Implementation of Omnibus Homeland Security Act:
D.C. Government Needs to Sharpen Its
Focus on Homeland Defense

March 3, 2009
# TABLE OF CONTENTS

**EXECUTIVE SUMMARY** ................................................................. 1

**PURPOSE** .................................................................................... 1

**OBJECTIVE, SCOPE, AND METHODOLOGY** ........................................ 1

**BACKGROUND** ............................................................................. 4

Executive Branch Compliance with Specific Requirements of the Act Remains Incomplete ....... 9

The Institutional Structure for Homeland Security Policymaking Needs to Be Strengthened ..... 10

The District Government Set the Foundation for an Effective Homeland Security Program in the Five Years Following the Terrorist Attacks of September 11, 2001 ............ 15

Lack of Private-Sector Cooperation Has Hampered Critical Infrastructure Protection ........... 16

Logistical Support, Including Shelter, Transportation, and Mass Care, Remains a Key Area in Need of Attention ................................................................. 19

HSEMA’s Performance Measurement System Could Make Greater Use of Outcome Measures, Including Independent Assessments of Performance ............................. 23

The District’s FY 2009 Operating Budget Allocates Approximately $300 Million to Homeland Security. More Than 80 Percent of this Funding Is in the HSEMA Operating Budget ................................................. 26


The Threat and Vulnerability Assessment Commissioned by HSEMA Is Not Fully Compliant with the Act. ........................................................................ 31

The Annual Report to the Council Provides Valuable Information, But Was Almost a Year Late ......................................................................................... 37

The District Government Has a Solid Public Information Program, But Faces the Challenge of Sustaining and Reinforcing Public Interest and Involvement ................................. 38

The District Government Has Implemented Useful Citizen Training Programs, But Has Not Developed the Neighborhood Networks That Could Be Invaluable in Responding to a Crisis ........................................................................ 42
The Community Emergency Management Plans Developed by HSEMA Are Not Well-Tailored to Neighborhood Needs and Circumstances ......................... 44

HSEMA Has Not Met the Requirement to Develop and Issue Guidelines for a Public Employee Security Training Program ............................................. 47

HSEMA Has Not Completed the Requirement to Develop Guidance for Building Operators and Managers to Enhance the Security of Large Commercial and Residential Buildings ...................................................... 50

The District Government Is Not Making Sufficient Use of the Homeland Security Exercise and Evaluation Program to Promote Continuous Improvement in Preparedness ..................... 53

HSEMA Has Embarked on a Promising Initiative to Implement an Outdoor Warning System ........... 57

HSEMA Has Not Requested That Private Entities Voluntarily Share Best Practices to Prevent, Mitigate, Respond to, and Recover From a Terrorist or Other Security Incident ....................................................... 61

The Mayor Has Not Complied with the Mandate to Establish the Homeland Security Commission ................................................................. 63

Conclusion ........................................................................................................ 65
EXECUTIVE SUMMARY

PURPOSE

In accordance with Section 455(b) of Public Law 93-198, the District of Columbia Auditor conducted an audit of the implementation of D.C. Law 16-262, the “Homeland Security, Risk Reduction, and Preparedness Amendment Act of 2006,” which took effect on March 14, 2007.

CONCLUSION

The Auditor examined the implementation of D.C. Law 16-262, the “Homeland Security, Risk Reduction, and Preparedness Amendment Act of 2006,” an omnibus act that includes requirements for threat and vulnerability assessment, government employee security training, homeland security exercises, public information and involvement, large building security, protection of critical infrastructure, coordination with the private sector and other levels of government, and the establishment of a Homeland Security Commission. The Act also expanded the role of the District’s Emergency Management Agency, which was renamed the Homeland Security and Emergency Management Agency (HSEMA) and designated as the District’s lead agency for homeland security.

Given the broad scope of the Act, its implementation provides a useful vantage point on the District’s homeland security policies and programs more than seven years after the terrorist attacks of September 11, 2001. This audit is based on interviews with senior homeland security officials in the D.C. government, interviews with community leaders and private-sector representatives, and extensive review of local and federal homeland security plans, directives, and analyses.

The Auditor is concerned that the governmental focus on homeland security may be waning as we move further away from the September 11th attacks. The District of Columbia’s homeland security program has abiding strengths, yet the inter-governmental coordination that is key to homeland security appears to have declined. A particular source of concern is that three of six specific tasks or deadlines set forth in the Act have not been fulfilled, while one requirement was only partly fulfilled and another requirement was completed nine months after the deadline (the sixth

---

1 See Section 455(b) of the District of Columbia Home Rule Act, approved December 24, 1973 (Pub. L. No. 93-198; 87 Stat 803); D.C. Code § 1-204.55(b) (2001) which states: “The District of Columbia Auditor shall each year conduct a thorough audit of the accounts and operations of the government of the District of Columbia in accordance with such principles and procedures and under such rules and regulations as he [she] may prescribe. See also D.C. Code § 1-204.55(c) which states: “The District of Columbia Auditor shall have access to all books, accounts, findings, and all other papers, things, or property belonging to or in use by any department, agency, or other instrumentality of the District government and necessary to facilitate the audit.”
requirement – requesting that private entities share information on best practices for preventing, mitigating, and responding to a terrorist attack, appears unfeasible).

Specifically, the Mayor did not submit an annual report to the Council (due in March 2008) describing the current level of preparedness, assessing homeland security capabilities, and identifying high-priority unmet needs, until December 2008. The Mayor has yet to appoint any members to the seven-member Homeland Security Commission, almost two years after the Act took effect. HSEMA has not yet developed and issued guidelines for a public employee security training program, or developed guidance for building managers to enhance the security of large commercial and residential buildings. As required by the Act, HSEMA commissioned a threat and vulnerability assessment (TVA) for the District of Columbia, but the TVA did not assess actions already taken to improve homeland security or recommend additional steps to protect the homeland.

Homeland security is fundamentally an inter-agency responsibility. Although HSEMA is the lead agency for homeland security, the involvement and contributions of other agencies including the Metropolitan Police Department, the Fire and Emergency Medical Services Department, the Department of Health, the Department of Transportation, the Department of Human Services, the Office of the Chief Technology Officer, and Serve DC (the Mayor’s Office on Volunteerism) are essential. Yet the Emergency Preparedness Council (EPC), the homeland security policymaking body established by former Mayor Anthony Williams in 2002 to coordinate the efforts of these agencies, has been less active, with no meetings in 2007 and only three meetings in 2008. In addition, revisions to the District’s core emergency preparedness plan, the District Response Plan (DRP), took three years to complete even though D.C. law mandates an annual update.

The Auditor finds that the executive branch needs to revitalize the interagency system for making and implementing homeland security policy by making any necessary changes to the EPC structure and holding bi-monthly meetings of the EPC. This is not merely a process issue but rather a way to focus and coordinate the resources of the government to fulfill the outstanding requirements of the Act and to address other policy issues cited in this report. For example, the District needs to finish continuity of operations plans for all agencies; enhance and test its capacities to provide shelter, and mass care when necessary; tailor community emergency management plans to the needs and circumstances of each neighborhood; create a cadre of trained citizens in each neighborhood to assist in emergency response; and ensure that corrective actions identified in homeland security exercises are implemented.
The Auditor also emphasizes that the Act’s key accountability provisions — the requirement for an annual report to the Council and the mandate to establish an independent Homeland Security Commission — are more than matters of bureaucratic compliance. Annual reporting is important to keep policymakers and the public informed about and engaged in emergency preparedness, and to take stock of the capabilities that have been built and the gaps that remain. The seven-member Homeland Security Commission was intended to provide a permanent source of independent expertise and constructive criticism on matters of life-and-death importance, allowing the District to draw on individuals with backgrounds in security, transportation, emergency communications, chemical safety, and risk assessment to ensure that the District, as one of the highest-risk cities in the nation, has one of the most effective homeland security programs.

The Auditor believes that there are underlying strengths in the District of Columbia’s homeland security program. During the first five years after the September 11th attacks, the District created a solid foundation for homeland security, developing a system of interoperable radio communications for police, fire, and emergency medical workers; implementing a four-part citizen emergency notification system that includes text and voice alerts; disseminating a family preparedness guide and creating an emergency preparedness website; and purchasing personal protective gear and equipment for first responders. More recently, the District has launched a “fusion center” housed at the Metropolitan Police Department to analyze intelligence information and disseminate threat information in partnership with regional and federal agencies. HSEMA is implementing a new outdoor warning system for targeted areas such as the National Mall to complement the text and voice alert systems already in place. The challenge for the District is to maintain a high level of determination and intensity in protecting the homeland, and to avoid complacency, as homeland security policymaking becomes a routine and institutionalized aspect of government operations. The District’s homeland security capacities are strong in many respects, but as one of the two highest-threat cities in the nation, the District of Columbia must have the strongest homeland security program possible.

**MAJOR FINDINGS**

1. Executive Branch Compliance with Specific Requirements of the Act Remains Incomplete.


4. Lack of Private-Sector Cooperation Has Hampered Critical Infrastructure Protection.

5. Logistical Support, Including Shelter, Transportation, and Mass Care, Remains a Key Area in Need of Attention.


7. The District’s FY 2009 Operating Budget Allocates Approximately $300 Million to Homeland Security. More Than 80 Percent of This Funding Is in the HSEMA Operating Budget.


10. The Annual Report to the Council Provides Valuable Information, But Was Submitted Almost a Year Late.

11. The District Government Has a Solid Public Information Program, But Faces the Challenge of Sustaining and Reinforcing Public Interest and Involvement.

12. The District Government Has Implemented Useful Citizen Training Programs, But Has Not Developed the Neighborhood Networks That Could Be Invaluable in Responding to a Crisis.


14. HSEMA Has Not Met the Requirement to Develop and Issue Guidance for a Public Employee Security Training Program.
15. HSEMA Has Not Completed the Requirement to Develop Guidance for Building Operators and Managers to Enhance the Security of Large Commercial and Residential Buildings.


17. HSEMA Has Embarked on a Promising Initiative to Implement an Outdoor Warning System.

18. HSEMA Has Not Requested That Private Entities Share Best Practices to Prevent, Mitigate, Respond to, or Recover From a Terrorist or Other Security Incident.

19. The Mayor Has Not Complied with the Mandate to Establish the Homeland Security Commission.

**MAJOR RECOMMENDATIONS**

1. The Mayor Should Revise and Re-Issue Mayor’s Order 2002-1 Governing the Emergency Preparedness Council (EPC) to Ensure the EPC is an Efficient and Effective Forum for Homeland Security Policymaking and Oversight.

2. The City Administrator, or Other Official Designated by the Mayor, Should Convene the EPC Bi-Monthly and Require Participation by All Agencies with Lead Responsibility for Emergency Support Functions.

3. The City Administrator and HSEMA Director Should Use the EPC as a Working Group to Fulfill the Unmet Requirements of the Act.

4. HSEMA, Working with Other Lead Agencies Responsible for Emergency Support Functions, Should Revise the District Response Plan Annually, As Required by Statute, or Seek a Change in the Statute.

5. The Mayor and City Administrator Should Direct All Agencies to Complete Continuity of Operations Plans That Are Approved by HSEMA By the End of August 2009.

6. The Mayor Should Designate HSEMA as the Lead Agency for Critical Infrastructure Protection in the District of Columbia.
7. HSEMA Should Focus Its Critical Infrastructure Program on Critical Systems, Networks, and Functions, as Well as Critical Facilities.

8. HSEMA and the Department of Human Services Should Examine the Potential of Other Government Facilities, Such as Senior Citizen Centers, to Serve as Shelters and Increase the Number of Shelters That Are Accessible to People with Disabilities and Other Special Needs.

9. HSEMA, the Department of Human Services, the Department of Transportation, the Metropolitan Police Department, the American Red Cross, and Regional Governments Should Conduct an Annual Exercise to Test the Plans for Shelter and Mass Care.

10. HSEMA and the Department of Transportation Should Seek to Establish Memoranda of Understanding with the Owners of All Privately-Owned or Controlled Transportation Transfer Points.


12. Serve DC, the Metropolitan Police Department, and the Department of Health Should Develop and Implement Outcome-Oriented Performance Measures for Their Homeland Security Programs.

13. The Mayor and Council Should Consider a Local Funds Increase for HSEMA Once the District’s Fiscal Position Improves.


15. HSEMA Should Relate Issues of Governance, Communication, and Coordination to the Prevalence and Mitigation of Risk As Part of Its Threat and Vulnerability Assessments.
16. HSEMA Should Use Threat and Vulnerability Assessments to Assess Possible Delivery Methods for Terrorist Attacks, As Well as the Most Likely Threats and Weapons That Might Be Used.


18. HSEMA Should Include More Information on High-Priority Capabilities in Future Annual Reports, Focusing Less on Internal Processes and More on Results.


21. Serve DC Should Set the Goal of Developing a Neighborhood Corps for Every Community in the District of Columbia, and Track Progress Toward This Goal.

22. HSEMA Should Customize Each Community Emergency Management Plan During the Next Cycle of Revisions.


24. HSEMA Should Test New Approaches to Involve Residents in Community Exercises, Such as Holding Events in Large Apartment Complexes or Public Housing Projects.

25. The Office on Latino Affairs, the Office on Asian and Pacific-Islander Affairs, the Office on African Affairs, and the Office of Gay and Lesbian Affairs Should Assist HSEMA in Recruiting Participants for Community Exercises.

27. HSEMA Should Regularly Track and Update the Lists of Emergency Liaison Officers (ELOs), and Ensure That ELOs Have Sufficient Training in WebEOC\textsuperscript{2} to Perform Their Duties Adequately.

28. HSEMA, with the Assistance of the Office of the Chief Technology Officer, Should Establish a Centralized Data Base That Will Track Homeland Security Training.


30. HSEMA Should Develop Building Security Guidance Relevant to Different Types of Businesses and Organizations, Such As Day-Care Centers and Nursing Homes.

31. The Office of Property Management Should Issue Regulations for All District-Owned and Leased Space By the End of March 2009 and Include a Requirement for Annual Building Evacuation Drills.

32. HSEMA Should Make Greater Use of “No-Notice” Homeland Security Exercises.

33. HSEMA Should Ensure That After-Action Reports Are Completed Within One Month After an Exercise Was Conducted.

34. HSEMA Should Use the EPC as a Forum for Discussing and Evaluating Homeland Security Exercises, and Monitoring Implementation of Corrective Actions.

35. The Mayor and City Administrator Should Use the Homeland Security Exercise Program as the Topic of a CapStat Accountability Session.

36. HSEMA Should Synthesize Available Information About Best Practices in Private-Sector Vulnerability Assessment and Mitigation Efforts and Disseminate the Information to Private Organizations and Trade Associations.


\textsuperscript{2} WebEOC is the District’s web-enable crisis information management system, used as the Emergency Operations Center.
PURPOSE

In accordance with Section 455(b) of Public Law 93-198, the District of Columbia Auditor conducted an audit of the implementation of D.C. Law 16-262, the “Homeland Security, Risk Reduction, and Preparedness Amendment Act of 2006,” which took effect on March 14, 2007.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of the audit was to assess the implementation of D.C. Law 16-262, the “Homeland Security, Risk Reduction, and Preparedness Amendment Act of 2006” (the “Act”), which is codified at § 7-2271.01 et seq. of the D.C. Official Code. The Auditor chose to examine the implementation of the Act because it addresses a broad range of issues critical to homeland security. These issues include the identification and mitigation of threats, risks, and vulnerabilities; establishment of readiness priorities and performance measures; coordination of public and private entities in homeland defense; collaboration with the federal government and neighboring jurisdictions; exercises to test homeland security plans; and efforts to involve and inform the public.

More than seven years after the devastating attacks of September 11, 2001, there is a danger that public vigilance and determination to prevent future terrorist strikes could erode. Therefore, it is important to keep the spotlight on the District of Columbia government’s actions to prevent, prepare for, respond to, and recover from a terrorist attack. The Act itself highlights the need to “promote transparency regarding homeland security efforts, in order that government officials and the public can assess the risks, adequacy of programs, the progress made, and the gaps remaining.” This audit was conducted to promote transparency about ongoing efforts to enhance homeland security.

---

3 See section 455(b) of the District of Columbia Home Rule Act, approved December 24, 1973 (Pub. L. No. 93-198; 87 Stat 803); D.C. Code § 1-204.55 (b) (2001) which states: “The District of Columbia Auditor shall each year conduct a thorough audit of the accounts and operations of the government of the District of Columbia in accordance with such principles and procedures and under such rules and regulations as he [she] may prescribe. See also D.C. Code § 1-204.55(c) which states: “The District of Columbia Auditor shall have access to all books, accounts, records, findings, and all other papers, things, or property belonging to or in use by any department, agency, or other instrumentality of the District government and necessary to facilitate the audit.”

4 The U.S. government defines “homeland security” as “a concerted national effort to prevent terrorist attacks within the United States, reduce America’s vulnerability to terrorism, and minimize the damage and recover from terrorist attacks that do occur.” See U.S. Homeland Security Council, National Strategy for Homeland Security (October 2007), p. 3.

5 Terrorism is defined in the Code of Federal Regulations as “the unlawful use of force and violence against persons or property to intimidate or coerce a government, the civilian population, or any segment thereof, in furtherance of political or social objectives” (28 C.F.R. Section 0.85).

6 See D.C. Official Code § 7-2231.01(3).
security in the District of Columbia, one of the nation’s highest-threat cities,⁷ and encourage continued public resolve to prevent future attacks.

The scope of the audit included eight key parts of the Act, which are as follows:

- “Homeland Security Program” (D.C. Official Code § 7-2231.03);
- “Public Information and Involvement Program” (D.C. Official Code § 7-2231.04);
- “District of Columbia Government Employee Security Training Program” (D.C. Official Code § 7-2231.05);
- “Large Building Security” (D.C. Official Code § 7-2231.06);
- “Exercises” (D.C. Official Code § 7-2231.07);
- “Public Notification of Emergencies” (D.C. Official Code § 7-2231.08);
- “Private Sector Vulnerability Assessments and Mitigation Plans” (D.C. Official Code § 7-2231.09); and

The Auditor did not include Title III of the Act (“Strict Liability for Release of Hazardous Materials During Transport”) in the scope of the audit because there have not been any releases of the hazardous materials covered by Title III since the Act took effect. Other sections of the Act (including Title IV, “Conforming Amendments”) make mostly technical changes and are therefore not included in the scope of the audit. In addition, a non-germane amendment to the Act (Title V,

---

⁷ The Commission on Terrorist Attacks Upon the United States (the “9-11 Commission”) stated that, “Homeland security assistance should be based strictly on an assessment of risks and vulnerabilities ... Washington, D.C., and New York City are certainly at the top of any such list.” See The National Commission on Terrorist Attacks Upon the United States, Final Report (New York: W.W. Norton & Company, Inc., 2004), p. 396. In addition, the U.S. Department of Homeland Security has designated the National Capital Region, which includes the District of Columbia and neighboring jurisdictions in Maryland and Virginia, as one of the six urban areas at highest risk of terrorist attack.
“Establishment of Comprehensive Homicide Elimination Strategy Task Force”) is not within the scope of the audit because this part does not deal with homeland security.

To accomplish the audit objective, the Auditor conducted background research, document review, and interviews during the period from May 1, 2008 to October 31, 2008. This work included:

- review of the Act and its legislative history;

- review of major homeland security plans and analyses prepared by or on behalf of the District government, such as the District Response Plan (DRP)\(^8\), community emergency management plans, and “after-action” reports\(^9\);

- key policy documents from the Homeland Security and Emergency Management Agency (HSEMA), including the agency’s annual budget request, performance plan, performance report, and testimony to the D.C. Council;

- policy directives, standards, and guidance issued by the U.S. Department of Homeland Security (U.S. DHS);\(^10\)

- reports on national homeland security issues by public and private organizations such as the U.S. Government Accountability Office (GAO), the Congressional Research Service, and the Commission on Terrorist Attacks Upon the United States (the “9-11 Commission”);

---

\(^8\) The DRP is defined in D.C. law as a “comprehensive and detailed District of Columbia state program for preparation against, and assistance following, emergencies and major disasters.” The Mayor is required to review the DRP on an annual basis, publish any revisions to the plan in the D.C. Register, and transmit the revised plan to the Council. See D.C. Official Code § 7-2302.

\(^9\) An after-action report captures the lessons learned from an exercise and summarizes recommendations for post-exercise improvements.

\(^10\) The U.S. Department of Homeland Security plans, directives, and guidance reviewed by the Auditor include the “National Response Framework” (January 2008); the “National Strategy for Homeland Security” (October 2007); the “National Infrastructure Protection Plan” (2006); and the “Nationwide Plan Review” (2006).
• interviews with the HSEMA Director and HSEMA senior staff members, as well as senior officials with homeland security responsibilities in the Metropolitan Police Department (MPD) and Serve DC\textsuperscript{11};

• interviews with Advisory Neighborhood Commissioners or civic association leaders from each ward of the city to gather information about community preparedness; and

• interviews with representatives of private organizations with important roles in homeland security, including the Apartment and Office Building Owners Association of Metropolitan Washington, the D.C. Hospital Association, the Downtown D.C. Business Improvement District, and the Greater Washington Board of Trade.

The audit was conducted 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. The Auditor believes that the evidence obtained provides a reasonable basis for our findings and conclusions based on the audit objectives.

BACKGROUND

Bill 16-242, the “Homeland Security, Risk Reduction, and Preparedness Act of 2005,” was introduced by Councilmembers Kathy Patterson and Phil Mendelson on April 6, 2005, and referred to the Council’s Committee on the Judiciary. The purpose of the legislation was to “address a range of important unmet homeland security needs in the District of Columbia and base our homeland security policies upon thorough assessments of threats and vulnerabilities, as recommended by the National Commission on Terrorist Attacks Upon the United States.”\textsuperscript{12}

The Committee on the Judiciary held a public hearing on the legislation on June 17, 2005, and approved the legislation, with amendments, on December 4, 2006. The Council gave final approval to the legislation on December 19, 2006, and Mayor Anthony Williams signed the

\textsuperscript{11} “Serve DC” has been the informal name for the District’s Commission on National and Community Service. In June 2008, Mayor Fenty changed the name of the office to “Serve DC, the Mayor’s Office on Volunteerism.” Serve DC administers the District’s community service programs, including those that promote neighborhood emergency preparedness. See \url{http://serve.dc.gov}.


The main provisions of the Act are as follows:

- **Homeland Security and Emergency Management Agency.** The Act changed the name of the D.C. Emergency Management Agency (EMA) to the Homeland Security and Emergency Management Agency (HSEMA) and vested the agency with broader responsibilities to protect the District and ensure its preparedness for man-made and natural hazards. As discussed below, the Act places the HSEMA Director in charge of the District’s homeland security program and gives the Director explicit responsibility for coordinating the District’s homeland security activities with federal, regional, and private entities. Previously, the Deputy Mayor for Public Safety and Justice (a position that was abolished by Mayor Adrian Fenty in January 2007) served as the Mayor’s homeland security advisor and the District’s single point of contact with US DHS; in fact, one unit within the Office of the Deputy Mayor for Public Safety and Justice was the “Office of Homeland Security.”

