



**Snohomish County
Auditor's Office**
Performance Audit Division

**AUDIT OF SNOHOMISH COUNTY
DEPARTMENT OF EMERGENCY MANAGEMENT**

Final Report

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LIST OF EMERGENCY MANAGEMENT ACRONYMS

CBPI	Capabilities-Based Planning Instrument, Homeland Security
CC/CERT	Citizen Corps/Citizen Emergency Response Teams
CEMP	Comprehensive Emergency Management Plan (DHS calls this the EOP)
CERT	Community Emergency Response Team
CFR	Code of Federal Regulations
DEM	Department of Emergency Management, Snohomish County
DHS	Department of Homeland Security (also HS and HLS)
DIS	Department of Information Services
EMAP	Emergency Management Accreditation Program
EMD	Emergency Management Division of Washington State
EMPG	Emergency Management Performance Grant
EOC	Emergency Operations Center
EOP	Emergency Operations Plan (Snohomish County's is called a CEMP)
ESCA	Emergency Services Coordination Agency (Lynnwood, Mountlake Terrace, Edmonds, Mill Creek, Brier, Woodway, and Mukilteo)
ESF	Emergency Support Functions
FEMA	Federal Emergency Management Agency
HAZMAT	Hazardous Materials
HIVA	Hazards Identification and Vulnerability Analysis for Snohomish County (2000)
HLS	Department of Homeland Security
HIS	Homeland Security Institute
HS	Department of Homeland Security
ICS	Incident Command System
ILA	Inter-local Agreement
JIC	Joint Information Center
LEPC	Local Emergency Planning Committee
LETPP	Law Enforcement Terrorism Prevention Program
MAA	Mutual Aid Agreement
MOU	Memorandum of Understanding
MRC	Medical Reserve Corps
NIMS	National Incident Management System
NRP	National Response Plan
ODP	Office for Domestic Preparedness
RACES	Radio Amateur Civil Emergency Services
RCW	Revised Code of Washington
SCNHMP	Snohomish County Natural Hazards Mitigation Plan
SOG	Suggested Operating Guideline
SOP	Standard Operating Procedure
UASI	Urban Area Strategic Initiative
WAC	Washington Administrative Code



1 INTRODUCTION

1.1. *Summary of Results*

Snohomish County Department of Emergency Management (DEM) has a solid foundation as well as areas to improve. DEM is charged with protecting human life, property, the environment, and the region's economic health in the event of an emergency in Snohomish County. The Executive requested this performance audit to assist them in identifying and rectifying long standing organizational issues at DEM. Snohomish County assumed leadership of DEM on January 1, 2006. The audit team identified 90 criteria for high performing emergency management entities. DEM met or partially met 80% of these criteria.

DEM is focusing on making organizational, management, and staffing improvements. Deficits in these areas could result in not being able to effectively complete important emergency management objectives. In order to enhance these areas, recommendations include a comprehensive strategic planning process, systems to ensure achievement of objectives, redesign of office structure and staffing, development and maintenance of appropriate documentation, and a focus on technology.

DEM is in compliance with most applicable laws and regulations. When laws and regulations are not met there is a risk of ineligibility for grant or other funding or liability for the County. Full compliance with laws and regulations should be a priority for DEM.

DEM implementation of the National Incident Management System (NIMS) is partially complete. NIMS implementation is required for continued federal preparedness funding. Federal guidance states that some NIMS components should be implemented by a September 2006 deadline. The state has agreed to extend compliance on some NIMS components to 2007.

DEM should improve disaster preparedness planning. Developing and practicing effective preparedness plans is required by the state and the federal government. Planning helps ensure that DEM will effectively and efficiently respond to emergencies, thereby minimizing loss of life and property. Recommendations in this area include alignment of DEM activities with local hazards, development and updates of planning documents, planning and documentation of training, and focus on communication with stakeholders.

DEM largely manages grant processes effectively, but needs improvement in some areas. Grant management is critical to DEM's disaster preparedness to ensure that DEM retains current dollars and remains eligible and competitive for future grant funding. 70% of DEM's budget is from federal grants. Recommendations include improved monitoring of equipment purchased with grant money passed on to others; a



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centralized grant filing system; and continuous monitoring of grant objectives, reporting requirements, and grant completion activities.

Snohomish County is working toward sufficient planning for continuity of government operations. It is important to ensure continued functioning of government activity in the case of an extended emergency. The County should focus on development of countywide continuity planning.

1.2. Government Auditing Standards Compliance Statement

This audit was performed in compliance with Government Auditing Standards (GAS) for Performance Audits.

1.3. Background

Emergency managers must effectively analyze, plan, and coordinate resources that help prevent, prepare for, respond to, and recover from the effects of emergencies¹ in our region. Snohomish County Department of Emergency Management (DEM) is charged with protecting human life, property, the environment, and the region's economic health in the event of a disaster.

Emergency management agencies have seen an increase in program requirements and grant funding for terrorism-related preparedness activities from federal and state governments following 9/11 and Hurricane Katrina. Some report that although many of the capabilities overlap, the federal funding directed specifically for terrorism has reduced emergency management entities' available grant dollars to prepare for natural and accidental emergencies. Emergency management and disaster preparedness, including continuity of operations (COOP), became an important consideration for all businesses, nonprofits, governments, and the general population following these events.

Snohomish County's DEM has undergone organizational changes as the agency transitioned from an independent entity led by a Director with a board made up of member cities and the County to a department within County government advised by the member cities. DEM currently reports directly to the County Executive's Office.

Shortly after the County integrated DEM operations, the Executive's Office requested a performance audit to determine DEM's status and how to achieve improved disaster preparedness. Many findings in this audit stem from opportunities for improvement that were present before DEM became a County department.

¹ "Emergencies" are natural or human-caused events.



1.4. ***Auditee Strengths and Challenges***

After the audit investigation period was completed, the Executive's Office hired a new Director of DEM who has emergency management experience to head the department. The new Director reports that he is moving quickly to make positive changes to DEM. Please review DEM's formal response letter in Section 4 for detail about these changes.

DEM's Strengths:

- Despite transition and uncertainty, DEM staff members are focused on performing to the best of their abilities.
- County departments² are improving DEM's legal documentation, procurement practices, vehicle acquisition and maintenance, and property management functions.
- Regional emergency management departments have strong relationships with Snohomish County DEM.
- DEM's Snohomish County Strategy Committee is a regional disaster preparedness group that other jurisdictions have emulated.
- DEM is prepared to manage floods, hazardous material spills, terrorism, and weather related incidents.
- DEM staff are focused on improving internal controls to ensure accomplishment of County and organizational objectives.

Challenges facing DEM:

- Staffing has become a difficulty for DEM. The previous DEM Director made an informal commitment to remain at DEM through the transition, but this did not occur. Shortly after DEM became a County department the Director, an Emergency Coordinator, and two experienced Homeland Security (HLS) Coordinators left DEM for other opportunities. Three positions were already vacant at the time of the transition.
- Previous management compartmentalized staff rather than fostering a team approach, increasing the impact of staff losses.
- Frequently changing state and federal requirements and guidelines are complex, time-consuming and often conflict.
- Significant staff turnover at Washington State's Emergency Management Division has made communication difficult.
- The grant landscape is constantly shifting, including grant standards and funding streams, making it difficult to formulate policies and procedures for grants management.

² Finance, Facilities, DIS, Human Resources, and Public Works.



1.5. Objectives, Scope and Methodology

The audit team evaluated the status of DEM during the audit period, April through June 2006, with past data for reference. Grants were evaluated for 2005 and part of 2006. The objectives of this DEM audit are shown in Figure 1.5.1.

Figure 1.5.1 DEM Audit Objectives

Objective	Section Number
Determine if DEM is organizationally structured, staffed, and administered to execute emergency management functions most effectively.	2.1
Determine if DEM is complying with applicable laws and regulations.	2.2
Evaluate NIMS implementation and adequacy.	2.3
Determine whether DEM has sufficient emergency management plans and capacity to successfully direct, control and coordinate a response to disaster events.	2.4
Evaluate whether DEM effectively manages grants and contracts.	2.5
Determine if plans for continuity of government operations are sufficient and ensure adequate response in the case of an emergency.	2.6
Analyze DEM operations based on best practices, standards, performance measures.	Throughout

To obtain this information the DEM Audit Project Team:

- Conducted over 80 interviews with:
 - ✓ County staff
 - ✓ Member Cities
 - ✓ Regional emergency management partners
 - ✓ Emergency management professionals and staff in other jurisdictions
 - ✓ State and federal emergency management staff
- Observed DEM daily functions
- Visited several emergency operations centers in the region
- Evaluated DEM facilities
- Reviewed over 110 documents from:
 - ✓ DEM
 - ✓ Other jurisdictions, federal, and state entities
- Identified best practices



1.6. Notes

Auditee Communications

Interim reports and other early communications regarding audit findings were forwarded to DEM to allow the department to begin to resolve issues in a timely manner. Limitations in internal controls and other DEM performance audit findings are detailed in the Focus Issues and Recommendations that follow in Section 2.

Assessment Charts

Throughout this document summary charts identify the criteria against which we compared DEM's plans, processes, and functioning. Figure 1.6.1 describes what these assessments mean:

Figure 1.6.1 Compliance Rating Key

Green Rating	Yes	The Performance Auditor believes that DEM has met requirements.
Yellow Rating	Partial	The Performance Auditor believes that some requirements are met, but that additional DEM attention is needed in this area.
Red Rating	No	The Performance Auditor believes that requirements have not been met and DEM should address this area.

Data

Since a number of staff left DEM over the past six months, it is difficult to guarantee that the auditors had access to all relevant information and documentation. There may be instances in which we reported that an item was not present when, in fact, it simply could not be located. Current DEM staff members worked hard to provide the auditors with documentation that were needed to complete our audit while meeting their responsibilities for critical emergency management functions as well as covering other duties for vacant staff positions.

State Audit

The Washington State Auditor's Office recently conducted two audits of DEM including a review of DEM's grant procedures. DEM and the Executive's Office have taken action to correct the issues identified. The objectives of the State Auditor's engagements were different than those covered in the Performance Audit Division DEM Audit; our audit team did not further review these issues.



2 FOCUS ISSUES AND RECOMMENDATIONS

2.1 *DEM is focusing on making organizational, management, and staffing improvements to execute emergency management functions effectively.*

Sub-areas in this section:

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2.1.1 DEM's Compass

Critical Change Element	In Place at DEM?
Communicating Need	Yes
Strategy and Plan	No
Support	Yes
Resources	No
Performance Measurement	No

A successful compass for DEM will lead to effective organizational change resulting in improved planning, support, resources, and performance.

DEM has been in a state of flux for many months. Management experts state that in order to effectively implement change and improve their ability to execute disaster preparedness functions DEM must:

1. Communicate the need for change
2. Have sufficient strategy and planning
3. Have internal and external support
4. Have adequate financial and staff resources
5. Measure performance

Communicating the Need for Change

The need for change within DEM has been communicated to staff, stakeholders, and Snohomish County leaders. There is general agreement that actions will need to be taken to ensure that DEM is an efficient and effective department. There is broad support for change.



Strategic Planning

Transition planning took place prior to the County assuming leadership of DEM; however, sufficient strategic planning has not taken place since then. There is no documentation of strategy and verbal communication of strategic plans and objectives is not cohesive. Strategic planning provides a short and long term roadmap that helps DEM meet its goals. Without a plan DEM has primarily focused on issues needing immediate attention rather than meeting objectives.

Support

DEM has begun to increase communication and outreach to stakeholders but could make improvements. Communication and teamwork is critical to successful handling of emergencies. Without sufficient collaboration, DEM could encounter barriers during an emergency when decisive action is required. Examples of relationships that should be monitored to ensure effective communication and collaboration are:

- Snohomish County Government³
- Member Cities
- Regional Emergency Management Entities
- Community Partners
- Washington State Government
- Federal Government
- General Public
- Media and the Press

Resources

Additional resources are needed to support DEM in its efforts to become a highly effective organization. These resources include staff, equipment, and infrastructure. Both the County Executive and Council have indicated their desire to successfully integrate DEM into Snohomish County and are willing to review the needs of the new department.

Performance Measurement

Snohomish County DEM has not developed performance measures. The emergency management function should have meaningful and useful performance measures. Emergency Management Accreditation Program ([EMAP](#))⁴ standards advise that entities should establish performance objectives for all program elements and conduct periodic evaluations.

³ Executive, Council, Departments, and Offices.

⁴ For details on EMAP see Section 2.2 “Other Standards and Tools”



Recommendation 1:

DEM leadership should undertake a strategic planning process and document the results. The strategic plan should include development of performance measures linking activities to goals and objectives, as well as address resources.

2.1.2 DEM Objective Achievement (Internal Controls)

Critical Element	Control Sufficient at DEM?
Policies	No
Training	Partial
Information Management	Partial
Culture	Partial

Achieving DEM objectives will lead to a more efficient and effective emergency management program for Snohomish County.

Weaknesses in internal controls⁵ have led to the inability of DEM to achieve its objectives. Internal controls are required components of an overall environment of effectiveness. The implementation of internal controls is a process that occurs over time. There are four primary ways to ensure goal achievement, by implementing strong:

1. Policies and Procedures
2. Training
3. Information Management
4. Culture

Policies and procedures at DEM often do not exist and in some cases are in need of revision. Staff training and skill sets are not evaluated and there are no short- or long-term training plans set. Information management is not structured, clear, or reliable. DEM office culture does not fully support DEM’s successful attainment of goals. These issues are addressed in more detail later in this report.

Important objectives when designing and evaluating internal controls include the following:

- Staff members should understand DEM’s mission and how they contribute to it.
- Staff members should understand their individual objectives and how they fit with larger DEM objectives, including cross training of individuals inside and outside of emergency operations.
- Staff members should understand the policies that affect their actions.
- Performance targets should exist.

⁵ The term “internal controls” as defined by *Guidance on Control* is used to describe elements of an organization (including resources, systems, processes, culture, structure and tasks) that, taken together, support people in the achievement of the organization’s objectives.



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- Staff members should understand what they are accountable for, responsible for, and authorized to do.
- Critical decisions should be made by people with the necessary expertise, knowledge and authority.
- DEM should have the right people, skills, tools and resources.
- Individual staff actions should be coordinated with one another effectively.

Recommendation 2:
DEM leadership should design and implement internal controls to ensure that DEM objectives are met.

2.1.3 Organizational Structure

Structure Element	Present in Current DEM Structure?
Departmental Flexibility	No
Big Picture and Detail Orientations	Partial
Teamwork and Communication	Partial

Appropriate organizational structure will ensure that DEM actions are responsive to emerging needs, efficient, and effective.

There are as many organizational structures in emergency management as there are agencies. There is no clear best practice, although any structure that is implemented should do the following:

1. Facilitate departmental flexibility and responsiveness
2. Ensure that both the big picture and the details are addressed
3. Facilitate effective teamwork and communication

DEM could be structured in a variety of ways depending on how the mission, vision, purpose and responsibilities are interpreted. DEM could structure around:

- Function
- Funding
- Incident Command Structure
- Flexible Team Structure

Departmental Flexibility and Responsiveness

Emergency management requires quick assessment of problems, evaluation of resources, and creative coordination and deployment of those resources. Current DEM job descriptions are quite specific to the work to be performed. In some cases this is necessary, but generic position titles such as “Program Manager” instead of “Homeland



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Security Program Manager” will allow DEM to be more responsive to changing needs and environments. For example, Homeland Security grants may not be a permanent funding source for DEM. Broadening job descriptions would also encourage staff to understand all DEM responsibilities since projects could be redistributed at any time.

Big Picture and Detail Orientation

DEM has not sufficiently attended to the broad, strategic issues that they face. When fully staffed, the duties of Director, Deputy, and Division Manager should be primarily focused on the big picture of emergency management. Staff members with this broad view are responsible for ensuring that appropriate plans are in place and that Snohomish County and stakeholders understand their roles and how they fit into the local, regional, and national context of emergency management. Staff members with specific emergency management skill sets are also needed to address the operational activities of DEM. Cross-training should occur between these two perspectives to strengthen teamwork and flexibility.

Teamwork and Communication

The current structure of DEM does not lend itself to functioning as a team. Job descriptions and operational duties are compartmentalized. Team processes and structures are not yet institutionalized. Due to current position vacancies, staff members have worked together more closely but it is not clear how these positions will interrelate when these vacant positions are filled. A specific structure and continued focus on teamwork and communication is needed to combat the historic tendency toward compartmentalization.

Recommendation 3:

DEM leadership should redesign job descriptions and the organizational structure to ensure that DEM:

1. Is flexible and responsive
2. Includes both big picture and detail orientations
3. Integrates teamwork and communication



2.1.4 Adequate DEM Staffing

Staff Area	Sufficient Staffing at DEM?
Comparability to Region	No
Grants	No
NIMS	No
CEMP/SOG	No
Technology	No

Adequate staffing levels will allow DEM to meet or exceed its mission, goals and objectives and become a highly functioning emergency management agency.

Lack of staff at DEM has led to insufficient coverage of important issues. Some of the needed staff could be secured on a project basis and volunteers could be effectively used to accomplish project-specific tasks or administrative functions.

Comparability to Region

Regional emergency management entities vary widely in the grant and general funding at their disposal to build a department. At 9 FTEs⁶, DEM has significantly fewer staff compared to the average staffing level for the region. If DEM was staffed according to the regional average⁷, they would have 14 FTEs funded by a combination of grant and general fund dollars. See [Appendix C](#).

Grant Supervision

Additional resources focused on grant administration are needed at DEM. In the last six months, eight different staff members have worked on various aspects of grant management at DEM. Many have insufficient grant experience and there have been errors and inefficiencies identified in grant management and reporting. Past DEM leadership did not have sufficient grant experience or the time to effectively supervise the complex funding that DEM applies for, receives, and distributes. Other jurisdictions use a combination of grant monies and general funds to fund specialized grant administrator positions.

