2013 they will begin funding the majority of training courses in JFOs using the Disaster Readiness and Support account rather than the more general Disaster Relief Fund. As of March 2012, the fiscal year 2012 spend plan and projected future costs had not been finalized. However, IWMO officials said that the proposed fiscal year 2012 budget for FQS is \$7.8 million, which was based on the training budget of prior years' training as well as future needs. According to key practices for training management, agencies should have accounting, financial, and performance reporting systems that produce credible, reliable and consistent data on agency activities, including training and development programs.⁶⁴ Since FEMA does not know how much money it historically has spent on training at the JFOs using the Disaster Relief Fund, it does not have a complete picture of the total cost to train DAEs both at the Emergency Management Institute and at the JFOs each year. Further, FEMA does not have reasonable assurances that the proposed fiscal year 2013 FQS budget is at an appropriate level to cover the total training costs. Without a systematic process to track training costs, FEMA does not have a complete picture of training, including its total costs. Developing a systematic process to track such training costs would provide FEMA with additional information to inform decisions about allocating future funding for training and assist it in doing so effectively.

FEMA Announced Impending Transformation of DAE Program, but It Is Too Soon to Evaluate the Effectiveness of the Agency's Planned Actions

On April 17, 2012 FEMA announced plans to transform the DAE program. Among the changes, FEMA will change the name to the FEMA Reservist Program. According to FEMA, as of June 1, 2012, the agency will begin offering DAEs the opportunity to seek new appointments in the Reservist Program by applying for specific incident management positions within FQS. The Reservists selected at the end of the application process will be assigned to nationally managed cadres, which will replace all regionally-based cadres by the end of 2012. FEMA announced that as of July 1, 2012, DAEs who transition to the Reservist Program before the end of 2012 will have their pay "grandfathered" into the new program and therefore be exempt from the new rules regarding having pay determined based on their FQS position. In addition, FEMA stated it will establish a goal and policy to deploy all Reservists at least once per year with the length of the deployment depending on operational needs, which is intended to ensure that all Reservists have the current incident response

⁶⁴[GAO-04-546G](#).

experience and demonstrated performance required by FQS. Furthermore, FEMA stated that it will begin providing Reservists required FQS training by utilizing a portion of annual deployment days and allowing Reservists to complete some mandatory training from home. Moreover, FEMA announced that it would be issuing Reservists mobile communication and computing equipment upon their first deployment, to ensure that they are mission ready immediately upon checking into a disaster and that they have continuous access to the FEMA network and FEMA e-mail, if they choose, regardless of deployment status. These efforts, if implemented effectively should address a number of the challenges we identified with FEMA's management of the DAE program. However, FEMA has not identified specifics to these broad plans that allowed us to evaluate the effectiveness of its planned actions. Therefore, it is too soon to determine whether the planned actions will be implemented as stated and whether they will fully address the problems we identified.

Conclusions

FEMA relies heavily upon DAEs to respond to disasters. The agency has taken steps to improve the program, such as establishment of a credentialing program, FQS, and a planned transformation of the DAE program; however, it is too soon to assess the extent to which these efforts will address the challenges we identified with FEMA's management of the DAE program, the workforce, and training. For example, while FEMA intends to provide guidance to cadre managers, including a revised FEMA Instruction 8600.1 by the end of 2012, FEMA has experienced difficulty in the past in completing similar efforts, such as the 2008 cadre management handbook that was never finalized. Thus, establishing time frames for completing deliverables such as the revised FEMA Instruction 8600.1 and a cadre manager handbook for DAE management would help ensure accountability for completing initiatives. Furthermore, FEMA's decentralized structure allows for flexibility; however, establishing a mechanism to ensure ongoing monitoring of regional implementation of DAE policies and procedures and DAEs' implementation of FEMA's disaster policies and procedures can assist management in ensuring that disaster assistance is conducted in accordance with policy and consistently applied across regions. In addition, establishing policies and procedures for how FEMA will communicate with DAEs and developing a plan with time frames and milestones for how it will better communicate policies and procedures and cadre-specific information to DAEs when not deployed would help ensure that it is providing DAEs with the tools they need to be prepared for disaster deployments.

Further, FEMA's human capital controls do not adhere to internal control standards for hiring, compensation, and performance appraisals. By standardizing criteria for hiring and salary determinations, FEMA would have greater assurance that DAEs have the necessary skills and qualifications, as well as ensure consistency across regions. In addition, taking steps to establish a more rigorous performance management system would provide FEMA with more information regarding how effectively DAEs are performing and provide a mechanism to identify and improve any performance deficiencies.

Moreover, FEMA's management of DAE training is not consistent with training key practices for planning and tracking training costs. Establishing a plan with milestones for training DAEs would provide FEMA with a roadmap to train its DAE workforce and ensure accountability for qualifying DAEs under FQS. Finally, developing a systematic process for capturing training costs would provide FEMA with additional information to inform its decisions about allocating future funding for training and assist it in doing so effectively.

Recommendations for Executive Action

To help DHS improve the management of DAEs and build on some of the actions taken to date, we recommend that the Secretary of Homeland Security direct the Administrator of FEMA to take the following seven actions:

1. Establish timelines for development and dissemination of DAE cadre management guidance and revisions to FEMA Instruction 8600.1;
2. Establish a mechanism to monitor both its regions' implementation of DAE policies and procedures and DAEs' implementation of FEMA's disaster policies and procedures to ensure consistency.
3. Develop a plan with time frames and milestones for how it will better communicate policies and procedures and cadre-specific information to DAEs when they are not deployed;
4. Establish standardized criteria for hiring DAEs that include defined qualifications and skill sets to make hiring decisions and salary determinations;
5. Establish a more rigorous performance appraisal system that includes criteria and guidance to serve as a basis for performance ratings, as well as how ratings could be used, and a process to address performance deficiencies;
6. Establish a plan with milestones to ensure all DAEs have opportunities to participate in training and are qualified; and
7. Develop a systematic process to track training costs.