- **Homeland Security Program.** The Act requires the HSEMA Director to develop and implement a broad-based homeland security program to “identify and mitigate threats, risks, and vulnerabilities within the District of Columbia.” The program shall include, but not be limited to, the following elements: (1) identifying public infrastructure and other public assets that need protection, assessing the vulnerability of those assets, and addressing high-priority protection needs regarding those assets, (2) establishing measurable readiness priorities and targets that balance the potential threat and magnitude of terrorist attacks and other hazards with the resources required to prevent, respond to, and recover from the threats,

---

13 The summary provided below does not discuss Title III, “Strict Liability for Release of Hazardous Materials During Transport.” As discussed earlier, the provisions of this Title, which establishes strict liability for any person who releases certain hazardous materials transported into the District of Columbia and provides public and private rights of action to recover costs, have not been tested because there have been no violations.

14 See, for example, the testimony of Deputy Mayor for Public Safety and Justice Margret Kellem before the Council of the District of Columbia, Committee on the Judiciary, February 6, 2004, pp. 12-13. The Deputy Mayor of Public Safety and Justice and the City Administrator also served as co-chairs of the Emergency Preparedness Council (EPC) under Mayor’s Order 2002-1, “Establishment of the Mayor’s Emergency Preparedness Council,” issued January 2, 2002. By contrast, the Director of the Emergency Management Agency was designated the executive secretary of the EPC, “coordinating all Council logistics and assignments.”

15 See D.C. Official Code § 7-2231.03(a).
(3) establishing readiness metrics and performance measures for preparedness in the areas of prevention, protection, response, and recovery, (4) assisting residents and public and private entities in emergency preparedness, (5) coordinating with federal, state, and regional authorities, as well as private entities, to enhance homeland security, and (6) developing a budget to implement the homeland security program.

- **Threat and Vulnerability Assessment (TVA).** The Act directs the HSEMA Director to “contract for a baseline threat and vulnerability assessment of the District of Columbia”\(^{16}\) as part of the homeland security program described above. The TVA is critical to realizing the Act’s intent to base homeland security policy on “an assessment of risks and vulnerabilities.”\(^{17}\) The Act specifies that the TVA shall consider “risks associated with, but not limited to, terrorism (including bioterrorism), radiological weapons and their potential transport into the District of Columbia, food and water supply, cybersecurity, fire and rescue capability; an assessment of actions already taken to address security issues and recommendations on whether additional safety and security actions are needed; and recommendations for additional legislation needed to enhance the security of District residents.”\(^{18}\)

- **Annual Report to the Council.** The Act also requires the Mayor to transmit an annual report to the Council on the homeland security program. The annual report must describe “the current level of preparedness of the District of Columbia, including reports on the District’s homeland security capabilities, priority unmet needs and the cost of meeting those needs, relevant training and readiness exercises, resident education, and the utilization of mutual aid.”\(^{19}\)

- **Public Information and Involvement Program.** The Act requires the Mayor to (1) disseminate homeland security information to the public and engage residents in homeland security emergency planning, (2) solicit resident input in vulnerability assessment and planning activities, and (3) offer periodic training opportunities to members of the public.

---

\(^{16}\) See D.C. Official Code § 7-2231.03(b).

\(^{17}\) See D.C. Official Code § 7-2231.01(5).

\(^{18}\) See D.C. Official Code § 7-2231.03(b).

\(^{19}\) See D.C. Official Code § 7-2231.03(c).
• **Government Employee Security Training Program.** The Act requires the HSEMA Director, in consultation with other District government agency directors; law enforcement, security, and terrorism experts; and public employee representatives, to develop and issue guidelines for a government employee security training program. In addition, the Act states that the HSEMA Director may require District government agencies to submit employee security training programs to the Director for annual review.

• **Large Building Security.** The Act directs the HSEMA Director to develop guidance for building operators and managers to enhance the security of large commercial and residential buildings, and to consult with property owners, property managers, and building operators and managers while developing the guidance. In addition, the Act states that the HSEMA Director shall occasionally review the building code to determine potential changes that could improve building security, in consultation with the Director of the Department of Consumer and Regulatory Affairs and organizations representing property owners, property managers, and building operators and managers.

• **Exercises.** The Act mandates that HSEMA shall “coordinate a regular program of readiness exercises to test the District of Columbia’s emergency preparedness, propose action to address any gap in preparedness, and coordinate with regional, federal, and private entities.”

• **Public Notification of Emergencies.** The Act directs HSEMA to “establish and implement an effective homeland security public warning and information capability that can be used during emergencies to warn residents timely and to disseminate emergency information to residents, both indoors and outdoors, at any time and regardless of residents’ special needs.” The Act further directs HSEMA to “pay particular attention to the needs of senior citizens and low-income residents” in establishing an effective public warning and information capacity.

• **Private Sector Vulnerability Assessments and Mitigation Plans.** The Act states that the HSEMA Director shall request that private entities share information about best practices for preventing, mitigating, responding to, and recovering from a terrorist attack or other disaster, including information on relocation and business continuity plans.

---


21 See D.C. Official Code § 7-2231.08.
Homeland Security Commission. The Act establishes a seven-member District of Columbia Homeland Security Commission to be comprised of individuals with "expertise in security, transportation, communication, chemical safety, risk assessment, terrorism (including bioterrorism), or occupational safety and health."22 The Mayor would appoint the seven members of the Commission to staggered three-year terms,23 subject to the advice and consent of the Council. The Commission would be charged with (1) gathering and evaluating information on the status of homeland security in the District of Columbia, (2) measuring progress and gaps in homeland security preparedness, (3) recommending security improvement priorities in consultation with major public and private entities, and (4) advising the District of Columbia government on the homeland security program. The Commission would have to report annually to the Mayor and Council on its activities and make recommendations about areas of the homeland security program that need improvement. The Act also prescribes rules governing the confidentiality of Commission proceedings and the confidentiality of information provided to the Commission.

22 See D.C. Official Code § 7-2271.02(a).

23 The Act provides that the initial terms of Commission members will be staggered, such that "either 4 positions or 3 positions" would expire one year after the Commission begins operations. See D.C. Official Code § 7-2271.02(b)(3) and (b)(4).
**FINDINGS**

**EXECUTIVE BRANCH COMPLIANCE WITH SPECIFIC REQUIREMENTS OF THE ACT REMAINS INCOMPLETE**

The Auditor found that overall implementation of the Act is incomplete. The table below, which lists six specific tasks or deadlines required by the Act, shows that the executive branch partly fulfilled one of six major requirements, and completed another major requirement nine months after the statutory deadline. One requirement appears unfeasible, while the other three requirements have not been met.

**Table 1**  
*Executive Branch Compliance with Specific Requirements of D.C. Law 16-262*

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>HSEMA shall commission a baseline threat and vulnerability assessment (TVA) of the District of Columbia by March 14, 2008</td>
<td><strong>Partly Met</strong> – HSEMA commissioned the TVA, which was completed in March 2008, but the TVA does not comply with the Act’s requirements to assess actions already taken to improve homeland security, and to recommend additional steps to protect the homeland.</td>
</tr>
<tr>
<td>The Mayor shall submit an annual report to the Council describing the current level of preparedness, assessing homeland security capabilities, and identifying high-priority unmet needs, by March 14, 2008.</td>
<td><strong>Delayed</strong> – The Mayor transmitted the annual report to the Council nine months late, in December 2008.</td>
</tr>
<tr>
<td>HSEMA shall develop and issue guidelines for a public employee security training program.</td>
<td><strong>Not Met</strong> – HSEMA expects to complete the guidelines by the late summer of 2009.</td>
</tr>
<tr>
<td>HSEMA shall develop guidance for building operators and managers to enhance the security of large commercial and residential buildings</td>
<td><strong>Not Met</strong> – HSEMA is still working on the security guidance for large buildings.</td>
</tr>
<tr>
<td>HSEMA shall request the voluntary sharing of information from private entities on best practices for preventing, mitigating, responding to, and recovering from a terrorist or other security incident.</td>
<td><strong>Not Feasible</strong> – The Auditor concluded that this requirement is not feasible and needs to be revised, because private entities are largely unwilling to share information about security practices.</td>
</tr>
<tr>
<td>The Mayor shall establish a Homeland Security Commission to assess the District’s homeland security program and make recommendations to the government on homeland security policies.</td>
<td><strong>Not Met</strong></td>
</tr>
</tbody>
</table>
The Auditor regards with concern the executive branch’s failure to comply fully with the Act’s requirements. The provisions of the Act touch on basic elements of homeland security, including threat assessment, training, public-private cooperation, accountability, and independent monitoring, and none of the required tasks is of unusual complexity or scope.

Although the specific tasks and deadlines listed in Table 1 are core elements of the Act, the legislation also establishes overall policy direction for a number of other important aspects of homeland security policy. These areas include infrastructure protection, readiness metrics and performance measures, public-private cooperation, federal and regional cooperation, public information and involvement, exercises, and public notification of emergencies. Findings and recommendations relevant to those topics are outlined in the following sections of this report.

THE INSTITUTIONAL STRUCTURE FOR HOMELAND SECURITY POLICYMAKING NEEDS TO BE STRENGTHENED

Mayor Anthony Williams created an institutional structure for homeland security policymaking and coordination by formally establishing the Emergency Preparedness Council (EPC) through Mayor’s Order 2002-01, dated January 2, 2002. Co-chaired by the City Administrator and the Deputy Mayor for Public Safety and Justice, the EPC was charged with the following duties: (1) “continually re-examine the overall state of emergency and disaster readiness in the District of Columbia,” (2) “provide a consistent network of District agency expertise to make the District of Columbia Government a national leader in comprehensive emergency management,” and (3) “make recommendations on improving District planning for, response to, and recovery from emergency and disaster events as well as emerging threats.”

To promote broad-based collaboration, the EPC included not only the directors of agencies with important responsibilities outlined in the DRP, but also the Council Chairman, the Chairman of the Council’s Judiciary Committee, federal agencies; private organizations such as the American Red Cross, the D.C. Hospital Association, and the D.C. Consortium of Colleges and Universities; and regional organizations such as the Washington Metropolitan Area Transit Authority (Metro) and the Water and Sewer Authority. The Mayor’s Order, which is still in effect, directs the EPC to administer a disaster exercise program while documenting the lessons learned from exercises and monitoring corrective actions. The EPC served as a locus of homeland security policymaking and implementation in the five years after the September 11th attacks, addressing issues such as the allocation and expenditure of federal grants, training, and procurement. Moreover, the EPC was a

forum in which agencies with key homeland security responsibilities could report on their progress and the obstacles they were facing.

The Auditor found, however, that the EPC did not hold any meetings during 2007, and held only three meetings during 2008 (January 21, 2008; May 16, 2008; and August 26, 2008). Current policy states that the EPC shall meet bi-monthly. The range of participants has also narrowed; for example, there were no representatives from the D.C. Council, private organizations, or regional organizations at the May and August 2008 meetings. The HSEMA Director stated that he had made the decision to suspend EPC meetings upon assuming his position in June 2007 because it had become an unwieldy forum for decision-making and because he wanted to shift his agency from an emergency management model to a homeland security model.

The Auditor understands the HSEMA Director’s desire to review and revise the homeland security decision-making structure, but believes it is time for a new EPC structure to be put in place. Mayor’s Order 2002-1 is now long out of date; for example, it designates the Deputy Mayor for Public Safety and Justice – a position that no longer exists – as co-chair of the EPC, along with the City Administrator. Important agencies like Serve DC, which promotes citizen preparedness, and the Office of Unified Communications, which was established in 2004 to manage the District’s emergency 911 and non-emergency 311 call centers, are not included in the policy-making structure set forth in Mayor’s Order 2002-1.

One way to make the EPC decision-making process more efficient would be to create subcommittees that bring together people with specialized experience to address specific issues. Some EPC meetings could be limited to D.C. government officials to facilitate internal planning, which could be complemented by larger sessions that include regional officials, private-sector representatives, and community members. Overall, the Auditor finds that a formal, intergovernmental body that meets regularly to formulate and monitor homeland security policy is


27 In fact, Mayor’s Order 2002-1 envisioned the creation of four subcommittees (operations support, community services, infrastructure, and emergency services), as well as an Emergency Preparedness Group comprised of the lead planners from EPC agencies, but these bodies never became operational. In August 2003, a legislative and regulatory revisions subcommittee to the EPC was established (see Mayor’s Order 2003-121, dated August 15, 2003, published in the District of Columbia Register, Vol. 50, No. 35, August 29, 2003, pp. 7246-7248).
essential. The Auditor recommends that the executive branch use the EPC to fulfill the requirements set forth in the Act, including developing guidelines for public employee security training, and issuing guidance on the security of large buildings.

Moreover, the EPC is intended to serve as a forum to consider and make timely revisions to the DRP, the core emergency preparedness plan for the District. Designed as an “all-hazards” plan that applies to any emergency or disaster, natural or man-made, the DRP was modeled on the National Response Plan and was first issued in April 2002. The DRP “establishes the framework for District government entities to respond to, recover from, and mitigate an emergency in a methodical and efficient manner that protects life and property and ensures public safety.” The building blocks of the DRP are 16 different types of resources, known as “Emergency Support Functions.” The DRP discusses how each ESF will be activated and managed during a crisis; sets forth the “Concept of Operations” that will guide the District’s emergency response; defines organizational roles and responsibilities; summarizes the policies and procedures for emergency operating facilities and emergency operations teams; integrates response, recovery, and mitigation actions; and addresses resource coordination and management.

HSEMA completed the most recent revisions to the DRP in December 2008, amending the previous version that had been issued in December 2005. Nevertheless, D.C. law requires an annual review of the DRP, a requirement that has been reflected in numerous policy documents (including the Mayor’s Order establishing the EPC). HSEMA officials have stated that annual updates are not feasible because there would be no stability to the DRP. In their view, relevant government officials

---

28 The 2005 DRP states that, “The EPC is the principal body that addresses DRP planning and implementation at the working level. It handles issue formulation and resolution, review of after-action reports and lessons learned, significant changes to DRP planning and implementation strategies, and other DRP-related operational issues that involve interagency resolution. See Government of the District of Columbia, District Response Plan (December 2005), p. 45.

29 The National Response Plan, which was prepared by the Federal Emergency Management Agency, has since been renamed the “National Response Framework.”


31 The 16 ESFs are as follows: transportation, communications, public works and engineering, firefighting, information and planning, mass care, resource support, health and medical services, urban search and rescue, hazardous materials, food, energy, law enforcement, community relations, donations and volunteer management, and animal protection.

32 See D.C. Official Code § 7-2302(d), which states that, “The Mayor shall review the District of Columbia response plan on an annual basis. Any revisions to the plan shall be published in the District of Columbia Register and forwarded to the Council pursuant to subsection (b) of this section.”
and private-sector partners would have no time to implement and practice the plan – or to identify its strengths and weaknesses – before the next review cycle started. The Auditor understands the challenges posed by an annual updating process, but concludes that a three-year lag between updates is too long.

HSEMA officials emphasized that the agency led monthly meetings, beginning in August 2008, to prepare for the January 2009 presidential inauguration. HSEMA officials credit these meetings, which included 20 D.C. government agencies as well as federal and regional agencies, with enhancing intergovernmental and regional cooperation, and contributing to a successful event involving at least 1 million people on the National Mall without any arrests or life-threatening injuries or illnesses.\(^{33}\) The Auditor recommends that the executive branch capitalize on the collaboration developed during the inauguration planning and execution by reviving the EPC process.

One example of the need for stronger inter-governmental coordination concerns continuity of operations (COOP) planning for D.C. government agencies, one of the agenda items for the May 2008 EPC meeting. COOP planning, in which agencies detail how essential operations will continue during a man-made or natural disaster, requires consideration of alternate operational sites, succession orders, maintenance of communication, transportation of staff and equipment, client files and records management, information technology, and other complex logistical issues. Without adequate COOP planning, the government may not be able to respond effectively to a crisis or to lead recovery efforts. HSEMA has contracted with the University of Maryland’s Center for Health and Homeland Security to develop COOP plans for six agencies.\(^{34}\) Through this pilot project, the District will then generate a COOP template for the entire government. Although the Auditor welcomes the focus on COOP planning, the fact that COOP work for most of the government is still under development seven years after the attacks of September 11, 2001, reflects a serious gap in District of Columbia preparedness.

In comments on a draft version of this report, HSEMA noted the six COOP plans under development should be completed by late spring 2009. HSEMA further stated that, “HSEMA conducted a full-scale exercise to test its COOP plan in October 2008 and then activated its COOP


\(^{34}\) The six agencies are the Executive Office of the Mayor, the Metropolitan Police Department, the Fire and Emergency Medical Services Department, the Homeland Security and Emergency Management Agency, the Department of Health, and the Department of Transportation.
site during the Inauguration and had the necessary equipment and personnel to continue operations in the event that the primary emergency operation center was disabled.\textsuperscript{35}

RECOMMENDATIONS

1. The Mayor should revise and re-issue Mayor's Order 2002-1 governing the Emergency Preparedness Council, in order to reflect changes in the District's system of governance (such as the abolishment of the Deputy Mayor for Public Safety and Justice position) and to ensure the EPC is an efficient and effective forum for policy-making and oversight.

2. The City Administrator (or other official, such as the HSEMA Director, designated by the Mayor to chair the EPC) should convene the EPC bi-monthly and require participation by representatives of all agencies responsible for emergency support functions in the District Response Plan.

3. The City Administrator and HSEMA Director should use the EPC as a working group to fulfill the outstanding requirements of the Act, such as developing guidelines for a public employee security training program and issuing guidance on the security of large commercial and residential buildings.

4. HSEMA, working with other lead agencies responsible for emergency support functions, should revise the District Response Plan on an annual basis as required by statute, or seek a change in the statute.

5. The Mayor and City Administrator should direct all agencies under their authority to complete COOP plans that are approved by HSEMA by the end of August 2009. HSEMA should make its COOP template available to independent agencies to facilitate their planning.

THE DISTRICT GOVERNMENT SET THE FOUNDATION FOR AN EFFECTIVE HOMELAND SECURITY PROGRAM IN THE FIVE YEARS FOLLOWING THE TERRORIST ATTACKS OF SEPTEMBER 11, 2001

In large part, the Act represents an effort to maintain and extend the homeland security capabilities developed by the District of Columbia in the first five years after the attacks of September 11, 2001, and to provide a statutory and institutional basis for continued efforts to protect residents, workers, and visitors to the District of Columbia. As the District enters a new stage in homeland security policymaking following the dramatic growth of homeland security programs and initiatives from 2001 to 2006, policymakers can build on a solid foundation created during that period. District leaders created emergency plans, established policy-making and coordinating bodies, as discussed earlier, and also invested in technology, equipment, and personnel to enhance homeland defense. Some of the key initiatives were as follows:

- Developing a common system of 800 MHZ radio communications for police, fire, and emergency medical workers with expanded on-street and within-building coverage;

- Purchasing personal protective gear for all police officers and MPD civilian employees;

- Creating a hazardous materials unit within the Department of Fire and Emergency Medical Services (Fire/EMS);

- Building a Unified Communications Center that houses HSEMA and the District’s state-of-the-art emergency operations center along with emergency 911 call-takers, non-emergency 311 call-takers, and the traffic management system;

- Implementing a four-part citizen emergency notification system, known as “Alert DC,” that includes voice alerts, text alerts (via e-mail, cell phone, pager or Blackberry, or wireless personal digital assistant), an Emergency Information Center web site, and an Emergency Alert System that uses local radio and TV stations;

- Disseminating a “Family Preparedness Guide,” which has been printed in eight languages and Braille;

- Participating in regional emergency preparedness forums through the Metropolitan Washington Council of Governments and the Senior Policy Group of the National Policy
Group, which has allocated millions of dollars in federal homeland security grants on behalf of the region; and

- Securing accreditation of the city’s emergency preparedness program from the Emergency Management Accreditation Program (EMAP) by demonstrating compliance with EMAP’s 54 quality standards. The District was one of the first two jurisdictions in the nation to attain EMAP accreditation.36

Within the past two years, the District also established the Washington Regional Threat and Analysis Center (WRTAC), a multi-agency “fusion” center housed at MPD that is charged with analyzing intelligence information and disseminating relevant threat information to law enforcement partners within the D.C. government, the region, and the federal government. WRTAC gathers and evaluates intelligence information about a wide range of criminal activity and public-health threats (such as a possible outbreak of disease) in addition to terrorism threats. US DHS and the Federal Bureau of Investigation are among the agencies represented at the fusion center, which could prove to be a significant step in advancing federal and regional cooperation.

LACK OF PRIVATE-SECTOR COOPERATION HAS HAMPERED CRITICAL INFRASTRUCTURE PROTECTION

Critical infrastructure protection (sometimes also referred to as critical infrastructure/key resources, or “CI/KR” protection) is an important element of homeland security policy. US DHS defines critical infrastructure as “assets, systems, and networks, whether physical or virtual, so vital to the United States that the incapacity or destruction of such assets, systems, or networks would have a debilitating impact on security, national economic security, public health or safety, or any combination of those matters.”37 The September 11th attacks powerfully illustrate the importance of critical infrastructure, as terrorists exploited weaknesses in our commercial aviation system to use its assets as weapons of mass destruction. It is commonly estimated that 85 percent of the critical infrastructure in the United States is privately-owned.38

36 EMAP is an independent, non-profit organization established by a dozen national organizations to foster excellence and accountability in emergency management and homeland security programs at the state and local levels. EMAP accreditation involves self-assessment, documentation of compliance with EMAP standards, and an on-site assessment by a group of trained EMAP assessors. See www.emaponline.org.


38 See, for example, Commission on Terrorist Attacks Upon the United States, p. 398.
The Act emphasizes the importance of "identifying public infrastructure and other public assets in the District that need protection, assessing vulnerability, and addressing priority needs" (see D.C. Official Code § 7-2231.03(a)). Nevertheless, it is clear that HSEMA also has a role in protecting privately-owned critical infrastructure, because the Act also charges the HSEMA Director with "assisting residents and public and private entities in emergency preparedness" and "coordinating with federal, state, and regional authorities, and with private entities" (see D.C. Official Code § 7-2231.03(a)).

HSEMA has identified 99 critical infrastructures in the District of Columbia and immediately adjacent to the District (reflecting the fact that attacks or natural disasters at sites outside the District could have spillover effects), spanning the government, health care, transportation, and commercial sectors, and including national monuments. According to a senior HSEMA official, the agency has assessed 35 of the 99 critical infrastructure sites using the Automated Critical Asset Management System, a web-based system designed by US DHS that can be used to create an asset inventory, assess vulnerabilities, and generate reports. HSEMA officials stated, however, that the process of assessing the security of these infrastructures has been hampered by the reluctance of private and federal owners to cooperate. In particular, the owners and managers of privately-controlled critical infrastructure have expressed concern that information on their vulnerabilities could be inadvertently or improperly exposed, and that proprietary information might also be at risk.

There is also some uncertainty about agency roles and responsibilities in protecting critical infrastructure. In a July 18, 2008, letter to the Auditor, the HSEMA Director stated that, "MPD has been the primary agency for conducting critical infrastructure assessment to this point. HSEMA has worked closely with MPD to ensure that the data has been entered into the ACAMS system and is submitted to the U.S. Department of Homeland Security. There were three site assessments conducted in 2007 and 17 conducted in 2008. Additionally, MPD has conducted assessments at several universities and hospitals, primarily for the security of radiological sources." MPD has also managed the federal grants that the D.C. government receives through the Buffer Zone Protection

---


Program, which provides funding to build security and risk-management capabilities to protect critical infrastructure. Nevertheless, HSEMA officials described their agency as taking a more important role in critical infrastructure recently, and HSEMA hired an individual with National Guard experience to lead its critical infrastructure activities. A senior government official described organizational responsibility for critical infrastructure as a "work in progress."