NIMS⁸ Compliance Coordination

DEM should give considerable attention to NIMS compliance coordination to meet NIMS requirements by September 2006 and additional requirements in 2007. Failure to meet these requirements may make the County ineligible for further grants from the Department of Homeland Security. Other jurisdictions have had to apply additional resources in order to gain compliance and have dedicated staff specifically to NIMS coordination and implementation.

⁶ 5 of these FTEs are general funded, 2 are grant funded, and 2 are regional staff.

⁷ Staff members per population served is 1:26,988.

⁸ NIMS, the National Incident Management System, is described in detail in its own section below.



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CEMP and SOG Update Coordination

DEM should focus on updating the Comprehensive Emergency Management Plan (CEMP) and the Suggested Operating Guidelines (SOGs); this will require significant staff resources. The Snohomish County CEMP is a critical emergency management planning document. This document must be reviewed every two years and updated in 2007. DEM is also responsible for assisting member cities with CEMP updates.

Technology Coordination⁹

DEM would benefit from information technology expertise. The public's technology interface with DEM is very important. A large number of people can be reached through the web economically compared to other types of public information campaigns. DEM's website is in need of significant improvement, expansion and ongoing attention. In addition to providing the public with vital emergency preparedness and response information, the web could help facilitate online CERT and NIMS training, which is an effective tool to train large numbers of people while reserving DEM staff time for other tasks.

DEM has purchased a resource coordination and emergency management communications system called "WebEOC," that is not fully implemented due to the need for a qualified staff person to oversee its use. A number of local jurisdictions have found WebEOC to be a useful integrated information management tool, though it is a system that can be labor intensive to maintain. DEM intends to fully implement WebEOC when resources allow.

Recommendation 4:

DEM leadership should ensure that DEM is adequately staffed to achieve its objectives.

⁹ Technology issues are described in more detail in Section 2.1.6.



2.1.5 Documentation

Required Documentation	Adequate in DEM?
Vision, Mission, Enabling Authority	Yes
Program Goals and Objectives	Partial
Strategic Plan	No
Policies and Procedures	No
Authorities, Legislation, Regulation, Codes of Practice	Partial
Budget, Project Schedule, Milestones	Partial
Required Plans	Partial

Documentation is required by state and federal agencies, and is vital in emergency management planning. With appropriate documentation, DEM will be able to meet national emergency management requirements and institutional memory is retained if staff members change.

Although DEM has generated some program documentation, there has not been an agency-wide culture of documentation to date. Documentation is critical to emergency management functions and is required to meet standards. EMAP states that:

- The entity shall have a documented program that defines the following:
1. Executive policy including vision, mission statement, and enabling authority
 2. Program goals and objectives
 3. Program plan (strategic plan) and procedures
 4. Applicable authorities, legislation, regulation, and/or industry codes of practice
 5. Program budget, project schedule, and milestones

Vision, Mission, Enabling Authority

Review of the Mission and Vision statements on the website is needed. There are two primary ways that emergency management organizations see their role, strategic or tactical. Strategic entities act as coordinators of information and resources during an emergency while tactically focused entities provide a field presence and are active on the ground during an emergency. Emergency management experts state that the strategic approach is most appropriate and in our region the larger counties have this focus. The current text of DEM's stated mission, purpose, and responsibilities lean toward a strategic approach, however many of DEM actions during emergencies are tactical. Effective vision, mission, and enabling authority are important to ensure that DEM is focused and efficient and continues to meet their mandate. This documentation also communicates purpose and direction to those external to DEM.

Program Goals and Objectives

The Purpose and Responsibilities published on the DEM website could be construed as Goals and Objectives, but would benefit from being reviewed and revised for completeness. Goals and objectives would assist DEM in linking their activities back to



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their mission. With the vast array of emergency management activities that could be undertaken, goals and objectives will assist DEM in ensuring that they effectively prioritize their activities.

Strategic Plan

There is no documented strategic plan for DEM. There is a regional Homeland Security Strategic Plan that does not address DEM strategic issues specifically. Strategic planning is discussed in more detail in Section 2.1.1.

Policies and Procedures

There are few policies and procedures in place at DEM, although DEM is now subject to applicable County guidelines. Those that are documented would benefit from being revised and updated to improve their effectiveness. Policies and procedures would help to ensure that activities occur in the way that they are intended and that goals and objectives of DEM are met.

Authorities, Legislation, Regulation, Codes of Practice

Many DEM staff members were able to identify laws and regulations that apply to DEM functions; however, these laws and regulations are not listed in DEM's program documentation and it was not clear that compliance was tracked. When compliance with laws, regulations, and standards are monitored it makes it more likely that DEM will retain funding, credibility, and support.

Budget, Project Schedule, Milestones

A record is kept of DEM's budget; however, there is no documentation of projects, schedules or milestones. Documentation of these issues would help to ensure that projects moved forward efficiently and deadlines are met.

Emergency Management Plans

DEM needs to ensure that sufficient disaster preparedness plans are in place. Figure 2.1.1 lists a number of the required and recommended emergency management plans for local jurisdictions and indicates whether DEM has the plan on file. The audit team conferred with Washington State EMD who reported that the list below appears to be comprehensive. DEM can utilize the chart below to determine where to improve their planning documentation.



Figure 2.1.1 Disaster Preparedness Plans

Plan Name	What authority recommends or requires the plan?	On File at DEM?
Comprehensive Emergency Management Plan (CEMP)	NIMS HSPD-5 WAC 118-30-060 RCW 38.52	Yes
Hazards Identification and Vulnerability Analysis (HIVA)	WAC 118-30-060	Yes
NIMS Implementation Plan	NIMS HSPD-5	Yes-not current
Hazards Mitigation Plan	CFR 44.201.6 DMA 2000	Yes
Suggested Operating Guidelines	NIMS HSPD-5	Yes-not current
Public Information Policy and Plan*	NIMS HSPD-5 EMAP	No
Hazardous Materials Response Plan	WAC 118-40-170	Yes
Homeland Security Strategy Plan	2005 EMPG scope of work	Yes
Emergency Communications Plan	2005 EMPG scope of work EMAP	No
DEM Strategic Plan	2005 EMPG scope of work	No
Recovery Plan	EMAP	No
Continuity of Operations Plan	EMAP RCW 42.14	No

*DEM reports that the NIMS Implementation Center will distribute a template for Public Information Policies and Plans in October 2006.

Recommendation 5:

DEM leadership should develop and update documentation according to legal requirements and strategic priorities.



2.1.6 Technology

Required Documentation	Adequate in DEM?
Web Site	Partial
Information Management	Partial

Effective use of technology will provide emergency responders and the public with important information about emergency activities and preparedness. In addition, improvements in DEM's information management will lead to a more efficient agency.

Web Site

DEM's website is not accurate or effective, and although some improvements have recently been made, a more user-friendly format may improve it. A number of jurisdictions have extensive websites where the public has easy access to emergency management information. An informative website is an important public service.

Problem areas include:

- When "Snohomish County Emergency Management" is searched on a popular search engine, you are routed to a defunct website.
- The old website for DEM (prior to County involvement) is still active and contains out-of date information including staff, email addresses, training schedules, and other dated public information.

Information Management

Improvements in DEM's management of information would increase efficiency and effectiveness of DEM operations. DEM currently tracks information in paper binders and on multiple spreadsheets that are not linked to one another.

Developing and implementing a comprehensive database would:

- Provide a central repository for information
- Provide a structured system for collecting information
- Serve as a communications tool
- Streamline the data collection and reporting process
- Facilitate analysis in order to make data-driven decisions
- Make data readily accessible to all authorized users

Storing information in a database would also allow information to be imported into WebEOC. Fully utilizing WebEOC would give DEM the capability to access resource information, GIS maps, and satellite images and share data with other jurisdictions in real time. DEM reports that there are barriers to full use including firewalls and other information technology issues.



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Recommendation 6:

DEM leadership should ensure that an effective and informative website is developed and maintained and that technology is appropriately incorporated into DEM operations.



2.2 DEM is in compliance with most applicable laws and regulations.

Guidance	DEM in Compliance?
HSPD-5, 7, 8	Partial
DMA 2000	Partial
WAC 118-30-060	Partial
WAC 118-30-070	Not Enforced
WAC 118-40-160	Yes
WAC 118-40-040	Yes
WAC 118-40-170	Partial
RCW 38.52.070	Yes
SCC 2.36	Yes

Complying with applicable laws and regulations makes DEM eligible and competitive for federal and state emergency preparedness funding, will decrease Snohomish County’s vulnerability to disasters by having appropriate plans in place, and will allow DEM to function as an independent Emergency Operations Center.

DEM must balance resources in complying with requirements and recommendations to best achieve strategic goals. Emergency management leaders agree that it is one of the primary challenges of emergency management entities to stay abreast of and in compliance with the many expectations of federal, state, and local governments.

EMAP states that programs should comply with laws, regulations, and other directives and states that strategies should be implemented for recommending legal revisions.

Federal

Homeland Security Presidential Directives 5, 7, 8 (HSPD-5, HSPD-7, HSPD-8)

HSPD-5: DEM is currently working toward meeting the NIMS¹⁰ requirements set out in HSPD-5 for 2006 and is communicating with the Washington State EMD for guidance on meeting future compliance requirements. This directive requires state and local jurisdictions to implement NIMS to receive federal preparedness funding.

HSPD-7: This directive requires identification and protection of critical infrastructure. DEM’s Critical Infrastructure Sub Committee has identified the County’s critical infrastructure and is waiting for additional funding to determine necessary protection measures.

HSPD-8: DEM’s activities do not fully align with HSPD-8 requirements. This directive is a companion to HSPD-5 but focuses on mitigation and preparation for response to

¹⁰ Section 2.3 reviews NIMS in more detail.



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terrorism. It discusses the National Preparedness Goal and requires that federal funding be based on implementation of strategies that reflect this goal.

Disaster Mitigation Act of 2000 - Public Law 106-390

DEM is in partial compliance with DMA 2000. This legislation reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide. It is aimed primarily at the control and streamlining of the administration of federal disaster relief and programs to promote mitigation activities. It requires that a Hazards Mitigation Plan be developed and submitted to the state for federal approval. DEM and Surface Water Management (SWM) developed the Snohomish County Natural Hazards Mitigation Plan (SCNHMP) in 2003-2004, and the plan was approved in 2004. FEMA may recover awarded funding or deny future funding if mitigation commitments are not fulfilled.

State

WAC 118-30-060 Emergency plan.

DEM is in partial compliance with WAC 118-30-060. This WAC requires that emergency management entities develop and maintain a current plan of operations based on a hazard analysis. The CEMP cites the 2000 Hazard Identification and Vulnerability Analysis (HIVA) as the basis for determining which emergencies and disasters are likely to occur in Snohomish County. A complete emergency management plan should include hazard-specific annexes or appendices.

WAC 118-30-060 also requires that DEM's emergency plan contain specific functional concepts. All of the required functional concepts can be found in DEM's CEMP and ESFs. The WAC specifies that the CEMP shall be updated and reviewed at least once every two years. However, Washington State EMD endorses an annual review and four-year update cycle. DEM is not maintaining the plan on an annual basis, but is complying with the four-year update cycle.

WAC 118-30-070 Program papers.

Although it is not being enforced across the state, this WAC requires that an Emergency Management program paper be submitted annually to the state. The state has not enforced this requirement with any emergency management entities and DEM has not submitted this documentation.

WAC 118-40-160. Local emergency planning committee—Organization, membership.

DEM is in compliance with WAC 118-40-160. Each local planning committee shall submit annually a list of membership and organizations they represent to the state emergency response commission. DEM reports that they submit this list annually.

WAC 118-40-040 State emergency response commission—Establishment, membership, chairperson.

DEM is in compliance with WAC 118-40-040. The WAC states that the chief elected official of the local planning district shall appoint a local emergency planning



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committee. Snohomish County has a local emergency planning committee (LEPC) in place.

WAC 118-40-170 Local emergency planning committee—Responsibilities.

DEM is in partial compliance with WAC 118-40-170. This WAC states that the LEPC shall complete the preparation of a hazardous materials emergency response plan. It should be reviewed and updated annually. Snohomish County's Hazardous Materials Emergency Response Plan was completed in November of 2003 and updated in 2005, but had not been updated annually.

RCW 38.52.070¹¹ Emergency management. Local organization and joint local organizations authorized

DEM is in compliance with RCW 38.52.070, that states that local CEMPs must be submitted to the state and specify the use of the incident command system for multiagency/multijurisdiction operations. Snohomish County has submitted their CEMP to the state, and it identifies the incident command system.

Local

SCC 2.36 Emergency Management, Advisory Board Established.

DEM is in compliance with SCC 2.36. This code states that the advisory board shall be established and composed of one member from each city, town or tribe that contract with the County through an interlocal agreement for emergency management services. DEM's advisory board meets these requirements.

¹¹ DEM staff, volunteers, and activities may be protected from legal liability under the authority of RCW 38.52.180 and Hauber v. Yakima County, 147 Wn.2d 655 (2002).



Other Standards and Tools

Standard/Guideline	Integrated at DEM?
NIMS	Partial
EMAP	Partial
National Response Plan	Partial
Nat'l Preparedness Goal	Partial
CBPI	Partial

National Incident Management System (NIMS)

DEM is in partial compliance with NIMS guidelines. NIMS is a comprehensive system that will improve response operations through the use of standard procedures and preparedness measures. NIMS also promotes cross-jurisdictional, statewide and interstate regional cooperation and coordination during large scale incidents. NIMS is discussed in detail in section 2.3.

Emergency Management Accreditation Program (EMAP)

EMAP is a nationally recognized, voluntary, evolving emergency management standard and accreditation program. Its 58 standards include self-assessment, documentation and external review designed to evaluate, enhance, and publicly recognize quality in emergency management programs and to increase professionalism in emergency management. EMAP is a best practice framework that 600 state and local jurisdictions across the country utilize as a tool to help build preparedness programs. Currently 9 jurisdictions are fully accredited. Both FEMA and the Office of the Inspector General have collaborated with and referenced EMAP standards in official documents.

National Response Plan (NRP)

DEM is in partial alignment with the NRP. The NRP was developed by the Department of Homeland Security (DHS) combining a number of previously existing plans into a “model” CEMP format. The Department of Homeland Security requests that local governments modify their existing emergency operations plans to ensure alignment with the NRP coordinating structures, processes, and protocols but it is not a regulation in itself.

National Preparedness Goal

DEM will need to undertake additional preparation to meet the National Preparedness Goal. The National Preparedness Goal states that, “The NRP generally defines what needs to be done to manage a major incident and the NIMS generally defines how it needs to be done. The Goal defines how well it needs to be done and provides program solutions to help the nation develop and maintain the capabilities to prevent, respond to, and recover from major incidents as described in the NRP and NIMS.” .

Capabilities-Based Planning Instrument (CBPI)

DEM is in partial alignment with the CBPI. The CBPI was designed by the Homeland Security Institute (HSI) to help agencies align their existing preparedness strategies with



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national goals. It allows agencies to use a simple, interactive process to find and assemble information contained in current federal guidance, including the NIMS National Preparedness Goal, Universal Task List, and Target Capabilities List. Alignment with these capacity measures demonstrates an agency's adherence to national standards.

CEMP Guide

DEM has partially aligned with state guidelines on CEMP. The Washington State Emergency Management Division provides recommendations on the development of local emergency management department CEMPs, including the Emergency Support Functions (ESFs). Revisions to this planning guide are currently under review and a modified guide should be published soon. The revised guide will use the National Response Plan as a model on which to base its recommendations. We review this in more detail in the CEMP, ESF and Annex sections of this document.

Recommendation 7:

DEM leadership should work to come into full compliance with all laws and regulations focusing on:

- NIMS
- HSPD-5, HSPD-7, HSPD-8
- DMA 2000
- National Preparedness Goal



2.3 DEM implementation of the National Incident Management System (NIMS) is partially complete.

NIMS	DEM in Compliance?
Meeting Requirements for September 2006	Partial

Meeting NIMS requirements will maintain Snohomish County's eligibility for federal preparedness funding and will increase their ability to effectively respond to emergency events.

NIMS is a system that has evolved over time and was re-developed by the Department of Homeland Security to integrate effective practices in emergency preparedness and response into a comprehensive national framework for incident management.

A number of NIMS components are required to be implemented by September 2006 (see Figure 2.3.1) but DEM is receiving mixed messages regarding the timeline that they must meet for compliance. The chart below applies to DEM operations; however, we did not verify the compliance of DEM's partner agencies. Homeland Security Presidential Directive 5 (HSPD-5) requires state and local jurisdictions to fully implement NIMS to receive federal preparedness funding. However, Washington State EMD has approved Snohomish County to update the CEMP on its established four-year cycle, which in DEM's case means in 2007 rather than September 2006. The state is responsible for reporting NIMS compliance for the entire state to Homeland Security. DEM reports that their goal is to comply with NIMS during the required timeframes.



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Figure 2.3.1 NIMS Compliance

Required Action for September 2006 NIMS Compliance	DEM in Compliance?
Adopt NIMS at the community level for all government departments and agencies; as well as promote and encourage NIMS adoption by associations, utilities, non-governmental organizations (NGOs), and private sector incident management and response organizations.	Yes*
Incident Command System (ICS): Manage all emergency incidents and preplanned (recurring/special) events in accordance with ICS organizational structures, doctrine, and procedures, as defined in NIMS. ICS implementation must include the consistent application of Incident Action Planning and Common Communications Plans.	Partial
Multi-agency Coordination System: Coordinate and support emergency incident and event management through the development and use of integrated multi-agency coordination systems, i.e develop and maintain connectivity capability between local Incident Command Posts (ICPs, local 911 Centers, local Emergency Operations Centers (EOCs) and state EOC.	Yes
Public Information System: Implement processes, procedures, and/or plans to communicate timely, accurate information to the public during an incident through a Joint Information System and Joint Information Center.	Partial
Revise and update plans and SOPs to incorporate NIMS components, principles and policies, to include planning, training, response, exercises, equipment, evaluation, and corrective actions.	No
Participate in and promote intrastate and interagency mutual aid agreements, to include agreements with the private sector and non-governmental organizations.	Partial
Complete IS-700 NIMS: An Introduction	Yes*
Complete IS-800 NRP: An Introduction	Yes*
Complete ICS 100 and ICS 200 Training	Yes*
Incorporate NIMS/ICS into all tribal, local and regional training and exercises.	Yes*
Participate in an all-hazard exercise program based on NIMS that involves responders from multiple disciplines and multiple jurisdictions.	Yes
Incorporate corrective actions into preparedness and response plans and procedures.	No
Inventory community response assets to conform to homeland security resource typing standards.	Partial
To the extent permissible by law, ensure that relevant national standards and guidance to achieve equipment, communication, and data interoperability are incorporated into tribal and local acquisition programs.	Yes
Apply standardized and consistent terminology, including the establishment of plain English communications standards across public safety sector.	Yes
Establish the community's NIMS baseline against the FY 2005 and FY 2006 implementation requirements.	Yes
Develop and implement a system to coordinate all federal preparedness funding to implement the NIMS across the community.	Yes

*DEM reports that this has occurred for DEM but other community entities report directly to the state regarding NIMS compliance so are not represented here. The audit team did not verify this information.



