

July 2009

URBAN AREA
SECURITY
INITIATIVE

FEMA Lacks Measures
to Assess How
Regional
Collaboration Efforts
Build Preparedness
Capabilities



GAO

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Highlights of [GAO-09-651](#), a report to congressional committees

Why GAO Did This Study

From fiscal year 2003 through fiscal year 2009, the Department of Homeland Security (DHS) allocated about \$5 billion for the Urban Area Security Initiative (UASI) grant program to enhance regional preparedness capabilities in the nation's highest risk urban areas (UASI regions). The Federal Emergency Management Agency (FEMA) administers this program. The Implementing Recommendations of the 9/11 Commission Act of 2007 (9/11 Act) required FEMA to change the size of the geographical areas used to assess UASI regions' risk. The conference report accompanying the Consolidated Appropriations Act for fiscal year 2008 directed GAO to assess FEMA's efforts to build regional preparedness through the UASI program, and determine how the 9/11 Act change affected UASI regions. This report addresses (1) the extent to which FEMA assesses how UASI regions' collaborative efforts build preparedness capabilities, and (2) how UASI officials described their collaboration efforts and changes resulting from the 9/11 Act. GAO surveyed all 49 UASI regions that received funding prior to the 9/11 Act change, and visited 6 regions selected based on factors such as length of participation. GAO also reviewed FEMA's grant guidance and monitoring systems.

What GAO Recommends

GAO recommends that FEMA develop performance measures to assess how regional collaboration efforts funded by UASI grants build preparedness. FEMA concurred with our recommendation.

[View GAO-09-651](#) or [key components](#). For more information, contact William O. Jenkins, Jr. (202) 512-8777, jenkinswo@gao.gov.

URBAN AREA SECURITY INITIATIVE

FEMA Lacks Measures to Assess How Regional Collaboration Efforts Build Preparedness Capabilities

What GAO Found

Although FEMA has gathered and summarized data on UASI regions' funding for specific projects and related preparedness priorities and capabilities, it does not have measures to assess how UASI regions' collaborative efforts have built preparedness capabilities. An executive directive, Departmental policy, and agency guidance all require that preparedness priorities and capabilities be measurable so that FEMA can determine current capabilities, gaps, and assess national resource needs. To report on the performance of the UASI program, FEMA has gathered data on UASI regions' funding for projects and the goals and objectives those projects support, including the National Priority to Expand Regional Collaboration. However, FEMA's assessments do not provide a means to measure the effect UASI regions' projects have on building regional preparedness capabilities—the goal of the UASI program. FEMA acknowledged a lack of specific measures that define how or whether national priorities—including expanding regional collaboration—are achieved. In the absence of measures, FEMA directed states to describe their collaborative activities. However, these state activities do not provide a means to assess how regional collaboration activities help build preparedness capabilities. FEMA has an effort underway to establish a comprehensive assessment system to appraise the nation's preparedness capabilities. FEMA could build upon its current efforts to assess overall preparedness by developing and including measures related to the collaboration efforts of UASI regions and their effect on building regional preparedness. This could provide FEMA with more meaningful information on the return on investment of the \$5 billion it has allocated to the UASI program to date.

UASI officials described program activities that they said greatly or somewhat helped support regional collaboration, reflecting factors GAO identified that can enhance and sustain collaboration, and also described a variety of actions taken in response to the 9/11 Act change to assess risk. Regarding program activities that support regional collaboration, of the 49 UASI regions GAO surveyed, 46 said they have active mutual aid agreements in part to share resources among jurisdictions, and 44 described training and exercises as activities they use to build regional preparedness capabilities. Some UASI regions reported changes in membership in response to FEMA's change in the size of the geographical areas used to assess UASI regions' risk. For example, of the 49 regions GAO surveyed, 27 reported that additional jurisdictions were included within the geographical area FEMA used to assess risk that were not included in the region's membership. However, 17 of these regions reported that they had assessed and evaluated the need to include these new jurisdictions in their membership and 3 UASI regions said they plans to do this, while 7 UASI regions said they had no plans to do this.