Agency Comments and Our Evaluation

We provided a draft of this report to DHS for comment. We received written comments from DHS on the draft report, which are summarized below and reproduced in full in appendix VIII. DHS concurred with the recommendations and indicated that FEMA has taken or is taking steps to address them. The actions DHS reported are important first steps; however, FEMA's implementation plans do not fully address one of the seven recommendations, as discussed below. Moreover, insufficient detail is provided related to FEMA's plans for three of the recommendations; thus it is not clear to what extent these plans will fully address the three recommendations.

In regards to the first recommendation, that FEMA establish time frames for development and dissemination of DAE cadre management guidance and revisions to FEMA Instruction 8600.1, DHS agreed and stated that FEMA Instruction 8600.1, which is now called the FEMA Reservist Program Directive, was revised and, as of May 11, 2012, is in FEMA's Office of the Chief Counsel for final review. Furthermore, DHS stated that the estimated timeline for approval and publishing of this instruction is June 1, 2012. In addition, DHS stated that the Cadre Manager's Handbook, the FEMA Reservist Program Manual, the Reservist Pay Directive, and the Reservist Handbook are being developed with an estimated timeline for development, approval, and dissemination approximately 90 days after the signing of the FEMA Reservist Program Directive. It will be important that the FEMA Reservist Program Directive align with the planned Disaster Workforce Transformation. These actions, if implemented effectively, would address the intent of the recommendation.

In reviewing the draft of the second recommendation that FEMA establish a mechanism to monitor disaster policies and procedures to ensure consistency, FEMA officials requested clarification, stating that the recommendation was too broad as it focused on FEMA's disaster policies rather than DAEs. We agreed and modified the recommendation to more clearly state that FEMA should monitor how the regions implement DAE policies and procedures and how DAEs implement disaster policies and procedures. DHS agreed with our revised recommendation and discussed several actions it has taken or has underway to address the recommendation. Specifically, it stated that (1) in December 2011, the FEMA Administrator directed the agency to identify, review, and centrally post all agency doctrine, policies, and directives, (2) all documents were posted to their respective locations on April 13, 2012, and (3) the agency's policies guiding DAEs are now available on the FEMA intranet. Moreover, FEMA stated that it has also established and is working to

improve a number of mechanisms through which it validates compliance with the agency policies and standards. FEMA also stated that communication with reservists on disaster policies and procedures will be initiated from FEMA headquarters to ensure consistency. FEMA has taken actions to make policies and procedures readily available to reservists; however, FEMA did not provide details about the mechanisms it has established for its regions to monitor DAE policies and procedures or DAEs' implementation of FEMA's disaster policies. Thus, it is not clear to what extent these actions will fully address the recommendation.

In regards to the third recommendation, that FEMA develop a plan with time frames and milestones for how it will better communicate policies and procedures and cadre-specific information to DAEs when they are not deployed, DHS agreed and stated that the FEMA Reservist Program Directive requires Headquarters, Regional, and National Cadre Management leadership to provide consistent two-way messaging to all Reservists, deployed or not, through e-mail, websites, webinars, and other outreach, and estimates that these efforts will be completed by September 30, 2012. However, DHS did not provide details on the types of information that it will be providing DAEs. Thus, it is not clear to what extent FEMA's planned actions will fully address the recommendation. To fully meet the intent of the recommendation, FEMA needs to ensure that it is communicating both cadre-specific and administrative information to DAEs.

In regards to the fourth recommendation, that FEMA establish standardized criteria for hiring DAEs that include defined qualifications and skill sets to make hiring decisions and salary determinations, DHS agreed and stated that the FEMA Qualification System (FQS) Position Task Books define specific qualifications and skills for each required position and will be the basis for establishing standardized criteria for hiring Reservists, including pay. Currently, Position Task Books are used to document and record tasks performed by the trainees, in order to become qualified under FQS. It will be important for FEMA to define skills and/or necessary experience applicants must have prior to being hired for each position, and how if at all, any prior experience will impact salary determinations. Without doing so, DHS will not fully address the intent of the recommendation.

In regards to the fifth recommendation, that FEMA establish a more rigorous performance appraisal system that includes criteria and guidance to serve as a basis for performance ratings, as well as how ratings could be used, and a process to address performance

deficiencies, DHS agreed. DHS stated that upon implementation of the FEMA Reservist Program Directive and the publishing of various supporting directives and handbooks, FEMA's Incident Workforce Management Office will coordinate with FEMA's Office of the Chief Component Human Capital Office to develop a more robust Reservist performance appraisal system that will, among other things, establish performance standards, identify successful task completion, and improve performance deficiencies. These actions, if implemented effectively, would address the intent of the recommendation.

In regards to the sixth recommendation, that FEMA establish a plan with milestones to ensure all DAEs have opportunities to participate in training and are qualified, DHS agreed and stated that as part of the changes in the DAE program through the Disaster Reservist Program, FEMA will ensure that all DAEs have opportunities to participate in training and are qualified to serve in a primary disaster-specific job title on the basis of FEMA's Force Structure requirements. Furthermore, FEMA plans to complete this by September 30, 2013. However, DHS did not provide details on how it plans to ensure that DAEs will become qualified by September 2013, including when it will complete the FEMA Force Structure which had not been finalized as of April 2012. It will be important for FEMA to develop intermediate milestones to provide a roadmap for how it will qualify its workforce. Thus, it is not clear to what extent FEMA's plans will fully address the intent of the recommendation.

In regards to the seventh recommendation, that FEMA develop a systematic process to track training costs, DHS agreed and stated that FEMA has combined all funding for FQS supportive training into a single account to ensure a process for tracking training costs, course offerings, and force structure requirements. DHS also stated that it will include all of this information in the Incident Qualification Certification System—intended to be the primary FQS tracking system—to track all FQS-related training costs. In addition, DHS stated that it should be completed by October 1, 2012. These actions, if implemented effectively, would address the intent of the recommendation.

DHS also provided technical comments that we incorporated, where appropriate.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate

congressional committees, the Secretary of the Department of Homeland Security and the Administrator of the Federal Emergency Management Agency. The report will also be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff members have any questions about this report, please contact me at (202) 512-8777 or jenkinswo@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix IX.

A handwritten signature in black ink, reading "William O. Jenkins". The signature is fluid and cursive, with a large loop at the end of the last name.