Recommendation 8:

DEM should make every effort to be in full compliance with NIMS by September 2006. This will include full implementation and documentation of NIMS requirements in relation to:

1. ICS
2. Public Information System
3. SOGs
4. Mutual Aid Agreements including updating current agreements and new agreements with:
 - a. Independent EOCs in Snohomish County
 - b. Stakeholders listed in Figure 2.1.2.
5. After-Action Issue Implementation
6. Inventory Community Response Assets (personnel, teams, facilities, equipment, and supplies) including:
 - a. Snohomish County assets
 - b. Regional assets
 - c. Nonprofit assets
 - d. Public sector assets



2.4 ***DEM should improve disaster preparedness planning.***

Sub-areas in this section:

2.4.1	Introduction	27
2.4.2	Activity Alignment with Snohomish County Hazards	29
2.4.3	Comprehensive Emergency Management Plan (CEMP)	31
2.4.4	Emergency Support Functions (ESFs)	32
2.4.5	Suggested Operating Guidelines (SOGs)	34
2.4.6	Emergency Operations Center (EOC) and Equipment	35
2.4.7	Drills, Exercises, and Training	40
2.4.8	Coordination and Communication	43
2.4.9	Mutual Aid Agreements	47

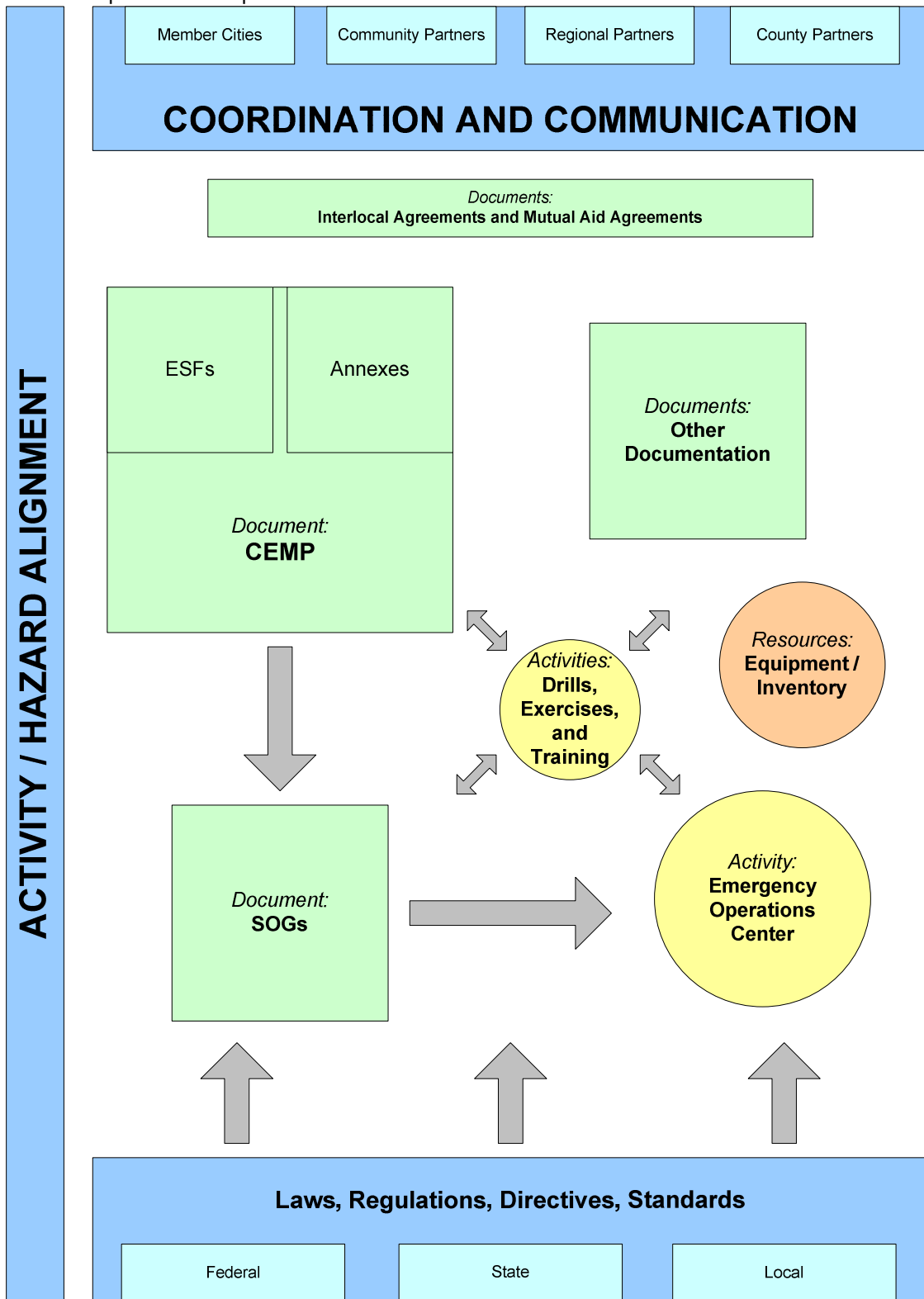
2.4.1 **Introduction**

This section analyzes DEM’s operational effectiveness. Figure 2.4.1 on the following page shows the components of operational effectiveness and how they interrelate.



Figure 2.4.1

Operational Map





2.4.2 Activity Alignment with Snohomish County Hazards

Alignment with Hazards	Sufficient at DEM?
Identification of Hazards	Yes
Action to Mitigate Hazards	Partial
Plan for Hazard Response	Partial
Practice Hazard Response	Partial

Preparing for all hazards and appropriately aligning DEM activities with Snohomish County hazards will allow a more effective response in the event of an emergency.

DEM should be prepared for all hazards; however, there should be strategic focus on hazards that are more likely to occur in Snohomish County.

Identification of Hazards

DEM sufficiently identifies local hazards; however, documentation does not clearly indicate whether DEM is adequately preparing for these hazards. Since there are limited resources for mitigation, planning and practice, DEM must prioritize its activities.

The hazards identified for Snohomish County are:

- Avalanche
- Dam Failure
- Earthquakes
- Floods
- Hazardous Materials
- Mass Movement
- Severe Weather
- Terrorism/Epidemic/Civil Unrest
- Tsunami
- Volcano
- Wildland Fire

Hazards Identification and Vulnerability Analysis (HIVA)

The HIVA serves as the basis for DEM emergency management plans and procedures. DEM contracted with the University of Washington Institute for Hazard and Mitigation Planning to create the 2004 HIVA.

Snohomish County Natural Hazards Mitigation Plan (SCNHMP)

The 2004 SCNHMP meets the federal requirement for an approved hazard mitigation plan, making DEM eligible for pre-disaster federal hazard mitigation funding.



Action to Mitigate Hazards

DEM has taken some action to mitigate hazards. Mitigation is one of four functional divisions, (planning, mitigation, response, and recovery) of emergency management listed in the CEMP. The mitigation function includes programs and activities designed to reduce or eliminate the effects of future disasters upon people and property. Some examples of DEM mitigation activities include the following:

- Training is provided to the community to educate residents and help them to prepare for specific hazards.
- DEM collaborates with the Army Corps of Engineers and with the County's Surface Water Management in reviewing flood prone areas.
- Volcano evacuation route signs were developed for placement when an eruption is predicted that would impact Snohomish County.
- DEM works with LEPC to give information packets to businesses that handle hazardous waste.

Plan for Hazard Response

DEM needs to develop additional hazard-specific plans. DEM has created the following hazard-specific plans:

- Terrorism Incident Annex
- Flood Response Plan
- Terrorism Response Coordination Plan
- Hazardous Materials Response Plan
- Northwest Region Fire Mobilization Plan

NIMS, EMAP, and the state EMD recommend developing information about hazard-specific responses. DEM does not address hazard-specific emergency response for earthquakes, severe weather, volcanoes, or landslides. All of these are identified in Snohomish County's HIVA as area-specific risks.

The need for evacuation of large groups of people and the subsequent care of those people could be necessary in Snohomish County secondary to volcanic activity, following an earthquake, or other emergency. Snohomish County DEM does not have a mass evacuation plan for Snohomish County but funding has been secured for King County to coordinate a regional evacuation plan.

Practice Response to Hazards

DEM coordinates and participates in exercises and drills involving emergency management partners within the County¹². Since current funding sources emphasize terrorism, the exercises and drills conducted in 2005 and 2006 practiced terrorism scenarios. Skills learned in these exercises transfer to other hazard responses.

¹² More information on Exercises and Drills is reviewed in Section 2.4.7.



Recommendation 9:

DEM should ensure preparedness for all hazards and alignment of activities with Snohomish County hazards including the following:

1. Take additional actions focusing on mitigation
2. Develop additional hazard-specific plans
3. Seek out opportunities to practice response to specific Snohomish County hazards

2.4.3 Comprehensive Emergency Management Plan (CEMP)

Critical Element	Adequate in DEM?
Regulations and Standards Met	Partial
Clear, Current, Complete	Partial
Disseminated and Understood	Partial
Appropriate Annexes	Partial

Meeting the responsibilities identified in the CEMP will improve DEM’s ability to implement effective mitigation, response, and recovery activities in the event of an emergency.

The CEMP is a document that provides a framework for responding to emergency situations and establishes DEM functions and the responsibilities of others in responding to an emergency.

According to NIMS, Washington State Administrative Code (WAC), and EMAP, the CEMP should:

- Meet regulatory requirements
- Be clear, current, and complete
- Be fully disseminated and understood by all responsible parties
- Fulfill self-identified responsibilities

Meet Regulatory Requirements

Snohomish County’s 2003 CEMP fulfills most current regulatory requirements and was approved by the state. One area of concern is that DEM has not made biennial revisions as required.

Clear, Current, and Complete

The CEMP is consistent with the format described in the State Planning Guideline; however, issues of ongoing plan maintenance and incorporation of NIMS and EMAP guidelines need to be addressed. See [Appendix D](#) for recommended updates to the CEMP.



Disseminated and Understood

DEM has made the CEMP available to staff, partners, and the community by putting it on the website and distributing electronic and hard copies. DEM provided a distribution list showing 95 stakeholders. Despite this availability, some DEM staff had only a cursory knowledge of the CEMP.

Annexes

DEM does not meet all of the standards for annexes to the CEMP. NIMS requires and EMAP states that the CEMP include hazard-specific and public awareness and education annexes. DEM has an Information Systems and Warning Emergency Support Function (ESF), which includes public warning guidelines, but does not include pre- and post-incident public awareness and education. DEM does not have comprehensive hazard-specific annexes.

Recommendation 10:

DEM should undertake a thorough update of the CEMP, including the ESFs. This should include attention to:

1. RCW, NIMS, and EMAP compliance
2. Consistent CEMP format and clarity
3. Disseminate to and educate all designated partners
4. Include hazard-specific and public awareness and education annexes

2.4.4 Emergency Support Functions (ESFs)

Critical Element	Adequate in DEM?
Regulations and Standards Met	Partial
Clear, Current, Complete	Partial

Comprehensive ESFs will ensure that the participants in emergency operations management are aware of their responsibilities and obligations during an emergency and ensure that critical functions are completed.

ESFs identify responsibilities for specific emergency management functions in the case of an emergency. DEM’s ESFs were approved as part of the 2003 CEMP, but there are areas that need improvement in the next update.

According to the Department of Homeland Security, Washington State, and internal DEM documents, ideal ESFs should:

- Meet regulatory requirements
- Be clear, current, and complete



Meet Regulatory Requirements

DEM's ESFs are part of the CEMP which was approved by the state in 2003. The ESFs will need to be updated in conjunction with the CEMP to be in full compliance with NIMS in 2007. Comparisons with NIMS requirements are shown in Figure 2.4.2¹³.

Figure 2.4.2 ESF NIMS Components

NIMS Component	Requirement Description	In Place?
Do your ESFs describe the concept of operations?	The concept of operations should include division of responsibilities, sequence of action (before, during and after the incident), how requests for resources will be met, and who and under what circumstances will request be made for additional aid from the State.	Partial
Do your ESFs describe the organization and assignment of responsibilities?	The organization and assignment of responsibilities should establish which organizations will be relied upon to respond to the emergency. The ESFs should describe the tasks each element of the organization is responsible for and expected to perform.	Partial
Does your EOP* contain functional annexes?	Functional annexes should contain activities to be performed by anyone with a responsibility under that function. Functional annexes also clearly define actions before, during and after an emergency event.	Partial
Does your EOP contain hazard-specific appendices?	Hazard specific appendices are supplements to functional annexes. The appendices should be created for any functional annex that does not provide enough hazard-specific information to respond to a specific type of emergency.	Partial
Do your ESF's pre-designate functional area representatives to the EOC/MACS?	The ESFs should pre-designate which organization is assigned which responsibilities and that organization should provide representatives to the EOC or the Multi-agency Coordination System that is being utilized.	Partial
Does your EOP include pre-incident and post-incident public awareness, education, and communications plans and protocols?	The EOP should describe the public awareness and education that the community is provided. How this information will be communicated to the public before and after incidents occur should be described in the EOP. This information is typically located in the Emergency Public Warning Annex.	Partial

* NIMS uses the acronym EOP (Emergency Operations Plan) to refer to the CEMP.

¹³ The structure and subject matter suggested by the National Response Plan (NRP) and the Washington State CEMP Planning Guide is not fully reflected in DEM's ESFs and is compared in Appendix E.



Clear, Current, and Complete

DEM’s ESFs need improvement. They should be updated, organized differently and compliant with regulations to ensure that the ESFs are clear, current, and complete. See [Appendix E](#) for federal and state requirements for ESF structure.

See Recommendation 10 in Section 2.4.3 for proposed action relating to the ESFs.

2.4.5 Suggested Operating Guidelines (SOGs)

Critical Element	Adequate in DEM
Regulations and Standards Met	Partial
Clear, Current, Complete	Partial
Checklists	Partial
Disseminated and Understood	No

Sufficient documentation and knowledge of processes will ensure effective implementation of emergency activities during a disaster.

DEM’s existing SOGs need significant improvement. The SOGs are the procedures required to implement the ESFs. Snohomish County DEM staff state that it is a priority to improve the SOGs to fulfill requirements. According to the Department of Homeland Security, Washington State, and internal DEM documents the SOGs must:

- Meet regulatory requirements
- Be clear, current, and complete
- Have checklists
- Be fully disseminated and understood

Meet Regulatory Requirements

DEM’s SOGs do not fully meet NIMS requirements. The SOGs do not include planning, training, exercises, current equipment, evaluation or corrective actions as required by NIMS. DEM does not have sufficient SOGs that address tasks or mission assignments required by the NIMS integration guide.

Clear, Current, and Complete

DEM’s SOGs do not meet the following guidance:

- The *Washington State CEMP Planning Guide 2003* states that, “You can define any format you desire for your procedures. The important thing is to keep the format simple enough for someone to come into an event cold, and still be able to use the procedures effectively.”
- The Department of Homeland Security describes SOGs as ensuring that “institutional knowledge is not lost to the organization with staff turnover.”



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- Procedures should be “written down—not simply understood by those who typically engage in emergency management activities.”

DEM is aware that the SOGs need significant work to become clear, current, and complete and they plan to address this by the end of 2006.

Checklists

Some DEM SOGs contain only a checklist and no guideline and others contain only a guideline and no checklist. Washington’s Comprehensive Emergency Management Planning Guide and the Department of Homeland Security’s NIMS documents state that procedural checklists are an essential element to a smooth operation. Checklists for field teams should be included in the procedures to help ensure coordinated response.

Disseminated and Understood

Partially because DEM is aware that the SOGs are not sufficient, they have not disseminated them among all staff and appropriate parties. All staff members should be familiar with the SOGs. In the event of a disaster staff members may not have time to familiarize themselves with the processes and procedures.

See Recommendation 8 in Section 2.3 for proposed action relating to the SOGs.

2.4.6 Emergency Operations Center (EOC) and Equipment

Critical Element	Adequate in DEM?
Coordination	Partial
Communications	Yes
Resource Tracking/Dispatch	Partial
Information	Yes
Regulations and Standards Met	Partial

Meeting critical elements for an EOC will result in efficient and effective response to emergencies.

An Emergency Operations Center (EOC) is the physical location where the overall command, control, communications and coordination of information and resources to support domestic incident management activities normally takes place.

The core functions of an EOC are:

- Coordination
- Communications
- Resource Tracking and Dispatch
- Information Collection, Analysis and Dissemination



Coordination

DEM is partially fulfilling the core function of coordination at the EOC. A feasibility study is being conducted by Snohomish County on the construction of a new EOC. Several stakeholders expressed concern about the adequacy, location and survivability of the current EOC facility. A structurally weak and poorly located facility may negatively impact DEM’s ability to coordinate an EOC activation, as well as negatively impact DEM’s other core functions. The current EOC is not large enough to accommodate the people who need to be present and the activities that take place during most activations.

DEM meets the EMAP standard advising both primary and alternate EOC facilities. In addition, DEM has recently purchased two vehicles that will serve as mobile EOCs. These state of the art Command and Control vehicles increase DEM’s capacity to fulfill all of its core functions in the event of an emergency. During a recent training exercise, the Command vehicle effectively monitored all radio communications and performed its duties well.