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United States Government Accountability Office
Washington, DC 20548

July 2, 2009

The Honorable Robert C. Byrd, Chairman
The Honorable Thad Cochran, Ranking Member
Subcommittee on Homeland Security, Committee on Appropriations
United States Senate

The Honorable David E. Price, Chairman
The Honorable Harold Rodgers, Ranking Member
Subcommittee on Homeland Security, Committee on Appropriations,
House of Representatives

The November 2008 Mumbai attacks, where members of a terrorist group attacked multiple locations, including transportation, commercial, and religious facilities, illustrated the propensity of terrorists to strike high-profile urban targets. To prepare for and respond to such acts of terrorism, the Department of Homeland Security (DHS) provides grants administered by the Federal Emergency Management Agency (FEMA) to state, local, tribal jurisdictions, and urban areas to build and sustain national preparedness capabilities. From its inception in fiscal year 2003 through fiscal year 2009, Congress has appropriated about \$5 billion for the Urban Area Security Initiative (UASI) to support regional preparedness in the nation's highest risk urban areas.¹ The UASI grant program is designed to distribute federal funding to an urban region composed of multiple local governments and first responder agencies rather than a single city. The purpose of the UASI program is to support regional collaboration among local jurisdictions and emergency response organizations in order to build and sustain regional preparedness capabilities necessary to prevent, protect, respond to, and recover from acts of terrorism.

Reflecting the requirements of the Implementing Recommendations of the 9/11 Commission Act of 2007 (9/11 Act),² FEMA changed the way it assessed risk for urban areas in allocating grant funds in 2008. Previously, FEMA measured the relative risk of UASI regions' using a 10 mile radius

¹ FEMA uses a risk-based methodology that considers threat, consequences, and vulnerability to identify the urban areas eligible for grants, and couples this methodology with the Urban Area's anticipated effectiveness (as assessed through peer review) to determine the amount of funds urban areas receive.

² Pub. L. No. 110-53, § 101, 121 Stat. 266, 271-293 (2007).

around the center city's boundaries. The 9/11 Act required FEMA to use the boundaries of metropolitan statistical areas (MSAs) for the 100 largest (by population) areas in determining its 2008 UASI grant allocations.³ Although the 9/11 Act did not specify the intent of the change to MSAs, we concluded in June 2008 that using MSAs provided a more standardized and generally accepted approach to defining an urban area.⁴

In the conference report accompanying the Consolidated Appropriations Act for fiscal year 2008, Congress directed that GAO assess how DHS is implementing a regional approach to preparedness through the UASI program and what changes to this approach resulted from the relevant 9/11 Act provisions.⁵ We conducted this review to answer the following questions:

- To what extent has FEMA assessed how UASI regions' collaborative efforts build regional preparedness capabilities?
- How did UASI officials describe their regional collaboration efforts and changes, if any, resulting from the 9/11 Act?

To determine the extent to which FEMA has assessed how UASI regions' collaborative efforts build regional preparedness capabilities, we reviewed DHS strategic policies and guidance such as the National Preparedness Guidelines and the Target Capabilities List, as well as FEMA's UASI program policies and guidance.⁶ Specifically, we reviewed guidance from the Homeland Security Grant Program that requires grantees to report on project progress and costs and use metrics and/or narrative discussions to

³ Metropolitan statistical areas are geographic entities defined by the U.S. Office of Management and Budget (OMB) for use by federal statistical agencies in collecting, tabulating, and publishing federal statistics. Currently defined metropolitan statistical areas are based on application of 2000 standards (which appeared in the *Federal Register* on December 27, 2000) to 2000 decennial census data. Current metropolitan statistical area definitions were announced by OMB effective June 6, 2003.

⁴GAO, *Homeland Security: DHS Risk-Based Grant Methodology Is Reasonable, But Current Version's Measure Of Vulnerability Is Limited*, [GAO-08-852](#) (Washington, D.C.: June 27, 2008).

⁵ H.R. Rep. No. 110-259, at 289, 294 (2007) (Conf. Rep.).