Critical infrastructure protection clearly requires a significant amount of inter-governmental cooperation. MPD will receive a large volume of threat information through WRTAC and through the regular activities of its patrol officers and detectives. Fire/EMS and the D.C. Department of Transportation (DDOT) also bring specialized expertise to the task of critical infrastructure protection. Nevertheless, the Auditor recommends that HSEMA, the District’s homeland security agency, be recognized as the lead agency. There are natural linkages between HSEMA’s critical infrastructure work and its other duties, such as its responsibilities for outreach to the private sector and community preparedness. At the same time, agencies such as MPD have numerous other responsibilities besides homeland security.

The Auditor also finds that the District would benefit from an approach to critical infrastructure that emphasizes threats to critical systems, networks, and functions, as well as the risks to specific sites or facilities. The Auditor notes that attacks on communications, energy, or water systems, for example, could create cascading effects on the rest of society that could severely damage the economy, public health, or public safety. The Georgia Tech Information Security Center recently reported that cyberattacks pose a growing threat to power grids, water systems, transportation, and communications.\(^{41}\) Therefore, an important part of critical infrastructure protection should involve identifying the key nodes and assets whose failure could lead to such crippling impacts. In The Forgotten Homeland, Richard Clarke and Rand Beers describe the possible ripple effects of a successful attack on a critical system as follows:

For example, many manufacturing systems dependent on critical infrastructure could cease operations, creating further cascading effects down the economic food chain; financial transactions might be halted and the coordination of the delivery of goods, particularly those dependent on just-in-time delivery systems, could be seriously disrupted. In the event of a catastrophic cyber event, software patches and other IT solutions designed to address specific cyber vulnerabilities might not get to their

---

intended destinations because the normal electronic delivery processes provided by
the Internet are degraded or disabled.\textsuperscript{42}

**RECOMMENDATIONS**

1. The Mayor should designate HSEMA as the lead agency for critical infrastructure
   protection in the District of Columbia. Inter-agency efforts to protect critical
   infrastructure should involve close coordination with MPD, Fire/EMS, DDOT, and
   the Office of Property Management (OPM), using the EPC and an inter-agency
   Critical Infrastructure Working Group as forums for coordination and collaboration.

2. HSEMA should focus its critical infrastructure program on critical systems,
   networks, and functions pertaining to sectors such as telecommunications, energy and
   other utilities, and health care, in addition to the specific critical infrastructures
   identified by the agency.

**LOGISTICAL SUPPORT, INCLUDING SHELTER, TRANSPORTATION, AND MASS
CARE, REMAINS A KEY AREA IN NEED OF ATTENTION IN THE DISTRICT’S
HOMELAND SECURITY PROGRAM**

In the years immediately following the attacks of September 11, 2001, governments at all
levels focused on the training, equipment, and capacity of first responders, as well as the need for
greater security in critical infrastructure and systems such as aviation and surface transportation.\textsuperscript{43} For FY 2005, for example, the U.S. Congressional Budget Office estimated that 37 percent of the federal government’s homeland security expenditures were designated for border and transportation
security, with 31 percent devoted to the protection of critical infrastructure and key assets.\textsuperscript{44} Many state and local governments used federal grant funds to purchase or upgrade equipment, such as
emergency communication systems, chemical and radiological detectors, and bomb detection
equipment.

\textsuperscript{42} Richard Clarke, Rand Beers, et. al., *The Forgotten Homeland: A Century Foundation Task Force Report*

\textsuperscript{43} See for example Veronique de Rugy, “What Does Homeland Security Spending Buy?” (American

\textsuperscript{44} U.S. Congressional Budget Office, “Federal Funding for Homeland Security: An Update,”
(Congressional Budget Office Economic and Budget Issue Brief, July 20, 2005), p. 2.
The District of Columbia followed this trend. The District government allocated a federal homeland security appropriation of $155.9 million, approved in January 2002\textsuperscript{45}, as follows: $45.5 million on emergency communications, $25.5 million on increased facility security, $20.7 million on emergency traffic management, $15 million on first response capability, and $10.4 million on chemical and biological weapons preparedness.\textsuperscript{46} Although many of these functions were critical, the emphasis on complex and technologically advanced systems and equipment may have overshadowed more basic logistical concerns that support community preparedness, response, and recovery.

The devastation that Hurricane Katrina wreaked on the Gulf Coast in the fall of 2005 alerted officials to the importance of key logistical supports and human factors in any emergency response — and the extent to which a disaster can damage basic systems that are needed to respond and recover. As the GAO reported in a review of preparedness and response for Hurricanes Katrina and Rita, the effectiveness of first responders depends not only on their training and equipment, but also on more elementary concerns such as their ability to get to work. The GAO found that:

- When local government infrastructure is severely damaged or essential government employees are victimized by a disaster or forced to evacuate, government’s continuity of operations is in question and public safety and other services will suffer.

- The scope of the devastation makes a comprehensive damage assessment and an estimate of services that victims might need very difficult.

- Logistics systems may be overwhelmed, with critical resources apparently not available, properly distributed, or provided in a timely manner.

- Agencies need to be able to plan for and anticipate requirements for needed goods and services, clearly communicate responsibilities across agencies and jurisdictions, and deploy sufficient numbers of personnel to provide contractor oversight.

\textsuperscript{45}This funding was contained in P.L. 107-117, “The Department of Defense and Emergency Supplemental Appropriations for Recovery from and Response to Terrorist Attacks on the United States Act, 2002,” effective January 10, 2002.

• The magnitude of the affected population in a major catastrophe calls for greater capabilities to assist special-needs populations such as those in hospitals and nursing homes, and to coordinate transportation systems.

• Providing long-term shelter, if needed, is a massive challenge.

• Additional capacity is needed to effectively manage and deploy volunteers and unsolicited donations.47

Like other governments around the nation, the District has sought in the past three years to improve catastrophic planning and address issues such as shelter, mass care, transportation, and assistance to people with disabilities. Despite efforts by HSEMA, the Department of Human Services (DC DHS), DDOT, and other agencies to strengthen plans for shelter and mass care, the magnitude of the potential problem remains daunting. For example, the GAO recently reported that 300,000 people might need shelter in the Washington metropolitan area after a chemical, biological, radiological, nuclear, or other explosive attack, while the American Red Cross (ARC) estimates its total bed-space capacity for the region at 13,000.48 The D.C. government has a crucial role to play in coordinating public and private resources to expand the local and regional capacity to provide mass care following a terrorist attack or other disaster.

The D.C. government has developed an Official Shelter Plan and has worked with ARC to identify 50 public schools and 26 recreation centers that could serve as shelters, as well as two “super-shelters” (the Washington Convention Center and the Robert F. Kennedy Stadium Armory) that could house more than 1,000 people apiece. DC DHS, which has the responsibility to open shelters upon request from HSEMA, requires a ratio of 1 staff member to 10 residents for each shelter and would recruit workers from its own employees, ARC, and Serve DC. Shelter security would be provided by OPM’s Protective Services Division and MPD’s School Security Bureau, with a minimum of two guards at each shelter, three security guards when capacity exceeds 100 residents, and four security guards when capacity exceeds 200 residents. According to HSEMA, ARC has 10,000 heater meals (which do not require preparation) immediately available, and should have the


capacity to obtain 25,000 more meals within five to 10 hours. DC DHS has 600 cots available for immediate use, and ARC has access to 15,000 cots within the National Capital Region as well as six trailers deployed throughout the District filled with cots and blankets in case of an emergency. If the District government runs out of shelter space, it will turn to neighboring jurisdictions for assistance.

The sheltering of people with disabilities remains a major challenge, partly due to the outdated infrastructure in many government-owned facilities. HSEMA reported that 37 out of 50 (74 percent) of public schools identified as shelters were rated by ARC as “not accessible” to the disabled. Only seven of the schools (14 percent) were deemed “fully accessible” and six (12 percent) were rated as “partially accessible.” Many schools lack showers, and many of the existing showers are not accessible to the disabled. Recreation centers fared better than schools in terms of accessibility. The majority (13 out of 20) of the recreation centers rated thus far received a designation of fully accessible, while five were rated “partially accessible” and two were rated “not accessible.”

Moreover, the Stadium Armory (one of the two large shelters) was found deficient when it was used in September 2005 as a shelter for more than 400 people who had fled the Gulf Coast in the aftermath of Hurricane Katrina. The Armory lacked entry controls and air conditioning, as well as adequate shower facilities and communications infrastructure.

The need to regularly test the District’s shelter plan is imperative, because available resources provided by the ARC and other organizations could be absorbed by neighboring jurisdictions during a crisis; volunteers might be unable or unwilling to staff the shelters; and critical supplies could be blocked from delivery. HSEMA is planning to participate in an April 2009 full-scale exercise sponsored by ARC to test the shelter plan.

Even though sheltering in place may often be the most suitable option during an emergency, there may be times when evacuation of at least some parts of the city, if not the whole city, may be necessary. According to U.S. Census data, 37 percent of D.C. residents do not own cars, with the highest percentages of residents lacking cars found in Ward 1 (48 percent), Ward 2 (47 percent), and Ward 8 (47 percent). Therefore, the transportation component of evacuation planning is extremely

---


important—as evidenced by Hurricane Katrina, when thousands of people who lacked transportation were stranded. In particular, the government would need to set up staging areas or pick-up points for those needing transportation during an evacuation.

Although the District government has created a list of 25 transfer points spanning the four quadrants of the city, the Auditor is concerned about the District’s ability to shift from plan to execution. The transportation points have not been publicized, having been deemed as “law-enforcement sensitive,” and several officials noted that it might be misleading to publish the list of transfer points because none or only a few of the sites might be used in a crisis. Although some of the transfer points are public locations that the D.C. government can access and control, others are private and memoranda of understanding need to be put in place to govern the use of these sites.

RECOMMENDATIONS

1. HSEMA and DC DHS should examine the potential of other government facilities, such as senior citizen centers, to serve as shelters and also expand the number of shelters that are accessible to people with disabilities and other special needs.

2. HSEMA, DC DHS, DDOT, MPD, ARC, and regional governments should conduct an annual exercise to test the plans for shelter and mass care.

3. HSEMA and DDOT should establish memoranda of understanding with the owners of all of the privately-owned or controlled transportation transfer points that govern the District’s access to the sites and the procedures for putting the transfer points into operation.

HSEMA’S PERFORMANCE MEASURES COULD MAKE GREATER USE OF OUTCOME MEASURES, INCLUDING INDEPENDENT ASSESSMENTS OF PERFORMANCE

HSEMA’s performance measures are shown in Table 2 on the next page. The Auditor recognizes that performance measures pertaining to homeland security and emergency management are difficult to devise, because the ultimate test of effectiveness is the absence of attacks or disasters. Many jurisdictions use workload or activity measures, such as the number of drills and exercises,

---

52 Emergency Management Agency and District Department of Transportation, District Response Plan: Emergency Transportation Annex, pp. 74-75.
the number of community forums held, or the number of brochures distributed, to measure their performance in homeland security and emergency management.\textsuperscript{53} Nevertheless, such measures are of limited utility because they do not reflect the impact of those drills, exercises, forums, or brochures on the capabilities or preparedness of government agencies, government employees, private organizations, or residents.

Table 2
HSEMA’s Performance Measures and Targets for Fiscal Year 2009

<table>
<thead>
<tr>
<th>Performance Measure</th>
<th>Performance Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Percentage of Cabinet members attending one exercise annually.</td>
<td>85 percent</td>
</tr>
<tr>
<td>2. Percentage of Executive Office of the Mayor and Cabinet members who have completed National Incident Management System/Incident Command System training.</td>
<td>100 percent</td>
</tr>
<tr>
<td>3. Percentage of target capability level achieved.</td>
<td>35 percent</td>
</tr>
<tr>
<td>4. Number of employees involved in emergency response or emergency preparedness trained in Incident Command System.</td>
<td>710 employees</td>
</tr>
<tr>
<td>5. Percentage of targeted District households and businesses that receive preparedness materials each year at least once.</td>
<td>100 percent</td>
</tr>
<tr>
<td>6. Percentage of corrective actions from HSEMA-sponsored exercises completed on schedule.</td>
<td>100 percent</td>
</tr>
<tr>
<td>7. Increase percentage of District residents who have created a family emergency plan</td>
<td>10 percent annual increase</td>
</tr>
<tr>
<td>8. Number of continuity of operations test sites conducted annually that demonstrate full functionality within one hour of activation.</td>
<td>4</td>
</tr>
<tr>
<td>9. Percentage of successful monthly tests of regional communication systems with National Capital Region emergency operations centers and fusion centers.</td>
<td>100 percent</td>
</tr>
<tr>
<td>10. Percent increase in subscribers to Alert DC</td>
<td>75 percent</td>
</tr>
</tbody>
</table>


\textsuperscript{53} For example, New York City’s Office of Emergency Management tracks the number of field drills, the number of tabletop drills, the number of government employees trained in emergency response, the number of newly-certified Community Emergency Response Teams, and the number of “Ready New York” guides viewed online, among other measures. See City of New York, Michael Bloomberg, Mayor, \textit{Mayor’s Management Report, September 2008}, pp. 139-141.
Overall, HSEMA’s performance measures attempt to go beyond workload or activity measures. For example, the percentage of corrective actions resulting from exercises that are completed on schedule is a key measure of performance (although “on schedule” needs to be defined), and some of the participation measures tracked by HSEMA – such as the percentage increases in residents with a family emergency plan or subscribers to Alert DC – hone in on key measures of individual preparedness.

Nevertheless, HSEMA’s performance measures could go further toward measuring quality and effectiveness. In particular, no external measures of performance, such as ratings by D.C. residents, independent experts, or US DHS, are included in HSEMA’s performance plan. For example, Measure 5, “Percentage of targeted District households and businesses that receive preparedness materials each year at least once,” could be usefully revised (or supplemented) to measure the percentage of households and businesses who rate the information as good or excellent. Moreover, the Auditor found it would be useful for HSEMA to track more direct indicators of household preparedness, such as the percentage of families who have at least a three-day supply of water (one gallon per person per day), a first aid kit, or a battery-powered radio and flashlight on hand. Measure 3, “Percentage of target capability level achieved,” could also be revised to reflect specific, high-priority capabilities, as the meaning of “target capability level” is difficult to operationalize or interpret. Finally, the Auditor found that Measure 8, regarding continuity of operations plans, could be made more outcome-oriented and informative if it measured the percentage of government agencies with COOP plans approved by HSEMA.

In addition, the Auditor noted that none of Serve DC’s three performance measures for FY 2009 touch directly on the citizen preparedness and volunteer programs administered by Serve DC; that MPD did not include any measures of performance of its homeland security bureau in its FY 2009 performance plan; and that the Department of Health (DOH) did not include any performance measures for its emergency health and medical services program (which is responsible for

---


55 Serve DC’s three performance measures for FY 2009 are (1) number of volunteers engaged in service, (2) number of new partnerships developed, and (3) number of new private and in-kind donations received to support “Seasons of Service Days.” See Government of the District of Columbia, FY 2009 Proposed Budget and Financial Plan: Getting the Job Done, Agency Budget Chapters, Part I (June 2008), p. A-41.

bioterrorism and pandemic flu, as well as other high-priority programs).\textsuperscript{57} As required by the Government Managers Accountability Amendment Act of 1995 (D.C. Law 11-16; D.C. Official Code § 1-614.11 \textit{et seq.}), which directs agencies to establish one or more measures of performance for each major program,\textsuperscript{58} Serve DC, MPD, and DOH should develop measures to monitor and report on the outcomes of their homeland security programs.

RECOMMENDATIONS

1. HSEMA should make its performance measures more outcome-oriented and include independent assessments of performance.

2. Serve DC, MPD, and DOH should develop and implement outcome-oriented performance measures for their homeland security programs and activities, consistent with the Government Managers Accountability Amendment Act of 1995.

THE DISTRICT’S FY 2009 OPERATING BUDGET ALLOCATES APPROXIMATELY $300 MILLION TO HOMELAND SECURITY. MORE THAN 80 PERCENT OF THIS FUNDING IS IN THE HSEMA OPERATING BUDGET

Many District government agencies spend considerable sums on homeland security, reflecting the inter-disciplinary nature of homeland defense. The Auditor examined the District’s FY 2009 operating budget to estimate the financial resources allocated to homeland security. Table 3 shows budget allocations earmarked for homeland security programs and activities in five agencies (HSEMA, MPD, Fire/EMS, Serve DC, and DOH). The total homeland security funding of $301.3 million shown in the table serves as a rough estimate. On one hand, many other agency programs and functions (such as MPD field operations or investigations, or Fire/EMS hazmat and search-and-rescue programs) also contribute to homeland security at the same time that they meet other public needs. The omission of these multi-purpose funding streams may lead to an underestimation of the District’s homeland security expenditures. At the same time, some of the federal homeland security grant dollars allocated to the District are in turn passed through to other regional jurisdictions; this factor artificially inflates the District’s homeland security spending.

---


\textsuperscript{58} See D.C. Official Code § 1-614.12(d).
With these caveats in mind, one can draw several conclusions from Table 3. First, the bulk of the District’s operating dollars for homeland security (83 percent of funding earmarked for homeland security) is found in the HSEMA budget. MPD has the second-largest homeland security budget. Second, the bulk of the District’s homeland security funding (84 percent of the operating funding for homeland security) is provided by the federal government. The Fire/EMS homeland security budget of $99,000 shown in Table 3 clearly underestimates the resources that Fire/EMS devotes to homeland security, because other budget accounts such as special operations, specialized training, and information technology also support Fire/EMS’ homeland security activities.

Table 3
Homeland Security Funding for District Government Agencies in the FY 2009 Operating Budget59 ($ in 000s)

<table>
<thead>
<tr>
<th>Agency</th>
<th>HSEMA</th>
<th>MPD</th>
<th>Fire/EMS</th>
<th>Serve DC</th>
<th>DOH</th>
<th>Total Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local</td>
<td>$4,700</td>
<td>$32,845</td>
<td>$99</td>
<td>$0</td>
<td>$852</td>
<td>$38,496</td>
</tr>
<tr>
<td>Federal</td>
<td>$244,927</td>
<td>$2,277</td>
<td>$0</td>
<td>$0</td>
<td>$4,922</td>
<td>$252,126</td>
</tr>
<tr>
<td>Intra-District</td>
<td>$0</td>
<td>$2,190</td>
<td>$0</td>
<td>$448</td>
<td>$0</td>
<td>$2,638</td>
</tr>
<tr>
<td>Other</td>
<td>$0</td>
<td>$7,985</td>
<td>$0</td>
<td>$0</td>
<td>$19</td>
<td>$8,004</td>
</tr>
<tr>
<td>Agency Total</td>
<td>$249,628</td>
<td>$45,297</td>
<td>$99</td>
<td>$448</td>
<td>$5,793</td>
<td>$301,264</td>
</tr>
<tr>
<td>FTE Level</td>
<td>46.0</td>
<td>293.0</td>
<td>1.0</td>
<td>6.0</td>
<td>32.0</td>
<td>37</td>
</tr>
</tbody>
</table>


59 HSEMA budget data are for the entire agency. MPD budget data are for the agency’s Homeland Security and Counterterrorism Bureau. Fire/EMS budget data are for the “Homeland Security” budget activity line in the agency’s performance-based budget. Serve DC data are for the agency’s “Citizen Corps’ Program. Department of Health budget data are for the agency’s Office of Emergency Health and Medical Services.
ALMOST ALL OF HSEMA'S $250 MILLION OPERATING BUDGET FOR FY 2009 REFLECTS FEDERAL GRANTS THAT HSEMA ADMINISTERS FOR THE DISTRICT GOVERNMENT AND THE NATIONAL CAPITAL REGION. LOCAL REVENUE FOR HSEMA OPERATIONS, WHICH TOTALS $4.7 MILLION IN FY 2009, HAS GROWN MORE SLOWLY THAN LOCAL REVENUE CITYWIDE

In reviewing the HSEMA operating budget, the Auditor used the FY 2002 budget as a baseline because this budget (completed in June 2001) represents the agency’s funding level at the pivotal time of the September 11, 2001, terrorist attacks. After the attacks, homeland security became a high priority for government at all levels, and the time, money, and attention devoted to homeland security increased sharply. HSEMA’s FY 2002 operating budget was $3,964,000, with local tax revenue providing the bulk of the funds ($3,001,000) and federal grants providing the rest ($963,000). The FY 2002 budget supported a full-time equivalent staffing level of 39.61

HSEMA’s FY 2009 budget is $249,628,000 — reflecting exponential growth of 6,200 percent since FY 2002. Nevertheless, as shown in Table 4 on the next page, almost all of the growth reflects the massive increase in federal funding that followed the September 11th attacks. HSEMA’s federal grant budget rose from $963,000 in FY 2002 (24 percent of the agency’s operating budget) to $244,927,000 in FY 2009 (98 percent of the operating budget). At the same time, local funding increased from $3,001,000 to $4,700,000, but the percentage of HSEMA’s operating budget provided by local revenue fell from 76 percent to 2 percent.62 Meanwhile, HSEMA’s FTE level rose modestly (18 percent) from 39 in FY 2002 to 46 in FY 2009.

---

60 Local revenue is defined as “tax and non-tax revenue that is not earmarked for a particular purpose and is allocated to fund District programs during the annual budget process, a part of General Fund revenue.” See Government of the District of Columbia, FY 2009 Proposed Budget and Financial Plan: Getting the Job Done (Washington, D.C.: Office of the Chief Financial Officer, June 2008), Vol. 1, Executive Summary, p. D-7.


Table 4
Fiscal Year 2002 and Fiscal Year 2009 Operating Budgets for the Homeland Security and Emergency Management Agency
($ in 000s)

<table>
<thead>
<tr>
<th></th>
<th>Fiscal Year 2002</th>
<th>Fiscal Year 2009</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Revenue</td>
<td>$3,001</td>
<td>$4,700</td>
<td>56.6%</td>
</tr>
<tr>
<td>Federal Grant Revenue</td>
<td>$963</td>
<td>$244,927</td>
<td>25,333.7%</td>
</tr>
<tr>
<td><strong>Total Budget</strong></td>
<td><strong>$3,964</strong></td>
<td><strong>$249,628</strong></td>
<td><strong>6,197.4%</strong></td>
</tr>
<tr>
<td>FTE Staffing Level</td>
<td>39.0</td>
<td>46.0</td>
<td>18.0%</td>
</tr>
</tbody>
</table>


Nevertheless, some of this rapid growth in HSEMA’s federal funding reflects an accounting change. In January 2007, Mayor Fenty designated HSEMA as the “state administrative agent” responsible for managing all federal homeland security grants disbursed to the District (the Office of the Deputy Mayor for Public Safety and Justice, which was abolished in January 2007, previously served as the state administrative agent). HSEMA uses some of the federal grants for its own operations, but the bulk of the money is typically passed through to the National Capital Region (NCR), which includes the District of Columbia and neighboring jurisdictions in Maryland and Virginia and to other D.C. government agencies. HSEMA officials estimated that they would directly use $12.6 million of the $244.9 million in FY 2009 federal grant funding and that the rest of the funding would be funneled to other D.C. government agencies and to the region.