EOC Communications

DEM’s equipment meets the NIMS communication requirement. Good communications equipment and procedures allow an agency to disseminate warnings; communicate with an incident site and across jurisdictions; make resource requests and develop and maintain incident awareness. NIMS requires that agencies’ communications equipment has the elements in Figure 2.4.3 on the next page.

Figure 2.4.3 EOC Communications

Communications Element	In Place at DEM?	Notes
Interoperability	Yes	DEM has two pieces of equipment which are used to ensure that different radio systems can communicate. This includes both horizontal and vertical interoperability. The 800MHz system, a radio channel reserved for emergency communications, also allows for critical communications between emergency management organizations, responders, and others*. Currently, only first responders have these radios, but the program is being expanded.
Redundancy	Yes	DEM has satellite radios; amateur radio; VHS radio; the 800MHz radio; and a five-line telephone system.
Effective Terminology (communications and resource typing)	Yes	DEM uses plain English communications standards during an emergency and has begun a process to type community response assets to conform to Homeland Security resource typing standards.

*The 800 MHz system had some difficulties during the recent Evergreen Sentry Exercise.



Resource Tracking and Dispatch

DEM tracking and dispatch will need to be improved. DEM is beginning to improve tracking equipment; however, DEM does not track all available resources. See Figure 2.4.4 for detail. There is nothing in place to coordinate the dispatch of resources outside of DEM's control. Good systems and processes for resource tracking and dispatch are important for effective emergency response and recovery efforts. For each of the sources below the following categories of resources should be tracked:

- Personnel
- Teams
- Facilities
- Equipment
- Supplies

Figure 2.4.4 Resources

Sources of Resources for Dispatch	Tracked at DEM?
Sub-Recipients	Yes
DEM	Yes
Snohomish County Departments	No
Regional Entities (Counties, Cities, EM consortiums)	Partial
Nonprofit Organizations	No
Private Sector	No

Information Collection, Analysis and Dissemination

DEM meets minimum requirements for information collection, analysis and dissemination. DEM has the required computing equipment to collect, analyze, disseminate, and display information with various back-up systems in place.

EOC Criteria

Emergency Managers at EMAP-accredited agencies and DEM stakeholders defined the critical elements of a high-functioning EOC in Figure 2.4.5 below.



Figure 2.4.5 EOC Elements

Critical Element	Detail	Present in DEM's EOC?
Partnerships	Good communication, relationships, and teamwork among the EOC liaisons is important.	Yes
Role Clarity	There must be a shared understanding between EOC liaisons and the first and second responders on the scene because tactical decision-making happens at the field operations level and strategic decision-making and asset allocation takes place in the EOC.	Yes
Authority	The appropriate liaisons should be present in the EOC during activation.	Yes
Training	EOC liaisons should be adequately trained in the pertinent policies, procedures, roles, and responsibilities related to EOC activation.	Partial
Exercises	Relevant hazards should be exercised.	Partial
After-Action Improvements	Lessons learned during incidents and/or exercises should be operationalized.	Partial
Documentation	Position descriptions and role checklists should be in place since EOC personnel change frequently.	No
Information Management	There should be a system that allows an effective EOC to take in and effectively disseminate information	Partial

Capabilities Based Planning Instrument

Homeland Security’s Capabilities Based Planning Instrument is intended to assist with NIMS compliance. Snohomish County DEM meets or partially meets 17 of 18 CBPI measures related to EOC management. See Figure 2.4.6 on the next page.



Figure 2.4.6 CBPI

CBPI Capability Measures - EOC Management	In Place at DEM EOC?
A management plan for the EOC exists	Partial
A procedure for staffing the EOC exists	Partial
All EOC-related communications systems are interoperable with surrounding jurisdictions	Yes
Alternate EOC or alternate EOC capability has appropriate Continuity of Operations Plan (COOP) and Continuity of Government Plan (COG)	No
EOC meets NIMS incident command structure requirements to perform core functions: coordination, communications, resource dispatch and tracking, and information collection, analysis, and dissemination	Partial
EOC plans are exercised	Partial
EOC plans integrate Joint Field Office, if necessary	Yes
EOC procedures are consistent with NRP, NIMS, and appropriate State, local, and tribal procedures	Partial
Jurisdiction has an operations plan for the EOC	Partial
Jurisdiction has identified alternate EOC site in case first site is damaged/destroyed in the event and is not capable of operating	Yes
Either a stand-alone facility or a facility that can be converted into an EOC	Yes
Jurisdiction has the ability to coordinate with other EOCs – local, State, or regional	Yes
Jurisdictions have an identified liaison representative at the local, State, or regional level	Yes
Mutual Aid Agreements (MAAs) and Memorandums of Understanding (MOUs) are in place	Partial
Procedures are in place to activate mutual aid agreements	Partial
The management plan for the EOC includes sections on: incident action planning, situation reports, interagency coordination	Partial
Trained personnel are available to cover appropriate ESF functions	Partial
Training for personnel staffing the EOC is conducted on a regular periodic basis	Yes

EMAP Standard

DEM partially meets four of the ten EMAP standards relating to EOCs. Detail regarding these standards is shown in [Appendix F](#).

See Recommendation 13 in Section 2.4.8 for proposed action relating to the EOC.



2.4.7 Drills, Exercises, and Training

Critical Element	Adequate in DEM?
Regulations and Standards Met	Partial
Sufficient Drills/Exercises	Partial
After-Action Improvement	No
Sufficient Training is Provided	Partial
Sufficient Training is Received	Partial

Adequate preparation will ensure that DEM, the County government, and the public are prepared to respond to an emergency avoiding wasted resources, economic disruptions, and loss of life and property.

DEM partially meets expectations for drills, exercises, and training. Drills and exercises are simulated emergency events that DEM participates in, and in some cases, plans. Trainings are educational opportunities provided by DEM on specific topics to the public, emergency management professionals, and or appropriate officials. DEM staff members also receive training on specific emergency management topics to increase skills. NIMS requires emergency management personnel to complete a specific series of trainings in order to be NIMS compliant.

Regulations

DEM has not coordinated or documented required activities, but has completed some required activities. NIMS states that EOCs must ensure that needed improvements in plans, procedures, communications, staffing, and other capabilities are acted upon once exercises and drills have been completed.

EMAP Standards on training are detailed in Figure 2.4.7 on the next page.



Figure 2.4.7 EMAP Standards on Training

EMAP Standard on Training	Is DEM Meeting the Standard?
5.12.1 Training of emergency personnel and key public officials is given high priority. Evidence of that importance includes a formal, documented program comprised of training needs assessment, curriculum, course evaluations, and records of training.	Partial
5.12.2 Emergency personnel receive and maintain training consistent with their current and potential responsibilities. Specialized training related to the threats confronting the jurisdiction is included in the training program. Awareness training and education of key officials are provided.	Yes
5.12.13 Training is regularly scheduled and conducted in conjunction with the overall goals and objectives of the training program. The scope and frequency of training is consistent with the training needs assessment. Training is related to corrective action program deficiencies where possible.	Partial

Records and Documents

Standards dictate that the documents and records shown in Figure 2.4.8 should be in place.

Figure 2.4.8 Training Documentation

Standard for Training Documents/Records	In Place at DEM?
Training needs assessment	No
Training program goals and objectives	No
Training curricula	Yes
Training participant lists	Yes
Course evaluations	Partial
List of trainings provided	Yes
Staff training logs	Partial
Documentation of how program deficiencies are corrected through training	No

Drills and Exercises

DEM should take a strategic approach to practicing emergency response, including increasing their participation in drills and exercises that align with local hazards. This would ensure that DEM and partner agencies are prepared to respond to actual emergency events and problems are worked through during practice rather than during an event. Emergency management experts and industry literature emphasize the



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critical nature of practice in ensuring appropriate response in a real emergency. Drills and exercises are expensive to participate in and to coordinate.

Drills and exercises are required by funding agencies, but there is no clear standard for frequency and types of drills and exercises that should be implemented. DEM does not keep a centralized database of all the exercises they participate in; records are kept by the staff members who participated in the exercises.

After-Action Improvements

DEM has not focused on after-action improvements. After-Action Reports are required by NIMS, and should be written for each drill and exercise to ensure that deficiencies will not reoccur during an emergency. Most Department of Homeland Security grants also require that formal After-Action Reports for all exercises conducted with grant funding be posted on the Homeland Security Exercise Evaluation secure website. DEM reports that they have begun the process and are logging reports from this point forward. DEM collects information about incidents and exercises, but the lessons learned have not consistently been documented or integrated into written plans, nor have they been disseminated to all appropriate entities.

Training

Provided by DEM for the Community

DEM conducts training courses for the community and other stakeholders covering all hazards. Training courses were scheduled regularly. Sample trainings include:

- Community Emergency Response Team (CERT)
- Earthquake Preparedness
- Disaster Preparedness
- Weather Spotting

Training Requirements for DEM Staff

Although some staff members document their training, overall, training for DEM staff is not well planned or documented. Training of emergency management staff is critical to ensuring that they are prepared to effectively plan for and coordinate emergencies. DEM does not develop or maintain staff training or education plans.

Recommendation 11:

DEM should ensure that appropriate documentation is in place for training that they provide. This should include:

1. Specific goals and objectives
2. Assessment of constituency training needs
3. Participant lists
4. Course evaluations



Recommendation 12:
DEM should develop and document training plans and training logs for each DEM staff person.

2.4.8 Coordination and Communication

Element	Adequate in DEM?
DEM Transition	Partial
Communication	Partial
Level of Service	Partial
NIMS and CERT	Partial
Public Outreach	Partial
EMAP Standard	Partial

Improvements in coordination and communication with member cities, internal, and external partners, and the public will lead to more effective planning, mitigation, response and recovery.

Successful coordination and communication is important to effective emergency management. Emergency management experts interviewed state that an emergency management agency could have required plans, a new EOC, and state of the art communications equipment but without the dedication, commitment and trust of other entities they may not be effective. DEM has been developing partnerships with key groups to provide additional support in its emergency planning, mitigation, response and recovery efforts. To examine the effectiveness of DEM's relationships member cities, internal and external partners, and neighboring jurisdictions were consulted. See [Appendix A](#) for a complete list of interviewees.

DEM Structure

DEM is a leader or participant in three groups shown in Figure 2.4.9 on the next page.



Figure 2.4.9 DEM Groupings

Sno Co DEM	UASI* Workgroup	Region I
Member Cities:	Members:	Members:
Arlington	King County	Snohomish County
Darrington	Pierce County	Skagit County
Gold Bar	Snohomish County	Island County
Granite Falls	Seattle	Whatcom County
Index	Bellevue	San Juan County
Lake Stevens	Strategy Committee:	Tribes
Marysville	Representatives of	
Snohomish	many internal and	
Stanwood	external partners of	
Sultan	SnoCo DEM	
Unincorporated Areas		

*Urban Area Strategic Initiative – focuses on urban/regional preparedness and training programs.

DEM Transition

Prior to January 1, 2006 DEM was comprised of 12 cities plus Snohomish County, each having one vote on the DEM Board of Directors. The cities of Mukilteo and Monroe decided not to participate in the new DEM structure, and currently Snohomish County DEM consists of 10 member cities. These cities are assessed service charges by the County based on a per capita fee of \$0.97 in exchange for providing emergency management services to the members. An *Interlocal Agreement for Emergency Management Services* is the legal contract that Snohomish County DEM and each of the above named cities and towns have executed for 2006.

Member Cities

Member cities felt that there were opportunities to improve the transition of DEM to the County¹⁴. Some areas that they suggested needed more focus included:

- communication to the member cities
- clarity of DEM strategy
- ensuring member city participation

Stakeholders

Most of the independent EOCs and external partners had a favorable view of the transition. Those who did not were optimistic that things would improve as the County began to implement changes.

¹⁴ Arlington, Darrington, Gold Bar, Granite Falls, Index, Lake Stevens, Marysville, Stanwood, Sultan



Communication

DEM communicates effectively with its internal and external partners, but could improve its communication with its member cities. A 2004 statewide “Study of Emergency Management at the Local Program Level” found that for most local emergency management agencies there is a lack of routine communication within and among local jurisdictions regarding emergency management requirements, roles, responsibilities and resources.

Level of Service

DEM could clarify their role and better evaluate stakeholder needs. Member cities and internal/external partner perceptions of the adequacy of DEM in addressing their needs is mixed.¹⁵ By understanding the needs and concerns of its partners, DEM could better inform its own workplan when it comes to emergency management planning for the region.

DEM’s role with the member cities and partners is not clear. This has led to unreasonable expectations about the level of service that DEM provides. A common theme throughout the interviews was that member cities realize that they are ultimately responsible to their citizens for emergency services, but additional guidance, suggestions, outreach and communication would be appreciated from DEM. Cities hoped that more information, resources, and expertise would be shared with the members than is occurring currently.

Training

Member cities would like assistance from DEM to meet NIMS requirements. DEM’s member cities may fall short of meeting NIMS requirements for 2006. It is primarily the responsibility of the member city to ensure that first responders and emergency management personnel are NIMS compliant. Of the nine member cities interviewed, three cities felt that they were adequately trained in NIMS and CERT while six of the member cities reported that they have completed little to no NIMS training and are in need of CERT classes.¹⁶ These cities stressed that assistance from DEM in helping to coordinate training would be appreciated, though they do not expect DEM to provide all of the needed training.

NIMS

There appeared to be confusion about NIMS requirements for some of the smaller member cities. They were uncertain about the upcoming reporting requirements this fall, as well as which classes were required. A number of cities were not aware that NIMS training was available on-line. The larger cities appear to be on track in meeting NIMS requirements.

¹⁵Arlington, Darrington, Gold Bar, Granite Falls, Index, Lake Stevens, Marysville, Stanwood, Sultan, Fire Chief’s Association, Snohomish County PUD, Snohomish County Public Works, Snohomish County Sheriff, Snohomish County Corrections, Everett, Monroe, Tulalip Tribe.

¹⁶Arlington, Darrington, Gold Bar, Granite Falls, Index, Lake Stevens, Marysville, Stanwood, Sultan



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All of the independent EOCs stated that they are adequately trained and will meet the upcoming NIMS requirements. External and internal DEM partners are split as to their reported level of compliance to date.

CERT

The level of CERT training was an area where there appeared to be a wide disparity between cities. The larger cities reported having coordinated CERT training classes with DEM over the years, while smaller cities stated that they have had difficulty attaining the minimum number of students required (25) in order for DEM to offer CERT classes in their community. CERT training is now available on-line, which may assist the smaller jurisdictions in meeting the requirements.

Public Outreach

Most member cities, external partners and independent EOCs hoped for improved public education.¹⁷ A few cities stated that educating the public is a shared responsibility among DEM and the local jurisdiction, and that more resources are needed to promote emergency management public education.

Independent EOCs within the County

The fact that there are many EOCs across Snohomish County rather than a single countywide entity was a concern for many internal and external partners as well as for neighboring jurisdictions. There are currently four independent EOCs within Snohomish County, each providing varying levels of emergency management services to their constituencies. External partners stated that having four independent EOCs is not ideal and may pose challenges in the wake of a large disaster as all four compete for statewide attention and funding and poses a challenge to organized county planning, mitigation, response and recovery. The four independent EOCs are:

- *Emergency Services Coordinating Agency (ESCA)*
The ESCA EOC serves the cities in south Snohomish County. ESCA's Director chose not to participate in our interview of internal/external and regional partners. The city of Mukilteo split from DEM and joined ESCA in January, 2006.
- *Everett Emergency Management*
The Everett EOC serves the citizens of Everett. Everett became an independent EOC in December, 2004 because the city felt that they could provide better service to the citizens independent of DEM.

¹⁷Arlington, Darrington, Gold Bar, Granite Falls, Index, Lake Stevens, Marysville, Stanwood, Sultan



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- *Monroe Emergency Management Office*
The city of Monroe split from DEM in January, 2006 and is now an independent Community Coordination Center (CCC). Monroe felt that DEM provided little service for the annual per capita fee they were paying each year.
- *Snohomish County Department of Emergency Management*
The Snohomish County DEM EOC currently provides emergency management services to 10 member cities and the unincorporated area of the County.

The independent EOCs interviewed indicated a desire to establish a working committee that would meet regularly and discuss funding, coordination and cooperation issues. In addition, some mentioned the need to develop and execute a Mutual Aid Agreement among all four of Snohomish County’s independent EOCs.

An additional concern is that some of the cities in the eastern half of Snohomish County have had discussions about establishing an “East County Emergency Management Agency.” Some officials believe that they would be better served by an emergency management agency that could focus on the area east of the I-5 and Route 9 corridor. Due to budgetary realities of the smaller cities in East County, this plan has been put on hold, but it highlights the varying levels of comfort and satisfaction that member cities have with DEM.

Recommendation 13:

DEM should develop specific processes to ensure sufficient communication, coordination, and service to member cities, internal and external partners, and regional EOCs.

2.4.9 Mutual Aid Agreements

Critical Element	Adequate in DEM?
Meet NIMS Requirements	Partial
Meet RCW Requirements	Yes
Meet EMAP Requirements	Partial
Exist Between All Important Parties	No

Appropriate Mutual Aid Agreements will lead to improved assistance and resources from other jurisdictions, private entities, and nonprofit agencies in the event of a disaster.

DEM could improve Mutual Aid Agreements. Mutual Aid Agreements are the means for one jurisdiction to provide resources, facilities, services, and other required support to



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another jurisdiction during an incident. Mutual Aid Agreements are one of the most important elements of an effective emergency management program that communicate what is and what is not going to happen with outside groups and jurisdictions.

NIMS¹⁸

DEM does not meet NIMS recommended elements for Mutual Aid Agreements. They do not have signed agreements in place with all relevant neighboring jurisdictions, other independent EOCs or relevant private-sector and nongovernmental agencies. Other jurisdictions have developed a practice of broad inclusion for mutual aid and have agreements signed by parties including the following stakeholders:

- Fire Districts
- Law Enforcement Entities
- Nonprofits
- Private Industry
- Cities
- Tribes
- Utility Companies
- Hospitals and EMS
- Schools
- Sewer and Water Districts
- Transit Agencies
- Media/Broadcasters

NIMS requirements also state that at a minimum, Mutual Aid Agreements should include elements or provisions shown in figure 2.4.10 on the next page.