⁶ The National Preparedness Guidelines describe the tasks needed to prepare for national emergencies, such as a terrorist event or natural disaster, and establish readiness priorities, targets, and metrics to align the efforts of federal, state, local, tribal, private-sector, and nongovernmental entities. The Target Capabilities List provides guidance on building and maintaining capabilities that support the National Preparedness Guidelines.

indicate project progress/success.⁷ The guidance also describes how grantees are to structure their UASI programs, membership and management, and processes for developing, submitting, and implementing proposed grant projects. We reviewed FEMA's January 2009 Federal Preparedness Report, and the information FEMA submitted for OMB's 2008 Program Assessment Rating Tool (PART) on the UASI program.⁸ We observed demonstrations of two systems FEMA uses to monitor and report on the status and progress of the use of homeland security grants (the Grant Reporting Tool and Grant Monitoring Tool), and reviewed documents supporting another system being developed by FEMA to help grant recipients assess and prioritize grant project proposals (the Cost To Capability Initiative). In addition, we analyzed project data submitted by UASI grantees to FEMA. FEMA maintains this information in its Grant Reporting Tool, which includes information on the kinds of projects UASI applicants proposed, how these projects were associated with the National Priority to Expand Regional Collaboration, and the types of preparedness capabilities UASI grant recipients anticipated would be increased as a result of these projects. We reviewed all those projects that supported the National Priority to Expand Regional Collaboration—446 projects from the total 2,847 UASI grant projects funded under the program during this time period. We assessed the reliability of these data by questioning agency officials about the steps they take to ensure the integrity of the data, including efforts taken during site monitoring visits. We also compared the results from our analyses to other information provided by FEMA. From these efforts we believe that the data used in our analyses were sufficiently reliable for the purposes of this report. Finally, we interviewed FEMA officials responsible for implementing, measuring, and monitoring the UASI program. In addition to the National Preparedness Guidelines and UASI program guidance, we reviewed the Post-Katrina Emergency Management Reform Act and Homeland Security

⁷ FEMA distributes federal funding to states and urban areas through its Homeland Security Grant Program for planning, equipment, and training to enhance the nation's capabilities to prevent, protect against, respond to, and recover from acts of terrorism or other catastrophic events.

⁸ The Program Assessment Rating Tool (PART) was developed to assess and improve program performance so that the federal government can achieve better results. A PART review was designed to identify a program's strengths and weaknesses to inform funding and management decisions aimed at making the program more effective. According to OMB, the PART looks at all factors that affect and reflect program performance including program purpose and design; performance measurement, evaluations, and strategic planning; program management; and program results.

Presidential Directive 8, which also require measures and assessments of national preparedness.

To determine how UASI officials described their regional collaboration efforts and the changes, if any, resulting from the 9/11 Act, we surveyed by telephone all 49 UASI regions that were recipients of UASI grant funding in fiscal years 2008 and in at least 1 fiscal year prior to 2008. We based our survey questions in part on our prior work including best practices for collaboration, factors that support regional collaboration, and challenges to interagency coordination.⁹ We conducted pretests by telephone with representatives of 3 UASI regions to refine our questions, develop new questions, clarify any ambiguous portions of the questionnaire, and identify any potentially biased questions. We obtained a 100 percent response rate to our telephone survey. Because our survey included all 49 UASI regions that received grant funding as described above, there are no sampling errors. We also selected a nonprobability sample of 6 UASI regions to visit.¹⁰ We selected these UASI regions based on several factors, including the length of time the region had participated in the program, its relative risk ranking (Tier 1—those at highest risk—or Tier 2), the amount of grant funding received, the change in geographic footprint resulting from the switch to MSAs, and geographical diversity. While the results of these site visits cannot be generalized to all UASI regions, we believe that the observations obtained from these visits provided us with a general understanding of the differing extents to which UASI program managers felt their programs were achieving regional collaboration and what steps, if any, they took in response to FEMA’s change in the definition of a UASI region for its risk allocation methodology.

We conducted this performance audit from July 2008 through June 2009, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient,

⁹ GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005); *Managing for Results: Barriers to Interagency Coordination*, GGD-00-106, (Washington, D.C.: Mar. 29, 2000); and *Homeland Security: Effective Regional Coordination Can Enhance Emergency Preparedness*, [GAO-04-1009](#) (Washington, D.C.: Sept. 15, 2004).