William O. Jenkins, Director
Homeland Security and Justice Issues

Appendix I: Objectives, Scope, and Methodology

The objectives of this report were to determine (1) to what extent does the Federal Emergency Management Agency (FEMA) have policies and procedures in place to govern the Disaster Assistance Employee (DAE) program; (2) to what extent are FEMA's human capital controls over the DAE workforce consistent with internal control standards; and (3) to what extent does FEMA's DAE training incorporate key attributes of effective training and development programs. In addition, we describe FEMA's initiative to transform the DAE program announced in April 2012 as it relates to the three questions above.

We addressed each objective by reviewing relevant FEMA documents. To determine the extent to which FEMA has policies and procedures in place to govern its DAE program; and to determine the extent to which FEMA's human capital management controls over the DAE workforce are consistent with internal control standards, we analyzed relevant documents on FEMA's organizational structure as well as both program-specific and human capital-related guidance, policies, and procedures produced by FEMA headquarters and regional offices. We also compared FEMA's human capital controls with criteria in Standards for Internal Control in the Federal Government.¹

To determine the extent to which FEMA's management of DAE training incorporates key attributes of effective training and development programs, we reviewed data on the following: training requirements, the location and frequency of training courses, course schedules, and the amount of funding dedicated to training from the Disaster Readiness and Support account (2009-2011) and the Disaster Relief Fund (2007-2011).² We determined that the data was sufficiently reliable for the purposes of this report based on interviews with responsible officials about the integrity and reliability of the data to include controls FEMA has in place. We also reviewed policies and procedures on training requirements, FEMA's Learning Management Systems, Joint Field Office (JFO) operations, and FEMA's new credentialing program, the FEMA Qualification System (FQS). In addition, we observed Public Assistance

¹GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

²The Fiscal Year 2010 Department of Homeland Security Appropriations Act required FEMA to submit a report of quarterly obligations of funds against the Disaster Readiness and Support (DRS).

training attended by DAEs in a JFO. We compared FEMA's management of DAE training with key attributes of effective training and development programs to determine the extent to which they are aligned.³

To address all three objectives, we reviewed previous Department of Homeland Security Inspector General Reports, and a FEMA sponsored study conducted by Booz Allen Hamilton on FEMA's disaster workforce.⁴ We found the conclusions and recommendations drawn in each report to be sufficient based on the methodologies used. In addition, we conducted interviews with FEMA officials in headquarters and in the regions. We interviewed officials in the following offices in FEMA headquarters: Office of Response and Recovery, Incident Workforce Management Office (IWMO), Office of the Chief Component Human Capital Officer (OCCHCO), Emergency Management Institute, Office of Policy, Planning, and Analysis (OPPA), Field Based Operations, Training Exercise and Doctrine (TED), Office of the Chief Information Officer (OCIO) and national cadre managers. In addition to interviews with officials in FEMA headquarters, we conducted site visits to four FEMA regions. We selected regions that were geographically dispersed and had a Joint Field Office with Individual and Public Assistance programs operating as of September 2011. In each of the four selected regions, we interviewed the Regional Administrator and Regional Cadre Managers. In addition, we visited one JFO in each of the selected regions. In each selected JFO, we interviewed the Federal Coordinating Officer and Branch Chiefs from selected cadres. We focused our interviews on the following DAE cadres: (1) Individual Assistance (IA); (2) Public Assistance (PA); (3) Hazard Mitigation; (4) Disaster Field Training Operations; (5) Human Resources (HR); and (6) Community Relations. We focused on IA, PA, Hazard Mitigation, and CR because these cadres are responsible for administering the disaster assistance program and interacting with the public. In addition, we chose HR and Disaster Field Training Operations because they are responsible for the management and training of DAEs. In addition, we interviewed officials from the state emergency management agency, for the state in which the JFO was located. Table 1

³GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts for the Federal Government*. [GAO-04-546G](#) (Washington, D.C.: March 2004).

⁴The Booz Allen Hamilton report was preliminary and FEMA could not locate the final report. FEMA stated that the report drew accurate conclusions and they are currently addressing the observations from the report.

lists the FEMA regions, JFO locations, and State Emergency Management Agencies we visited.

Table 1: FEMA Regional Office, Joint Field Office, and Emergency Management Agencies

FEMA Region	JFO Location	State Emergency Management Agency
Region 1, Boston, Massachusetts	Springfield, Massachusetts	Massachusetts Emergency Management Agency
Region 4, Atlanta, Georgia	Birmingham, Alabama	Alabama Emergency Management Agency
Region 7, Kansas City, Missouri	Lincoln, Nebraska	Nebraska Emergency Management Agency
Region 8, Denver, Colorado	Bismarck, North Dakota	North Dakota Department of Emergency Services

Source: GAO.

To obtain the views of DAEs on issues related to all three of our objectives, we conducted 16 focus group sessions with a total of 125 DAEs at the four selected JFOs. These sessions involved structured small-group discussions designed to gain more in-depth information about issues DAEs face. Discussions were guided by a moderator who used a list of discussion topics to encourage participants to share their thoughts and experiences as DAEs. Specifically, discussion topics included the hiring process, training, policies and procedures, FQS and communication by regional managers; however, not all topics were discussed in each group. Each focus group involved 5 to 12 DAE participants. There were four types of focus groups based on job titles: IA and PA supervisors, IA and PA non-supervisors, and supervisors and non-supervisors from other cadres other than IA and PA. We completed written summaries of each focus group, and used content analysis software to categorize responses and identify common themes across the focus groups, using appropriate checks to ensure accuracy. The results of the focus groups are not generalizable. However, the views we obtained from them provided us with valuable examples of DAE experiences. In addition, to obtain further perspectives from regional management on hiring, training, deployments, policies and procedures and FQS, we conducted follow-up interviews with 16 regional cadre managers we interviewed during our site visits. In addition, we reviewed FEMA's April 2012 memorandum announcing the transformation of the DAE program, but did not assess its planned actions to transform the DAE program because the agency is in the early planning stages.