¹⁸ NIMS, the National Incident Management System, is described in detail in its own section below



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Figure 2.4.10 NIMS Elements for Mutual Aid Agreements

NIMS Minimum Element	Whatcom, Skagit, Snohomish, and San Juan Counties	Inter-county Mutual Aid Omnibus Agreement
Definitions of key terms used in the agreement	No	Yes
Roles and responsibilities of individual parties	Yes	Yes
Procedures for requesting and providing assistance	No	Yes
Procedures, authorities, and rules for payment, reimbursement, and allocation of costs	No	Yes
Notification procedures	No	Yes
Protocols for interoperable communications	No	No
Relationships with other agreements among jurisdictions	No	No
Workers compensation	No	Yes
Treatment of liability and immunity	Yes	Yes
Recognition of qualifications and certifications	No	Yes
Sharing agreements, as required	Yes	No

RCW

DEM complies with the minimum elements for Mutual Aid Agreements required by RCW 38.52.091 shown in Figure 2.4.11.

Figure 2.4.11 RCW Requirements for Mutual Aid Agreements

RCW Required Elements	Whatcom, Skagit, Snohomish, and San Juan Counties	Inter-county Mutual Aid Omnibus Agreement
Purpose	Yes	Yes
Authorization	Yes	Yes
Implementation	Yes	Yes
General Fiscal Provisions	Yes	Yes
Privileges and Immunities	Yes	Yes

EMAP

DEM's Mutual Aid Agreements partially fulfill EMAP standards. EMAP has two elements related to mutual aid agreements:

- The program develops and implements mutual aid agreements, contractual services requirements, memoranda of understanding, and/or other agreements that provide additional equipment, supplies, facilities, and/or personnel that can be used to achieve operational objectives.
- Mutual aid agreements shall be referenced in the applicable program plan.

The Inter-County Mutual Aid Omnibus Agreement provides additional equipment, supplies, facilities, and/or personnel. Specific agreements are not referenced in the CEMP as advised by EMAP.



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See Recommendation 8 in Section 2.3 for proposed action relating to Mutual Aid Agreements.



2.5 DEM largely manages grant processes effectively.

Sub-areas in this section:

2.5.1	Grant Background	51
2.5.2	Sub-Recipients	53
2.5.3	Managing Grant Funds	54
2.5.4	Grant Documentation	55
2.5.5	Reporting	56

2.5.1 Grant Background

Critical Element	Sufficient at DEM?
Timely Closeout	Partial
Meet Grant Objectives	Partial

Effective management of grants will increase DEM efficiency and effectiveness and ensure that DEM achieves their mission through the continued award of available grant dollars.

In 2005, DEM had financial resources of \$2,377,034. Approximately 70% of this funding came from federal grants, most of this from Homeland Security. The remainder of DEM's funding came from other sources of revenue, such as a per capita fee system, the state, and Snohomish County general funds.

DEM currently receives funding from 10 grants. The objectives for each grant are detailed in [Appendix G](#). A grants management checklist, compiled using best practices, can be found in [Appendix H](#).

Timely Closeout

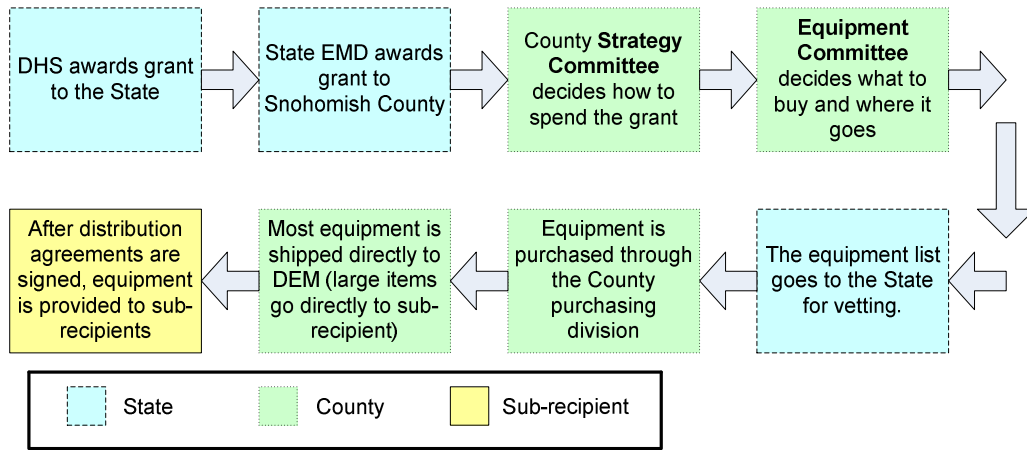
The time from grant award through closeout is very active for DEM and its sub-recipients¹⁹. The flow chart in Figure 2.5.1 shows the grant closeout process at multiple levels.

¹⁹ Sub-Recipients are entities (cities, law enforcement agencies, non-profits etc.) that receive equipment purchased by DEM, who receive grant money with which to purchase emergency-related equipment, or to assist with training or exercise expenditures.



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Figure 2.5.1 Grant Closeout Processes



DEM requested extensions on 50% of grants reviewed. In some cases DEM requested up to three extensions to ensure that they could expend the granted dollars. Some extensions were required because demand for specific equipment resulted in failure of the vendor to deliver goods by the grant deadline. Grants should be spent down and closed out as close as possible to the grant’s end date. See Figure 2.5.2.

Figure 2.5.2 Grant Extensions

Grant	# of Extensions
LETPP E05-076	1
LETPP E06-052	0
UASI E04-058	3
UASI E05-098	2
UASI E06-041	0
SHLGP E05-071	2
SHLGP E06-022	0
EMPG E05-289	0
MRC 2005-2006	0
CC 9140-04	1

Applying for amendments in order to extend the end date of a grant is a lengthy and time consuming process that is initiated by the state and additional work is done at the local level if extensions are needed. Not only must DEM negotiate with the grantor during extensions, they must develop new contracts with sub-recipients and have them signed and returned. Estimates of time required to request extensions, not including the time to completion, range from a few days to a couple of weeks.



Meet Grant Deliverables²⁰

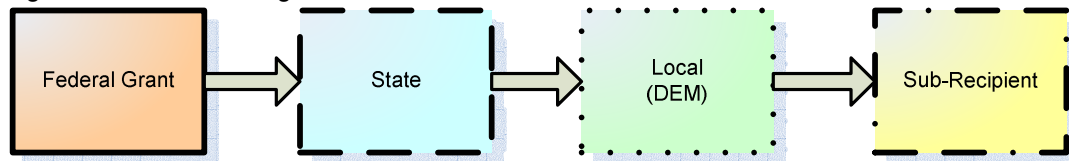
DEM is meeting or partially meeting 75% of grant deliverables. In the grants we reviewed there were 247 deliverables²¹ required as part of the grants. Grantors report that they are flexible with emergency management entities in meeting deliverables; however, failure to meet grant deliverables could put funding at risk. See Recommendation 17 in Section 2.5.5 for proposed action relating to timely grant closeout and meeting grant deliverables.

2.5.2 Sub-Recipients

Critical Element	Sufficient at DEM?
Sub-Recipient Equipment Monitoring	No
Sub-Recipient Direction	Partial

Sub-Recipients are entities such as DEM member cities, local hospitals and law enforcement agencies that receive equipment or provide trainings or exercises with grant dollars. Figure 2.5.3 below shows the flow of funding from the federal to the sub-recipient level.

Figure 2.5.3 Funding Flow



Monitoring of Sub-Recipient Equipment

DEM has not had a strong equipment monitoring program to date and has not met federal equipment monitoring requirements. DEM notified sub-recipients in March 2006 that an equipment monitoring process was in development. Sub-recipients often do not have experience with federal grants or grant guidelines and therefore need additional guidance to appropriately acquire, document, and maintain equipment. A *Best Practices Checklist* for sub-recipient grant management can be found in [Appendix I](#).

DEM is required by grant contracts to monitor sub-recipients in the following areas:

1. Maintain detailed property records
2. Maintain a control system ensuring adequate maintenance and safeguarding
3. Inventory equipment²² at least every 2 years for the lifetime of the item
4. Dispose of equipment following federal disposal requirements

²⁰ “Deliverables” are specific things that need to be completed by the grantee. They are often described as “objectives.”

²¹ We took a statistically significant random sample of these deliverables and reviewed DEM outputs/outcomes.

²² For equipment valued over \$5,000.

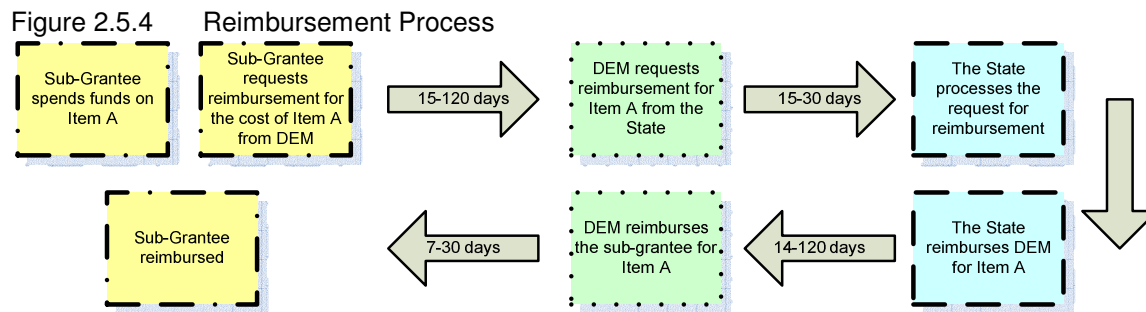


Recommendation 15:
DEM should continue to develop and implement effective sub-recipient equipment monitoring processes.

2.5.3 Managing Grant Funds

Critical Element	DEM Action Sufficient?
Timely Reimbursement Requests	Yes
Sub-Recipient Reimbursement	Yes

Figure 2.5.4 below shows the reimbursement process.



Reimbursement of Sub-Recipients

DEM is currently exceeding expectations in requests for reimbursement for sub-recipients to the state. DEM should request reimbursement payment within 30 days of the end of each calendar quarter. DEM requests payment every 30 days or in some cases, more often.

From timeframes reported by DEM, reimbursement of sub-recipients can take anywhere from 2-10 months, but it appears that much of this downtime occurs before and after DEM’s responsibilities in the process. DEM noted that sub-recipients are often frustrated by the long turnaround times for reimbursement.



2.5.4 Grant Documentation

Critical Element	Sufficient at DEM?
Information Management	No
Fund Disbursement Documentation	Yes
Sub-Recipient Documentation	No
Exercise and Training Records	Partial

Some aspects of DEM grant data is disorganized and difficult to access. Completion of grants-related documentation is an essential component of grant management. The consolidation of the large volume of information related to each grant allows agencies to better manage their grant programs.

Information Management

DEM does not have a unified filing system for grants-related documentation. This lack of policies and procedures for the storage of information has resulted in inefficient filing of progress reports and training and exercise documentation. It has generally complicated the jobs of those working on grants-related tasks at DEM by making it difficult for them to obtain information.

Fund Disbursement Documentation

Documentation related to the disbursement of funds to DEM as well as to sub-recipients was complete and well-organized.

Sub-recipient Monitoring Documentation

Documentation related to sub-recipients and sub-recipient equipment monitoring is not complete. Although documentation related to the distribution of equipment to sub-recipients is on file (including distribution agreements and hand receipts), documentation related to the monitoring of storage and use of this equipment is not being kept. This may be improved when new sub-recipient equipment monitoring processes are in place.

Exercise and Training Records

Documentation related to exercise and training records is partially complete. Documentation efforts for trainings and exercises related to grants funded through Region 1 have lagged due to staffing issues.

Recommendation 16:

DEM should develop centralized files and data management procedures including comprehensive files for each grant.



2.5.5 Reporting

Critical Element	Sufficient at DEM?
Progress Reports	Partial
Initial Strategy Implementation Plans (ISIPs)	Yes
Biannual Strategy Implementation Reports (BSIRs)	Yes
A-19s (Invoices)	Yes

A review of available documentation identified a total of 83 required reports for the UASI, SHSGP, LETPP, EMPG, MRC, and CC grants. The DEM Audit team verified that 88% of the reports were completed. DEM is required to submit a variety of financial and progress reports for each grant, including:

- Monthly, Quarterly and/or Bi-Annual Progress Reports
- Final/Closeout Reports
- Monthly/Quarterly/Closeout Invoices
- Grant Specific Documents such as Strategy and Assessment Plans

Though it has been difficult to verify whether DEM is meeting grant reporting requirements due to documentation and filing problems, it appears that DEM is meeting the expectations of grantors. In our analysis, we found that DEM is submitting the ISIP, BSIP and A-19 as required, but neglected to submit 6 required progress reports.

Accurate Reporting to Grantors

Inaccuracies were observed in DEM's 2005 EMPG grant reporting document. Of the 96 objectives on which DEM reported their progress to EMPG, three statements were found to be inaccurately reported. DEM has submitted a revised report to EMPG correcting inaccuracies in reporting. EMPG received and accepted the revisions.

Recommendation 17:

DEM should implement continuous monitoring processes including methods for ensuring that:

- Grants are closed out timely
- Grant objectives are being met
- Grant reporting requirements are submitted as required



2.6 *The County is working toward sufficient planning for continuity of government operations.*

Sub-areas in this section:

2.6.1	Background and Definition	57
2.6.2	Laws, Regulations, Standards, and Guidance	58
2.6.3	Snohomish County's Continuity Plans	60

Critical Element	Sufficient at DEM?
Laws, Regulations, Standards	Partial
County COOP Plans	Partial

Continuity of operations planning will minimize the disruption of government functions in the event of a significant and/or extended emergency in Snohomish County.

2.6.1 Background and Definition

DEM has not been responsible for Snohomish County Continuity of Operations (COOP) or Continuity of Government (COG) planning. COOP and COG are included in this audit inquiry because they are critical components of emergency management and evaluation of effectiveness in this area was requested by the Performance Audit Committee.

Historically, governments have been prepared to respond to emergencies in their jurisdictions by focusing on public safety, public health, property protection, maintaining communications, and providing public services. Following 9-11 and Hurricane Katrina it has become clear that emergencies can interrupt, paralyze, or destroy the capability of governments to perform essential functions. As a result, COOP are mandated for all federal agencies and by many state and local governments. In Snohomish County, pandemic flu planning is laying the groundwork for comprehensive COOP implementation.

According to FEMA's "Interim Guidance on Continuity of Operations Planning for State and Local Governments", a COOP enables each level of government to preserve, maintain, and/or reconstitute its capability to function effectively in the event of an emergency. Taking an all-hazards approach to this process ensures that regardless of the emergency, essential County functions and services will continue to be provided.

Continuity of Operations Plans should identify:

1. Essential Functions – Determine the functions required by statute, executive order, or otherwise necessary to provide vital services, exercise civil authority, maintain the safety and well being of the general populace, and sustain the industrial/economic base in an emergency. In addition, prioritize functions and



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- decide which personnel are responsible and what equipment is needed for performing them.
2. Delegation of Authority/Orders of Succession – Ensure a rapid response to any emergency by pre-delegating authorities for making decisions, as well as establishing orders of succession to key positions.
 3. Alternate Operating Facilities – Identify and prepare a facility that can be used to accomplish essential functions if the department’s primary facilities become unusable.
 4. Interoperable Communications – Ensure that communication systems at an alternate facility support connectivity to internal departments, critical personnel, and the public.
 5. Vital Records – Identify and protect vital records, systems, data management systems, and equipment needed to perform essential functions to reconstitute operations following an emergency (includes operating, legal and financial records); and assist residents and businesses in obtaining federal, state and private assistance payments for damage.
 6. Human Capital – Secure the safety of all employees and address the needs of employees that perform essential operations, including pre-event family independence preparedness.
 7. Test and Training – Establish a program to maintain the department’s COOP capability whereby all personnel who are involved in COOP should be trained and equipped to perform their emergency duties; and hold an annual tabletop exercise to ensure continued capability.
 8. Reconstitution Operations – Document the procedures for returning to normal operations and identify potential sources for recovery resources.

A detailed checklist of COOP requirements can be found in [Appendix J](#).

2.6.2 Laws, Regulations, Standards, and Guidance

Guidance	Compliant at DEM?
WAC 118-30-060	Yes
CEMP Appendix 2	Partial
RCW Ch 42.14	Yes
SCC 2.36.075	Yes
EMAP Standard 5.7	Partial

WAC 118-30-060 Emergency Plan

Section (2) (b) indicates that the emergency plan (CEMP) should include a functional description of how continuity of government will be addressed, and it suggests that it be in Annex form.



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Snohomish County CEMP Appendix 2 – Continuity of Government

This Appendix discusses the continued operation of local government during and after disasters. The responsibilities stated are shown in the figure below.

Figure 2.6.2.1 COG Responsibilities

CEMP COG Responsibility	Is the County meeting its COG Responsibility?
1. Elected officials and executive heads of all political subdivisions, departments and agencies will ensure that essential records are identified, preserved and adequately protected.	It is unclear if this activity is occurring since most of the current County continuity plans do not address this issue. Snohomish County Department of Information Services (DIS) is believed by many departments to be the primary guardian of their essential electronic records, but all departments must maintain internal vital records essential for organizational reconstitution.
2. Elected officials, executive department/agency heads will identify essential services and develop and maintain plans for alternate locations for vital government operations.	Few Snohomish County departments have identified what their essential functions are and even fewer have identified alternate locations.
3. Each elected official and executive department/agency head will identify in writing his/her successors with procedures for twenty-four (24) hour notification.	Successors are listed in Snohomish County’s Facilities Emergency Response Procedures (July 2005) though some of the listed individuals are no longer County employees.

RCW Chapter 42.14—Continuity of Government Act

This act discusses the need for political subdivisions to adopt rules and regulations providing temporary successors to offices in the case of an enemy attack or due to a natural disaster. It also allows for meetings of governing bodies of political subdivisions at other than usual places. SCC 2.36.075 (below) accomplishes these requirements for Snohomish County.