¹⁰ Nonprobability sampling is a method of sampling where observations are selected in a manner that is not completely random, usually using specific characteristics of the population as criteria. Results from nonprobability samples cannot be used to make inferences about a population because in a nonprobability sample, some elements of the population being studied have no chance or an unknown chance of being selected as part of the sample.

appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

UASI Grant Program Designed to Build Preparedness Capabilities within Urban Areas and Support Regional Collaboration

FEMA created the Grant Programs Directorate on April 1, 2007, in accordance with the Post-Katrina Emergency Management Reform Act (Post-Katrina Act), to consolidate the management of emergency preparedness grants, including the UASI grants. The Grant Programs Directorate's subject-matter experts are to provide on-site programmatic monitoring and technical assistance to grantees, while analyzing, evaluating, and ensuring accountability and program effectiveness. Similarly, FEMA created the National Preparedness Directorate to carry out key elements of the national preparedness system, in coordination with other federal, state, local, tribal, nonprofit, and private-sector organizations.¹¹ The Directorate includes the National Integration Center and the Office of Preparedness Policy, Planning, and Analysis. The Office of Preparedness Policy, Planning, and Analysis is responsible for developing tools and measures for assessing national preparedness nationwide.

Since its inception in fiscal year 2003, the purpose of the UASI program has been to provide federal assistance to build and sustain regional preparedness capabilities necessary to prevent, protect, respond to, and recover from acts of terrorism in the nation's highest risk urban areas, such as information gathering, search and rescue, and citizen evacuation.¹² To administer the UASI program, FEMA estimates the risk relative to selected urban areas, considering threat, vulnerability, and consequences. On the basis of this analysis, it ranks the UASI areas and identifies urban areas as eligible to apply for UASI funding. DHS and FEMA have increased the number of regions receiving UASI grant funds from the original 7 areas

¹¹ DHS has defined the national preparedness system as a continuous cycle that involves four main elements: (1) policy and doctrine, (2) planning and resource allocation, (3) training and exercises, and (4) an assessment of capabilities and reporting.

¹² The program was originally authorized by the Emergency Wartime Supplemental Appropriations Act for fiscal year 2003. Pub. L. No. 108-11, 117 Stat. 559, 583 (2003).

identified for funding by DHS in 2003 which received \$96.5 million, to 62 areas designated by FEMA that received \$798.6 million in funding in 2009, as shown in table 1.

Table 1: UASI Grant Program: Funds Allocated for Fiscal Years 2003 through 2009

(Dollars in millions)

	2003	2003 Supplemental	2004	2005	2006	2007	2008	2009
Amount allocated	\$96.5	\$593.3	\$675	\$829.7	\$710	\$747	\$781.6	\$798.6
# UASI regions	7	30	50	43	46	46	60	62

Source: GAO analysis of UASI grant guidance for fiscal years 2003 through 2009.

As required by the 9/11 Act, FEMA changed the definition it used to identify the UASI regions included in its risk analysis model. Specifically, FEMA used this risk analysis model to determine its 2008 UASI grant allocations and changed the definition of UASI regions included in the model from one that includes a 10-mile radius around an urban area's center city boundary to Metropolitan Statistical Areas (MSAs) as defined by the Census Bureau. In July 2008, we reported on the effect of this change on FEMA's risk analysis model and risk-based allocation methodology for determining risk and distributing UASI grant funds and found the methodology reasonable.¹³ In addition, although the 9/11 Act did not specify the intent of the change to MSAs, we concluded that using MSAs provided a more standardized and generally accepted approach to defining an urban area. FEMA did not require UASI grantees to change the number of jurisdictions participating in the governance of the UASI region as a result of this change, but recommended in grant guidance that UASI regions expand their efforts to involve regional preparedness partners (for example, contiguous jurisdictions, port authorities, rail and transit authorities, campus law enforcement, and state agencies) in their program activities.