---

63 The National Capital Region (NCR) was created pursuant to the National Capital Planning Act of 1952 (Title 40, United States Code, Section 71). The NCR includes the District of Columbia; Montgomery and Prince George’s Counties in Maryland; Arlington, Fairfax, Loudoun, and Prince William Counties in Virginia; and all cities within the boundaries of the Maryland and Virginia counties listed above. The NCR is one of the high-threat metropolitan areas deemed by the U.S. Department of Homeland Security as eligible for Urban Area Security Initiative (UASI) grant funding. The District of Columbia government serves as the NCR’s fiscal agent for the UASI program. The UASI funding is allocated on behalf of the region by a Senior Policy Group comprised of the Governors of Maryland and Virginia, the Mayor of the District of Columbia, and the Advisor to the President for Homeland Security.
Federal homeland security funding has fluctuated considerably, reflecting not only changes in overall federal appropriations, but also changes in the funding formulas the U.S. government uses to allocate money to states and urban areas. For example, the awards that the District of Columbia has received from the federal government through the State Homeland Security Grant Program rose from $2.7 million in FY 2002 to $17.9 million in FY 2003, and then declined sharply to $4.3 million in FY 2006 before rebounding to $6 million in FY 2007\(^6\) and $11.3 million in FY 2008.\(^5\) Similarly, funding provided to the NCR through the Urban Area Security Initiative fell by 40 percent (from $77.5 million to $46.5 million) between FY 2005 and FY 2006,\(^6\) before increasing to $61.7 million in FY 2007\(^7\) and then dropping slightly to $59.8 million in FY 2008.\(^8\) These swings in federal funding levels and the uncertainty about future funding – particularly in light of the large federal budget deficit\(^9\) – underscore the importance of a solid local funding base for the District’s homeland security programs.

The Auditor finds that local funding for HSEMA, which rose by 57 percent between FY 2002 and FY 2009, rose more slowly than the District’s operating budget as a whole, which grew by 62 percent during the same period.\(^7\) Although federal homeland security aid reflects the acute national

---


\(^9\) In January 2009, the U.S. Congressional Budget Office projected that the federal government’s fiscal year 2009 budget deficit would reach an unprecedented $1.2 trillion. See Testimony of Robert Sunshine, Acting Director, Congressional Budget Office, “The Budget and Economic Outlook: Fiscal Years 2009 to 2019,” before the Committee on the Budget, United States Senate, January 8, 2009.

interest in a safe, secure national capital, the Auditor remains concerned that the local funding component has not kept pace with the growth in the overall budget. Whereas federal grant funds are accompanied by many restrictions in the way money can be used,\(^71\) local dollars are completely flexible and are needed to provide stable, ongoing support for core homeland security needs.

A larger local budget for HSEMA could be used to strengthen a number of critical functions discussed in this report. For example, additional resources could be used to conduct periodic threat and vulnerability assessments, revise and strengthen the DRP and community emergency management plans, expand training and exercise programs, plan and administer a mass-care program, enhance public information for target groups like businesses and people with disabilities, and accelerate efforts to assess and protect critical infrastructure. Although the Auditor recognizes that a local funds increase for HSEMA may not be possible as revenue estimates continue to fall during a severe recession,\(^72\) policymakers should consider increasing HSEMA’s local funding once the District’s fiscal position improves.

**RECOMMENDATION**

The Mayor and Council should consider a local funds increase for HSEMA once the District’s fiscal position improves.

**THE THREAT AND VULNERABILITY ASSESSMENT (TVA) COMMISSIONED BY HSEMA IS NOT FULLY COMPLIANT WITH THE ACT. THE TVA FAILS TO ASSESS ACTIONS ALREADY TAKEN BY THE D.C. GOVERNMENT TO PROTECT THE HOMELAND, AND OFFERS ONLY GENERIC RECOMMENDATIONS TO ENHANCE SECURITY**

The Act requires the HSEMA Director to “contract for a baseline threat and vulnerability assessment of the District of Columbia” by March 14, 2008. The Act further specifies that the TVA

---

\(^71\) For example, funding from the U.S. Department of Homeland Security’s “Buffer Zone Protection Program,” can be used only to secure critical infrastructure sites such as financial institutions, dams, and stadiums. Funding from the U.S. Department of Homeland Security’s “Urban Areas Security Initiative Nonprofit Security Grant Program” can be used only to support “target-hardening” activities by non-profit organizations that are deemed to be at risk of a terrorist attack.

\(^72\) On February 25, 2009, Chief Financial Officer Natwar Gandhi lowered the District’s revenue estimates (which had been lowered only three months earlier) by $135.7 million for FY 2009 and $346.3 million for FY 2010. See letter from Dr. Natwar Gandhi, Chief Financial Officer, to Mayor Adrian M. Fenty and Council Chairman Vincent C. Gray, February 25, 2009, p. 1.
shall review “risks associated with, but not limited to, terrorism (including bioterrorism), radiological weapons and their potential transport into the District of Columbia, food and water supply, cybersecurity, (and) fire and rescue capability.” In addition to identifying threats and risks, the TVA must also include “an assessment of actions already taken to address security issues and recommendations on whether additional safety and security enforcement actions are needed; and recommendations for additional legislation needed to enhance the security of District residents” (see D.C. Official Code § 7-2231.03(c).

Threat and vulnerability assessment is not only a cornerstone of the Act, but is also regarded by experts as essential to an effective homeland security program. In The Forgotten Homeland, Rand Beers and Richard Clarke state that, “Every major metropolitan area should have complete vulnerability and mitigation assessments. Governments need to conduct thorough assessments of the vulnerabilities in critical infrastructure (such as transportation, water, and communication facilities) and potential targets controlled by the private sector (such as chemical plants, rail lines, and power plants).” Additionally, the GAO has long emphasized the need for threat and vulnerability assessment in setting homeland security priorities, stating that, “We continue to believe that risk management is the best approach to guide programs and responses to better prepare against terrorism and other threats. After threat, vulnerability, and criticality assessments have been completed and evaluated in this risk-based decision process, key actions can be taken to better prepare ourselves against potential attacks or events.”

The federal government also recognizes the importance of threat and vulnerability assessment. In its homeland security grant program guidance, the Federal Emergency Management Agency (FEMA) states that, “Based upon ongoing intelligence analysis, extensive security reviews, and Congressional direction, FEMA has once again focused the bulk of its available grant dollars on risk-based investment.” FEMA defines risk as the product of three principal variables: threat (the likelihood of an attack occurring), vulnerability (the relative exposure of a potential target), and

---

73 Beers and Clarke, p. 18.


consequence (the expected impact of a successful attack on a target). In the National Response Framework, issued in January 2008, US DHS states that, "(Hazard identification and risk assessment) serves as a foundation for planning, resource management, capability development, public education, and training and exercises."  

HSEMA engaged the firm Digital Sandbox, Inc., to prepare the baseline TVA for the District of Columbia. Completed in March 2008, the TVA included (1) an inventory of 99 critical assets, (2) a description of the District’s terrorism and natural-hazard risk profile for these assets, and (3) recommendations for capability improvements to mitigate the risks. Based on threat information from US DHS and discussions with subject-matter experts from D.C. government agencies, Digital Sandbox established and ranked risk scenarios for 18 terrorist threats and 14 natural hazards. Digital Sandbox used a proprietary risk-analysis model to estimate the percentage distribution of terrorism and natural-hazard risk for 10 infrastructure sectors—government, transportation, commercial, water, monuments, energy, telecommunications, health care, banking, and emergency services—and relevant sub-sectors. The risk estimates were the product of threat, vulnerability, and consequence variables.

The Digital Sandbox TVA provides some useful analysis. For example, it concludes that terrorist risk is highly concentrated, rating three assets as “higher-risk,” 11 assets as “moderate risk,” and 85 assets as “lower-risk.” The asset review includes not only well-known targets such as the U.S. Capitol and the White House, but also covers defense installations, government offices, tourist attractions, and sports facilities. In particular, the TVA finds that conventional explosive attacks (vehicle-borne improvised explosive devices and other improvised explosive devices) represent the most significant threat to the District of Columbia, posing particular danger for the government, commercial, water, and transportation sectors. The types of attacks that were assessed in the report include bioterrorism, food and water contamination, cyber attack, and other prominent threats.

Nevertheless, the Auditor found several major shortcomings with the TVA. First, the TVA is not fully compliant with the Act. The TVA does not comply with the Act’s mandate to assess the actions already taken by the District government to enhance security. Moreover, the Auditor found the recommendations offered in the report to protect the District of Columbia and its residents to be overly generic. The TVA recommends that “continued investment ... should be considered” to

---


78 Ten of the 99 assets studied are located outside of the District of Columbia. They were included in the Digital Sandbox analysis because terrorist attacks and natural disasters affecting these assets could result in the loss of life, economic disruption, or service disruptions in the District of Columbia.
enhance 16 important capabilities, such as intelligence analysis and production, critical infrastructure protection, explosive device response operations, and medical surge, that are part of the US DHS list of 37 target capabilities. Thus, the TVA lacks the specificity that would be useful to policymakers.

Threat and vulnerability assessments should be periodically updated to reflect changes in terrorist capabilities and intentions, the vulnerability of physical structures or systems, and the mission and significance of possible targets. The Auditor recommends that future TVAs provide more in-depth analysis of several high-risk areas.

First, mass transit (particularly the Metrorail system) represents a potentially major source of vulnerability. As the Congressional Research Service stated in a January 2006 report, passenger rail systems “share certain characteristics that make them vulnerable to attack: they make scheduled stops along fixed routes; their operations depend on people having quick and easy access to stations and trains; and the number of access points and volume of ridership make it impractical to subject all rail passengers to the type of screening that airline passengers undergo.”\(^\text{79}\) A data base on terrorist incidents maintained by the Rand Corporation and the Oklahoma City Memorial Institute to Prevent Terrorism shows that there were 181 attacks on trains and rail-related targets, such as stations, worldwide between 1998 and 2003 (an average of 30 per year). These incidents resulted in 431 deaths.\(^\text{80}\) In March 2004, terrorists detonated 10 bombs in the Madrid subway system, killing 191 people and injuring almost 1,500 people. In July 2005, terrorists set off four bombs targeting trains and buses during London’s morning rush hour, killing 52 people and injuring 700. Fortunately, there have been no such attacks in the United States, but it seems clear that mass-transit systems are a top target for terrorists seeking to kill and injure.\(^\text{81}\)

The water and sewer system also represents a potentially serious vulnerability due to its numerous access points, wide reach, and critical importance to public well-being and the economy. In a 2004 report, Public Citizen warned that, “The water distribution network—the pumping stations, storage tanks, and pipes that might cover thousands of miles within a metropolitan area—provides countless opportunities to introduce biological, chemical, or radiological contaminants into a public water supply.”\(^\text{82}\)


\(^{81}\) In The Forgotten Homeland, Rand Beers and Richard Clarke state that, “Khalid Sheik Muhammed, one of Osama bin Laden’s chief lieutenants, told his interrogators that al Qaeda had plans to attack the Metro system in Washington, D.C., and the release of Osama bin Laden’s January 2006 tape showed a similar inclination toward the transportation sector.” See Beers and Clarke, p. 35.
water system and invites physical attacks that could interrupt water supply."\textsuperscript{82} A January 2005 GAO report highlighted some of the vulnerabilities in sewer systems, pointing out that, "The numerous storm drains, manholes, and sewers that make up a community’s wastewater collection system’s network of sewers could be used to covertly place explosives beneath a major population center or to introduce substances that may damage a wastewater treatment plant’s process."\textsuperscript{83}

As evidenced by the anthrax attacks of 2001, bioterrorism poses a serious threat to the District of Columbia. The range of public health threats, including pandemic flu, smallpox, plague, and tularemia, is daunting. Biological agents can be stolen from labs or other storage facilities. Adding to the alarm is the prospect of new genetically-engineered pathogens. In its December 2008 report, \textit{World at Risk}, the Congressionally-mandated Commission on the Prevention of Weapons of Mass Destruction and Terrorism cited bioterrorism as a "more likely threat" than nuclear terrorism, and called for a stronger governmental emphasis on prevention.\textsuperscript{84} The Commission further observed that, "Because biological activities, equipment, and technology can be used for good as well as harm, (biological weapons)-related activities are exceedingly difficult to detect, rendering traditional verification measures ineffective."\textsuperscript{85}

Finally, the federal government and independent experts have warned that conventional explosives present a serious danger because they are relatively easy to assemble and detonate while causing widespread damage, as demonstrated by the frequent use of roadside and car bombs in the Iraq war. The U.S. government’s National Strategy for Homeland Security states that, "We remain particularly concerned about the employment of improvised explosive devices (IEDs) in an attack against the homeland, given the ready availability of IED components and the relative technological ease with which they can be fashioned."\textsuperscript{86} In February 2004 testimony to the Council, Michael Wermuth, the former executive director of the Congressionally-established Advisory Panel to Address Domestic Response Capabilities for Terrorism Involving Weapons of Mass Destruction, expressed the view that, "Conventional explosives, traditionally a favorite tool of the terrorist, will


\textsuperscript{85} Commission on the Prevention of Weapons of Mass Destruction and Terrorism, p. xviii.

likely remain the terrorist weapon of choice in the near-term as well... Increasing attention must now be paid to the historically more frequent, more probable, lesser-consequence attack.\textsuperscript{87}

**RECOMMENDATIONS**

1. HSEMA should make periodic threat and vulnerability assessment an ongoing part of the District’s homeland security program. Future TVAs should explore the dynamics of the major threats such as bioterrorism and conventional explosives in depth, assess the effectiveness of District policies and programs to mitigate risk, and include specific recommendations to reduce threats and vulnerabilities. For example, TVAs could assess the pros and cons of options to improve intelligence analysis and production, critical infrastructure protection, explosive device response operations, and medical surge capacity.

2. Threat and vulnerability assessments should also relate issues of governance, communication, and coordination to the prevalence and mitigation of risk. For example, it would be useful for the TVA to assess how the presence of multiple law enforcement jurisdictions in the District of Columbia hinders efforts to prevent and respond to crises, and to offer recommendations about how to overcome obstacles to better communication and coordination.

3. Threat and vulnerability assessment should examine not only the possible threats or weapons of attack (such as bioterrorism, or chemical, nuclear, or radiological attack), but also should review possible delivery methods for terrorist attacks. The attacks of September 11, 2001, and the anthrax incidents in the fall of 2001 provide a vivid reminder that communication and transportation networks can be used by terrorists to enable and amplify their plans for destruction. The water and sewer system, other utilities, and modes of transportation should all be reviewed to help ensure that widely-used and interdependent systems for transporting people, goods, services, and information are protected.

\textsuperscript{87} Testimony of Michael Wermuth, former executive director of the Advisory Panel to Address Domestic Response Capabilities for Terrorism Involving Weapons of Mass Destruction,\textsuperscript{87} before the Council of the District of Columbia, Committee on the Judiciary, February 6, 2004.
THE ANNUAL REPORT TO THE COUNCIL PROVIDES VALUABLE INFORMATION, BUT WAS SUBMITTED ALMOST A YEAR LATE

The Act requires the Mayor to “submit an annual report to the Council describing the current level of preparedness of the District of Columbia, including reports on the District’s homeland security capabilities, priority unmet needs and the cost of meeting those needs, relevant training and readiness exercises, resident education, and the utilization of mutual aid.” Although the first report was due in March 2008, the Mayor did not transmit the report to the Council until December 2008, nine months after the deadline. The Auditor understands that a draft of the annual report was completed in the spring of 2008, and is therefore puzzled by the delay in finalizing the report.

The annual report provides policymakers with valuable information. The report is logically organized into parts describing the District’s progress with respect to seven strategic priorities established by HSEMA: (1) interoperable communications, (2) mass casualty preparedness, (3) community preparedness, (4) intelligence and information sharing, (5) critical infrastructure protection, (6) weapons of mass destruction/chemical, biological, radiological, nuclear, and explosive (CBRNE) detection and response, and (7) planning. HSEMA offers a self-assessment of the District’s homeland security capabilities, and provides further context by summarizing US DHS evaluations of the District’s preparedness, most notably the 2006 “Nationwide Plan Review.” The report also takes a multi-disciplinary approach, spanning health, human services, law enforcement, and transportation, as well as emergency management and preparedness. Finally, the report describes the initiatives planned for the next several years.

The Auditor also identified a number of ways the annual report could be improved. The report could probe particular topics in more depth, and in particular could better inform policymakers and the public by describing in more detail the steps the District government has taken, or is taking, to strengthen homeland security capabilities. Many sections of the report focus on the policy process rather than its results, naming the planning committees and task forces that have been established to address various issues, and listing the plans issued by the committees and task forces.

For example, a section on medical surge capability – the “capability to expand rapidly the capacity of the existing healthcare system in order to provide triage and subsequent medical care”88 – highlights the District’s syndromic surveillance system, DOH’s critical asset survey of D.C. hospitals, a web-based Health Information Sharing Network, the Washington Automated Disease

Surveillance System, the Pandemic Influenza State Plan, the Avian and Pandemic Influenza Employee Guide, and the Emergency System for Advanced Registration of Volunteer Healthcare Personnel Program. Yet there is no discussion of the core issue related to medical surge: the ability of local hospitals and other health-care providers to provide beds for a large influx of victims, and to deploy the medical personnel, equipment, and supplies needed to care for the victims. The report does not cover critical dimensions of medical surge capacity, such as the capacity of hospital emergency rooms, intensive-care units, burn units, and isolation rooms. Nor does the report provide context about how the plans and systems described above are related and the combined effect that they may have in protecting the community.

RECOMMENDATIONS

1. The Mayor should transmit the annual report on homeland security preparedness and capabilities to the Council on a timely basis.

2. HSEMA should include more detailed information on high-priority capabilities, such as medical surge capability, mass care, evacuation, shelter-in-place, and CBRNE detection, in future annual reports. The report should devote less attention to internal processes and focus more on the specific steps underway and future steps that will be taken to increase key capabilities.

THE DISTRICT GOVERNMENT HAS A SOLID PUBLIC INFORMATION PROGRAM, BUT FACES THE CHALLENGE OF SUSTAINING AND REINFORCING PUBLIC INTEREST AND INVOLVEMENT

Since September 11, 2001, the District government has developed and refined a number of useful public information tools to educate residents, visitors, and businesses about how to prepare and protect themselves in the event of a terrorist attack or natural disaster. In particular, HSEMA has produced and disseminated several preparedness guides, and created an Emergency Information Center web site (http://72hours.dc.gov) in collaboration with the Office of the Chief Technology Officer. Representatives of HSEMA and other agencies also conduct outreach and education activities at Advisory Neighborhood Commission (ANC) and civic association meetings, schools, recreation centers, senior centers, block parties, and community fairs.
“Be Ready D.C.: A Guide to Family Preparedness,” which is described as HSEMA’s flagship publication for emergency preparedness, was first produced in December 2001 and has been revised several times. In March 2008, HSEMA distributed the most recent version of the guide through inserts in the The Washington Post as well as mailings to all households that do not subscribe to the Post. The family preparedness guide includes advice on what to do before, during, and after an emergency, in addition to recommendations tailored to particular types of emergencies such as flash flooding, winter storms, chemical and biological emergencies, and radiological emergencies. The guide also offers tips relevant to senior citizens, people with disabilities, and families with children; describes how people can get involved in neighborhood preparedness; and provides emergency information forms and pocket cards.

In addition, HSEMA disseminates “Be Ready! An Emergency Guide for D.C. Kids,” and “It’s a Disaster!”, a more in-depth guide to disaster preparedness, prevention, and first aid than the family preparedness guide. The Emergency Guide for D.C. Kids, which narrates the activities of the “Commander Ready” team, is targeted at children between the ages of 5 and 13 and is distributed at D.C. schools. The emergency guide shows children how to make a plan and a “Be Ready!” kit; explains the difference between sheltering in place (“staying put”) and evacuating (“moving out”); and describes what to do in different situations like thunderstorms, tornadoes, and flash floods. HSEMA has also produced shelter and evacuation guides for each ward, which were recently posted on the HSEMA web site. The guides include a city map with marked evacuation routes and potential shelter locations; a ward map with marked evacuation routes and potential shelter locations; and information about protective actions to take in common emergencies.

Other agencies disseminate emergency preparedness materials as well. DDOT publishes “Transportation Tips During an Emergency Incident,” which provides advice about whether and how people should evacuate, and displays the 19 major evacuation routes. DOH disseminates “The Truth About Avian and Pandemic Influenza.”

In January 2008, the D.C. government revised the Emergency Information Center web site and changed the Internet address to http://72hours.dc.gov. The new site address highlights the need for people to take care of themselves during the 72 hours after a disaster, when first responders may be concentrated at the disaster site and able to help only those in the most dire need. To help people protect themselves in an emergency, the “72 hours” site provides instructions on how to create an emergency plan, make a “go kit,” sign up for Alert DC, and find an evacuation route (residents can type in their address, and the system automatically generates an evacuation map). The web site also offers advice tailored to different scenarios, as well as guidance relevant to children, senior citizens, people with disabilities, and pets. During a terrorist attack or natural disaster http://72hours.dc.gov will provide updates on the threat and the protective actions that people should take.
HSEMA has sought to use new avenues of communication, launching a blog (http://bereadydc.blogspot.com) in April 2008 and a Facebook group (Be Ready DC!) in June 2008. Both of these sites provide information about special events, storms and other threats, and community preparedness activities. Membership in the Facebook group skyrocketed during the time leading up to the January 2009 presidential inauguration, rising from 42 members on November 6, 2008, to 1,182 members on February 13, 2009.

HSEMA also continues its efforts to educate the public about homeland security and emergency preparedness through community fairs, forums, and meetings. For example, during National Preparedness Month in September 2008, HSEMA held three preparedness fairs (including a multi-cultural preparedness fair at an elementary school and a business preparedness fair), distributed brochures and “go kits” at events such as “Elderfest,” and gave presentations at federal offices in partnership with FEMA. Through these events, HSEMA publicized the 72hours.dc.gov web site and urged people to sign up for the Text Alert program. FEMA’s region III awarded HSEMA and Serve DC its “2008 United We Stand Award” for “extraordinary efforts” and the largest number of events and activities (77) among regional jurisdictions during National Preparedness Month.89

Community leaders interviewed by the Auditor generally expressed praise for the public information efforts led by HSEMA, particularly the family preparedness guide and the web site, while expressing concern that community members may not be taking sufficient advantage of these resources. The Auditor identified several ways to bolster the District’s public information and involvement efforts. First, the most recent version of the “Family Preparedness Guide” is available only in English. The production of the Guide in other languages needs to be completed (for example, “Transportation Tips During an Emergency Incident” is available in English, Spanish, Korean, and Vietnamese). Second, the information presented on the emergency information web site (http://72hours.dc.gov), the HSEMA web site (www.hsema.dc.gov), and other D.C. government sites should be made more consistent and mutually-reinforcing. Although the shelter and evacuation guides for each ward are shown on the HSEMA web site, only the Ward 8 guide is displayed on the “72 hours” site. Moreover, the “72 hours” site does not feature the “Family Preparedness Guide” (which is found on the HSEMA web site), the “Transportation Tips During an Emergency Incident” (which is found on the DDOT web site), or “The Truth About Avian and Pandemic Influenza” (which is found on the DOH web site).

89 Letter from Jonathan Sarubbi, FEMA Regional Administrator, to D.C. Mayor Adrian M. Fenty, dated December 10, 2008.
The community leaders surveyed by the Auditor also expressed worry that there are inherent limits on the effectiveness of a general, broadly-based public information campaign. In particular, the community representatives spoke of a growing disinterest in homeland security and emergency preparedness information, particularly as the September 11th attacks fade further into the past. The ANC members and civic association leaders noted that a small group of involved and informed citizens participates in meetings and training sessions about homeland security, and that the rest of the population is very difficult to motivate or reach. The community leaders further expressed the view that residents are not heeding the messages to make family plans, prepare go kits, and take other recommended steps to increase their personal preparedness.