SCC 2.36.075 Continuity of Government

In accordance with Chapter 42.14 RCW, SCC 2.36.075 addresses continued operation of county government in the event of enemy attack.

EMAP Standard 5.7 – Planning

Standard 5.7.2.5 states, “A continuity plan shall identify the critical and time-sensitive applications, vital records, processes, and functions that shall be maintained, as well as the personnel and procedures necessary to do so, while the damaged entity is being recovered.” Snohomish County departments’ plans vary from highly detailed to vague.



Snohomish County Government – Facilities Emergency Response Plan (July 2005)

The FERP is a “supplement to DEM’s Comprehensive Emergency Management Plan and is limited to direction and control of evacuation and movement and disaster response at County-owned or leased facilities for 72 hours.” Attachment 6 of the FERP, entitled “Continuity of Government” lists elected officials and department director designees, and provides a template for departments to establish Employee Response Teams. The County’s FERP is not a continuity plan, though it does provide some continuity related information.

2.6.3 Snohomish County’s Continuity Plans

Snohomish County does not have a coordinated continuity of operations (COOP) plan, but few jurisdictions across the country do. The County began to discuss continuity issues with the approach of Y2K in 2000. Most departments assumed that information technology would be disrupted and they developed plans to manage their operations with that disability. In 2001, terrorism threats led governments to look at how a jurisdiction would function under stress. Most recently, the threat of a pandemic flu has led to planning for a large percentage of employees unavailable for work.

Without a plan in place, Snohomish County operations could be disrupted in the event of a significant or extended emergency. Officials believe that risks the County faces include:

- Financial implications - emergencies often lead to inefficiencies that can result in revenue loss.
- Lack of credibility with citizens - if core County services are not delivered or are not available during a crisis due to lack of planning by County government.

Classification

There is some confusion among County departments about what a continuity of operations plan is. When departments were asked to submit their “Emergency and Business Continuity Plans”, the following plans were received:

- Disaster Recovery Plan
- Disaster Response and Weather Emergencies
- Emergency Action Plan
- Emergency Operations Plan
- Emergency Operation and Business Recovery Policy Framework
- Emergency Operation Action Policy Framework
- Facility Emergency Preparedness Plan
- Law Enforcement and Security Resources Mobilization Plan

The County Executive’s Office is currently coordinating COOP efforts. The auditors were provided with a draft COOP for the Executive’s Office that could serve as a model



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for other County departments. The Department of Homeland Security and FEMA websites provide detailed COOP templates for governments.

County Continuity Plans

Most of the plans submitted by County departments need to be revised according to COOP standards. The Executive's Office, Department of Information Services (DIS), and the Public Works Department have the most complete plans. Their thorough plans incorporate preparedness, evacuation, response, and continuity issues. DIS is vital to the day to day functioning of government since they are primarily responsible for data on which the County relies. But as stated in DIS' Disaster Recovery Plan, "the extent to which this plan can be effective, however, depends on disaster recovery plans by other departments and units within the County." The DIS plan also describes the responsibility of all departments to determine how to conduct business if no information technology is available for up to 30 days. No Snohomish County plan submitted analyzed this scenario.

Role of Snohomish County DEM in COOP Planning

DEM is not currently involved in the development of the County's COOP although DEM has stated that they would like to take an active role in the County's efforts. There is no clear guideline or best practice for the appropriate organizational placement of COOP planning within government. The International Association of Emergency Managers (IAEM) believes that the processes and considerations of COOP and Emergency Management are identical; however, other officials believe that the continued functioning of government is not an emergency management responsibility, but rather an executive office function.

Recommendation 18:

A comprehensive COOP plan should be developed for Snohomish County government. The Executive's Office should determine what, if any, role DEM will play in the development of the COOP plan.



3 AREAS FOR FURTHER STUDY

Consolidation of County Emergency Operations Centers

The fragmentation of four independent EOCs in Snohomish County was a concern voiced by many internal/external partners and some neighboring jurisdictions. In the event of a large scale emergency in the County, it may be possible that all four EOCs would be competing for funding, resources, and other assistance from the state and federal governments. One emergency management professional stated that this fragmentation is like “the elephant in the room that everyone is trying to ignore.”



4 OFFICIAL RESPONSES

Department of Emergency Management Response to Performance Audit

To: Kymber Waltmunson, Performance Auditor

From: John E. Pennington, Director
Snohomish County Department of Emergency Management

Date: August 11th, 2006

Subject: Performance Audit Response

The Snohomish County Department of Emergency Management (DEM) takes seriously its mission. There is no greater challenge to a government and its leaders than the protection of its citizens. We are grateful to the County Executive for requesting this performance audit and we are equally grateful to those individuals who have conducted this in-depth analysis. We also sincerely appreciate the opportunity to respond to the final recommendations.

The former Department of Emergency Management, the primary focus of review for this audit, was by many accounts systemically broken and in need of complete overhaul. Even though much of what is recommended is based upon a thorough review of that former entity, the analysis and recommendations are nonetheless greatly beneficial to our new and evolving DEM.

Because of the detail of work and many of the findings of this audit (even while sometimes in disagreement), the Snohomish County Department of Emergency Management has a greater opportunity to improve its performance and we strongly commit to doing so.

The following is our response to the audit *Focus Issues and Recommendations*:

Recommendation 1: “DEM leadership should undertake a strategic planning process and document the results. The strategic plan should include development of performance measures linking activities to goals and objectives, as well as address resources.”

DEM Response: We concur and have already taken significant steps to address this section’s analysis and recommendation, including the complete reorganization of DEM, hiring of critical staff, and communication of a clear vision and mission for DEM’s employees and partners.

Recommendation 2: “DEM leadership should design and implement internal controls to ensure that DEM objectives are met.”

DEM Response: We strongly concur with this statement and have already begun the process of addressing this area.

Recommendation 3: “DEM should redesign job descriptions and the organizational structure to ensure that DEM is flexible and responsive; includes both big picture and detail orientations; integrates teamwork and communication.”



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DEM Response: DEM concurs with and has resolved this recommendation. Prior to the release of this audit, and at the direction of the new director of DEM, the department was completely reorganized to reflect more traditional emergency management entities. Job descriptions were restructured and two new individuals were hired to fill critical response roles.

Recommendation 4: “DEM leadership should ensure that DEM is adequately staffed to achieve its objective.”

DEM Response: Although we concur, we wish to stress that DEM staff is currently made up of only 5 general fund FTEs plus (when fully hired) approximately 5.5 grant funded staff. Grant funded staff have certain limitations that may prohibit or discourage their use during a response (EOC activation).

Recommendation 5: “DEM leadership should develop and update documentation according to legal requirements and strategic priorities.”

DEM Response: We concur and have addressed some of the concerns noted in this section by, as one example, reorganizing the department and then laying out an internal vision of DEM that is “strategic” (versus tactical) in nature.

Recommendation 6: “DEM leadership should ensure that an effective and informative website is developed and maintained and that technology is appropriately incorporated into DEM operations.”

DEM Response: We concur.

Recommendation 7: “DEM leadership should work to come into full compliance with all laws and regulations focusing on: NIMS; HSPD-5; HSPD-7; HSPD-8; DMA 2000; National Preparedness Goal.”

DEM Response: We concur and are making necessary efforts to comply with the aforementioned laws and regulations and their associated timeline requirements.

Recommendation 8: “DEM should make every effort to be in full compliance with NIMS by September 2006...”

DEM Response: We concur and have assigned specific staff to coordinate the completion of these tasks within the currently set deadlines of September 2006.

Recommendation 9: “DEM should ensure preparedness for all hazards and alignment of activities with Snohomish County hazards including the following...”

DEM Response: We concur strongly with recommendations to enhance our focus on mitigation and to develop additional hazard-specific plans relevant to Snohomish County, but we only *partially concur* with the recommendation that we should “ensure... alignment of activities with Snohomish County hazards...” We believe that such a strong recommendation to focus training and exercising only on Snohomish County-specific risks might inadvertently lead to less overall preparedness with, as an example, our regional partners and provide less opportunity to train and exercise with region-specific hazards. DEM believes it is more appropriate to align, when possible, these functions with our hazards.

Recommendation 10: “DEM should undertake a thorough update of the CEMP, including ESFs.”

DEM Response: We concur and have already begun a thorough review of the CEMP. Additionally, we have begun the process of simultaneously enhancing our existing EOC as well pre-designing a potential new EOC, both with a heightened focus on the role of the various ESFs within those facilities.



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Recommendation 11: *“DEM should ensure that appropriate documentation is in place for training that they provide. This goal should include: specific goals and objectives; assessment of constituency training needs; participant lists; course evaluations.”*

DEM Response: We concur.

Recommendation 12: *“DEM should develop and document training plans and training logs for each DEM staff person.”*

DEM Response: We concur.

Recommendation 13: *“DEM should develop specific processes to ensure sufficient communication, coordination, and service to member cities, internal and external partners, and regional EOCs.”*

DEM Response: We concur.

Recommendation 15: *“DEM should continue to develop and implement effective sub-recipient equipment monitoring processes.”*

DEM Response: We concur.

Recommendation 16: *“DEM should develop centralized files and data management procedures including comprehensive files for each grant.”*

DEM Response: We concur.

Recommendation 17: *“DEM should implement continuous monitoring processes including methods for ensuring that: grants are closed out timely; grant objectives are being met; grant reporting requirements and submitted as required.”*

DEM Response: We concur and are addressing this issue by reorganization of DEM and placing supervision over certain grant functions.

Recommendation 18: *“A comprehensive COOP plan should be developed for Snohomish County government. The Executive’s Office should determine what, if any, role DEM will play in the development of the COOP plan.”*

DEM Response: We strongly concur and believe that COOP planning and its overall coordination is appropriately placed within the Executive’s Office and the Department of Emergency Management.

Areas for Further Study: *“Consolidation of County Emergency Operations Centers”*

DEM Response: Although not a recommendation, DEM strongly agrees that the issue of multiple EOCs in Snohomish County must be addressed and we look forward to helping facilitate such a discussion.



MEMORANDUM

TO: Kymber Waltmunson, Performance Auditor

FROM: Mark Soine, Deputy Executive

DATE: August 11, 2006

SUBJECT: Executive Comments to DEM Performance Audit

The Executive Office is appreciative of the Performance Audit Team's response to the Executive's request to review the newly-acquired Department of Emergency Management (DEM). In 2005, Executive Reardon sought the merger of the independent DEM into Snohomish County government. The merger, which was approved by the DEM member cities in September 2005, was made to improve management, oversight and overall effectiveness of DEM which previously had been operating without County oversight and management.

Transition of DEM to a new Snohomish County department was completed on January 1, 2006. Shortly after the transition was completed, and following the abrupt resignation of the former DEM director, it became increasingly apparent that there were long standing and pre-existing systemic problems at DEM which needed to be addressed. As a result, Executive Reardon asked for a performance audit of DEM to obtain a snapshot of then-existing practices and to provide guidelines for improving service delivery over the previously independent DEM's practices. Furthermore, Executive Reardon authorized additional funding for the Performance Auditor to hire temporary help to expedite the completion of the audit. The Audit Team has worked diligently to complete this audit in a timely manner.

We are appreciative of the work done by Martha Robins of the Executive's Office, who stepped forward to direct DEM while a search was conducted for a permanent director. An experienced leader and a Major in the United States Army Reserves, Martha Robins did an excellent job as interim director beginning to identify and reverse the systemic problems during this time of transition.

The executive search resulted in nomination of John Pennington as the Director of the DEM. Mr. Pennington stepped down as FEMA Region X Director to lead DEM. His leadership and emergency management experience at FEMA will be invaluable in addressing the long standing and pre-existing systemic problems reported by the Performance Audit Team. Even as he awaits confirmation by the County Council as director, Mr. Pennington has begun working hard to resolve these deficiencies.

In addition to the review of DEM, the Performance Audit Team reviewed Continuity of Operations Planning and Continuity of Government efforts. The Executive Office and DEM will continue our ongoing effort to modify and improve these plans.

Clearly there are many long standing problems at the Department of Emergency Management which predate the merger into Snohomish County government. This audit will help us meet the goal of not only transitioning DEM to a Snohomish County Department, but also improve on all aspects of emergency response and management. We look forward to utilizing the report of the Performance Audit Team as an important tool to facilitate the transition of DEM to a Snohomish County Department of excellence. DEM will be working in an organized, methodical, and systematic way to create an effective emergency management department to assist the citizens of County when needed.



5 APPENDICES

5.1 Appendix A: *Officials Interviewed and Consulted*

County Staff

DEM and Executive Leadership

1. Mark Soine, Snohomish County Deputy Executive
2. Susan Neely, Executive Director
3. Martha Robins, DEM Interim Director
4. Chris Badger, DEM Deputy Director
5. Neil Clement, HLS Regional Coordinator
6. John Turner, HLS/UASI Program Manager
7. Tammy Jones, HLS Regional Grants Coordinator
8. Bill Eske, Temporary Planner
9. Diana Rose, Accounting Analyst
10. Tim Lawson, Equipment Coordinator
11. Terry Clark, Temporary MRC Coordinator
12. Lisa Jackson, Temporary CERT Coordinator

Public Works

13. Steve Thomsen, Acting Public Works Director
14. Allen Mitchell, Fleet Manager
15. Brad Graff, Fleet Management
16. Vaughn Collins, P.E., Hydraulic Engineer, Surface Water Management
17. John Engel, P.E., Supervisor, Habitat and Rivers CIP, Surface Water Management
18. Elizabeth Sjostrom, Public Works

Facilities

19. Al Garcia, Administrative Operations Manager, Facilities Management
20. Owen Carter, Acting Facilities Director

Sheriff

21. Kevin Prentiss, Bureau Chief, Field Operations, Sheriff
22. Tim Shea, Sheriff Field Operations

Other

23. Diane Weber, Risk Manager
24. Tad Seder, Assistant Civil Chief Prosecuting Attorney
25. Steve Smith, Executive Management Analyst
26. Chris Bly, Commander, Corrections
27. Gary Weikel, Director of Parks and Recreation
28. Alethea Hart, Deputy Prosecuting Attorney



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29. Gordon Sivley, Senior Civil Deputy Prosecuting Attorney
30. Dave Gossett, Snohomish County Council
31. Marsha Isenberg, Council Analyst
32. Bridget Clawson, HR Director
33. Tina Larson, HR Generalist

State

34. Sadie Armijo, State Auditor Audit Manager
35. Jayne Bentler, State Auditor
36. Rachel Glahe, EMPG Program Manager, Washington State Emergency Management Department
37. Jim Kadrmas, WA State Asst. EOC Manager
38. Mark Kogle, WA State Plans Review Coordinator
39. Tim Clark, Chief of Staff, Washington State Emergency Management Division
40. Marty Best, Mitigation Program Manager, Washington State Emergency Management Division
41. John Ufford, Planning, Analysis & Logistics Section Manager, Washington Emergency Management Division
42. Steve Kalmbach, Manager, Washington State Patrol
43. Tyler Ray, Citizen Corps Program Coordinator, Washington Commission for National & Community Service
44. Dr. Terry Egan, Planning, Exercises and Training Unit Manager

Regional Partners

Snohomish County

45. Dave Behar, Senior Manager, Snohomish County PUD #1
46. Ward Hinds, Chief Medical Officer, Snohomish County Health District
47. Gary Olson, President, Fire Chief's Association
48. Dave De Haan, Director, Everett Emergency Management
49. Brad Feilberg, Director, Monroe Emergency Management
50. Chuck Morrison, Director, Snohomish County Red Cross
51. Lisa Stowe, Clerk Treasurer, Index
52. Dennis Kendall, Mayor, Marysville
53. John Light, Public Works Director, Gold Bar
54. Lyle Romak, Mayor, Granite Falls
55. Randy Celori, Lake Stevens Chief of Police
56. Dennis Fenstermaker, Fire Chief, Darrington
57. Trudy Ladoucer, Safety Officer, Darrington School District
58. Margaret Larson, Mayor, Arlington
59. Mike Ganz, Fire Chief, Stanwood
60. Connie Dunn, Director of Public Works, Sultan
61. Jay Goss, Chief of Police, Tulalip Tribes
62. Lynda Harvey, Assistant to Police Chief, Tulalip Tribes
63. Steve Perry, SNOCOM Executive Director



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King County

- 64. Eric Holdeman, Director, King County Office of Emergency Management
- 65. Diane Newman, Deputy Director King County OEM
- 66. Jeff Bowers, Grants Administrator King County OEM
- 67. John Anthony, Emergency Management Supervisor, King County Office of Emergency Management

Pierce County

- 68. Steve Bailey, Director, Pierce County Office of Emergency Management
- 69. Bob Bartro, Program Coordinator Pierce County, Department of Emergency Management
- 70. Ken Parrish, Program Manager Pierce County DEM
- 71. Ellen Lenk, Pierce County Emergency Management

City of Seattle

- 72. Barb Graff, Director, Seattle Emergency Management
- 73. Roger Serra, Director of Security and Emergency Management, Seattle City Light (Past DEM Director)

Other

- 74. Kathy Estes, Thurston County Emergency Management
- 75. Dale Kloes, Program Specialist, Whatcom County Division of Emergency Management
- 76. Phyllis Mann, Director, Kitsap Department of Emergency Management
- 77. Tom Mattern, Spokane Emergency Management

National

- 78. Maggie Bulin, Deputy Director, Jacksonville, FL Emergency Management,
- 79. Lisa Nine, National Criminal Justice Association
- 80. Dan McGowan, Administrator, Montana Disaster and Emergency Services
- 81. Greg Wilz, Director, North Dakota Division of Homeland Security
- 82. Scott Gauvin, State EOC Manager, Illinois Emergency Management Agency
- 83. Dave Bujak, Operations Team Officer, Florida Division of Emergency Management
- 84. Mary Margaret Walker, NIMS Specialist, Department of Homeland Security



5.2 Appendix B: **Reference Documents**

A list of documents reviewed during the course of this audit follows in alphabetical order.