We conducted this performance audit from April 2011 through May 2012 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Categories of Disaster Workforce Employees

Name	Description
Disaster assistance employee (DAE)	Stafford Act federal employees who work on an on-call intermittent basis "forming the major workforce for FEMA in times of emergency or disaster." ^a They are also known as reservists. DAEs are temporary personnel appointed and compensated without regard to the provisions of Title 5, United States Code, governing appointments in competitive service. They are activated in direct response to a disaster declaration to support the work of FEMA at the disaster site. FEMA appoints DAEs in 2-year cycles, as intermittent employees who are deployed as needed for emergencies and/or disasters.
Cadre of on-call response/recovery employees (CORE)	Federal employees hired under the authority of the Stafford Act on a temporary full-time basis for 2- and 4-year terms. These terms are renewable if there is ongoing disaster work and funding available. Similar to DAEs, COREs are temporary personnel appointed and compensated without regard to the provisions of Title 5, United States Code, governing appointments in competitive service.
Temporary full-time (TFT)	Temporary federal employees covered by Title 5 provisions. They do not have specified appointment periods. Federal Coordinating Officers (FCO) are included in this employment group.
Permanent full-time (PFT)	Permanent federal employees hired in accordance with Title 5, United States Code.
Local hire	Staff locally hired under the authority of the Stafford Act for an initial period of 120 days. This period of time is renewable. Local hires augment the reservist workforce. They are hired for positions that "do not require FEMA-specific expertise, or when limited advance training or minimal on-the-job orientation or training is sufficient." ^b In certain instances local hires may convert to DAEs.

Source: FEMA.

^aTerms of employment, <http://www.fema.gov/about/career/terms.shtm>.

^bOIG: FEMA's Management of Disaster Assistance Employee Deployment and Payroll Processes, Appendix C Director's Policy 1-99, March 1999.

Appendix III: Cadre List and Descriptions

There are 23 functional disaster cadres excluding the Disaster Generalist Group, which was created to augment the External Affairs, Individual Assistance, and Public Assistance cadres and provide surge staff when required.

Table 2: Cadre List and Descriptions

Cadre	Managing organization	Description	Primary duties	Headquarters only
Alternative Dispute Resolution (ADR)	Office of Chief Counsel	Helps to foster collaborative and effective disaster operations. Seeks to quickly resolve situations that may distract disaster assistance workers from carrying out their mission.	<ul style="list-style-type: none"> Provides services including consultation, dispute resolution and prevention, conflict resolution training, and meeting facilitation. 	√
Attorney	Office of Chief Counsel	Serves as the primary legal advisor to the FCO/Director and senior staff.	<ul style="list-style-type: none"> Provides legal advice, instruction, and communication. Provides guidance and interpretation of FEMA statute and regulations. 	√
Community Relations (CR)	Office of External Affairs	Provides outreach to community-based organizations and disaster victims about federal and state recovery programs.	<ul style="list-style-type: none"> Provides field outreach to disaster victims and community leaders about federal and state recovery programs. Provides multilingual capabilities to help reach out to communities that may not be in the traditional information chain. 	
Comptroller	Mission Support/Office of Chief Financial Officer	Serves as the Finance and Administration Section Chief at a Joint Field Office (JFO), National Response Coordination Center (NRCC), or Regional Response Coordination Center (RRCC).	<ul style="list-style-type: none"> Advises the FCO and the Senior staff at JFO. Manages the funding process to ensure timely and sufficient funding to execute Stafford Act Programs and cover administrative costs at their assigned JFO. 	√
Congressional Affairs	Office of External Affairs	Coordinates dialogue between Federal efforts and the Congressional delegation of the affected area.	<ul style="list-style-type: none"> Coordinates the exchange of information between DHS, FEMA, Members of Congress, and their staff. Responds to congressional inquiries and casework. Arranges site visits to help Members of Congress to understand the Federal/state/local response and recovery process. Develops a Congressional Affairs strategy for outreach and incident-specific objectives. 	

Appendix III: Cadre List and Descriptions

Cadre	Managing organization	Description	Primary duties	Headquarters only
Contracting/ Acquisition	Office of Chief Procurement Officer	Deployed to support JFO operational acquisitions requirements. Can also support disaster acquisition operations requiring close-out in an effort to return funding to the Disaster Relief Fund.	<ul style="list-style-type: none"> Initiates acquisitions. Plans for source selection. Prepares solicitation offers. Evaluates bids and proposals in accordance with the terms and conditions for the solicitation. Implements the contract and monitors contractor performance. Monitors payments to contractors. 	√
Disaster Field Training Operations (DFTO)	Emergency Management Institute	Delivers response and recovery program-related training courses in a variety of training venues. Supports the Training Unit within the Finance and Administrative Section at a JFO.	<ul style="list-style-type: none"> Coordinates disaster training. Delivers a wide range of training-related services. Assesses and evaluates the training needs of a JFO. 	
Disaster Generalist Group	Office of Response and Recovery	Supports Community Relations, Individual Assistance, and Public Assistance cadres during a disaster declaration.	<ul style="list-style-type: none"> Establishes and maintains positive working relationships with the disaster-affected community by collecting and disseminating disaster-related materials. Identifies and reports potential issues within the community. Supplements other program areas as the scope of the disaster increases. 	√
Environmental/ Historical Preservation	Federal Insurance and Mitigation Administration	Ensures that FEMA's activities related to disaster response and recovery, hazard mitigation, and emergency preparedness comply with federal environmental and historic preservation law and executive orders.	<ul style="list-style-type: none"> Preserves historic, cultural and natural aspects of national heritage. Supports activities that achieve a balance between resource use and development. 	
Equal Rights	Office of Equal Rights	Possesses a background in Equal Employment Opportunity (EEO), Civil Rights, human resource management, conflict resolution, and community organization.	<ul style="list-style-type: none"> Civil Rights Resolution – works with Community Relations, Public Affairs, Human Services, and other components to resolve Civil Rights issues. Provides advice and guidance to the FCO on EEO and Civil Rights matters. Assists FEMA employees, employment applicants, and managers to resolve problems quickly, guide supervisors through downsizing, and process complaints that cannot be resolved informally. 	√