There is considerable reason to believe that apathy and information overload complicate the task of informing and involving the public in emergency preparedness. For example, the http://72hours.dc.gov site has a very useful automated function that walks people through all of the steps of creating a family emergency plan (food and water supplies, emergency go kit, necessary documents, emergency meeting plan) and culminates in a printable plan, but HSEMA reported that only 106 individuals or families have created a plan through this user-friendly mechanism.

Between March and October 2005, the jurisdictions of the National Capital Region launched an emergency preparedness public awareness campaign, using $4.6 million in federal funding, with the goal that 50 percent of residents would identify themselves as prepared for an emergency by the end of the campaign. Known as “Be Ready – Make a Plan,” the campaign involved a media blitz, including TV, radio, print, Internet, and transit advertising; a web site providing personal preparedness information; the distribution of more than one million wallet-sized personal preparedness planners; and preparedness training sessions. Despite this effort, the percentage of residents classified as prepared (based on their answers to questions about their plans and the supplies they have on hand) rose by only four percentage points, from 39 percent to 43 percent.90

The lack of a larger impact is particularly notable, because Hurricane Katrina struck in late August 2005, vividly underscoring the life-and-death importance of emergency preparedness. Focus-group research conducted for the Be Ready – Make a Plan campaign revealed that:

While the potential for a terrorist incident is permanently fixed in the national consciousness, NCR residents do not want to spend time thinking about terrorism or the potential effects of a terrorist act. The groups also made it clear that the public already has a general idea of what it means to be prepared for an emergency situation...

---

engage the issue of preparedness as it relates to terrorism. The bottom line is that citizens are doubtful that there is really any way to prepare for an unknown type of attack, in an unknown place, at an unknown time.91

As discussed in the following sections of this report, it may be necessary to combine broad-based public information efforts with more targeted efforts to develop networks of well-trained individuals who can serve as a resource for each community during a catastrophic event.

RECOMMENDATIONS


2. HSEMA should feature the “Family Preparedness Guide,” “Transportation Tips During an Emergency Incident,” “The Truth About Avian and Pandemic Influenza,” and the shelter and evacuation guides for each ward on the emergency information center web site (http://72hours.dc.gov).

THE DISTRICT GOVERNMENT HAS IMPLEMENTED USEFUL CITIZEN TRAINING PROGRAMS, BUT HAS NOT DEVELOPED THE NEIGHBORHOOD NETWORKS THAT COULD BE INVALUABLE IN RESPONDING TO A CRISIS

Because the effectiveness of homeland security education and outreach to the general public may be constrained by public complacency and by information overload, the government’s efforts to train community members with a particular interest in or concern about homeland security may become even more important. A core group of knowledgeable and well-prepared people in each community may be more able to organize assistance and provide help to their neighbors in support of first responders or in cases where first responders are unavailable.

The District government has developed a number of citizen training programs, managed by Serve DC, also known as the Mayor’s Office on Volunteerism. Serve DC administers a number of national service programs funded by federal grants, including AmeriCorps and Learn & Serve America, as well as the D.C. Citizen Corps homeland security program. Citizen Corps is an

umbrella program encompassing the following three programs designed to help residents prepare themselves for emergencies and assist their neighbors:

- **Commander Ready**, which is an emergency preparedness curriculum for D.C. schoolchildren created by Serve DC, as described earlier in this report. “Be Ready! An Emergency Guide for D.C. Kids,” describes the activities of the “Commander Ready” team – Reggie, Rachel, and their dog Rodney. MPD school resource officers offered the Commander Ready curriculum in eight D.C. public schools (one in each ward) during 2007-2008. Serve DC plans to bring the Commander Ready program to 16 schools in 2008-2009.

- **Community Emergency Response Team** (CERT) program, which trains individuals in basic emergency preparedness and response. CERT involves a 20-hour training program, provided in five sessions, that covers topics such as basic emergency preparedness, fire suppression and safety, medical operations, disaster psychology, light search and rescue, incident command/CERT organization, and terrorism. Although CERT-trained volunteers are an asset to the community, the volunteers are not part of a formal neighborhood structure.

- **Neighborhood Corps**, which gives volunteers who have undergone CERT or other emergency-preparedness training more advanced training. Those who have undergone Neighborhood Corps training can help manage the response to emergencies at the neighborhood level when professional first responders cannot reach the scene. Neighborhood Corps duties may include gathering information about the incident, providing first aid or medical care, assisting victims, directing traffic, evacuating neighborhoods, and securing a disaster site.

    Data provided by Serve DC indicate that 2,873 people have completed CERT training. Serve DC officials further noted that approximately 600 of the CERT-trained individuals responded to a call for volunteers to help Gulf Coast residents affected by Hurricane Ike and Hurricane Gustav (ultimately, the volunteers were not needed because the hurricane impact was less severe than had been feared), suggesting that there are at least 600 “active” CERT volunteers. HSEMA also stated that 350 CERT volunteers assisted with presidential inauguration activities.\(^{92}\)

Serve DC officials also provided data indicating that 23 of the District’s 39 neighborhood clusters have at least one Neighborhood Corps Academy graduate, and noted in a letter that, “The graduates ... were charged with organizing an active Neighborhood Corps in their community ... The

Citizen Corps staff is now expanding the Neighborhood Corps program that will recruit pre-formed community groups and offer customized training based on the specific needs of their particular community. Three classes of volunteers have completed the Neighborhood Academy training: the spring 2007 cohort had 42 graduates; the fall 2007 cohort had 33 graduates; and the spring 2008 cohort had 24 graduates.

The Auditor emphasizes the importance of developing strong neighborhood networks that can mount a community response to an emergency until first responders reach the scene (and to support the response after police, fire, emergency services, and other professionals arrive). Although trained individuals will have greater ability to protect themselves and their families, neighborhood groups are needed to provide first aid, direct traffic, and locate and assist people with special needs. In addition, the development of relationships among neighborhood residents – simple steps such as knowing who to call – will be key to an effective response. As many emergency preparedness experts point out, the day of the emergency is not the time to make introductions. The original concept of Neighborhood Corps, which envisioned community residents who participate in neighborhood training as well as tabletop and full-field exercises, has not yet been fully achieved.

**RECOMMENDATION**

Serve DC should set the goal of developing a Neighborhood Corps for every community cluster in the District of Columbia, each with a minimum number of members, and should track the progress of each community in developing a Neighborhood Corps. Councilmember offices, ANCs, and civic associations should provide assistance in this effort.

**THE COMMUNITY EMERGENCY MANAGEMENT PLANS DEVELOPED BY HSEMA ARE NOT WELL-TAILORED TO NEIGHBORHOOD NEEDS AND CIRCUMSTANCES**

EMA first developed community emergency management plans for 39 neighborhoods, covering the entire city, in 2002. The community plans were last revised in July 2004. The plans state that, “The goal ... is to assist the residents of the District of Columbia in preparing themselves, their families, their communities and their neighborhoods to cope with any and all types of emergencies,” including natural disasters as well as man-made catastrophes. The plans identify the 15 hazards most likely to affect the District, present key topics such as how to prepare a “go kit,” and describe the steps that residents might need to take in an emergency, such as how to shelter

---

in place at home, work, or school. The plans also summarize the resources and services available from the D.C. government, such as the Text Alert program, and the locations of possible cooling centers and emergency shelters.

The Auditor found, nevertheless, that the community emergency management plans as currently designed are almost identical, with very little discussion of the demography, institutions, resources, or risks that characterize each community. For example, the 42-page “Cluster 38 Community Emergency Management Plan” for the Douglass and Shipley Terrace neighborhoods includes only one page that is customized to the community; the rest of the document is standard text that appears in each community plan. Even the information that is tailored to the community is not particularly useful or specific. For example, the Cluster 38 plan lists the recreation centers, public schools, medical facilities, libraries, fire stations, and police stations within the cluster but does not detail how these facilities might be used in a crisis.

The ANC commissioners and civic leaders interviewed by the Auditor also voiced concerns about the community emergency management plans. Several of the community leaders were not aware of the community plans and exercises, and those who were aware of the plans did not find them particularly helpful in preparing the community. Several ANC commissioners expressed a desire for more information about where people might be sheltered, how transportation could be arranged for people who lack cars, and who would take responsibility for checking on residents with disabilities.

The community emergency planning process should involve a strong and productive two-way flow of information. ANC commissioners, civic association members, Neighborhood Corps members, and residents who have undergone CERT training – as well as residents who have been involved in other public-safety efforts such as Neighborhood Watch, “orange hat” patrols, and the police department’s Citizen Advisory Councils – should play a role in shaping community emergency management plans. Knowledgeable neighborhood leaders can advise D.C. government planners about the neighborhood institutions that people most frequently use and respect, where people would likely go in different types of emergencies; and where there are clusters of senior citizens, people with disabilities, and non-English-speaking residents who may need extra assistance. Moreover, community leaders could play a vital role in ensuring that the community plans are customized to reflect neighborhood context and needs. As stated by Dr. Roz Lasker, who led a nationwide study on how people would respond to two different types of terrorist attack (a smallpox outbreak and a “dirty bomb” explosion), “To develop effective terrorism response plans, planners will need to do more than talk to the public; they will also need to learn from the public.”

---

94 Testimony of Roz Lasker, M.D., Director, Division of Public Health and the Center for the Advancement of Collaborative Strategies in Health, the New York Academy of Medicine, Testimony Before the D.C. Council Committee on the Judiciary, October 25, 2004, p. 8.
HSEMA uses the services of a contractor to also conduct “tabletop” (discussion-based) exercises of each community emergency management plan once every three years. According to HSEMA, the exercises are intended to convey (1) the District government’s roles and responsibilities during an emergency, (2) what individuals, families, and communities should be prepared to do in an emergency, (3) how residents can organize the community during an emergency to coordinate with the government and with one another, (4) how neighbors can help neighbors before and during an emergency, and (5) the support the District government needs from residents and the community during an emergency.95

In an April 28, 2008, letter to the Auditor, the HSEMA Director stated that, “From mid-January to mid-March of last year, the agency conducted community emergency management exercises in neighborhoods across the city ... These plans were developed by HSEMA to guide neighborhood-specific response efforts during emergencies. More than 680 citizens took part in the 13 exercises.”96 However, the ANC commissioners and civic association leaders interviewed by the Auditor who attended the tabletop exercises were somewhat dissatisfied with the exercises, describing them as lists of tasks without specific information about how to carry out the relevant tasks. In the fall of 2008, HSEMA began a new cycle of community preparedness exercises in each ward,97 with four business preparedness exercises to follow in 2009. A member of the Auditor’s staff attended one of the community preparedness exercises held in November 2008 but found the event was marked by low turnout (less than 10 people). Both the community plans and the community exercises seem ripe for re-design and would benefit from new approaches to revitalize community participation.

RECOMMENDATIONS

1. HSEMA should customize each community emergency management plan during the next cycle of revisions, and include specifics about neighborhood demography and housing patterns, infrastructure, possible threats, communication systems, and neighborhood resources. Community leaders and residents should be used as a resource in revising the plans.


97 As of this writing, community exercises had been held in Ward 1 (11/1/08), Ward 2 (11/6/08), Ward 3 (11/25/08), Ward 6 (9/25/08), and Wards 7 and 8 (1/31/08), but not in Ward 4 or Ward 5.
2. HSEMA should include more information in the community emergency management plans on the locations (such as senior citizen residences) and special needs of senior citizens and people with disabilities, people with limited English proficiency, and people without a vehicle.

3. HSEMA should test new approaches to involving residents in community exercises, such as holding events in large apartment complexes or housing projects, and using tenant associations as a way to recruit participants.

4. The Office on Latino Affairs, the Office on Asian and Pacific-Islander Affairs, the Office on African Affairs, and the Office of Gay and Lesbian Affairs should assist HSEMA in recruiting participants for community exercises.

**HSEMA HAS NOT MET THE REQUIREMENT TO DEVELOP AND ISSUE GUIDELINES FOR A PUBLIC EMPLOYEE SECURITY TRAINING PROGRAM**

HSEMA has not fulfilled the Act’s requirement to “develop and issue guidelines for a public employee security training program to meet requirements established in the District of Columbia Emergency Response Plan” (D.C. Official Code § 7-2231.05). In comments on a draft version of this report, HSEMA stated that the curriculum for the public employee security training should be completed by the late summer of 2009.98

HSEMA’s Training and Exercise Division coordinates emergency preparedness and homeland security training for D.C. government employees, and is responsible for approving and funding employee participation in courses offered by the Emergency Management Institute, the U.S. Fire Academy, and US DHS’ Office of Domestic Preparedness. In addition, employees are eligible for online, independent study courses offered by the Emergency Management Institute. In the 2008 report to the Council, HSEMA stated that 1,257 employees enrolled in 89 training classes within the past year.99 The available courses include:

- Improvised Explosive Devices;
- Emergency Management Assistance Compact;
- Introduction to the Incident Command System (ICS);

---


• Incident Command Systems for Single Resources and Initial Action Incidents;
• Intermediate ICS for Expanding Events;
• Advanced ICS for Command and General Staff, Complex Incidents, and Multi-Agency Coordination Systems;
• National Incident Management System;
• WEB Emergency Operations Center (WEB EOC);
• WEB EOC Refresher;
• Emergency Liaison Officer Training;
• Preparing the States: Implementing Continuity of Operations Planning;
• Public Assistance Operations I; and
• Public Assistance Grant Program.\textsuperscript{100}

In an interview with the Auditor, the HSEMA Director expressed his intent to strengthen the management of the District government’s homeland security training program and institute a three-level system. The first tier would involve a baseline level of homeland security training for all employees – “Emergency Preparedness 101” – that new employees would receive as part of employee orientation. The second tier would involve specialized training for public-safety employees, and the third tier would entail training tailored to specific career positions, such as bomb technicians. The Auditor finds that the three-tiered approach to homeland security training is logical and appropriate, and sees particular merit in the idea of a basic level of training for all employees during new employee orientation. Universal training is highly desirable in a high-threat city like the District of Columbia.

The Auditor found, however, that HSEMA should take a stronger role in managing what is a fairly decentralized, ad-hoc homeland security training system. One particular area of concern centers on the emergency liaison officers (ELOs) who support the command staff during an emergency by providing subject-matter expertise and coordinating resources from the transportation, health care, law enforcement, mass care, public information, and other sectors. As of July 2008, HSEMA did not have a list of all of the ELOs for each functional area. It is critical that the District retain up-to-date information on the ELOs (private-sector representatives, as well as government agency representatives, serve as ELOs), their training, and their experience, in order to respond effectively to a crisis and sustain response and recovery operations.\textsuperscript{101}

\textsuperscript{100} See \url{www.hsema.dc.gov/deema/cwp/view.a.1225.q.579414.asp}.

\textsuperscript{101} Emergency Liaison Officers are expected to undergo an eight-hour training about their roles and responsibilities, the 16 emergency support functions in the District Response Plan, the procedures of the Emergency Operations Center, and how to operate 800-megahertz handheld radios.
Moreover, a persistent – and distressing – theme in HSEMA’s after-action reports on homeland security exercises, dating back at least to 2003, is the lack of adequately-trained ELOs. In particular, these reviews emphasized the need to ensure that ELOs are more proficient with WebEOC, the system that enables communication among the District and private-sector officials leading the response to a crisis, and tracks the flow of relevant information, requests, and decisions. The District needs to be certain that ELOs are trained in the procedures and systems of the Emergency Operations Center and that sufficient numbers of ELOs are ready to respond to different types of terrorist attacks or natural disasters. ELO readiness will be particularly important in a prolonged crisis that has long-term effects on the District’s economy, public health, or public safety.

More generally, the Auditor notes the importance of maintaining a centralized data base on employee homeland security training. If careful and regular tracking is not performed, the District may find itself without critical sources of expertise as people enter and leave government service. For example, HSEMA reported the encouraging news that during FY 2008, the number of D.C. government employees trained in incident command systems more than quadrupled, from 650 to 2,900,102 but it will be important to track the flow of trained individuals in and out of the government. Comprehensive records will help the District identify and correct any gaps in training and emergency response capacity, and will also alert employees and their managers when employees need to apply for re-certifications of various skills. In comments on a draft version of this report, HSEMA stated that it is reviewing off-the-shelf software that would establish a central data base to track homeland security training.103

RECOMMENDATIONS

1. HSEMA should develop and issue guidelines for the public employee security training program by the end of August 2009.

2. HSEMA should regularly track and update the lists of emergency liaison officers, and ensure that there are sufficient numbers of ELOs with proficiency in WebEOC for all of the emergency support functions (such as transportation, communications, public works and engineering, mass care, health and medical services).


3. HSEMA, with the assistance of the Office of the Chief Technology Officer, should establish a centralized database that will track employees’ homeland security training and certifications, while alerting managers and employees when recertification is necessary.

**HSEMA HAS NOT COMPLETED THE REQUIREMENT TO DEVELOP GUIDANCE FOR BUILDING OPERATORS AND MANAGERS TO ENHANCE THE SECURITY OF LARGE COMMERCIAL AND RESIDENTIAL BUILDINGS**

HSEMA has not completed the Act’s requirement to “develop guidance for building operators and managers to enhance the security of large commercial and residential buildings” (D.C. Official Code § 7-2231.06). In a letter to the Auditor dated July 18, 2008, the HSEMA Director stated that, “These guidelines are in progress. HSEMA is working with the Business Improvement Districts to develop a template for business preparedness guides that will be available on the 72hours website.”

In September 2002, EMA released a “D.C. Business and Industry Emergency Management Plan” that advises private organizations on how to develop an emergency management plan. Although useful, the plan largely outlines the process or steps involved in creating the plan (develop your team, conduct a risk assessment, plan for business continuity, practice your plan) without addressing in detail specific protective actions such as access control, building evacuation, or sheltering in place. The plan is also not widely disseminated; for example, it is not shown on the HSEMA web site. The guidelines for large building security should build on and elaborate on the Business and Industry Emergency Management Plan.

The Act also states that, “In consultation with the Director of the Department of Consumer and Regulatory Affairs and organizations representing property owners, property managers, and building operators and managers, the Director shall occasionally review the building code to determine potential changes that could improve building security” (D.C. Official Code § 7-2231.06). With regard to the building code, the HSEMA Director stated that:

The Portfolio Division of the Office of Property Management is in the process of revising and reissuing building regulations for all District-owned and leased space. The Protective Services Division has been part of the committee developing these regulations, and security has been incorporated into the document. Security

---

regulations include requirements for and usage of: access control systems, CCTV surveillance, intrusion detection, personnel/visitor screening, security officers, duress systems, loading dock security, garage parking, and visitor management. These regulations are an internal OPM document that is still in development, and is not intended as a guideline for private commercial and residential construction.\textsuperscript{105}

One important issue that OPM should address as part of the building regulations concerns building evacuation drills for all properties owned or leased by the government and presently in use. Based on informal surveys of D.C. government employees working in different locations, as well as the Auditor’s experience with her own leased office space, the Auditor found that building evacuation drills are not regularly done in D.C. government facilities.

The Auditor found that there have been no efforts to revise the District’s building code to include measures that could improve building security. In October 2008, the Director of the Department of Consumer and Regulatory Affairs gave notice of her intent to adopt the “D.C. Construction Codes of 2008,” a revision of the regulations that comprise the building, residential, electrical, fuel gas, mechanical, plumbing, property maintenance, fire safety, energy conservation, and existing-building codes.\textsuperscript{106} However, these regulations, which were approved by the Council in December 2008,\textsuperscript{107} do not include any changes designed to protect buildings from terrorist threat or natural disaster.

The Auditor underscores the importance of large-building security, and urges action on guidance for private-sector building operators and managers as well as regulations for all District-owned and leased space. The April 19, 1995, bomb attack on the Alfred P. Murrah Federal Building in Oklahoma City, Oklahoma, which killed 168 people and injured 853 people, provides the most vivid reminder of the need to protect large buildings from attack. More recently, the November 2008 terrorist attacks in Mumbai, India – where 10 coordinated attacks by gunmen on two hotels, a café, a hospital, a Jewish outreach center, and other facilities resulted in 164 deaths – suggest that international terrorists may mount similar attacks on large buildings and landmarks in the future.


\textsuperscript{107} The Council approved the regulations by adopting Resolution 17-877, the “Construction Codes Amendment Resolution of 2008,” on December 2, 2008.
The September 11, 2001, attacks on the World Trade Center demonstrate how building design, features, and safety precautions can make the difference between life and death. The 9-11 Commission reported that:

Several factors influenced the evacuation on September 11. It was aided greatly by changes made by the Port Authority in response to the 1993 bombing and by the training of both Port Authority personnel and civilians after that time. Stairwells remained lit near unaffected floors; some tenants relied on procedures learned in fire drills to help them to safety; others were guided down the stairs by fire safety officials based in the lobby... Rudimentary improvements... such as the addition of glow strips to the handrails and stairs, were credited by some as the reason for their survival. The general evacuation time for the towers dropped from more than four hours in 1993 to under one hour on September 11 for most civilians who were not trapped or physically incapable of enduring a long descent.108

RECOMMENDATIONS

1. HSEMA should develop and issue guidelines for large-building security by the end of March 2009. The guidelines should address building evacuation plans; sheltering in place; package and mail delivery; monitoring of garages, containers, and other structures outside of the main facility; surveillance options; means of contacting essential personnel; access control; employee identification; emergency use of building air handlers and HVAC; communications; and essential supplies.

2. HSEMA should develop guidance relevant to different types of businesses and organizations, particularly those that serve vulnerable populations, such as day-care centers and nursing homes.

3. The Office of Property Management should issue regulations for all District-owned and leased space by the end of March 2009, and include a requirement for annual building evacuation drills.

108 The National Commission on Terrorist Attacks Upon the United States, p. 316.
THE DISTRICT GOVERNMENT IS NOT MAKING SUFFICIENT USE OF THE HOMELAND SECURITY EXERCISE AND EVALUATION PROGRAM TO PROMOTE CONTINUOUS IMPROVEMENT IN PREPAREDNESS

The Act states that, “The (Homeland Security and Emergency Management) Agency shall coordinate a regular program of readiness exercises to test the District of Columbia’s emergency preparedness, propose action to address any gap in preparedness, and coordinate with regional, federal, and private entities” (D.C. Official Code § 7-2231.07). This provision codifies a longstanding District of Columbia policy. For example, Mayor’s Order 2002-1, which established the EPC, states that:

The EPC shall conduct a minimum of one full-scale and one functional/tabletop disaster exercise each calendar year to test the District’s overall condition of readiness. Each exercise required mandatory participation by each ESF lead agency. A formal after-action report shall be presented to the EPC within one month of each completed exercise. Each after-action report shall be incorporated into an overall Corrective Action Plan identifying proposed activities, policies, and programs to improve the District’s overall state of readiness to respond to any major emergency or disaster.¹⁰⁹

The District government participates in a range of homeland security exercises, some of which are led by the D.C. government and others which are sponsored by the federal government or the National Capital Region. The exercises vary in scope and in the extent to which they simulate real-world operations. In the 2008 Annual Report to the D.C. Council, HSEMA listed 21 homeland security exercises in which the D.C. government has participated since March 2007 (four of these exercises were sponsored by HSEMA), the majority of which were “tabletop exercises.” According to US DHS, “A tabletop exercise involves key personnel discussing simulated scenarios in an informal setting.” The tabletop format “can be used to assess plans, policies, and procedures.” At the other end of the spectrum is a “full-scale exercise,” which US DHS defines as “a multi-agency, multi-jurisdictional, multi-discipline exercise involving functional (e.g., joint field office, emergency operations centers, etc.) and ‘boots on the ground’ response (e.g., firefighters decontaminating mock

victims). Given the logistical challenges and required time commitments, most exercises are scheduled, but some are conducted on a “no-notice” basis.