UASI regions' members include local government policymakers, officials from first responder agencies, and officials from quasi-governmental authorities like ports and transit agencies. All of these officials are

¹⁶GAO, *Homeland Security: DHS Risk-Based Grant Methodology Is Reasonable, But Current Version's Measure Of Vulnerability Is Limited*, [GAO-08-852](#) (Washington, D.C.: June 27, 2008).

collectively responsible for coordinating development and implementation of the projects and programs being conducted with UASI grant funds. Each UASI region is to develop a charter or other form of standard operating procedures that addresses such issues as membership, governance structure, voting rights, grant management and administration responsibilities, and funding allocation method. The charter must also outline how decisions made in UASI meetings for that region will be documented and shared with UASI members. FEMA requires each UASI region to create its own regional working group, which FEMA's grant guidance refers to as an urban area working group. UASI grant guidance requires that membership of a region must include representation from the jurisdictions and response disciplines that comprise the region as defined by the urban area's working group. Beginning in fiscal year 2008, UASI grant guidance recommended to urban areas that they consider for UASI working group membership those counties within which the cities included in the UASI region reside, contiguous jurisdictions, and jurisdictions within the region's MSA.

Each year FEMA issues UASI grant guidance that describes the priorities and requirements for the annual grant cycle. FEMA requires each UASI region to develop and submit a strategic plan that outlines the region's common goals, objectives, and steps for implementation of projects and programs to enhance regional preparedness. This strategy, known as the Urban Area Homeland Security Strategy, is intended to provide each UASI region with direction for enhancing regional capabilities. UASI regions must use their strategy as the basis for requesting funds, and FEMA's grant guidance states that there must be a clear correlation between the goals, objectives, and priorities identified in the Urban Area Homeland Security Strategy and UASI program activities. Once FEMA allocates grant funds, UASI regions are responsible for coordinating development and implementation of preparedness projects under the grant program. After funds are awarded, grantees are required to report every 6 months on progress as part of the regular grant reporting process. Performance data submitted through grant reporting are to be reviewed and validated through program monitoring by FEMA.

National Preparedness Guidelines and Preparedness Capabilities

In December 2003, the President issued Homeland Security Presidential Directive-8 (HSPD-8), which called on the Secretary of Homeland Security to carry out and coordinate preparedness activities with public, private,

and nonprofit organizations involved in such activities, and directed that DHS establish measurable readiness priorities and targets.¹⁴ In addition, the Post-Katrina Act requires FEMA to develop specific, flexible, and measurable guidelines to define risk-based preparedness (i.e., target) capabilities and to establish preparedness priorities that reflect an appropriate balance between the relative risks and resources associated with all hazards.¹⁵ DHS published the National Preparedness Guidelines in September 2007. Specifically, the purposes of the Guidelines are to:

- organize and synchronize national—including federal, state, local, tribal, and territorial—efforts to strengthen national preparedness;
- guide national investments in national preparedness;
- incorporate lessons learned from past disasters into national preparedness priorities;
- facilitate a capability-based and risk-based investment planning process; and
- establish readiness metrics to measure progress and a system for assessing the nation’s overall preparedness capability to respond to major events, especially those involving acts of terrorism.

The Guidelines describe eight national priorities that are intended to guide preparedness efforts, as presented in table 2.

Table 2: National Preparedness Guidelines’ List of National Priorities

National Priorities:
Expand Regional Collaboration
Implement the National Incident Management Systems and the National Response Plan
Implement the National Infrastructure Protection Plan
Strengthen Information Sharing and Collaboration Capabilities
Strengthen Interoperable and Operable Communications Capabilities
Strengthen Chemical/Biological/Radiological/Nuclear and/or Explosive (CBRNE) Detection, Response and Decontamination Capabilities
Strengthen Medical Surge and Mass Prophylaxis Capabilities
Strengthen Planning and Citizen Preparedness Capabilities

Source: Department of Homeland Security, National Preparedness Guidelines, Sept. 2007.

¹⁴ Homeland Security Presidential Directive (HSPD) 8—National Preparedness (Dec.17, 2003).

¹⁵ Pub. L. No. 109-295, § 646, 120 Stat. 1355, 1426 (2006) (codified at 6 U.S.C. § 746).