Appendix III: Cadre List and Descriptions

Cadre	Managing organization	Description	Primary duties	Headquarters only
Federal Coordinating Officer (FCO)	Office of Response and Recovery	Presidentially appointed. Ensures the integration of Federal emergency management, resource allocation, and the integration of Federal activities in coordination with State, tribal and local government requirements.	<ul style="list-style-type: none"> Leads FEMA staff in field operations. Responsible for executing Stafford Act programs in a timely and cost effective manner. 	
Financial Management	Office of Chief Financial Officer	I Unit Leads, Funds Control Specialists/Managers, and Travel Specialist/Manager in the Cost Unit in the Finance and Administration Section.	<ul style="list-style-type: none"> Manages the funding process. Maintains the accounting records of the Disaster Declaration. Assists FEMA personnel with preparation of Travel Vouchers. 	
Human Resources (HR)	Office of the Chief Component Human Capital Officer	Focuses on recruitment, management, and the direction of the people in the organization.	<ul style="list-style-type: none"> Handles recruitment, staffing, and payroll & time/attendance. 	
Individual Assistance (IA)	Office of Response and Recovery	Provides direct assistance to individuals and families. Members work at JFOs, Disaster Recovery Centers (DRC), shelter facilities, and the National Processing Services Centers. Supports state Mass Care operations, administers funds to assist survivors to rebuild and recover, coordinates assistance with Voluntary Agencies, and supports direct housing operations.	<ul style="list-style-type: none"> Applicant Services: Program Specialists perform registration intake, referrals, and guide applicants through the FEMA assistance process. Mass Care Specialists: support state, local and tribal sheltering, feeding, and commodities distribution operations in coordination with Voluntary Agencies. Voluntary Agency Liaisons: transfer information between the Voluntary Agencies and the governmental assistance organizations, and also provide applicant referrals, assistance with special needs cases, and support for donations management. Direct Housing Operations: Specialists support the installation of temporary housing units. 	
Information Technology (IT)	Office of Chief Information Officer	Maintains all forms of data and telecommunications.	<ul style="list-style-type: none"> Installs, tests, and sets up IT communications equipment. Acquires required equipment, supplies, or services. Networks access capabilities for all personnel. Maintains and repairs IT communications equipment. 	

Appendix III: Cadre List and Descriptions

Cadre	Managing organization	Description	Primary duties	Headquarters only
Logistics	Logistics Management Directorate	Provides logistics capability for the procurement and delivery of life-sustaining goods and services to an impacted population.	<ul style="list-style-type: none"> Develops, advises, and executes logistics support course of action for field operations. Provides management of agency personal property accountability. Manages supply chain, warehouse, and transportation operation to source, order, transport, track, and distribute supplies, equipment, and services to support domestic emergencies. 	
Long Term Community Recovery	Office of Response and Recovery	Works with federal, state, and local governments as well as the nonprofit and private sectors to enable disaster-impacted communities to identify opportunities, creating partnerships and maximizing resources for recovery.	<ul style="list-style-type: none"> Helps communities identify long-term recovery plan. Helps communities identify and coordinate resources and funding sources for the implementation of the LTCR projects, programs, and initiatives. 	
Mitigation	Federal Insurance and Mitigation Administration	Identifies measures to protect lives and prevent or reduce the loss of property from hazardous events.	<ul style="list-style-type: none"> Identifies risk reduction opportunities. Educates the public and local government officials in methods to reduce future risks. Promotes hazard mitigation community planning and project development that will result in sustainable community development. Provides grants to fund hazard mitigation projects. Assists communities in marketing the National Flood Insurance Program (NFIP). 	
Operations (OPS)	Office of Response and Recovery	Coordinates support to all emergency management efforts and program implementation for Environmental and Historic Preservation, Mitigation, Public Assistance, and Individual Assistance.	<ul style="list-style-type: none"> Develops and implements strategy and tactics to carry out incident objectives. Organizes, assigns, and supervises response resources. 	