The four HSEMA-sponsored exercises in the past two years were (1) the Gallaudet University tabletop exercise held on June 4, 2008, which simulated the challenge of responding to a shooting attack in a special-needs environment, (2) the Mayor’s Cabinet-Level Senior Leaders Seminar held from June 21-30, 2008, which reviewed the government response to a fire in Mount Pleasant, (3) Winter Shield, a full-scale exercise held on October 31, 2008 to test the hospital preparedness program, and (4) a community preparedness exercise at the Old Naval Hospital held on September 25, 2008.

The District government has also used natural events, such as hurricanes and snowstorms, as an opportunity to review emergency practices and procedures. The lessons learned from exercises and the corrective actions required are documented in “after-action reports” (AARs). The District government has commissioned AARs for events as diverse as Hurricane Isabel and the Independence Day departure of people from the National Mall following the fireworks display. The District also documented the lessons learned from sheltering at the D.C. Armory several hundred people who were evacuated from the Gulf Coast after Hurricane Katrina.

HSEMA officials provided copies of the 11 AARs that have been completed since January 1, 2005. These reports document the observations, findings, and recommendations resulting from the exercises or events shown in Table 5 on the next page. However, as shown in the table, HSEMA has not completed any AARs in almost two years, which means that AARs were not completed for the four exercises held since March 2007. Moreover, there is sometimes a lag of several months between an exercise and the completion of the AAR, despite the standard set in Mayor’s Order 2002-1 that each AAR shall be completed and presented to the EPC within one month of the exercise. To have maximum impact, AARs should be completed quickly when the details of the event are still fresh in people’s minds and participants are most receptive to consider the lessons learned.

---


111 For example, the District conducted a no-notice exercise on May 11, 2004, in which senior officials were instructed to report to the back-up Emergency Operations Center and to bring their emergency go-kit.

<table>
<thead>
<tr>
<th>Exercise or Event</th>
<th>Date of Exercise or Event</th>
<th>AAR Completed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Senior Leaders Tabletop Exercise: Hurricane X</td>
<td>May 24, 2006</td>
<td>Not dated</td>
</tr>
<tr>
<td>Independence Day Events</td>
<td>July 4, 2006</td>
<td>Not dated</td>
</tr>
<tr>
<td>Hurricane Katrina</td>
<td>September 21-28, 2005</td>
<td>July 21, 2006</td>
</tr>
<tr>
<td>TOPOFF IV: Crisis Management Team and WebEOC</td>
<td>June 22, 2006</td>
<td>July 24, 2006</td>
</tr>
<tr>
<td>Transportation Tabletop</td>
<td>November 28, 2006</td>
<td>Not dated</td>
</tr>
<tr>
<td>Vigilant Shield</td>
<td>December 11, 2006</td>
<td>Not dated</td>
</tr>
<tr>
<td>Department of Human Services Tabletop</td>
<td>February 21, 2007</td>
<td>March 23, 2007</td>
</tr>
<tr>
<td>U.S. Marine Corps</td>
<td>March 29, 2007</td>
<td>Not dated</td>
</tr>
<tr>
<td>Valentine’s Day Winter Storm</td>
<td>February 13-14, 2007</td>
<td>March 30, 2007</td>
</tr>
</tbody>
</table>


Participation of senior officials in exercises is essential to prepare them for a real emergency. The Auditor was alarmed to learn that only 17 percent of Cabinet members attended one exercise during FY 2008, well short of the 75 percent performance goal, according to HSEMA’s FY 2008 performance report.\(^{113}\)

Despite the longstanding policy that officials must implement a corrective action plan to address weaknesses identified during homeland security exercises, HSEMA officials acknowledged that the corrective action process had lapsed. In fact, one of the initiatives in HSEMA’s FY 2008 performance plan was to “develop a process to systematically document – and address – corrective actions from preparedness exercises” by December 2008. The performance plan further stated that,

"Incorporating the lessons learned in those exercises and improvement plans into strategy, plans, training, etc., has often been a challenge. HSEMA will ensure that those corrective actions are systematically captured, analyzed, and then implemented."

As an example of this problem, the Auditor counted 351 open recommendations in HSEMA’s remedial action database, as of July 21, 2008. More than three-quarters of the open recommendations (267 out of 351) had been pending for two years or more.

The devastation caused by Hurricane Katrina in the fall of 2005 illustrates the potential consequences of not implementing the lessons learned from emergency preparedness exercises. In a report on Hurricane Katrina, the GAO stated that, “Hurricane Katrina demonstrated the benefits of applying lessons learned from training exercises and experiences with actual hurricanes as well as the dangers of ignoring them.” The GAO further pointed out that many of the problems uncovered in an exercise on a hypothetical “Hurricane Pam” had not been fully addressed by the time that Hurricane Katrina struck. In Congressional testimony, the Comptroller General observed that, “Unfortunately, many of the lessons emerging from Hurricanes Katrina and Rita are similar to those we identified more than a decade ago, in the aftermath of Hurricane Andrew in 1992.”

As stated earlier, the EPC – the inter-agency forum for homeland security policymaking in the District government – has not been meeting regularly during the past two years, and therefore has not fulfilled its duty under Mayor’s Order 2002-1 to review each AAR within one month of a completed exercise. HSEMA officials noted that the AARs reports draw on interviews with relevant officials in D.C. government agencies, and are presented to those officials to help them improve their operations. Nevertheless, the Auditor views the EPC (or relevant sub-committees thereof) as an ideal forum for sharing and reviewing the AARs, transmitting the findings and recommendations to a broader audience, and implementing corrective actions.

To ensure that the lessons of homeland security exercises are applied to future policy and practice, the HSEMA Director has assigned one of his senior aides to monitor and report on each agency’s implementation of corrective actions. The HSEMA Director further expressed his intent

---


to enforce corrective actions by using “the power of the purse” – his authority to approve all sub-
grants disbursed from federal homeland security grant awards. HSEMA officials have also stated that they have begun using a new web-based system\textsuperscript{117} introduced by US DHS to track the implementation of corrective action (heretofore, a database comprised of spreadsheets had been used). The web-based system is expected to promote more effective implementation because it requires managers to identify who is responsible for corrective action and establish deadlines, and will issue a reminder when those deadlines arrive.

**RECOMMENDATIONS**

1. HSEMA should make greater use of “No Notice” exercises that test officials’ readiness to report for duty immediately and fulfill the responsibilities they would face in a crisis.

2. HSEMA should ensure that after-action reports are completed within one month after an exercise was conducted.

3. HSEMA should use the Emergency Preparedness Council as a forum for discussing and evaluating exercises, disseminating findings and recommendations, and monitoring implementation of corrective actions.

4. The Mayor and City Administrator should use the homeland security exercise program as the topic of a CapStat accountability session.\textsuperscript{118}

**HSEMA HAS EMBARKED ON A PROMISING INITIATIVE TO IMPLEMENT AN OUTDOOR WARNING SYSTEM**

Public notification and warning capability is necessary to save lives, prevent injury, protect property, and minimize the time needed to recover from an attack or disaster. As stated by the Partnership for Public Warning (PPW), “When poison gas is drifting rapidly downwind or a dirty nuclear bomb has contaminated a region, thousands of lives could be saved if officials could quickly and effectively get the attention of people directly at risk and communicate how to get out of harm’s

\textsuperscript{117} This system is known as the Corrective Action Program System, or CAPS.

\textsuperscript{118} CapStat is “a performance-based accountability program,” implemented by Mayor Fenty, that “identifies opportunities to make District government run more efficiently, while providing a higher quality of service to its residents.” CapStat sessions focus on “high-priority issues that cut across agency boundaries ... For one hour, the Mayor and City Administrator bring into one room all executives responsible for improving performance on an issue, examine performance data and explore ways to improve government services, as well as make commitments for follow-up actions.” See [http://capstat.oca.dc.gov/WhatIsCapStat.aspx](http://capstat.oca.dc.gov/WhatIsCapStat.aspx).
way.” PPW identified the following characteristics of an effective emergency warning system: focused on the people at risk, available, accessible, safe, easy to use, resilient, reliable, timely, secure, and widely recognized.

In July 2004, the District government launched a four-part public notification program called Alert DC, giving residents and visitors multiple ways to receive emergency information. The four parts of Alert DC are text alert, voice alert, the Emergency Information Center website (now found at http://72hours.dc.gov), and an enhanced Emergency Alert System. The capabilities offered by these four systems are as follows:

- **Text Alert** provides emergency text messages on any device capable of transmitting text, such as a cell phone, computer e-mail system, pager, personal digital assistant, or Blackberry. People must register for Text Alert, which is not limited to D.C. residents.

- **Voice Alert** allows emergency officials to notify residents by telephone of an actual or impending incident that may require them to take protective action, such as evacuation or sheltering in place. Voice Alert has the capacity to deliver a recorded message to all 1.5 million landline telephones in the District of Columbia, but emergency managers can also target a message to a particular geographical area.

- The **Emergency Information Center**, which was discussed earlier in this report, would provide instructions on what to do in the event of an emergency. This website also provides a wide range of emergency preparedness information, including how to create a family preparedness plan, how to prepare an emergency kit, and evacuation guidance.

- The **Emergency Alert System** (formerly known as the “Emergency Broadcast System”) is part of a national public warning system that requires broadcasters and cable television systems to interrupt their programs to provide information during an emergency. HSEMA administers the Emergency Alert System for the District of Columbia.

---


120 Partnership for Public Warning, pp. 19-20.
The District has been a leader in implementing public notification systems. In launching “Alert DC” four years ago, the District was ahead of other high-threat cities, such as New York (which launched “Notify NYC” as a pilot program to deliver emergency information by e-mail, text messages, and voice messages in December 2007)\textsuperscript{121} and Chicago (which added text messaging to a voice alert system in September 2008).\textsuperscript{122}

Text Alert enrollment has risen steadily since the launch of the program. For example, in November 2005 there were only 18,000 subscribers to Text Alert.\textsuperscript{123} By July 4, 2008, there were 42,875 Text Alert subscribers. In recent months, Text Alert enrollment has grown at an especially rapid rate, in part due to the presidential inauguration. As of February 27, 2009, the number of people enrolled stood at 71,758.\textsuperscript{124}

Data provided by HSEMA on the number of people who have signed up for Text Alert indicate a fairly broad neighborhood distribution. HSEMA does not require people to provide a home address or zip code when registering for Text Alert; instead, people can designate multiple neighborhoods to receive emergency information relevant to their home, workplace, or regular activities. As of September 2008, the top five neighborhoods in terms of subscribers were Capitol Hill (8,682), followed by Downtown (8,080), Georgetown (7,722), George Washington University (7,331), and Dupont Circle (6,826). The distribution of subscribers by neighborhood is shown in the Appendix.

HSEMA is also implementing a “mass notification system,” which would allow warnings (both voice and tonal warnings) to be delivered to people by loudspeakers mounted on lampposts, telephone poles, or traffic lights. The National Mall, a potential terrorist target due to the presence of the U.S. Capitol, the Lincoln Memorial, and other major monuments, would be a primary location for the loudspeakers because people may lack access to phones, radios, and other communication devices when they gather on the Mall. The system, which is sometimes referred to as an “outdoor


\textsuperscript{123} Testimony of Barbara Childs-Pair, Director of the Emergency Management Agency, to the D.C. Council Committee on the Judiciary, November 7, 2005, p. 5.

\textsuperscript{124} Letter from Homeland Security and Emergency Management Agency Director Darrell Darnell, dated February 27, 2009, to District of Columbia Auditor Deborah Nichols, p. 4.
warning” or “modern siren” system, could also be installed in neighborhoods. Outdoor warning systems are also versatile; for example, they are used to warn San Francisco residents about earthquakes and to warn people who live near Mount Rainier in Washington State about volcanic eruptions. HSEMA officials stated that they successfully tested the mass notification system on January 11, 2009, but did not need to use the system during the presidential inauguration.\textsuperscript{125}

In 2007, Arlington County, Virginia, and the City of Alexandria, Virginia, participated in a federally-funded pilot project of an outdoor warning system similar to the system that the District is introducing. The outdoor loudspeakers were installed at six sites in Arlington County and two in Alexandria City, spanning areas with high-rise buildings, mid-rise buildings, and open spaces. Arlington County officials interviewed by the Auditor expressed enthusiasm for the system, stating that it was very useful in communicating with crowds who gathered at the Iwo Jima Memorial on the Fourth of July. Arlington County transmitted messages through the loudspeakers in both English and Spanish.

The Auditor finds that the outdoor warning system could help fill a serious gap in the District’s public notification system: how to communicate with people who do not have mobile devices, who are not enrolled in Alert DC, or who are outside or away from the television, radio, and telephone. As stated by experts in the field of public warning, multiple channels of communication are needed to reach people in different places and at different times of day.\textsuperscript{126} Moreover, live or recorded messages can be tailored to the threat facing a precise geographical area, giving people more specific guidance about how to protect themselves. Targeting is important because if emergency messages reach too many people who are not at risk, they are more likely to ignore subsequent messages. If implemented effectively, the loudspeaker system would continue the District’s record of leadership and innovation in public notification.

\textsuperscript{125} Letter from Homeland Security and Emergency Management Agency Director Darrell Darnell, dated February 27, 2009, to District of Columbia Auditor Deborah Nichols, pp. 3-4.

HSEMA HAS NOT REQUESTED THAT PRIVATE ENTITIES SHARE INFORMATION ON BEST PRACTICES TO PREVENT, MITIGATE, RESPOND TO, AND RECOVER FROM A TERRORIST OR OTHER SECURITY INCIDENT

Although HSEMA has worked with private entities to perform vulnerability assessments and has hired an individual to coordinate its critical infrastructure activities, the agency has not solicited the “voluntary sharing of information from private entities on best practices for prevention, mitigation, response, and recovery from a terrorist or other security incident, including information on relocation and other business continuity plans and programs,” as required by the Act (see D.C. Official Code § 7-2231.09). In a letter to the Auditor dated April 28, 2008, the HSEMA Director cited the following efforts by the District government and HSEMA to support private-sector vulnerability assessments and mitigation plans:

- HSEMA had “worked with private sector partners to conduct site assessments of critical infrastructure and develop a Risk Baseline Report” (the threat and vulnerability assessment described earlier in this report);

- The District government participates in the “All-Hazards Forum,” a public-private partnership of Mid-Atlantic states and private firms; and

- HSEMA has provided National Incident Management Training to private entities.127

In comments on a draft version of this report, HSEMA identified a number of barriers to the implementation of this section of the Act. HSEMA stated, “That information is considered sensitive, and HSEMA’s collection of such sensitive information from private entities would subject the information to public disclosure. Releasing such information would at best increase the District’s risk, and at worst serve as a handbook for members of the public looking to target the city’s vulnerabilities.”128

The Auditor does not believe that the voluntary sharing of information by private entities about best practices for preventing, mitigating, responding to, and recovering from a terrorist act would increase the District’s risk. At the same time, the Auditor finds that this policy, as prescribed


by the Act, may not be particularly feasible or productive. Government officials and private-sector representatives interviewed for this audit stated that private firms and organizations are reluctant to share information about mitigating risks and recovering from a disaster because they fear disclosing proprietary information or exposing their vulnerabilities.

Instead of seeking to gather information from the private-sector about best practices in reducing vulnerabilities and protecting assets, the Auditor recommends a strategy in which HSEMA, assisted by MPD, synthesizes information about best practices in protecting assets and offers that information to the private sector. US DHS established sector coordinating councils to produce critical infrastructure/key resource protection plans for each of 17 economic sectors.129 Each sector council produced a risk reduction plan that includes a sector profile; identification of assets, systems, networks, and functions; a sector risk assessment; prioritization of infrastructure; recommendations of protective steps; processes to measure progress; research and development strategies; and a sector management and coordination plan.130 The risk reduction strategies established by the sector councils illustrate the kind of information that HSEMA and MPD could provide to private entities and the trade associations that represent them. HSEMA could combine outreach to private entities about ways to reduce vulnerability with its critical infrastructure protection activities, such as the effort to encourage property and building owners to undergo site assessments using US DHS’ Automated Critical Asset Management System.

RECOMMENDATIONS

1. The Council should revise section 209 of the Act, which requires the HSEMA Director to “request the voluntary sharing of information from private entities on best practices for prevention, mitigation, response, and recovery from a terrorist or other security incident, including information on relocation and other business continuity plans and programs, for the purpose of collaboration to improve public and private preparedness” (D.C. Official Code § 7-2231.09). The revised language should require the HSEMA Director to provide private entities with information about best practices for prevention, mitigation, response, and recovery from a terrorist or other security incident.

129 The 17 sectors are as follows: agriculture and food; defense; energy; public health and healthcare; national monuments and icons; banking and finance; drinking water and water treatment systems; chemical; commercial facilities; dams, emergency services; nuclear reactors, materials, and waste; information technology; communications; postal and shipping; transportation; and government facilities.

2. HSEMA should synthesize available information about best practices in private-sector vulnerability assessment and mitigation efforts and disseminate this information to private organizations and trade associations. (HSEMA can use existing statutory authority to launch such an initiative, although it would also be desirable to revise section 209 of the Act as proposed in recommendation #1).

THE MAYOR HAS NOT COMPLIED WITH THE MANDATE TO ESTABLISH THE HOMELAND SECURITY COMMISSION

The Mayor has not complied with the Act’s mandate to establish the District of Columbia Homeland Security Commission. Almost two years after the Act became law, the Mayor has not nominated any individuals to serve on the seven-member Commission, which is to be comprised of members “with expertise in security, transportation, communication, chemical safety, risk assessment, terrorism (bioterrorism), or occupational safety and health” (D.C. Official Code § 7-2271.02(a)). The Council must confirm all nominations to the Commission.

In March 2008, the Mayor proposed eliminating the Commission in Title III-B of Bill 16-678, the “Fiscal Year 2009 Budget Support Act of 2008,” which Council Chairman Vincent Gray introduced on March 20, 2008, at the Mayor’s request. The annual Budget Support Act is an omnibus bill that makes statutory changes needed to facilitate the implementation of the District’s budget. In an April 4, 2008, letter to Councilmember Phil Mendelson, the Chairman of the Council’s Committee on Public Safety and the Judiciary, the HSEMA Director explained the administration’s rationale for proposing to eliminate the Commission. Mr. Darnell stated that:

The work which the Commission would have performed is currently being performed by numerous oversight bodies and inter-agency working groups. Currently, there are three oversight bodies that gather and evaluate information on the status of homeland security projects and programs. The oversight bodies include the Mayor’s Emergency Preparedness Council, the D.C. Local Emergency Planning Council, and the Consequence Management Team.\(^{131}\)

The Council removed Title III-B from the Fiscal Year 2009 Budget Support Act, leaving the mandate to establish the Commission in place. In urging the Council to preserve the existence of the Commission, the Committee on Public Safety and the Judiciary observed that:

---

\(^{131}\) Letter dated April 4, 2008, from Homeland Security and Emergency Management Agency Director Darrell Darnell to Councilmember Phil Mendelson, Chairman, Committee on Public Safety and the Judiciary, pp. 5-6.
The Commission was designed to be a formal and permanent mechanism that would use the professional expertise of individuals outside the government to help assure the safety of all who live and work in the nation’s capital. The continuing need for a Homeland Security Commission is illustrated by the Council’s action on the “toxic trains” issue. Neither the city’s public safety nor transportation officials brought this issue to the Council. It was raised, instead, by private citizens with expertise on chemical safety: representatives of the Sierra Club, Greenpeace, and Friends of the Earth. A major purpose of the Commission is to bring forward issues that are new and unrecognized, as a “fail safe” in the event any future District government is inattentive to security needs.\(^{132}\)

The Auditor finds that the establishment of the Commission is an important task, noting that two of the bodies cited by the HSEMA Director as carrying out similar functions – the EPC and the Consequence Management Team – are government coordinating bodies with critical operational functions. By contrast, the Commission has a completely different structure and purpose: it is to serve as a non-governmental source of expertise and a constructive critic of the District’s homeland security programs and policies. The Local Emergency Planning Council (LEPC), also cited by the HSEMA Director as fulfilling a similar purpose, is required by federal Superfund law to monitor and inform the public about the use of hazardous chemicals in the District of Columbia. The LEPC’s highly-specific mandate has very little overlap with the Commission’s broad mandate to (1) gather and evaluate information on the status of homeland security in the District of Columbia, (2) measure progress and gaps in homeland security preparedness, (3) recommend security improvement priorities in consultation with major public and private entities, and (4) advise the District of Columbia government on the homeland security program.

**RECOMMENDATION**

The Mayor should transmit to the Council, by the end of March 2009, the names of seven highly-qualified nominees to serve on the Homeland Security Commission. The nominees must collectively meet the Act’s requirement to possess expertise in security, transportation, communications, chemical safety, risk assessment, terrorism, or occupational safety and health.

---

CONCLUSION

The Auditor examined the implementation of D.C. Law 16-262, the “Homeland Security, Risk Reduction, and Preparedness Amendment Act of 2006,” an omnibus act that includes requirements for threat and vulnerability assessment, government employee security training, homeland security exercises, public information and involvement, large building security, protection of critical infrastructure, coordination with the private sector and other levels of government, and the establishment of a Homeland Security Commission. The Act also expanded the role of the District’s Emergency Management Agency, which was renamed the Homeland Security and Emergency Management Agency (HSEMA) and designated as the District’s lead agency for homeland security.

Given the broad scope of the Act, its implementation provides a useful vantage point on the District’s homeland security policies and programs more than seven years after the terrorist attacks of September 11, 2001. This audit is based on interviews with senior homeland security officials in the D.C. government, interviews with community leaders and private-sector representatives, and extensive review of local and federal homeland security plans, directives, and analyses.

The Auditor is concerned that the governmental focus on homeland security may be waning as we move further away from the September 11th attacks. The District of Columbia’s homeland security program has abiding strengths, yet the inter-governmental coordination that is key to homeland security appears to have declined. A particular source of concern is that three of six specific tasks or deadlines set forth in the Act have not been fulfilled, while one requirement was only partly fulfilled and another requirement was completed nine months after the deadline (the sixth requirement – requesting that private entities share information on best practices for preventing, mitigating, and responding to a terrorist attack, appears unfeasible).

Specifically, the Mayor did not submit an annual report to the Council (due in March 2008) describing the current level of preparedness, assessing homeland security capabilities, and identifying high-priority unmet needs, until December 2008. The Mayor has yet to appoint any members to the seven-member Homeland Security Commission, almost two years after the Act took effect. HSEMA has not yet developed and issued guidelines for a public employee security training program, or developed guidance for building managers to enhance the security of large commercial and residential buildings. As required by the Act, HSEMA commissioned a threat and vulnerability assessment (TVA) for the District of Columbia, but the TVA did not assess actions already taken to improve homeland security or recommend additional steps to protect the homeland.
Homeland security is fundamentally an inter-agency responsibility. Although HSEMA is the lead agency for homeland security, the involvement and contributions of other agencies including the Metropolitan Police Department, the Fire and Emergency Medical Services Department, the Department of Health, the Department of Transportation, the Department of Human Services, the Office of the Chief Technology Officer, and Serve DC (the Mayor’s Office on Volunteerism) are essential. Yet the Emergency Preparedness Council (EPC), the homeland security policymaking body established by former Mayor Anthony Williams in 2002 to coordinate the efforts of these agencies, has been less active, with no meetings in 2007 and only three meetings in 2008. In addition, revisions to the District’s core emergency preparedness plan, the District Response Plan (DRP), took three years to complete even though D.C. law mandates an annual update.