The National Preparedness Guidelines also define 37 specific preparedness capabilities that communities, the private sector, and all levels of government should collectively possess in order to respond effectively to disasters.¹⁶ These preparedness capabilities cover a broad range of activities to prevent, protect against, respond to, and recover from man-made or natural disasters, and include such things as information gathering, search and rescue, citizen evacuation, and structural damages assessment. A complete list of the 37 preparedness capabilities is provided in appendix 1. FEMA requires grant recipients to demonstrate how their progress in meeting these priorities is supported by projects to develop specific preparedness capabilities. According to FEMA, with its focus on enhancing regional preparedness through the collaborative efforts of multiple jurisdictions throughout urban areas, the UASI program directly supports the national priority to expand regional collaboration.

Prior GAO Work on Assessing Preparedness Capabilities

In March 2008 we testified that, although FEMA has taken some steps to establish goals, gather information, and measure progress, its monitoring of homeland security grant expenditures did not provide a means to measure the achievement of desired program outcomes.¹⁷ We further reported that FEMA's efforts did not provide information on the effectiveness of those funds in improving the nation's capabilities or reducing risk.

To address these concerns, FEMA is developing two new systems to gather data on preparedness capabilities. Specifically, as we reported in December 2008 and April 2009, respectively, FEMA is developing a Cost-to-Capability (C2C) initiative and a Comprehensive Assessment System.¹⁸ In December 2008, we reported that to help state and local stakeholders make better investment decisions for preparedness, FEMA's Grant

¹⁶ Department of Homeland Security, *National Preparedness Guidelines* (Washington, D.C.: Sept. 2007).

¹⁷ GAO *Homeland Security: DHS Improved its Risk-Based Grant Programs' Allocation and Management Methods, But Measuring Programs' Impact on National Capabilities Remains a Challenge*, [GAO-08-488T](#), (Washington, D.C.: Mar. 11, 2008).

¹⁸ GAO *National Preparedness: FEMA Has Made Progress, but Needs to Complete and Integrate Planning, Exercise, and Assessment Efforts*, [GAO-09-369](#) (Washington, D.C.: Apr. 30, 2009); *Homeland Security Grant Program Risk-Based Distribution Methods: Presentation to Congressional Committees – November 14, 2008 and December 15, 2008*, [GAO-09-168R](#) (Washington, D.C.: Dec. 23, 2008).

Programs Directorate is developing the C2C initiative to help assess a jurisdiction's capabilities. However, according to FEMA officials, the C2C results—as designed—would not directly measure preparedness, and grantees' use of the C2C tool will not be mandatory. In April 2009, we reported that FEMA is developing a comprehensive assessment system in response to a Post-Katrina Act requirement to assess the nation's capabilities and overall preparedness for preventing, responding to, and recovering from natural and man-made disasters. We reported that FEMA faces methodological and coordination challenges in developing and completing its proposed Comprehensive Assessment System and reporting on its results. Among other things, we recommended that FEMA enhance its project management plan to include milestone dates, an assessment of risk, and related mitigation strategies for comprehensively collecting and reporting on disparate information sources, developing quantifiable metrics for preparedness capabilities that are to be used to collect and report preparedness information, and reporting on the results of preparedness assessments to help inform homeland security resource allocation decisions. FEMA agreed with our recommendations.

In prior reviews, we examined effective regional coordination in emergency preparedness efforts and collaboration among federal agencies to identify common approaches and practices.¹⁹ For example, in September 2004 we reviewed coordination practices in various metropolitan areas to identify regional programs with lessons learned that could be applied in the National Capital Region and elsewhere and identified four factors that enhance regional coordination efforts—a collaborative regional organization, flexibility in the membership and geographic area, a strategic plan with measurable goals and objectives, and funding at a regional level. (See table 3).²⁰

¹⁹ For the purposes of this report we will hereafter use the term “collaboration” to discuss regional coordination efforts.

²⁰ GAO *Homeland Security: Effective Regional Coordination Can Enhance Emergency Preparedness*, [GAO-04-1009](#) (Washington, D.C.: Sept. 15, 2004).

Table 3: Factors That Characterize Effective Regional Coordination of Federally Supported Efforts

Factors	Definition
Collaborative regional organization	A collaborative regional organization includes representation from many different jurisdictions and different disciplines such as fire, police, and emergency medical organizations.
Flexibility in membership and geographic area	When regional civic and political traditions foster interjurisdictional coordination, allowing localities to choose their membership and geographic area of the regional organization can enhance collaborative activities.
Strategic planning	A strategic plan with measurable goals and objectives helps focus resources and efforts to address problems.
Regional funding	Funding at a regional level provides incentives for regional organizations' collaborative planning activities.