Appendix III: Cadre List and Descriptions

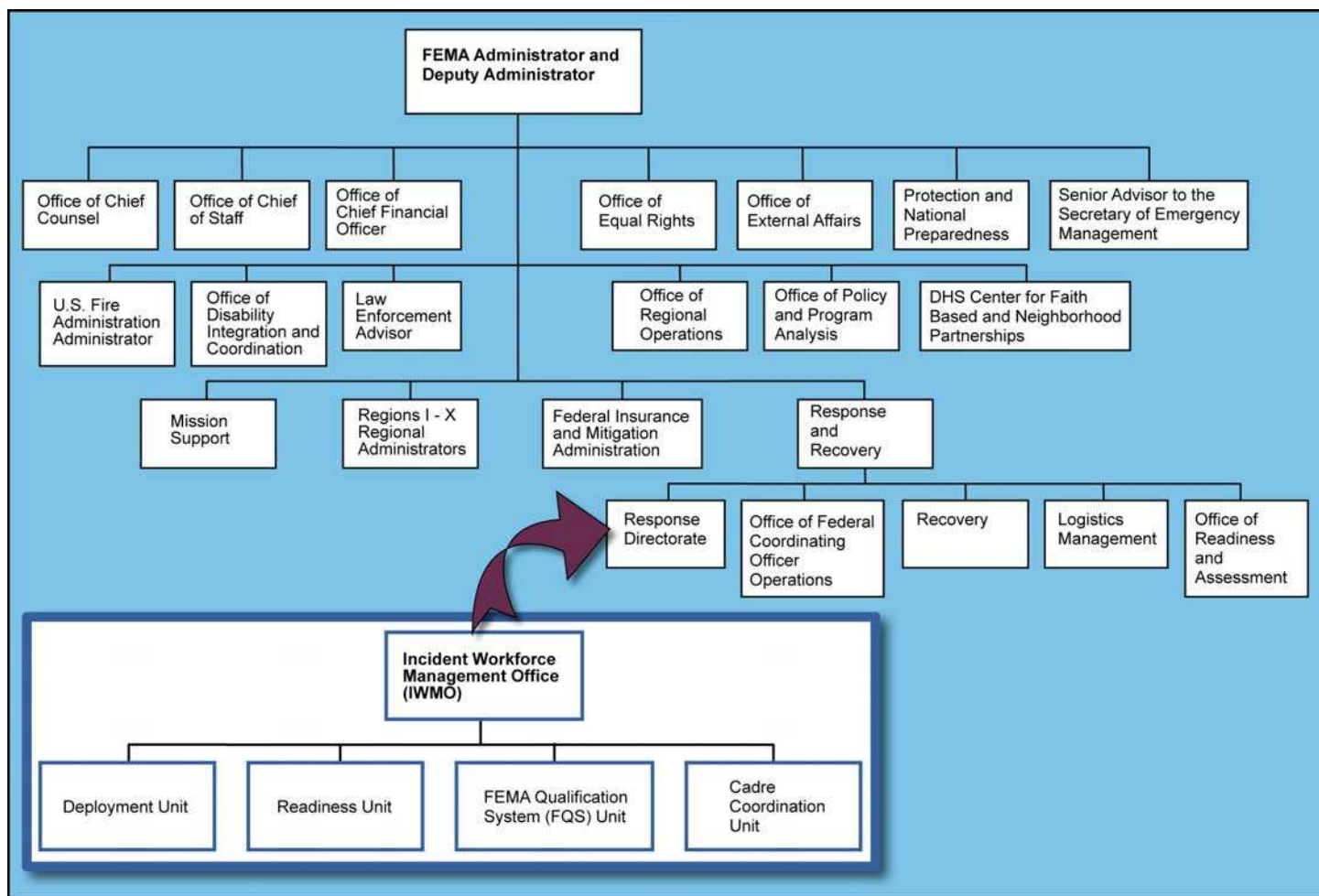
Cadre	Managing organization	Description	Primary duties	Headquarters only
Planning	Office of Response and Recovery	Provides support to planning and information for disaster operations.	<ul style="list-style-type: none"> Manages joint federal-state disaster plan development. Oversees disaster information management such as situational awareness, record retention and dissemination and resource tracking. Provides geospatial expertise in the development of Geospatial Information System data, graphical displays, remote sensing, and map production. Facilitates meetings integral to incident action planning and operational decision making. 	
Public Affairs	Office of External Affairs	Provides information to the public that would help them prepare for, prevent, respond to, and recover from disasters.	<ul style="list-style-type: none"> Establishes and maintains ongoing relationships with the media to promote the agency's programs, goals, and core values. Provides disaster survivors with timely and accurate information, and manage communication. 	
Public Assistance (PA)	Office of Response and Recovery	Authorized by the Stafford Act. Provides supplemental financial assistance to state, local and tribal governments and certain private non-profit organizations for response and recovery activities resulting from a declared disaster.	<ul style="list-style-type: none"> Provides grant assistance for debris removal, emergency protective measures and permanent restoration of infrastructure. 	
Safety	Office of Chief Administrative Officer	Serves as technical advisor to the Federal Coordinating Officer (FCO) on occupational safety and health matters.	<ul style="list-style-type: none"> Oversees safety and health activities throughout disaster operations for all FEMA employees and personnel in FEMA-managed facilities. Provides safety and health training to all FEMA employees deployed to disaster operations. Serves as a technical resource on occupational safety and health matters for the FCO. 	

Appendix III: Cadre List and Descriptions

Cadre	Managing organization	Description	Primary duties	Headquarters only
Security	Office of the Chief Security Officer	Maintains responsibility for all internal security processes at disaster facilities and special event assignments.	<ul style="list-style-type: none">• Serves as the Agency Technical Representative for contract guard services, as well as conduct facility vulnerability assessments on all FEMA disaster facilities.• Serves as law enforcement liaison.• Conducts preliminary inquiries on criminal and administrative actions.• Conducts background status checks, complete fingerprinting, badge operations, and coordinate the installation of alarm and closed-circuit television equipment.	

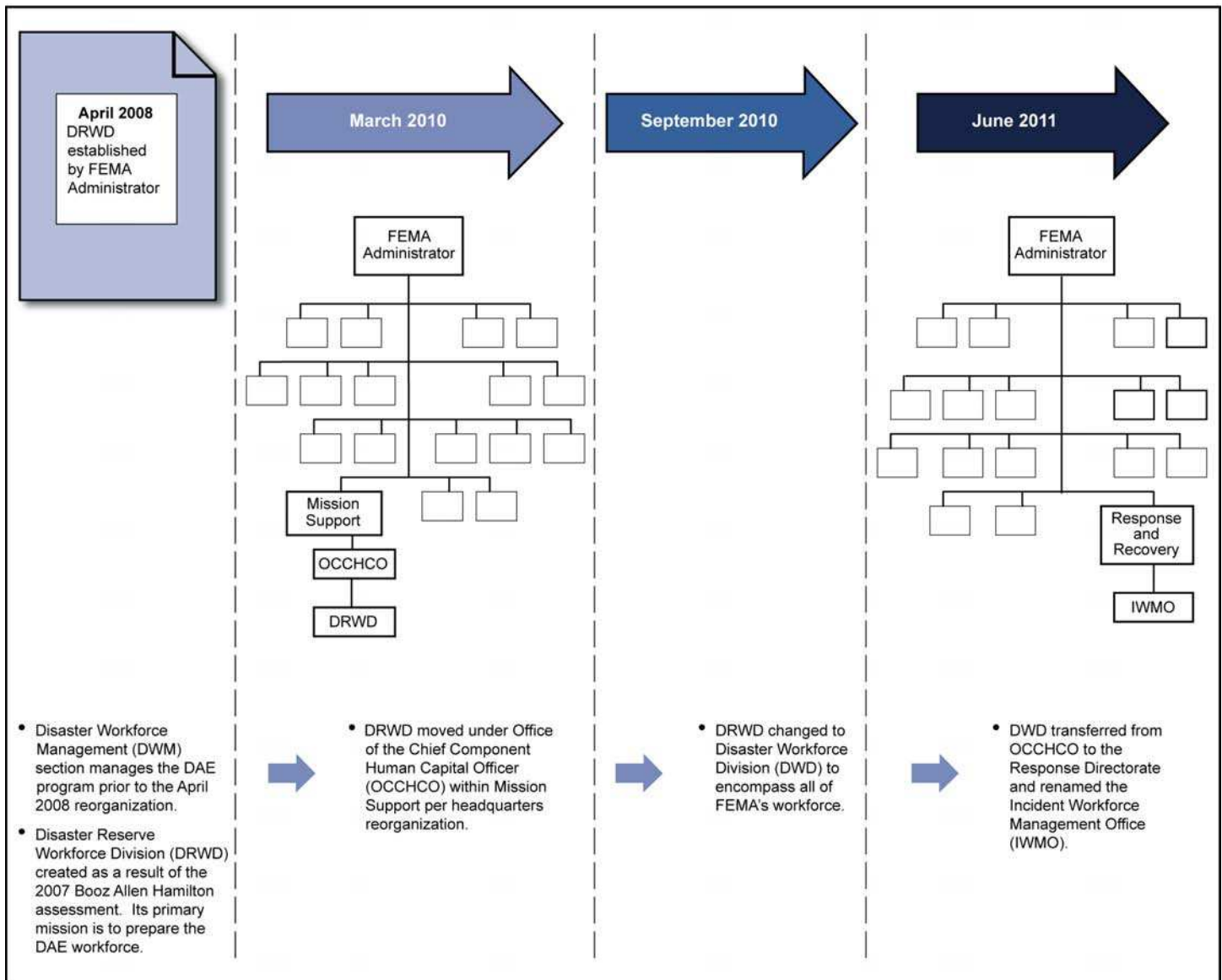
Source: FEMA.