The Auditor finds that the executive branch needs to revitalize the interagency system for making and implementing homeland security policy by making any necessary changes to the EPC structure and holding bi-monthly meetings of the EPC. This is not merely a process issue but rather a way to focus and coordinate the resources of the government to fulfill the outstanding requirements of the Act and to address other policy issues cited in this report. For example, the District needs to finish continuity of operations plans for all agencies; enhance and test its capacities to provide shelter, and mass care when necessary; tailor community emergency management plans to the needs and circumstances of each neighborhood; create a cadre of trained citizens in each neighborhood to assist in emergency response; and ensure that corrective actions identified in homeland security exercises are implemented.

The Auditor also emphasizes that the Act’s key accountability provisions – the requirement for an annual report to the Council and the mandate to establish an independent Homeland Security Commission – are more than matters of bureaucratic compliance. Annual reporting is important to keep policymakers and the public informed about and engaged in emergency preparedness, and to take stock of the capabilities that have been built and the gaps that remain. The seven-member Homeland Security Commission was intended to provide a permanent source of independent expertise and constructive criticism on matters of life-and-death importance, allowing the District to draw on individuals with backgrounds in security, transportation, emergency communications, chemical safety, and risk assessment to ensure that the District, as one of the highest-risk cities in the nation, has one of the most effective homeland security programs.

The Auditor believes that there are underlying strengths in the District of Columbia’s homeland security program. During the first five years after the September 11th attacks, the District created a solid foundation for homeland security, developing a system of interoperable radio
communications for police, fire, and emergency medical workers; implementing a four-part citizen emergency notification system that includes text and voice alerts; disseminating a family preparedness guide and creating an emergency preparedness web site; and purchasing personal protective gear and equipment for first responders. More recently, the District has launched a “fusion center” housed at the Metropolitan Police Department to analyze intelligence information and disseminate threat information in partnership with regional and federal agencies. HSEMA is implementing a new outdoor warning system for targeted areas such as the National Mall to complement the text and voice alert systems already in place. The challenge for the District is to maintain a high level of determination and intensity in protecting the homeland, and to avoid complacency, as homeland security policymaking becomes a routine and institutionalized aspect of government operations. The District’s homeland security capacities are strong in many respects, but as one of the two highest-threat cities in the nation, the District of Columbia must have the strongest homeland security program possible.

Respectfully submitted,

[Signature]

Deborah K. Nichols
District of Columbia Auditor
APPENDIX
APPENDIX

ENROLLMENT IN D.C. TEXT ALERT BY NEIGHBORHOOD AS OF SEPTEMBER 11, 2008

<table>
<thead>
<tr>
<th>Neighborhood</th>
<th>Recipients</th>
</tr>
</thead>
<tbody>
<tr>
<td>16th Street Heights</td>
<td>1,846</td>
</tr>
<tr>
<td>Adams Morgan</td>
<td>3,515</td>
</tr>
<tr>
<td>American University</td>
<td>4,475</td>
</tr>
<tr>
<td>American University Park</td>
<td>2,872</td>
</tr>
<tr>
<td>Anacostia</td>
<td>1,582</td>
</tr>
<tr>
<td>Arboletum</td>
<td>639</td>
</tr>
<tr>
<td>Arthur Capper</td>
<td>466</td>
</tr>
<tr>
<td>Barnaby Woods</td>
<td>533</td>
</tr>
<tr>
<td>Barney Circle</td>
<td>516</td>
</tr>
<tr>
<td>Barry Farm</td>
<td>987</td>
</tr>
<tr>
<td>Bellevue</td>
<td>460</td>
</tr>
<tr>
<td>Benning</td>
<td>984</td>
</tr>
<tr>
<td>Benning Ridge</td>
<td>529</td>
</tr>
<tr>
<td>Bloomingdale</td>
<td>548</td>
</tr>
<tr>
<td>Brentwood</td>
<td>820</td>
</tr>
<tr>
<td>Brightwood</td>
<td>984</td>
</tr>
<tr>
<td>Brightwood Park</td>
<td>526</td>
</tr>
<tr>
<td>Brookland</td>
<td>2,496</td>
</tr>
<tr>
<td>Buena Vista</td>
<td>668</td>
</tr>
<tr>
<td>Burleith</td>
<td>791</td>
</tr>
<tr>
<td>Burrville</td>
<td>390</td>
</tr>
<tr>
<td>Buzzard Point</td>
<td>599</td>
</tr>
<tr>
<td>Capitol Hill</td>
<td>8,682</td>
</tr>
<tr>
<td>Capitol View</td>
<td>981</td>
</tr>
<tr>
<td>Cardozo</td>
<td>1,552</td>
</tr>
<tr>
<td>Carrollsburg</td>
<td>441</td>
</tr>
<tr>
<td>Carver</td>
<td>413</td>
</tr>
<tr>
<td>Cathedral Heights</td>
<td>1,340</td>
</tr>
<tr>
<td>Central Northeast</td>
<td>972</td>
</tr>
<tr>
<td>Chevy Chase</td>
<td>2,858</td>
</tr>
<tr>
<td>Chinatown</td>
<td>2,909</td>
</tr>
<tr>
<td>Cleveland Park</td>
<td>3,560</td>
</tr>
<tr>
<td>Colonial Village</td>
<td>684</td>
</tr>
<tr>
<td>Columbia Heights</td>
<td>2,327</td>
</tr>
<tr>
<td>Congress Heights</td>
<td>2,240</td>
</tr>
<tr>
<td>Connecticut Ave. / K Street</td>
<td>5,013</td>
</tr>
<tr>
<td>Neighborhood</td>
<td>Population</td>
</tr>
<tr>
<td>-------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>Corcoran College of Arts and Design</td>
<td>228</td>
</tr>
<tr>
<td>Crestwood</td>
<td>633</td>
</tr>
<tr>
<td>Deanwood</td>
<td>755</td>
</tr>
<tr>
<td>Douglass</td>
<td>421</td>
</tr>
<tr>
<td>Downtown</td>
<td>8,080</td>
</tr>
<tr>
<td>Dupont Circle</td>
<td>6,826</td>
</tr>
<tr>
<td>Dupont Park</td>
<td>1,209</td>
</tr>
<tr>
<td>Eastland Gardens</td>
<td>431</td>
</tr>
<tr>
<td>Eckington</td>
<td>739</td>
</tr>
<tr>
<td>Edgewood</td>
<td>536</td>
</tr>
<tr>
<td>Fairfax Village</td>
<td>742</td>
</tr>
<tr>
<td>Fairlawn</td>
<td>1,019</td>
</tr>
<tr>
<td>Foggy Bottom</td>
<td>6,669</td>
</tr>
<tr>
<td>Forest Hills</td>
<td>774</td>
</tr>
<tr>
<td>Fort Davis</td>
<td>499</td>
</tr>
<tr>
<td>Fort Davis Park</td>
<td>474</td>
</tr>
<tr>
<td>Fort Dupont</td>
<td>696</td>
</tr>
<tr>
<td>Fort Lincoln</td>
<td>599</td>
</tr>
<tr>
<td>Fort McNair</td>
<td>823</td>
</tr>
<tr>
<td>Fort Stanton</td>
<td>470</td>
</tr>
<tr>
<td>Fort Totten</td>
<td>1,055</td>
</tr>
<tr>
<td>Foxhall Crescents</td>
<td>882</td>
</tr>
<tr>
<td>Foxhall Village</td>
<td>1,380</td>
</tr>
<tr>
<td>Friendship Heights</td>
<td>2,444</td>
</tr>
<tr>
<td>Gallaudet University</td>
<td>311</td>
</tr>
<tr>
<td>Garfield Heights</td>
<td>492</td>
</tr>
<tr>
<td>Gateway</td>
<td>392</td>
</tr>
<tr>
<td>Georgetown</td>
<td>7,722</td>
</tr>
<tr>
<td>Georgetown Law Center</td>
<td>356</td>
</tr>
<tr>
<td>Georgetown Reservoir</td>
<td>2,045</td>
</tr>
<tr>
<td>Georgetown University</td>
<td>1,069</td>
</tr>
<tr>
<td>Glover Park</td>
<td>1,597</td>
</tr>
<tr>
<td>Grant Park</td>
<td>559</td>
</tr>
<tr>
<td>Greenway</td>
<td>431</td>
</tr>
<tr>
<td>Hawthorne</td>
<td>396</td>
</tr>
<tr>
<td>Hill East</td>
<td>726</td>
</tr>
<tr>
<td>Hillandale</td>
<td>504</td>
</tr>
<tr>
<td>Hillcrest</td>
<td>644</td>
</tr>
<tr>
<td>Hillsdale</td>
<td>1,077</td>
</tr>
<tr>
<td>Historic Anacostia</td>
<td>870</td>
</tr>
<tr>
<td>Howard University</td>
<td>1,501</td>
</tr>
<tr>
<td>Ivy City</td>
<td>505</td>
</tr>
<tr>
<td>Kalorama Heights</td>
<td>1,005</td>
</tr>
<tr>
<td>Neighborhood</td>
<td>Code</td>
</tr>
<tr>
<td>---------------------------</td>
<td>------</td>
</tr>
<tr>
<td>Kenilworth</td>
<td>710</td>
</tr>
<tr>
<td>Kingman Park</td>
<td>583</td>
</tr>
<tr>
<td>Knox Hill</td>
<td>648</td>
</tr>
<tr>
<td>Lamond Riggs</td>
<td>506</td>
</tr>
<tr>
<td>Langdon</td>
<td>419</td>
</tr>
<tr>
<td>Langston</td>
<td>434</td>
</tr>
<tr>
<td>Lanier Heights</td>
<td>531</td>
</tr>
<tr>
<td>LeDroit Park</td>
<td>689</td>
</tr>
<tr>
<td>Lincoln Heights</td>
<td>449</td>
</tr>
<tr>
<td>Lincoln Park</td>
<td>794</td>
</tr>
<tr>
<td>Linden Neighborhood</td>
<td>376</td>
</tr>
<tr>
<td>Logan Circle</td>
<td>2,018</td>
</tr>
<tr>
<td>Manor Park</td>
<td>1,011</td>
</tr>
<tr>
<td>Marshall Heights</td>
<td>493</td>
</tr>
<tr>
<td>Massachusetts Ave. Heights</td>
<td>1,490</td>
</tr>
<tr>
<td>Mayfair</td>
<td>453</td>
</tr>
<tr>
<td>McLean Gardens</td>
<td>844</td>
</tr>
<tr>
<td>Michigan Park</td>
<td>849</td>
</tr>
<tr>
<td>Mount Pleasant</td>
<td>1,460</td>
</tr>
<tr>
<td>Mount Vernon Square</td>
<td>1,152</td>
</tr>
<tr>
<td>Naylor Gardens</td>
<td>693</td>
</tr>
<tr>
<td>Near Northeast</td>
<td>1,558</td>
</tr>
<tr>
<td>Near Southeast</td>
<td>1,583</td>
</tr>
<tr>
<td>North Capitol Street</td>
<td>1,893</td>
</tr>
<tr>
<td>North Cleveland Park</td>
<td>1,097</td>
</tr>
<tr>
<td>North Lincoln Park</td>
<td>516</td>
</tr>
<tr>
<td>North Michigan Park</td>
<td>516</td>
</tr>
<tr>
<td>North Portal Estates</td>
<td>421</td>
</tr>
<tr>
<td>Northeast Boundary</td>
<td>574</td>
</tr>
<tr>
<td>Oxon Run</td>
<td>948</td>
</tr>
<tr>
<td>Palisades</td>
<td>1,050</td>
</tr>
<tr>
<td>Park View</td>
<td>429</td>
</tr>
<tr>
<td>Penn Branch</td>
<td>629</td>
</tr>
<tr>
<td>Penn Quarter</td>
<td>1,897</td>
</tr>
<tr>
<td>Petworth</td>
<td>1,147</td>
</tr>
<tr>
<td>Pleasant Hill</td>
<td>614</td>
</tr>
<tr>
<td>Pleasant Plains</td>
<td>396</td>
</tr>
<tr>
<td>Queens Chapel</td>
<td>577</td>
</tr>
<tr>
<td>Randle Highlands</td>
<td>580</td>
</tr>
<tr>
<td>River Terrace</td>
<td>504</td>
</tr>
<tr>
<td>Rosedale</td>
<td>451</td>
</tr>
<tr>
<td>Shaw</td>
<td>1,208</td>
</tr>
<tr>
<td>Shepherd Park</td>
<td>830</td>
</tr>
<tr>
<td>Neighborhood</td>
<td>Registrations</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>---------------</td>
</tr>
<tr>
<td>Sheridan</td>
<td>416</td>
</tr>
<tr>
<td>Shipley</td>
<td>404</td>
</tr>
<tr>
<td>Shipley Terrace</td>
<td>443</td>
</tr>
<tr>
<td>Skyland</td>
<td>432</td>
</tr>
<tr>
<td>South Central</td>
<td>462</td>
</tr>
<tr>
<td>Southeaster University</td>
<td>194</td>
</tr>
<tr>
<td>Southwest Employment Area</td>
<td>1,091</td>
</tr>
<tr>
<td>Southwest/Waterfront</td>
<td>1,852</td>
</tr>
<tr>
<td>Spring Valley</td>
<td>964</td>
</tr>
<tr>
<td>Stadium Armory</td>
<td>1,273</td>
</tr>
<tr>
<td>Stanton Park</td>
<td>882</td>
</tr>
<tr>
<td>Stronghold</td>
<td>608</td>
</tr>
<tr>
<td>Summit Park</td>
<td>385</td>
</tr>
<tr>
<td>Takoma</td>
<td>1,426</td>
</tr>
<tr>
<td>Tenleytown</td>
<td>3,015</td>
</tr>
<tr>
<td>The Catholic University of America</td>
<td>2,778</td>
</tr>
<tr>
<td>The George Washington University</td>
<td>7,331</td>
</tr>
<tr>
<td>Trinidad</td>
<td>779</td>
</tr>
<tr>
<td>Trinity University</td>
<td>229</td>
</tr>
<tr>
<td>Truxton Circle</td>
<td>409</td>
</tr>
<tr>
<td>Twining</td>
<td>382</td>
</tr>
<tr>
<td>University Heights</td>
<td>514</td>
</tr>
<tr>
<td>University of the DC</td>
<td>1,096</td>
</tr>
<tr>
<td>Van Ness</td>
<td>1,898</td>
</tr>
<tr>
<td>Washington Highlands</td>
<td>972</td>
</tr>
<tr>
<td>Washington Navy Yard</td>
<td>1,868</td>
</tr>
<tr>
<td>Wesley Heights</td>
<td>674</td>
</tr>
<tr>
<td>West End</td>
<td>1,235</td>
</tr>
<tr>
<td>Woodland</td>
<td>435</td>
</tr>
<tr>
<td>Woodland-Normanstone Terrace</td>
<td>410</td>
</tr>
<tr>
<td>Woodley Park</td>
<td>2,378</td>
</tr>
<tr>
<td>Woodridge</td>
<td>871</td>
</tr>
<tr>
<td>Other Neighborhood</td>
<td>1,457</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>197,367</strong></td>
</tr>
</tbody>
</table>

*Note: Text Alert subscribers can register to receive information about more than one neighborhood. Therefore, the total number of neighborhood registrations (197,367) exceed the total number of people who have enrolled in Text Alert (42,875) as of July 2008.*

*Source: Homeland Security and Emergency Management Agency*
AGENCY COMMENTS
AGENCY COMMENTS

On January 9, 2009, the Office of the District of Columbia Auditor submitted this report in draft form for review and comment to the Homeland Security and Emergency Management Agency, the Metropolitan Police Department, and Serve DC.

The Auditor received written comments from the Homeland Security and Emergency Management Agency, but did not receive any comments from the Metropolitan Police Department or Serve DC. As appropriate, the Auditor made changes to the final report in light of the comments received from the Homeland Security and Emergency Management Agency, which are attached in their entirety, along with the Auditor’s response to the comments.
GOVERNMENT OF THE DISTRICT OF COLUMBIA
Homeland Security and Emergency Management Agency

Adrian M. Fenty
Mayor

Darrell L. Darnell
Director

Deborah K. Nichols
District of Columbia Auditor
717 14th Street N.W., Suite 900
Washington, D.C. 20005

13 February 2009

Dear Ms. Nichols:

I received the draft report entitled, “Implementation of the Omnibus Homeland Security Act: D.C. Government Needs to Sharpen Its Focus on Homeland Defense.” While I recognize that certain components of HSEMA’s scope of responsibility as outlined in the Act are still in the developmental or planning stages, HSEMA continues its efforts to enhance homeland security initiatives since the most recent document submission of July 18, 2008. Moreover, there is one misconception about HSEMA’s budget that I have corrected.

Attached, please find a response to the report’s findings concerning compliance with the specific requirements of D.C. Law 16-262. This response is structured to include responses to the status of compliance with the law’s requirements, as well as responses to specific findings and recommendations in the report. We have addressed every recommendation falling within the agency’s purview and included explanations where we have made substantial progress since the audit interviews and data collection concluded in July 2008. Overall, HSEMA has made considerable progress in addressing items mentioned in the report.

As always, please contact me with any questions or concerns at (202) 373-3720 or darrell.darnell@dc.gov.

Sincerely,

Darrell L. Darnell
Director

2720 Martin Luther King Jr. Avenue, S.E., 2nd Floor, Washington, D.C. 20032
(202) 727-6161 Fax (202) 715-7288
February 13, 2009

COMMENTS REGARDING THE DISTRICT OF COLUMBIA AUDITOR’S DRAFT REPORT
IMPLEMENTATION OF OMNIBUS HOMELAND SECURITY ACT: D.C. GOVERNMENT NEEDS TO
SHARPEN ITS FOCUS ON HOMELAND DEFENSE

Finding: The institutional structure for homeland security policymaking needs to be strengthened and key initiatives need to move from planning to implementation.

Recommendations:
1. The City Administrator (or other official, such as the HSEMA Director, designated by the Mayor to chair the EPC) should convene the EPC bi-monthly and require participation by representatives of all agencies responsible for emergency support functions in the District Response Plan.
2. The City Administrator and HSEMA Director should use the EPC as a working group to fulfill the outstanding requirement of the Act, such as developing guidelines for public employee security training program and issuing guidance on the security of large commercial and residential buildings.
3. HSEMA, working with other lead agencies responsible for emergency support functions, should revise the District Response Plan on an annual basis required by statute.
4. The Mayor and City Administrator should direct all agencies under their authority to complete COOP plans that are approved by HSEMA by June 30, 2009. HSEMA should make its COOP template available to independent agencies to facilitate their planning.

Agency Comments: While HSEMA has not held Emergency Preparedness Council meetings as frequently as in the past, since August 2008, HSEMA has chaired monthly meetings of the DC Presidential Inaugural Committee. These meetings were regularly attended by more than 20 District agencies—including all District Response Plan (DRP) Emergency Support Function (ESF) leads—as well as countless regional partners such as WMATA, US Park Police, DC National Guard, and the Consortium of Universities. Though the topics were Inaugural-focused, nearly all are relevant to the implementation of homeland security plans and policies. The implementation of exercises, policies and plans during the preparation for and performance during the Inaugural period demonstrates HSEMA’s accomplishments in moving from the review and planning stages through implementation. Evidence of those successes is found throughout this document.

The Plans and Preparedness Division assisted six critical public safety agencies in the development of continuity of operations (COOP) plans by sharing its COOP template and working closely with these agencies to populate the templates. HSEMA is continuously working to edit and revise the public safety agency COOP plans and anticipates completion by late spring 2009.
The inauguration allowed these agencies to evaluate their plans and, in many cases, activate COOP sites. HSEMA conducted a full-scale exercise to test its COOP plan in October 2008 and then activated its COOP site during the inauguration and had the necessary equipment and personnel to continue operations in the event that the primary emergency operation center was disabled.

**Finding:** Lack of private-sector cooperation has hampered critical infrastructure protection.

**Recommendations:**
1. The Mayor should designate HSEMA as the lead agency for critical infrastructure protection in the District of Columbia. Inter-agency efforts to protect critical infrastructure should involve close coordination with the Metropolitan Police Department, the Fire and Emergency Medical Services Department, the Department of Transportation, and the Office of Property Management, using the EPC and an inter-agency Critical Infrastructure Working Group as forums for coordination and collaboration.
2. HSEMA should focus its critical infrastructure program on critical systems, networks, and functions pertaining to sectors such as telecommunications, energy and other utilities, and health care, in addition to the 99 critical infrastructures identified by the agency.

**Agency Comments:** HSEMA has developed a Critical Infrastructure Protection (CIP) program in partnership with the US Department of Homeland Security (DHS). In cooperation with the District, DHS evaluated and prioritized the District’s most critical infrastructure. HSEMA has instituted and trained personnel on the Automated Critical Asset Management Systems (ACAMS) training program. Endorsed by DHS, ACAMS is an Internet-based information-sharing database that aids in the critical infrastructure protection process for state and local governments. Critical infrastructure protection is the focus of HSEMA’s 2009 DHS State Homeland Security Program and the NCR UASI investment plans.

**Finding:** Logistical support, including shelter, transportation, and mass care, remains a key area in need of improvement in the District’s Homeland Security Program.

**Recommendations:**
1. In developing its plan for large shelters, HSEMA should address logistical issues such as how many people are needed to manage and staff the shelters, who will supply and prepare food, who will provide security, how people with disabilities and other special needs can be housed, how children will be cared for, where pets can be kept, and how essential supplies and equipment will be procured and distributed.
2. During the summer or other times when school is not in session, HSEMA and DHS should conduct exercises with the D.C. Public Schools to simulate the use of schools as shelters during crisis.
3. HSEMA and DDOT should seek to establish memoranda of understanding with the owners or operators of each of the 25 transportation pick-up points that identify specific sites for the District government’s use and set forth the procedures for activating the sites.
4. HSEMA and DDOT should conduct exercises to test their ability to activate the transportation transfer points quickly and effectively, with sufficient qualified drivers and vehicles to transport targeted numbers of people.

Agency Comments: In planning the 56th Presidential Inauguration, HSEMA, with the assistance of District agencies, federal agencies, and non-governmental partners, developed a shelter plan. The plan opened four shelters over the course of a week which were fully staffed and supplied with sufficient resources. The shelter contingency plan was capable of being expanded to shelter mass numbers of individuals, transport individuals to nearby shelters, including those with special needs, and feed them as well. Any new information gathered from the Inaugural Shelter Plan has been incorporated into the most recent version of the District’s Official Shelter Plan.

- **Managing Shelters:** The Department of Human Services requires a 1:10 ratio of staff to clients in a shelter. Shelters are staffed by trained individuals from the Department of Human Services, American Red Cross volunteers, and Serve DC volunteers. Upon request from HSEMA, the Department of Human Services is responsible for opening shelters and a trained individual from the American Red Cross will register and keep track of clients entering the shelter. The American Red Cross and Serve DC maintain automatic call-out lists that are capable of reaching volunteers throughout the region in an emergency, to supplement staffing.

- **Food:** The American Red Cross has a sufficient number of heater meals to feed 10,000 people immediately. If necessary, the American Red Cross can obtain up to 25,000 people within 5-10 hours by reaching out to National Capital Region resources. Heater meals do not require preparation.

Additionally, during the Inauguration, the Red Cross had the Southern Baptist Church from Virginia on call and prepared to provide 30,000 additional meals, if necessary.