1. 2005-2006 Budget Narrative, Snohomish County Medical Reserve Corps, WA
2. 2006 Region One Investment Justification
3. An Audit of Citywide Grant Oversight, San Jose, CA
4. BSIRs (reviewed online)
5. Chapter 2.34 Snohomish County Code. Department of Emergency Management
6. Chapter 2.36 Snohomish County Code. Emergency Management.
7. Chapter 38.52 RCW, "Emergency Management".
8. Characteristics of Effective Emergency Management Organizational Structures, Public Entity Risk Institute
9. Citizen Corps (CC) Grant: 9140-04
10. Citizen Corps 2003 Grant Report
11. City of Marysville CEMP
12. City of Index CEMP
13. City of Monroe CEMP
14. CoCo Guidance on Control: Control and Governance-Number 1
15. Comprehensive Emergency Management Planning Guide, Emergency Management Division, WA State Military Department, Edition II, March 2003
16. COSO Enterprise Risk Management -- Integrated Framework and Application Techniques
17. DEM Advisory Board Minutes
18. DEM Board Of Directors Minutes
19. DEM E05-071 HLS tracking spreadsheet
20. DEM E05-098 tracking spreadsheet
21. DEM Management Committee Minutes
22. DEM MRC summary tracking spreadsheet
23. DEM Standard Operating Guide for Processing Grants Expenditures
24. DEM Transition Planning Minutes
25. DHS's Efforts to Enhance First Responders All-Hazards Capabilities Continue to Evolve, GAO, July 2005
26. Electronic Grants Management Initiative, National Criminal Justice Association (NCJA)
27. Electronic Grants Management System Monograph
28. EMD/HLS Equipment Approval/Purchase/Reimbursement Process
29. Emergency Coordination Center (ECC) Design Considerations, Eric Holdeman, 2/27/04
30. Emergency Management Performance Grant (EMPG): E05-289
31. EMPG E05-289 Progress Report, 10/1/04 – 12/30/05



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32. Equipment Budget Detail Worksheet
33. Grant Monitoring Checklist, State of Wisconsin Office of Justice Assistance
34. Guide to Opportunities for Improving Grant Accountability, Domestic Working Group: Grant Accountability Project, 2005
35. HLS Presidential Directive/ Hspd-5
36. HLS Presidential Directive/ Hspd-7
37. HLS Presidential Directive/ Hspd-8
38. Homeland Security Grant: E05-071
39. Homeland Security Grant: E06-022
40. Homeland Security Strategy Committee Minutes Jan 19 2006
41. Homeland Security Strategy Committee Minutes Sept 28 2005
42. How to Avoid a Substandard Audit: Suggestions for Procuring an Audit, National Intergovernmental Audit Forum, 1988
43. Interlocal Agreement for Emergency Management Services, 2006
44. International Association of Emergency Managers (IAEM) Survey 2005[1]
45. King, Pierce & Snohomish County Inter-county Mutual Aid Agreement, Omnibus Agreement
46. Law Enforcement Terrorism Prevention Program (LETPP) Grant: E05-076
47. Law Enforcement Terrorism Prevention Program (LETPP) Grant: E06-052
48. Local and Tribal NIMS Integration, Homeland Security, Version 1.0
49. Management Practices Across the United States, March 2006 (PGMP)
50. Medical Reserve Corps (MRC) Grants: 03-04 04-05 and 05-06
51. Medical Reserve Corps Progress Report for June 1, 2005 through June 30, 2005
52. Medical Reserve Corps Progress Reports for June 30, 2005 through December 31, 2005
53. Mount Baker-Glacier Peak Coordination Plan
54. National Response Plan, Homeland Security, December 2004
55. NIMS Basic, FEMA 501-3, March 27, 2006 (pp. 6).
56. NIMS Document, Homeland Security, March 1, 2004
57. NIMS Resource Typing System,
http://www.nimsonline.com/resource_typing_system/index.htm
58. Northwest Region Fire Mobilization Plan
59. Northwest Region Law Enforcement Mobilization Plan & Mutual Aid Agreement
60. Overview of the Grant Reporting Process, Grants Reporting Tool User's Guide v.3.0, Homeland Security Office of Grants and Training, 2006
61. Post Award Instructions, Office of the Comptroller Grant Award and Financial Management Information, 2005
62. Promising Grants Management Practices: A Compendium of Promising Grants Management Practices Across the United States, 2006
63. Proposal from Snohomish County to Contracting Cities to Transition Emergency Management Functions from DEM to Snohomish County Government, April 2005



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64. Proposal to County Executive Aaron Reardon Regarding the Approach to Transition Emergency Manager Functions from DEM to Snohomish County Government, September 2005
65. Public Administration Review March/April 2006. Managing Successful Organizational Change in the Public Sector, Fernandez and Rainey
66. Public Administration, Stillman
67. Public Law 93-288, "Disaster Relief Act of 1974" as amended by PL 100-707, "Robert T. Stafford Disaster Relief and Emergency Assistance Act."
68. Public Law 99-499, "Superfund Amendments and Reauthorization Act of 1986"
69. Public Works Emergency Response Mutual Aid Agreement signatory agencies
70. Region One Snohomish County Grant Tracking spreadsheet
71. Resource Definitions, FEMA, September 2004
72. Scope of Work, FFY2005 Emergency Management Performance Grant Program
73. SGSHP E06-022 FFY2005 Report
74. Snohomish County Comprehensive Emergency Management Plan
75. Snohomish County Convergent Volunteer Plan
76. Snohomish County DEM Suggested Operating Guidelines (SOGs)
77. Snohomish County DEM UASI Reporting
78. Snohomish County Department of Emergency Management 2005 Training and Information Guide
79. Snohomish County Emergency Operations (EOC) Equipment Proposal, February 10, 2006
80. Snohomish County FFY2004 State Homeland Security Program
81. Snohomish County Hazardous Materials Response Plan
82. Snohomish County Hazards Identification and Vulnerability Analysis (HIVA)
83. Snohomish County Homeland Security Strategy
84. Snohomish County Homeland Security Strategy Committee Policy and Procedures for Training and Exercise Draft
85. Snohomish County Homeland Security Strategy, Snohomish County Homeland Security Strategy Committee Revised September, 28, 2005
86. Snohomish County Law Enforcement Mobilization Plan
87. Snohomish County Mass Casualty Plan
88. Snohomish County Natural Hazards Mitigation Plan (SCNHMP)
89. Snohomish County NIMS implementation plan
90. Snohomish County RACES Plan
91. Snohomish County Technical Rescue Guidelines and Mobilization Plan 2004
92. Snohomish County Terrorism Response Coordination Plan
93. South Carolina SAA Monitoring for Sub-recipients Checklist Example



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94. State of Washington Mutual Aid and Interlocal Agreement Handbook, January 2001, Washington State Emergency Management Division
95. Study of Emergency Management at the Local Program Level, September 2004, Task Force on Local Program, Washington State Emergency Management Council
96. Target Capabilities List: Version 1.1- Dept of Homeland Security
97. Team Players and Teamwork, Fisher and Ury
98. The EMAP Standard, September 2004
99. The State of Indiana's Management of State Homeland Security Grants Awarded During Fiscal Years 2002-2003 (Redacted)
100. The National Preparedness Goal: Homeland Security Presidential Directive: "*National Preparedness*"
101. The Washington State Homeland Security Initiative Capabilities-Based Planning Instrument
102. Tribal Government and Local Jurisdiction Compliance Activities: Federal Fiscal Year 2006 (October 1, 2005-September 30, 2006), The NIMS Integration Center
103. UASI E04-058 Biannual Report 10/21/04 – 6/30/05
104. UASI E04-098 Biannual Report 12/01/03 – 6/30/05
105. UASI E05-098 Closeout Report
106. UASI Grant Equipment List
107. Universal Task List: Version 2.1- Dept of Homeland Security
108. Urban Area Security Initiative (UASI) Grant: E04-058
109. Urban Area Security Initiative (UASI) Grant: E05-098
110. Urban Area Security Initiative (UASI) Grant: E06-041
111. WAC118-40 - EPCRA
112. Washington Administrative Code



5.3 Appendix C: Regional Staffing Analysis

Staff size to Population* Served in Washington Counties			
Jurisdiction	Population	# of Staff	Pop/Staff
Snohomish	383,735	10	38,374
Pierce	550,000	23	23,913
King	400,000	19	21,053
Kitsap County	240,000	8.5	28,235
Whatcom County	167,000	4	41,750
Total	1,740,735	64.5	
Average	1 per 26,988		

Ideal Staff level based on average population served for Snohomish County is 14.

*Unincorporated county population



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5.4 Appendix D: Recommended Improvements to the CEMP

	Issue	Source	Action
1	CEMP to reflect full adoption of NIMS	NIMS State and Territory Compliance Activities – NIMS Integration Center	Revise and update plans and SOGs to incorporate NIMS, National Preparedness Goal, and National Response Plan (NRP) components
2	<p>The Public Information Appendix of the CEMP should include:</p> <ul style="list-style-type: none"> • Available media resource personnel (public relations officers, marketing staff and outreach workers) to call during an emergency or disaster including bilingual resources • Local news media to use for assistance in disseminating emergency information and instructions to the public including other than English language broadcasters • Ways to distribute Emergency Public Information materials to include newspapers, flyers, pamphlets, radio, television, cable, National Weather Radio and Emergency Alert System • Methods for Emergency Public Information to be received by the visually/ hearing impaired and non-English speaking groups. • Pre-made messages for initial actions in all community languages 	Suggested in the State Planning Guidelines	Update the Public Information section of the CEMP and include references to the relevant SOGs.
3	When the CEMP is in compliance with NIMS it will include designation of a Finance/Administration Section Chief, by title or position who is responsible for administration activities in the EOC during activations; and a checklist of their responsibilities.	Suggested in the State Planning Guidelines, NIMS	Update format of the CEMP to comply with NIMS organization and Emergency Administration Procedures and Records Annex of the CEMP.
4	The CEMP should include designation of an individual, by title or position who is responsible for developing procedures to safeguard financial, vital statistics, property, and personnel records and files.	Suggested in the State Planning Guidelines and Federal Guidance.	Update COOP elements and Emergency Administration Procedures and Records Annex of the CEMP.
5	The CEMP should include designation of an individual, by title or position who is responsible for assuring that exercise deficiencies defined in future After-Action Reports are addressed and corrected	Suggested in the State Planning Guidelines, UASI, and SHSGP guidelines.	Update Training and Education Annex of the CEMP.



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6	The CEMP should include designation of an individual, by title or position who is responsible for providing training and education	Suggested in the State Planning Guidelines, NIMS for Citizen Corps.	Update Training and Education Annex of the CEMP.
7	CEMP should include a requirement to conduct annual exercises, including tabletop exercises, functional exercises, and full scale as required by grants and regulations.	State Planning Guidelines, WAC 118-30-060, federal grants.	Update Training and Education Annex of the CEMP
8	Format the CEMP so that it complies with NIMS organization functions, and so each page includes the name of document, the section of the document, date of the page, and the page number.	Suggested in the State Planning Guidelines, WAC 118-30-060, NIMS requirements.	Update CEMP



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5.5 Appendix E: ESF Comparisons to Federal and State Requirements

ESF Structure:

ESF	National Response Plan ESFs	ESF	Snohomish County CEMP ESFs	ESF	Washington State CEMP Planning Guide
1	Transportation	1	Transportation	1	Transportation
2	Communications	2	Telecommunications/Information Systems and Warning	2	Telecommunications and Warning
3	Public Works and Engineering	3	Public Works and Engineering	3	Public Works and Engineering
4	Firefighting	4	Fire Service	4	Firefighting
5	Emergency Management	5	Information Analysis and Planning	5	Information Analysis and Planning
6	Mass Care, Housing, and Human Services	6	Mass Care	6	Mass Care
7	Resource Support	7	Resource Support	7	Resource Support
8	Public Health and Medical Services	8	Health and Medical Services	8	Health and Medical Services
9	Urban Search and Rescue	9	Search and Rescue	9	Search and Rescue
10	Oil and Hazardous Materials Response	10	Hazardous Materials	10	Hazardous Materials
11	Agriculture and Natural Resources	11	Food and Water	11	Food and Water
12	Energy	12	Energy and Utilities	12	Energy and Utilities
		20	Military Support to Civil Authorities	20	Military Support to Civil Authorities
14	Long-Term Community Recovery and Mitigation	21	Recovery and Restorations	21	Recovery
13	Public Safety and Security	22	Law Enforcement	22	Law Enforcement
		23	Damage Assessment	23	Damage Assessment
		24	Evacuation and Movement	24	Evacuation and Movement
15	External Affairs			25	State Animal Response Plan



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ESF Content:

National Response Plan ESF Sections	Snohomish County CEMP ESF Sections	Washington State CEMP Planning Guide ESF Sections
ESF Coordinator		
Primary Agency	Joint Primary Agencies	Primary Agency
Support Agencies	Supporting Agencies	Support Agencies
Introduction (Purpose, Scope, Policies)	Introduction; Policies; Purpose	Introduction (Purpose, Scope); Policies
		Situation (Emergency/Disaster Conditions and Hazards, Planning Assumptions)
Concept of Operations (General, Organization, Actions, Responsibilities)	Operational/Organizational Concepts	Concept of Operations (General, Organization, Procedures, Mitigation Activities, Preparedness Activities, Recovery Activities)
		Responsibilities
		Resource Requirements
References		



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5.6 Appendix F: EOC EMAP Standards

EMAP Emergency Operations Center/Multiagency Coordination Systems		
Functional Areas		
EMAP Standard Areas	EMAP Program Elements	In place at DEM?
Resource Management	The program shall establish resource management objectives consistent with the overall program goals and objectives related to identified hazards.	No
	The program has identified resource requirements to respond to identified hazards.	No
	Resource requirements identified by the program are prioritized and addressed through various initiatives, which may include the budget process, executive process, mutual aid agreements, memoranda of understanding, contractual service agreements, or business partnerships.	Partially
	The jurisdiction maintains a program resource inventory and has established a process that provides for the expeditious identification and procurement of external resources and assistance.	No
	The program, in coordination with volunteer agencies, has provisions in place to accept, inventory, maintain, distribute, and/or redirect solicited as well as unsolicited donations.	Partially
Logistics & Facilities	The program has a logistics management framework that includes an operational logistics plan and implementing procedures that address the identification, location, acquisition, warehousing, maintenance and testing, timely distribution, and accounting for services and materials.	No
Direction, Control & Coordination	Plans and procedures are in place that describe the command relationships within the program and with external organizations. The plans, procedures and necessary resources enable the chief executive and other key officials to direct, control, and coordinate both internal and external resources efficiently and effectively during response and recovery operations	Partially
	The program shall include an incident management system and specific organizational roles, titles, and responsibilities for each management function specified in the emergency operations/response plan.	Partially
	The program develops, publishes and distributes information about its incident management system to all who have a potential involvement in an emergency operation. The coordination includes superior, subordinate and lateral elements as well as neighboring jurisdictions. This information specifically addresses the resource management function and its relationship to incident management.	No
	The program has established written policies and procedures that address management structure and/or chain of command, lines of succession, and other contingencies for continuity of operations for appropriate individuals who provide authority or legal and regulatory oversight for the accomplishment of the program.	No



5.7 Appendix G: **Grant Objectives Detail**

Objectives taken from the text of the Catalog of Federal Domestic Assistance (CFDA)

Law Enforcement Terrorist Prevention Program (LETPP)

“LETPP will provide State and local law enforcement communities with funds to support the following prevention activities: information sharing to preempt terrorist attacks; target hardening to reduce vulnerability of selected high value targets; recognition and mapping of potential or developing threats; interoperable communications; and, interdiction of terrorists before they can execute a threat or intervention activities that prevent terrorists from executing a threat.”

Urban Areas Security Initiative (UASI)

“UASI program provides financial assistance to address the unique multi-discipline planning, operations, equipment, training, and exercise needs of high-threat, high density Urban Areas, and to assist them in building and sustaining capabilities to prevent, protect against, respond to, and recover from threats or acts of terrorism; however, in light of several major new national planning priorities, which address such issues as pandemic influenza and the aftermath of Hurricane Katrina, the allowable scope of UASI activities including catastrophic events, provided that these activities also build capabilities that relate to terrorism.”

Homeland Security (HLS) / State Homeland Security Grant Program (SHSGP)

HLS: “To enhance the capacity of State and local emergency responders to prevent, respond to, and recover from a weapons of mass destruction (WMD) terrorism incident involving chemical, biological, radiological, nuclear, and explosive (CBRNE) devices and cyber attacks.”

SHSGP: “To enhance the capacity of State and local first responders to respond to terrorism incident involving chemical, biological, nuclear, radiological, incendiary, and explosive devices. The program was re-named as the State Homeland Security Grant Program (SHSGP) (97.073). SHSGP is one of the six (6) component programs which have been merged or consolidated into the Homeland Security Grant Program (97.067).”

Emergency Management Performance Grant (EMPG)

“To assist the development, maintenance, and improvement of State and local emergency management capabilities, which are key components of a comprehensive national emergency management system for disasters and emergencies that may result from natural disasters or accidental or man-caused events. EMPG provides the support that State and local governments need to achieve measurable results in key functional areas of emergency management:



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1) Laws and Authorities; 2) Hazard Identification and Risk Assessment; 3) Hazard Management; 4) Resource Management; 5) Planning; 6) Direction, Control, and Coordination; 7) Communications and Warning; 8) Operations and Procedures; 9) Logistics and Facilities; 10) Training; 11) Exercises; 12) Public Education and Information; and 13) Finance and Administration.”

Medical Reserve Corps (MRC)

“To support the development of Medical Reserve Corps (MRC) units in communities throughout the United States to: (1) increase capacity at the community level to respond during emergencies which have medical consequences, and (2) improve public health in communities through volunteerism on an ongoing basis.”

Citizen Corps Program (CCP)

“The purpose of Citizen Corps is to supplement and assist State and local efforts to expand Citizen Corps. This includes Community Emergency Response Team (CERT) training, establishing Citizen Corps Councils and supporting the oversight and outreach responsibilities of the councils. The program supports and promotes efforts to involve a wide range of volunteer groups in activities that enhance individual, community, and family preparedness and contribute to the strengthening of homeland security.”