Appendix IV: FEMA Organizational Chart— Highlight of Response Directorate’s Incident Workforce Management Office



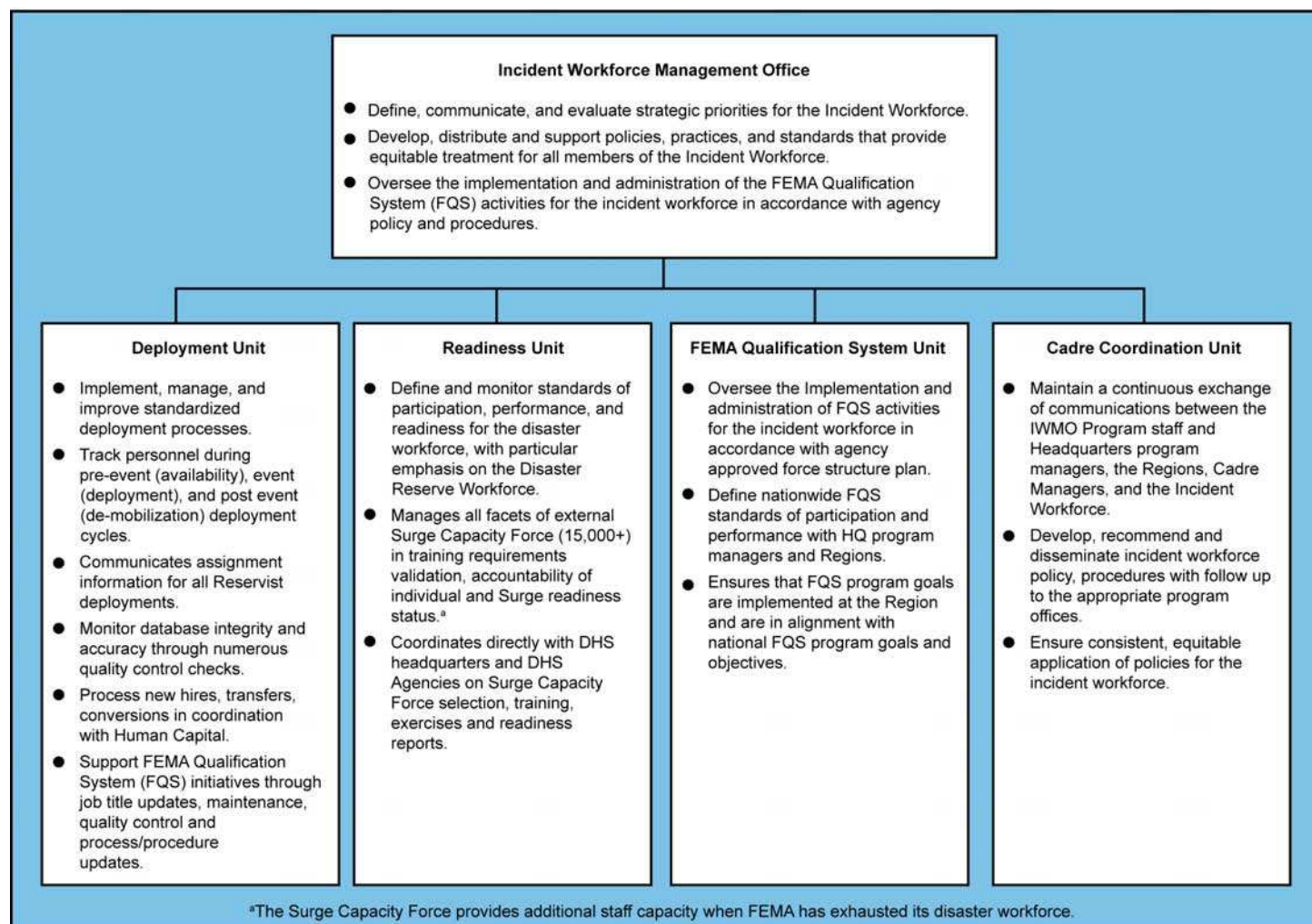
Source: GAO and FEMA.

Appendix V: Disaster Assistance Employee Program Office Reorganization Timeline, April 2008 through May 2012



Source: GAO and FEMA.

Appendix VI: Incident Workforce Management Office Organizational Structure and Proposed Roles



Source: GAO and FEMA.

Appendix VII: FEMA Disaster Assistance Employee Pay Scale, Calendar Year 2011

Grade	A	B	C	D	E
Level 1	\$23,555	\$29,627	\$44,887	\$65,093	\$77,408
Per hour	\$11.29	\$14.20	\$21.51	\$31.19	\$37.09
Overtime	\$16.94	\$21.30	\$32.27	\$32.91	\$37.09
Level 2	\$25,162	\$33,021	\$49,436	\$69,433	\$82,567
Per hour	\$12.06	\$15.82	\$23.69	\$33.27	\$39.57
Overtime	\$18.09	\$23.73	\$32.91	\$33.27	\$39.57
Level 3	\$27,361	\$36,699	\$54,313	\$73,773	\$87,728
Per hour	\$13.11	\$17.58	\$26.03	\$35.35	\$42.03
Overtime	\$19.67	\$26.37	\$32.91	\$35.35	\$42.03

Source: FEMA.