- **Security:** Security at the District of Columbia Public Schools and recreation centers is provided by the Office of Property Management’s Protective Services Division (OPM/PSD) and Metropolitan Police Department (MPD). Two security guards must be present at each shelter initially, three security guards when capacity exceeds 100 clients, and four security guards when capacity exceeds 200 clients.

- **Special Needs Population:** Individuals with special needs have been accounted for in the Official Shelter Plan. HSEMA has coordinated with the American Red Cross to identify 50 schools and 26 recreation centers that could serve as shelters. All potential shelters are incorporated into a shelter list and included in the Official Shelter Plan. All 50 public schools and 26 recreation centers within the District have been surveyed by the American Red Cross and have received an ADA compliance ranking.

The ADA compliance levels are as follows: Level 1: fully accessible; Level 2: partially accessible; Level 3: not accessible. Of the 50 schools, seven schools received a 1. Six schools
received a 2. Thirty-seven schools received a 3. Twenty of the 26 recreation centers have been assigned an ADA Accessibility Number. Of those 20, 13 recreation centers received a 1. Five recreation centers received a 2. Two recreation centers received a 3.

During the Inauguration, the plan for special needs populations in an emergency was to direct individuals to transfer points located very close to the National Mall. The Department of Transportation intended to use shuttle buses and ADA accessible vehicles to return individuals to their final destination or to overnight shelters, if necessary.

- **Children:** At a shelter, the Red Cross designates an area of the shelter for families and women with children. If sheltering has the potential to last several days, the Red Cross has the ability to set up a recreation area. If children are unattended, DC Child and Family Services Agency will be contacted.

  During the Inauguration, the Metropolitan Police Department was tasked with reuniting lost children with their parents. Children were brought to a District police station and all children were reunited with their parents by the end of the day.

- **Pets:** The District of Columbia coordinated with the Department of Health to produce the Evacuation and Sheltering of Companion Animal Plan (August 2008). This plan addresses how companion animals will be handled in an emergency. Additionally, Dunbar High School has an underground parking lot that will be used to house pets during an emergency. The Department of Health, with assistance from the Washington Humane Society, will operate the pet shelter.

- **Essential Supplies and Equipment:** The American Red Cross and the Department of Human Services provide essential supplies and equipment for shelters, including cots and blankets. The Red Cross has access to 15,000 cots within the National Capital Region and the Department of Human Services has 600 cots available for immediate use.

  The American Red Cross has six trailers staged throughout the District, each filled with cots and blankets, in case of an emergency. This pre-deployment allows the Red Cross to have resources available throughout the District within a short period of time.

HSEMA is currently planning to participate in the American Red Cross’s full-scale exercise in April to test the Official Shelter Plan. Public schools will be opened and volunteers will participate in the exercise.

Additionally, the Inauguration provided an excellent opportunity to test the shelter plan. Four shelters were opened from January 17th-22nd, 2009, staffed, and prepared to take clients. Public schools were used as a shelter on the first day, and then recreation centers were used the following days. The use of the various types of shelters provided insight into how operations would occur at each type of shelter facility. HSEMA is drafting an after-action report that will include shelter operations and corrective actions will be incorporated into the Official Shelter Plan.
The District of Columbia’s Evacuation Plan routes are public information, however, transfer points are considered sensitive information and not all transfer points may be used in every emergency. With respect to agreements between the District and the transfer points indicated in the recommendation above, most of the 25 transfer points designated in the District Evacuation Plan are street locations or public facilities that the District retains the authority to access and control. HSEMA has started to create memoranda of understanding (MOU) with owners of various private transportation pick-up points although they have not been finalized. Oral agreements have been made to use some private facilities, but the agreements have not been memorialized. For example, during the Inauguration, facilities such as the Kennedy Center, The George Washington University, the Convention Center, and the Verizon Center all gave permission to use their facilities in case of an emergency. American Red Cross supplies were staged in or near these locations.

The 56th Presidential Inauguration provided a sound testing board for the evacuation and transportation resources within the District. HSEMA hosted an exercise two weeks prior to the Inauguration where approximately 20 individuals from District agencies reviewed how transportation resources could be effectively utilized and to determine the most accessible transfer points. Discussion points were incorporated into the Inaugural Evacuation Plan and the District Department of Transportation was designated as the lead for operating this plan. Routes, transfer points, qualified drivers and vehicles were identified, and individuals with special needs were accounted for in the plan. The plan was then tested during the Inauguration by pre-staging supplies, assets, and personnel at or near all of the transfer points.

Finding: HSEMA performance measures could be made more outcome oriented and should include independent assessments of performance.

Recommendations:
1. HSEMA should revise its performance measurement system to make its measures more outcome-oriented and to include independent assessments of performance.

Agency Comments: By law, HSEMA is required to have at least one performance measure for each significant activity. Beginning in FY2010, HSEMA is required to submit at least 3 key performance indicators (KPIs) for each objective, with at least one of these KPIs reflecting an outcome goal, and one reflecting an efficiency goal. This same requirement will apply for HSEMA’s divisional performance plans as well.

Finding: The District’s FY 2009 Operating budget allocates more than $300 million to Homeland Security, and more than 80 percent of this funding is in HSEMA operating budget. Almost all of HSEMA’s $250 million operating budget for FY 2009 reflect federal grants that HSEMA administers for the District Government and the National Capital Region. Local revenue for HSEMA operations, which total $4.7 million for FY 2009, has grown more slowly than local revenue citywide.
Recommendations:

1. The Mayor and Council should consider a local funds increase for HSEMA of at least $1 million in the FY 2010 operating budget, as the first step in a funding increase to be sustained throughout the next five-year budget and financial plan.

Agency Comments: The U.S. Department of Homeland Security has awarded a significant amount of funding over the past few years to the District of Columbia and to the National Capital Region through various homeland security related grant programs. DHS does not award these grants to individual agencies in a piecemeal fashion, but rather makes the grant award to a single entity that is responsible for distributing the funding to sub-grantees on behalf of the state or urban area. HSEMA is the State Administrative Agent for the District of Columbia and the National Capital Region, and administers homeland security grant funds on behalf of all District agencies and all National Capital Region jurisdictions and agencies.

Between FY2006 and FY2008, HSEMA received a total of $315,264,629 in federal homeland security grant funding (these are the funds that are in play during District fiscal year 2009). All of this was allocated to fund projects in other D.C. agencies or other NCR jurisdictions.

The agency's proposed FY 2009 budget is sufficient to meet the requirements of the activities and initiatives that it supports.

Finding: The Threat and Vulnerability Assessment (TVA) commissioned by HSEMA is not fully compliant with the Act. The TVA fails to assess actions already taken by the D.C. Government to protect the homeland, and offers only generic recommendations to enhance security.

Recommendations:

1. HSEMA should make periodic threat and vulnerability assessment an ongoing part of the District's homeland security program. Future TVAs should explore the dynamics of the major threats such as bioterrorism and conventional explosive in depth, assess the effectiveness of District policies and programs to mitigate risk, and include specific recommendations to reduce threats and vulnerabilities. For example, TVAs could assess the cost effectiveness of different options to improve intelligence analysis and production, critical infrastructure protection, explosive device response operations, and medical surge capacity.

2. Threat and vulnerability assessments should also relate issues of governance, communication, and coordination to the prevalence and mitigation of risk. For example, it would be useful for the TVA to assess how the presence of multiple law enforcement jurisdictions in the District of Columbia hinders efforts to prevent and respond to crises, and to offer recommendations about how to overcome obstacles to better communication and coordination.

3. Threat and Vulnerability Assessment should examine not only the possible threats or weapons of attack (such as bioterrorism, or chemical, nuclear, or radiological attack), but also should review possible delivery methods for terrorist attacks. The attacks of September 11, 2001 and the anthrax incidents in the fall of 2001 provide a vivid reminder that communication and transportation networks can be used by terrorists to enable and amplify their plans for destruction. The water and sewer system, other utilities, and modes of transportation should all be reviewed to help ensure...
that widely-used and interdependent systems for transporting people, goods, services, and information are protected.

Agency Comments: The Threat and Vulnerability Assessment (TVA) established a risk baseline, and the results of this assessment provided an empirically based understanding of the relative risk to assets in the area and the capability investments that should be emphasized to mitigate those risks. The assessment included recommendations for specific capabilities on which to focus in particular neighborhoods, and HSEMA has used those findings to focus near-term investment, including developing Investment Justifications for the FY09 DHS State Homeland Security Program.

Further, in December, HSEMA began to develop a process to conduct community-based threat and vulnerability analyses (TVA). This process will include publication of a risk management handbook, specialized training for all District employees with particular attention given to Emergency Liaison Officers (ELOs), provision of workplace and neighborhood risk consultations, and the development of an online vulnerability database to which District employees (and eventually the public) can contribute and track mitigation activities. The online vulnerability database will give particular attention to critical infrastructure such as transportation, water, sewer, and energy assets. The timeline for completion is late summer 2009.

Finding: The Annual Report to the Council provides valuable information but was submitted almost a year late.

Recommendations:
1. The Mayor should transmit the annual report on homeland security preparedness and capabilities to the Council on a timely basis.
2. HSEMA should include more detailed information on high-priority capabilities, such as medical surge capabilities, mass care, evacuation, shelter-in-place, and CBRNE detection, in future annual reports. The report should devote less attention to internal processes and focus more on the specific steps underway and future steps that will be taken to increase capabilities.


Finding: The District Government has a solid public information program, but faces the challenge of sustaining and reinforcing public interest and involvement.

Recommendations:
2. HSEMA should produce and distribute the evacuation guides for all eight wards.
3. HSEMA should feature the “Family Preparedness Guide,” “Transportation Tips During an Emergency Incident,” and “The Truth About Avian and Pandemic Influenza” on the emergency information center website (http://72hours.de.gov).
Agency Comments: On January 7, 2008 HSEMA unveiled a new emergency preparedness campaign to help residents better anticipate their needs in the event of an emergency. A new website, 72hours.dc.gov, allows District residents to create a customized plan to prepare for, respond to and recover from emergencies and disasters of all types. Several types of new emergency preparedness guides have also been published, including ward-specific evacuation guides and guides for families and children.

72hours.dc.gov is the new home of the Emergency Information Center (EIC) website. The site has been redesigned with new interactive features to make it easier for users to access information about preparedness, protective actions and local police, fire and health care facilities. The site helps citizens answer the question, “What would you do if a major disaster hit the District?” and advises them to take four simple steps to prepare for an emergency:

- Get informed
- Make a Plan
- Make an emergency kit
- Be aware

HSEMA has updated its flagship publication the Family Preparedness Guide. The updated guide expands on the information found in previous versions of the publication and includes more information about the types of emergencies that frequently occur in the District. The guide also has sections for children and people with special needs, along with information about volunteer opportunities during emergencies, including CERT (Community Emergency Response Teams) and Neighborhood Corps. The new family preparedness guide was distributed to every residence in the District in February 2008. HSEMA has completed the translations according to the Language Access Act of 2004 and will be printing the document in the coming months.

HSEMA developed ward evacuation guides to help residents of each of the city’s eight wards easily determine the closest and most direct route to use to evacuate their homes in the event they are directed to do so by city officials. In addition to evacuation routes, the Ward guides also contain information about the location of schools, hospitals, police and fire facilities and designated shelter locations in each ward as well as basic protective actions for common emergencies such as severe weather. Individuals can now go onto 72hours.dc.gov and map out their individual evacuation route out of the District.

To reach additional individuals and promote preparedness, HSEMA utilizes social network sites such as Facebook and Twitter. In the days leading up to the Inauguration, HSEMA posted information regarding street closures, access to the National Mall, prohibited items, and Metro schedules.

Finding: The District Government has implemented useful citizen training programs, but has not developed the neighborhood networks that could be invaluable in responding to a crisis.
Recommendations:
1. Serve DC should set the goal of developing a Neighborhood Corps for every community cluster in the District of Columbia, each with a minimum number of members, and should track the progress of each community in developing a Neighborhood Corps. Councilmember offices, Advisory Neighborhood Commissions, and civic associations should provide assistance in this effort.

Agency Comments: Serve DC augments HSEMA citizen training program by promoting disaster preparedness. This relationship has allowed over 3,500 citizens to be trained in the Community Emergency Response Team (CERT) initiative. Demonstrating the strength of that commitment, more than 350 CERTs assisted with inaugural activities, in addition to nearly 400 additional non-affiliated volunteers who received a basic level introduction to CERT and were encouraged to take the full length course following inauguration. CERT training provides practical knowledge of medical operations and triage, fire suppression, and psychological effects of a disaster.

The guiding principle with the neighborhood networks is that they be built by the neighborhood through a coalition of forces including, Advisory Neighborhood Commissioners (ANCs), community and civic leaders, the Mayor's Office for Community Relations and Services (MOCRS), and faith-based organizations. Some neighborhood groups have formed committees in accordance with this part of the plan. Serve DC also offers the Neighborhood Corps program to encourage community groups and CERTs to assume leadership roles during emergencies in their neighborhood. To date, over 100 individuals have been a part of the Neighborhood Corps Academy. Currently, Neighborhood Corps is being re-worked to offer customized, neighborhood-specific training to community groups. A staff member has been hired at Serve DC to devote their full time to this initiative.

HSEMA works with the communities to ensure that their work and the government’s efforts complement each other. HSEMA’s community outreach program has served as the lead in making sure communities and city agencies are supported in their activities around emergency preparedness. The outreach staff typically attends ANC community meetings to discuss preparedness, visits schools to review plans and also to speak with students and parents about disaster preparedness, sets up informational display tables at health and safety fairs across the city, and delivers emergency go-kits to seniors and individuals with special needs. Serve DC additionally rolled out the Commander Ready Program that to-date has educated nearly 1,000 students. This program is responsible for nearly 90% of students at participating schools creating a Family Preparedness Plan at home with their care-givers.

For example, HSEMA has initiated opportunities for Boy Scouts, and in the near future, Girls Scouts, to augment the community outreach program whereby they would assist with neighborhood outreach. This past summer, a District student assisted with HSEMA’s community outreach and, as a result, will achieve ranking as an EAGLE SCOUT this month (Feb. 2009). After meeting the HSEMA Director, touring the Emergency Operation Center, and receiving preparedness outreach training, this Boy Scout was able to deliver emergency preparedness presentations within the community and distribute emergency go-kits to seniors in the community. There is current interest for Girl Scouts to do the same. This is just one example of the networks that HSEMA is helping to establish in communities.

In addition, HSEMA’s outreach program supports faith communities in establishing volunteer teams at local mosques, synagogues, temples, and churches. HSEMA also partners with District agencies to offer
emergency preparedness information through the Metropolitan Police Department's All Hands on Deck crime-reduction program and the DC Fire & EMS's Save-U fire prevention program. Community groups have also responded at a moment's notice to neighborhood based emergencies such as water-main breaks, apartment fires, and remnants of tropical storms.

In 2009, HSEMA will continue to work with these organizational groups through information-sharing efforts (It's A Disaster: A Disaster Preparedness, Prevention, and First-Aid Manual, DC Ready Guide to Family Preparedness, pocket emergency plans, and additional Department of Homeland Security fact sheets and brochures); Serve DC training, and community outreach programs and table-top exercises to strengthen these neighborhood networks. HSEMA will also continue to lead the way with National Preparedness Month. In September 2008, The District hosted 77 events to increase citizens' readiness for any kind of emergency. In fact, FEMA commended the District for hosting the most events in the mid-Atlantic region.

Finding: The Community Emergency Management Plans developed by HSEMA are not well-tailored to neighborhood needs and circumstances.

Recommendations:
1. HSEMA should consider each community emergency management plan during the next cycle of revisions, and include specifics about neighborhood demography and housing patterns, infrastructure, possible threats, communication methods, and neighborhood resources. Community leaders and residents should be used as a resource in revising the plans.
2. HSEMA should include more information in the community emergency management plan on the locations (such as senior citizen residences) and special needs of senior citizens and people with disabilities, people with limited English proficiency, and people without a means of transportation.
3. HSEMA should test new approaches to involving resident in community exercises such as holding events in large apartment complexes or housing projects, and using tenant associations as a way to recruit participants.
4. The Office of Latino Affairs, the Office of Asian and Pacific-Islander Affairs, the Office of African Affairs, and the Office of Gay and Lesbian Affairs should assist HSEMA in recruiting participants for community exercises.

Agency Comments: HSEMA recognizes that its community plans, while well-tailored when drafted, need to be revised as the structure of many District neighborhoods has developed rapidly. As the neighborhoods continue to define themselves, HSEMA will revise the community plans accordingly. HSEMA is in the process of updating the existing 39 plans to meet the communities' unique needs more specifically. The revisions were temporarily stalled by the requirements of the Inauguration, issuance of the updated District Response Plan (DRP) and HSEMA's re-certification under the Emergency Management Accreditation Program (EMAP).

Finding: HSEMA has not met the requirement to develop and issue guidelines for a public employee security training program.
Recommendations:
1. HSEMA should develop and issue guidelines for the public employee security training program by the end of February 2009.
2. HSEMA should regularly track and update the lists of emergency liaison officers, and ensure that there are sufficient numbers of ELOs with proficiency in WebEOC for all of the emergency support functions (such as transportation, communications, public works and engineering, mass care, health and medical services).
3. HSEMA, with the assistance of other District government agencies such as the Office of the Chief Technology Officer, should establish a centralized data base that will track employees’ homeland security training and certifications, while alerting managers and employees when re-certification is necessary.

Agency Comments: As part of the TVA process mentioned in the first response, HSEMA is developing a public employee security training program that will be built around the role of public employees in reducing risk and enhancing resilience. HSEMA has developed initial materials that describe threats, vulnerabilities, consequences, risk and resilience, and culminate in the role public servants play. District employees will be encouraged to:
1. Be Personally Prepared
2. Help your Workplace Prepare
3. Encourage your Neighbors to Prepare

The curriculum will be based around these principles and will be delivered in person as well as online. The timeline for completion is of this initiative is also late summer 2009.

Moreover, HSEMA’s Training and Exercise Division made major strides by implementing a District employee training program for individuals working Inaugural events or within the Emergency Operations Center (EOC). All District employees involved in the Inauguration—from street sweepers to Emergency Liaison Officers (ELOs)—were required to complete a U.S. Department of Homeland Security-sponsored course on improvised explosive device (IED) awareness. Further, WebEOC and ELO training were required for all ELOs and continue to be conducted regularly.

HSEMA is currently reviewing off-the-self software that will create a centralized data base that will track employees’ homeland security training and certifications.

Finding: HSEMA has not met the requirement to develop guidance for building operators and managers to enhance the security of large commercial and residential buildings.

Recommendations:
1. HSEMA should develop and issue guidelines for large-building security by the end of February 2009. The guidelines should address building evacuation plans; sheltering in place; package and mail delivery; monitoring of garages, containers, and other structures outside of the main facility; surveillance options; means of contacting essential personnel; access control; employee identification; and emergency use of building air handlers and HVAC.
Agency Comments: As a result of the agency’s commitment to develop guidance for building operators and managers to enhance the security of large commercial and residential buildings, HSEMA is developing a new program to serve the particular needs of large building security. This program will include guidelines, ongoing communication on threat and vulnerability analysis, and training provided at no charge to those involved in building security, building management, and property risk management. Occasional reviews, in consultation with other agencies, will be implemented in order to determine periodic changes that may affect building security. The program is being developed in consultation with a number of stakeholders, including the private sector, to reflect their priorities and needs as well as the high-priority risks already identified for the District.

Finding: The District Government is not making sufficient use of the Homeland Security Exercise and Evaluation Program to promote continuous improvement in preparedness.

Recommendations:
1. HSEMA should make greater use of “No Notice” exercises that test officials’ readiness to report for duty immediately and fulfill the responsibilities they would face in crisis.
2. HSEMA should ensure that after-action reports are completed within one month after an exercise was conducted.
3. HSEMA should use the Emergency Preparedness Council as a forum for discussing and evaluating exercises, disseminating findings and recommendations, and monitoring implementation of corrective actions.

Agency Comments: In accordance with DHS mandates, all of HSEMA’s exercises follow the Homeland Security Exercise and Evaluation Program (HSEEP) guidelines. HSEMA’s adherence to HSEEP policy ensures objective assessments of capabilities so that strengths and improvement areas are identified, corrected and shared, as appropriate, prior to an incident.

Prior to the Inauguration, HSEMA entered all after-action reports (AARs) from the previous three years into US DHS’s Corrective Action Program (CAP) system. By so doing, HSEMA is using DHS’s HSEEP suite of tools to manage the most important output of exercises—the Improvement Plans. We will continue to use the system to track and analyze corrective actions in order to improve future outcomes.

Finding: HSEMA has not requested that private entities share information on best practices to prevent, mitigate, respond to, and recover from a terrorist or other security incident.

Recommendations:
1. HSEMA should synthesize available information about best practices in private sector vulnerability assessment and mitigation efforts and disseminate this information to private organizations and trade associations.

Agency Comments: “Request[ing] the voluntary sharing of information from private entities on best practices for preventing, mitigating, responding to, and recovering from a terrorist or other security incident” would pose significant challenges for HSEMA. That information is considered sensitive, and HSEMA’s collection of such sensitive information from private entities would subject the information to
public disclosure. Releasing such information would at best increase the District's risk, and at worst serve as a handbook for members of the public looking to target the city's vulnerabilities. As HSEMA's function is to prevent exactly that kind of threat, holding HSEMA to a transparency standard would result in less information-sharing; even if HSEMA requested it, partners would be reluctant to provide it. This would result in a less-informed HSEMA, and a more at-risk District. HSEMA agrees with the Council Auditor's recommendation to revise Section 209 of the Homeland Security Act to allow HSEMA to provide private entities with information regarding best practices for prevention, mitigation, response, and recovery from a disaster.
AUDITOR’S RESPONSE TO AGENCY COMMENTS

The Auditor appreciates the constructive and informative comments on a draft of this report provided by the Homeland Security and Emergency Management Agency (HSEMA). The Auditor made revisions to the final report based on these comments and also offers the following response to the agency comments.

1. In response to HSEMA’s comments about the collaborative efforts involved in planning for the January 2009 presidential inauguration (p. 1 of HSEMA comments), the Auditor noted in the final report the inter-governmental planning and cooperation that led to a successful event without any arrests or life-threatening injuries or illnesses. The Auditor further recommended that the executive branch capitalize on this experience by reviving the inter-agency Emergency Preparedness Council as a policymaking and oversight body for homeland security initiatives.

2. The Auditor incorporated many of the points regarding shelter, transportation, and mass care from pp. 3-5 of HSEMA’s comments.

3. Although HSEMA contended on p. 6 of its comments that, “The agency’s proposed FY 2009 budget is sufficient to meet the requirements of the activities and initiatives that it supports,” the Auditor remains concerned about the adequacy of HSEMA’s local funds budget. Despite the large amounts of federal homeland security grant funds that are administered by the District government, HSEMA officials estimated that a relatively small share of federal grant funding ($12.7 million in FY 2009) will be directly used by HSEMA. As the District’s lead agency for homeland security, HSEMA has greatly expanded responsibilities and ongoing challenges in planning, threat and vulnerability assessment, training and exercises, community emergency management planning, sheltering and mass care, outreach to the private sector, and critical infrastructure protection.

4. Most of the points regarding public information and involvement (pp. 7-8 of HSEMA comments) were already included in the draft report, and remain in the final report.

5. Based on HSEMA’s comments on the homeland security exercise program (p. 12), the Auditor has revised the final report to clarify that HSEMA is using a new tracking system provided by the U.S. Department of Homeland Security to track the implementation of recommendations that emerge from homeland security exercises.