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5.8 Appendix H: Grant Overview Checklist

Developed by the audit team using best practice data.

Grant Overview Checklist

___ General

- ___ Grant completed in a timely manner; minimize number of amendments
- ___ Dollars spent consistent with stated grant objectives
- ___ Controls in place
- ___ Conflicts of interest identified and mitigated

___ Sub-Recipients

- ___ Sufficient direction to sub-recipients regarding purchase of equipment or activities
- ___ Activities of sub-recipients adequately monitored

___ Sub-Contractors

- ___ Use competitive process

___ Managing Funds

- ___ Submit requests for payment within 30 days after the end of each calendar quarter (even if there is no grant activity)
- ___ Minimize time between transfer and disbursement of reimbursement funds to sub-recipients

___ Documentation

- ___ Supporting documentation exists for all fund disbursement related decisions
- ___ Maintain documentation for all sub-recipients
- ___ Records of grant funded exercises including dates, locations, participant names, disciplines, type of exercise
- ___ Records of grand funded trainings including course title, attendee names, disciplines, dates, locations
- ___ Data is efficiently stored
- ___ Data is readily accessible

___ Reporting (as required for grant)

- ___ Programmatic reporting to meet guidelines
- ___ Properly submit ISIPs (due no later than 60 days after the grant award date)
- ___ Properly complete and submit BSIRs (due no later than 1/31, 7/31 and closeout)
- ___ Properly complete and submit CAPRs (due no later than 1/31, 7/31 and closeout)

___ Closeout

- ___ Location of equipment, serial numbers, etc.



5.9 Appendix I: **Sub-Recipient Checklist**

Developed by the audit team using best practice data.

Best Practices Checklist—Sub-Recipient Activities

___ Department maintains policies, systems and procedures for activities that precede identification of sub-recipients.

___ Department informs potential sub-recipients of mission and funding priorities.

___ Equipment Committee reviews and evaluates potential allocation of funding to sub-recipients.

___ **Response Timeline:** Maintain and communicate a timeline for considering and determining allocation.

___ **Review Process:** Maintain clear policy and process for determining allocation.

___ **Communication:** Maintain policies regarding staff interactions with potential sub-recipients and written communication for informing about allocation decisions.

___ **Tracking:** Maintain system to track and document allocation decisions.

___ Department maintains a checklist of required information to be submitted by or collected on potential sub-recipients.

___ Department performs a due diligence review of potential sub-recipients to determine the reasonableness of the grant and the sub-recipients' ability to manage the equipment.

___ Department maintains policies and procedures over documents developed and collected.

___ Department maintains a checklist of documents to maintain in sub-recipient file.

___ Department maintains letter/policy to notify the sub-recipient that equipment will be allocated to them and set forth the terms under which the allocation will operate.

___ **Purpose:** The intent of the allocation and expectations of the sub-recipient.

___ **Amount:** Total allocation dollar amount.

___ **Duration:** Period of time in which equipment should be obtained or activity should be initiated and completed by the sub-recipient.

___ **Reimbursement Process:** Clarify the process by which the sub-recipient should request and receive reimbursement for funds expended.

___ **Modifications:** Specify whether or not modifications are allowed and detail the process for revision approvals.

___ **Quality Standard:** Explain any standards of quality requirements that must be maintained in order for the allocation to remain active or the notification process for deficiency, corrective action, and result of non-compliance.

___ **Recordkeeping:** Define what records at what level of detail the sub-recipient must maintain, the length of time such records must be kept, and whether the Department has the right to inspect/audit the records.

___ **Financial Reporting:** Specify any requirements of financial report(s) and state when the report(s) will be due. Describe the level of detail and format required.

___ **Contact Person:** Identify the staff person responsible for monitoring the sub-grant and to whom inquiries should be directed.



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___ Department maintains written procedure to ensure that proper payments are made to the right payee at the right time and to provide a clear audit trail while minimizing the opportunity for malfeasance.

___ Department maintains list of upcoming reimbursement payments, verify status of allocations (requirements and contingencies met), and obtain outstanding documents.

___ Department records reimbursement payments.

___ Department sends reimbursement to authorized official at the sub-recipient organization.

___ Department maintains records that reimbursement was made and the date the payment was sent to the sub-recipient.

___ Department maintains written policy and/or procedure that articulate the reporting requirements for sub-recipients based on reasonable criteria.

___ Department maintains written policy/procedure for conducting evaluation of sub-recipient equipment or activities (may include desk audit, site visit, and/or observation of operations).

___ Department maintains written policy/procedure for conducting evaluation of A-133 audits undergone by sub-recipients and assessing corrective action plans of sub-recipients when necessary.



5.10 Appendix J: Continuity of Operations Plan (COOP)/Continuity of Government (COG) Checklist

Developed by the audit team using best practice data.

Executive Office COOP/COG Checklist

- Establish a countywide COOP/COG program.
- Appoint a senior executive as the county COOP/COG program point-of-contact.
- Develop a COOP/COG multi-year strategy and program management plan that includes a recommendation for a program budget to support viable COOP/COG capability.
- Develop, approve, and maintain COOP/COG plans and procedures for Executive and all subordinate departments.
- Provide templates, support, and input into development of Department/Office COOP/COGs.
- Coordinate COOP/COGs between departments to ensure necessary collaborations (e.g. DIS, HR etc.).
- Develop and communicate procedures for the following:
 - ✓ Closure of facilities
 - ✓ Dismissal of non-essential employees
 - ✓ Leave policies
 - ✓ Overtime pay
 - ✓ Return to work policies
 - ✓ Telework agreements
 - ✓ Testing fire and communication systems
- Conduct tests, training, and exercises of agency COOP/COGs at least annually, to include COOP/COG personnel, and essential systems and equipment, to ensure timely and reliable implementation of COOP/COG plans and procedures.
- Participate in interagency COOP/COG exercises to ensure effective interagency coordination and mutual support.
- Develop beneficial Mutual Aid Agreements and review yearly.
- Notify appropriate agencies upon the implementation of the COOP/COG.
- Coordinate intra-county COOP/COG efforts and initiatives with policies, plans, and activities in accordance with directives related to terrorism, critical infrastructure protection, and all-hazards preparedness.



Department/Office COOP/COG Checklist

Continuity of Operations Plan Sections

- ✓ General
- ✓ Essential Functions
- ✓ Delegation of Authority
- ✓ Alternate Facilities
- ✓ Interoperable Communications
- ✓ Records, Databases, and Systems
- ✓ Human Capital
- ✓ Restoration

General

The three phases of a COOP/COG are:

1. Phase I: Activation and Relocation
2. Phase II: Alternate Facility Operations
3. Phase III: Reconstitution

Contacts

- Maintain a list of current COOP Team²³ titles, names, and their contact information.

Plan Exercise and Training

- Conduct a tabletop exercise of the COOP/COG at least annually.
- Ensure that officials who might be expected to assume authority are trained at least annually to carry out their emergency duties.
- Train all employees responsible for the execution of the COOP/COG in disaster recovery and emergency management.
- Hold a comprehensive debriefing after each exercise for the participants to identify systemic weaknesses in plans and procedures and to recommend and incorporate appropriate revisions into the After-Action Report and Improvement Plan.

Plan Maintenance and Storage

- Identify responsibility for updating document or document sections.
- Update the COOP/COG at least annually, but revise as necessary and redistribute current copies.
- Maintain an audit trail of the changes made to the COOP/COG.
- Keep a current copy of the COOP/COG offsite and online if feasible.
- Maintain access to a current copy of the COOP/COG at all times for COOP/COG users.

Essential Functions

- Identify essential functions, which must be continued under all circumstance with minimal disruption or which cannot be interrupted for more than 12 hours.

²³ the team of people responsible for implementing the COOP/COG



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- Identify functions that can be suspended while staff is reassigned to roles that are more critical.
- Plan for sustaining the essential functions of normal business activities for up to 30 days.
- Prioritize essential functions based on the criticality and time sensitivity of the function.
- Identify resources needed to perform essential functions within 12 hours and for up to 30 days including:
 - ✓ Staffing, resource requirements, and any other supporting activities needed
 - ✓ A roster of personnel needed to perform essential functions
 - ✓ Equipment needed (including information technology and telecommunications hardware)
 - ✓ Consumable office supplies needed
- Develop a process to account for all personnel within a department/office.
- Identify resources needed for community recovery and ensure availability of:
 - Property records
 - Vital statistics
 - Business licenses

Delegation of Authority

- Ensure that documentation of the legal authority for delegation to officials below the Department/Office head is in place. Include:
 - ✓ Conditions under which delegation will take place
 - ✓ Methods of notification of delegation
 - ✓ When delegated authority would terminate
 - ✓ Actions authorized to delegate and exceptions
 - ✓ Identify delegates by position or title rather than name
 - ✓ Any procedures to follow in the case of delegation

Alternate Facilities

- Ensure that alternate site preparation and activation plans are in place to achieve full operational capability within 12 hours of need.
- Consider the use of virtual offices as an alternate facility.
- Identify alternate facility for operation. The facility should meet the following criteria:
 - ✓ Have an all-hazard risk assessment
 - ✓ Be capable of being operational within 12 hours of activation including access to data and systems
 - ✓ Have the ability to sustain operations until normal business operations can resume (up to 30 days)
 - ✓ Be located a safe distance away from vulnerable areas or facilities
 - ✓ Have access to essential resources such as food, water, fuel, power, medical facilities from the alternate facility
 - ✓ Have access to transportation
 - ✓ Have the ability to run emergency power to allow essential functions and operations to continue in any environment
 - ✓ Ensure that size is appropriate for scope of necessary staffing
 - ✓ Allow for housing of personnel at or near the facility if necessary
 - ✓ Have adequate interoperable communications to perform essential functions
 - ✓ Provide physical security that meets all requirements for essential functions
 - ✓ Consider needs for health, safety, and emotional well being of personnel



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- If the alternate facility is not owned or leased by the agency, ensure that an MOU/MOA exists. Ensure that:
 - ✓ The MOU/MOA is reviewed annually
 - ✓ The MOU/MOA takes into consideration the time period from notification of requirement to availability of facility for occupancy; space and services required; and any needs for sole use of allocated space during the period of occupancy
- Include plans for movement to alternate operating facilities, including directions and maps of routes from primary location to alternate operating facilities.
- Include plans for the ordering of necessary equipment/supplies that are not already in place at alternate facilities.
- Include plans for the reception and processing of personnel at alternate facilities.
- Ensure that adequate life support items (food, water, medical supplies) are available from external sources and are accessible to the facility in sufficient quantities to sustain 30 days of operations.

Interoperable Communications

- Identify all necessary communications media likely to be available and needed in an emergency situation.
- Ensure that interoperable communications capability is commensurate with the Department/Office's essential functions.
- Plan for the ability to communicate with personnel, other employees, leadership, including pre-planned use of the media, both through paid advertising and through editorial support.
- Plan for access to data systems necessary to conduct essential functions and support activities.

Vital Files, Records, and Databases

- Complete a vital records inventory with precise locations for vital records.
- Develop a protection program for vital records including:
 - ✓ Purpose and scope
 - ✓ Roles and responsibilities
 - ✓ Necessary keys and access codes
 - ✓ Staff training
- Plan to function without DIS support for up to 30 days if data and connections cannot be restored.
- Maintain a complete inventory of records identified under Emergency Operating Records and Legal and Financial Records, along with the location and access information for all records.
 - ✓ Maintain emergency operating records and legal and financial records at multiple sites
- Complete a risk assessment to identify the risks if vital records are retained in current locations and medium as well as the difficulty of reconstituting them if they are destroyed. Take action based on this assessment in the following areas:
 - ✓ Determine if off site storage is necessary
 - ✓ Determine if alternative storage media is advisable
 - ✓ Determine if duplicate records are advisable, including a plan for regular updates
- Work with DIS to identify records recovery experts and vendors who can assist with recovery in the event of records damage.
- List access requirements and sources of equipment necessary to access records.



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Human Capital

- Develop Personnel and Employee contact lists.
- Identify staff that can be cross-trained to backfill critical functions.
- Identify emergency employees who must report for work under various situations (essential employees) in order to continue government operations.
 - ✓ Notify essential employees in writing in advance to explain their designation and responsibilities.
- Develop procedures for the following:
 - ✓ Telework agreements
 - ✓ Communicating policies and instructions to non-essential employees
 - ✓ Filling emergency or special staffing needs
 - ✓ Providing supplies to employees if there is a shelter-in-place requirement
- Communicate with employees about the following issues:
 - ✓ Encourage them to remain aware and be attentive to suspicious activities
 - ✓ Familiarize them with the methods of communications that may be used internal and external to the department, as well as the means of notification used to inform and instruct employees

Reconstitution Operations

- Develop an executable plan to transition from emergency status to an efficient normal operation status once a threat of disruption has passed. Identify Personnel who are authorized to make these decisions. Include:
 - ✓ Movement back from the alternate operations location to the original operating site or a new operating facility if needed
 - ✓ Informing all personnel that the threat of an emergency or the actual emergency has passed and provide instructions for resumption of normal operations
 - ✓ Verify that all systems, communications, and other required capabilities are available and operational and that the agencies are fully capable of accomplishing all essential functions/operations at the new or restored facility
 - ✓ Include plans for an after-action review of COOP/COG operations and effectiveness of plans and procedures, identify areas for correction and develop a remedial action plan



5.11 Appendix K: **Promising Practices**

Promising Practices are practices, activities, and ideas from other jurisdictions or emergency management literature that may be of value to DEM as they engage in organizational change.

Member City Outreach:

- Kitsap County's Department of Emergency Management distributes an informative brochure on the roles, responsibilities, and services that the department provides to its member cities and partners. The document entitled, "What we do for you..." is an effective outreach tool, and the Director stated that the member cities "usually get far more service than they pay for."
- Pierce County stated that they stay in close contact with their contracted cities, and provide cities with "all the information that they could possibly want or need," and that "customer service is tied to the contract success."
- Whatcom County makes it a practice to visit each contracted city once per quarter to discuss issues on an informal basis.

Website Development:

- A number of jurisdictions (particularly King County) have extensive websites where the public has access to vital emergency management information. DEM needs to improve its website as well as providing correct "redirect" messages on inactive pages.

Cross-Training:

- Pierce County provides cross-training workshops every two weeks for staff and King County recently reshuffled its staff projects so that there is a broader knowledge base of emergency management functions King County has specifically hired a manager with strong team building skills to strengthen teamwork in their staff.

COOP Planning Process:

- COOP planning falls under the responsibility of Pierce County's Department of Emergency Management. They recently completed a four month countywide COOP planning process which was spearheaded by two DEM staff. DEM provided training and templates so that each department's plan addressed the same basic continuity issues. They also found that three departments (Human Resources, Budget and Finance, and Information Technology) interacted with almost everyone within the County so their individual plans had to take into account how their actions would affect the rest of the departments. Pierce County has offered to



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discuss their planning process with Snohomish County in order to share their successes and pitfalls with COOP planning.

- In King County, COOP planning for a flu pandemic is currently coordinated through the Department of Executive Services in consultation with the Public Health Department and the Office of Emergency Management. The Seattle and King County Public Health Department produced a document entitled, "Continuity of Government issues that should be addressed by local agencies" which offers basic, but essential guidelines for COOP planning.
- In Seattle, continuity planning is coordinated through the Department of Emergency Management with oversight from the Executive's Office.

Grant Management:

- Given the high percentage of funding coming from the federal government, other sources of funding should be obtained to ensure future financial stability and efficiency. This could include increased County general funding, increased member fees, a more diverse grant source base, etc. If the County chooses not to diversify the funding base, there should be a strategy in place to scale back operations and eliminate grant funded positions as grant funding decreases over time. (Washoe)
- Access the annually published *Federal Catalog of Domestic Assistance* in order to gain information on funding opportunities and identify possible new funding opportunities.
- Sign up for auto-emails on eCivis and grants.gov in order to get updates on grants and funding opportunities (King).
- Apply for specific hazard mitigation grants (Pierce).

Grant Close-Out:

- Minimize amending grant contracts by overspending and moving spending between fiscal years as necessary. (Pierce)
- Put processes in place to complete equipment orders early. Many jurisdictions may be ordering the same types of equipment from the same vendors, so those who order first will benefit. (Pierce)
- Check in with sub-recipients four months before grant completion to make sure the purchases/projects will be completed. (King)
- Have a contract in place with the media companies in case there is available funding at the end of a grant for public education. (King)
- Have a contingency plan for last minute equipment purchases and public education in case grant isn't fully expended. (King)
- Pre-identify equipment on the approved list that can be delivered in a short timeframe. (King)



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Sub-Recipient Grants:

- Make site visits to a sample of the sub-recipients and document to check on the status of their equipment. Use a camera and a checklist to verify that equipment is being put to proper use. (Pierce)
- Require and document that all sub-recipients submit a certification of their equipment every two years. (Pierce)
- Review and document sub-recipients' internal controls and accept a lower level of reporting (i.e. certification) from those who are able to demonstrate they have adequate internal controls within their own organization. Make site visits to look more carefully into the use and treatment of equipment were made to those entities with less solid internal controls. (Whatcom)
- Maintain equipment tracking information in a database. (Pierce)
- Utilize a bar code system for the inventory of and checking out of equipment to sub-recipients. (Pierce)

Grant Documentation:

- Establish policies and procedures for the storage of documentation and other information pertaining to grants.
- Maintain a file for each grant that contains the contract, amendments, distribution agreements, hand receipts, invoices, performance and other progress reports, training and exercise documentation. (Pierce)
- Maintain a separate file for each sub-recipient that contains all information related to the monitoring of that sub-recipient. This file may include some duplicate documentation to that which is stored in the mail grant file.
- Ensure that state guidance is in writing and keep it in the contracts file. (Pierce)
- Keep copies of grant reporting documentation in the grant file.

Grant Reporting:

- Create a spreadsheet of due dates for all progress reports for each grant. Either have each program manager do this individually or have a central system that can be monitored by the Director.