Appendix VIII: Comments from the Department of Homeland Security

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



**Homeland
Security**

May 18, 2012

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

Re: Draft Report GAO-12-538, "DISASTER ASSISTANCE WORKFORCE: The Federal Emergency Management Agency Could Enhance Human Capital Management and Training"

Dear Mr. Jenkins:

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

The Department is pleased to note GAO's acknowledgment of the Federal Emergency Management Agency's (FEMA's) responsibility for leading the Nation in mitigating, responding to, and recovering from major disasters both natural and man-made, including hurricanes, earthquakes, floods, hazardous spills, and acts of terrorism. The report also appropriately recognizes that the annual number of federal major disaster declarations has grown significantly—44 percent—during the past 5 years.

In addition, we appreciate GAO's recognition that FEMA has taken steps to transform and enhance its management of the Disaster Assistance Program and that, if implemented effectively, those steps should address a number of the challenges GAO has identified with the program. FEMA remains committed to supporting 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.

The Department concurs with all seven recommendations in the draft report. Specifically, GAO recommended the Secretary of Homeland Security direct the Administrator of FEMA to:

Recommendation 1: Establish timelines for development and dissemination of DAE cadre management guidance and revisions to FEMA Instruction 8600.1.

Response: Concur. FEMA Instruction 8600.1, which is now called the FEMA Reservist Program Directive, was revised and, as of May 11, 2012, is in FEMA's Office of the Chief Counsel for final review. The estimated timeline for approval and publishing of this instruction is June 1, 2012. Also being developed are the Cadre Manager's Handbook, the FEMA Reservist Program Manual, the Reservist Pay Directive, and the Reservist Handbook with an estimated

timeline for development, approval and dissemination approximately 90 days after the signing of the FEMA Reservist Program Directive. Estimated Completion Date (ECD): September 30, 2012.

Recommendation 2: Establish a mechanism to monitor both regions' implementation of DAE policies and procedures and DAEs' implementation of FEMA's disaster policies and procedures to ensure consistency.

Response: Concur. FEMA has recently undertaken a significant effort to inventory, update, and improve access to all FEMA doctrine and policy documents. In December 2011, the FEMA Administrator directed the Agency to identify, review and centrally post all agency doctrine, policies and directives. Internal directives were centrally posted to FEMA's intranet site for easy access by all employees. Policies and doctrine were centrally posted to FEMA's document library on www.FEMA.gov. The inventory of Agency documents was completed on February 27, 2012, and all documents were posted to their respective locations on April 13, 2012. The Agency's policies guiding Disaster Assistance Employees (DAEs) were included in this review and are now available on the FEMA intranet. This site is accessible by FEMA's ten Regions and all Agency employees. Updates to these policies will be maintained in the centralized inventory and posted to the appropriate internal or external website. FEMA has also established and is working to improve a number of mechanisms through which it validates compliance with agency policies and standards, such as the FEMA Readiness and Assessment Program. Further, FEMA is nationalizing the reservist program and cadre management based on the Agency's workforce transformation efforts and in order to ensure successful implementation of workforce policies. Communication with reservists on disaster policies and procedures will be initiated from FEMA headquarters to ensure consistency.

Recommendation 3: Develop a plan with time frames and milestones for how it will better communicate policies and procedures and cadre-specific information to DAEs when they are not deployed.

Response: Concur. The FEMA Reservist Program Directive requires Headquarters, Regional, and National Cadre Management leadership to provide consistent two-way messaging to all Reservists, deployed or not, through email, Web sites, Webinars, and other outreach regarding policies, procedures, training, and workforce initiatives. ECD: September 30, 2012.

Recommendation 4: Establish standardized criteria for hiring DAEs that include defined qualifications and skill sets to make hiring decisions and salary determinations.

Response: Concur. The FEMA Qualification System (FQS) Position Task Books define specific qualifications and skills for each required position and will be the basis for establishing standardized criteria for hiring Reservists, including pay. ECD: September 30, 2012.

Recommendation 5: Establish a more rigorous performance appraisal system that includes criteria and guidance to serve as a basis for performance ratings, as well as how ratings could be used, and a process to address performance deficiencies.

Response: Concur. Upon implementation of the FEMA Reservist Program Directive and the publishing of various supporting directives and handbooks, FEMA's Incident Workforce Management Office will coordinate with FEMA's Office of the Chief Component Human Capital Office to develop a more robust Reservist performance appraisal system that will, among other things, establish performance standards, identify successful task completion, and improve performance deficiencies. ECD: September 30, 2012.

Recommendation 6: Establish a plan with milestones to ensure all DAEs have opportunities to participate in training and are qualified.

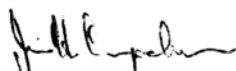
Response: Concur. As part of the changes in the DAE program through the Disaster Reservist Program, FEMA will ensure that all DAEs have opportunities to participate in training and are qualified to serve in a primary disaster-specific job title on the basis of FEMA's Force Structure requirements. ECD: September 30, 2013.

Recommendation 7: Develop a systematic process to track training costs.

Response: Concur. FEMA has combined all funding for FQS supportive training into a single account to ensure a process for tracking of training costs, course offerings, and force structure requirements. All information will be included in the Incident Qualification Certification System, which will enable FEMA to track all FQS-related training costs. ECD: October 1, 2012.

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

Sincerely,



Jim H. Crumpacker
Director
Departmental GAO-OIG Liaison Office

Appendix IX: GAO Contact and Staff Acknowledgments

GAO Contact

William O. Jenkins, Jr. (202) 512- 8777 or jenkinswo@gao.gov

Acknowledgments

In addition to the contact named above, Leyla Kazaz, Assistant Director, managed this assignment. Martene Bryan, Landis Lindsey, Lauren Membreno, Aku Pappoe and Michelle Su made significant contributions to the work. Cynthia Saunders assisted with design and methodology. Tracey King provided legal support and analysis. Linda Miller and Debbie Sebastian provided assistance in report preparation. Robert Robinson developed the report graphics.

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