Source: [GAO-04-1009](#).

In 2005, we examined challenges that federal agencies face in coordinating their efforts and identified key practices that can enhance and sustain their collaborative efforts by among other things:

- defining and articulating a common outcome(s);
- establishing mutually reinforcing or joint strategies to achieve the outcome;
- identifying and addressing needs by leveraging resources;
- achieving mutual agreement(s) on agency roles and responsibilities;
- establishing compatible policies, procedures, and other means to operate across agency boundaries;
- developing mechanisms to monitor, evaluate, and report the results of collaborative efforts; and
- reinforcing agency accountability for collaborative efforts through agency plans and reports.²¹

In March 2000, we reported that agencies can encounter a range of barriers when they attempt to collaborate. These include such challenges as missions that are not mutually reinforcing or that may even conflict, agencies' concerns about protecting jurisdiction over missions and control over resources, and incompatible procedures, processes, data, and

²¹ GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005).

computer systems—making reaching a consensus on strategies and priorities difficult.²²

In September 2004, we also reported that the short history of regional collaboration for homeland security is characterized by attempts of federal, state, and local governments to overcome a fragmented federal grant system and local jurisdictional barriers to assess needs, fill gaps, and plan for effective prevention and emergency response.²³ In July 2002, the President issued the National Strategy for Homeland Security, which emphasized a shared responsibility for security involving close cooperation among all levels of government. To enhance emergency preparedness, the strategy called for systems that avoid duplication and increase collaboration to better align public and private resources for homeland security. We have consistently called for the development of a national, rather than purely federal, strategy that involves partners from all levels, including federal, state, and local organizations. For example, in testimony given in 2003, we highlighted multiple barriers to addressing one basic area of preparedness—interoperable communications systems—including the lack of effective, collaborative, interdisciplinary, and intergovernmental planning.²⁴ In another study of bioterrorism preparedness, we reported that although progress had been made in local planning, regional planning involving multiple municipalities, counties, or jurisdictions in neighboring states lagged.²⁵ We found that the autonomy of local jurisdictions and competing priorities within and among them can make regional coordination difficult and that efforts that seek to overcome these challenges to coordinate regionally must take into account the different operational structures and civic traditions of states and municipalities.

²² GAO/GGD-00-106.

²³ GAO-04-1009.

²⁴ GAO, *Homeland Security: Challenges in Achieving Interoperable Communications for First Responders*, GAO-04-231T (Washington, D.C.: Nov. 6, 2003).

²⁵ GAO, *Bioterrorism: Preparedness Varied across State and Local Jurisdictions*, GAO-03-373 (Washington, D.C.: Apr. 7, 2003).

FEMA Gathers Data and Reports on Funding for Regional Collaboration Efforts, but Does Not Assess How UASI Regions' Collaborative Efforts Enhance Regional Preparedness

FEMA uses two grant administration tools—the Grant Reporting Tool and the Grant Monitoring Tool—to gather information on projects funded and progress made by UASI grantees to expand regional collaboration and to report on UASI program performance. However, FEMA has not assessed how UASI regions' collaboration efforts have helped build regional preparedness capabilities.

FEMA Uses Grant Administration Tools to Gather Data and Report On UASI Program Performance

FEMA uses two grant administration tools to gather information on projects funded and progress made by UASI grantees; and the agency used this information to help produce the first Federal Preparedness Report in January 2009, which provided an overall assessment of the nation's preparedness to prevent, protect, respond to, and recover from natural and man-made disasters.²⁶ UASI region officials use FEMA's Grant Reporting Tool to, among other things, report on project funding plans and collect and record grant expenditures over the life of grant projects. FEMA program analysts use another system, the Grant Monitoring Tool, to record the results of their monitoring visits at each UASI region once every 2 years. FEMA also used information from the Grant Monitoring Tool to report on UASI program performance in OMB's 2008 Program Assessment Rating Tool (PART).

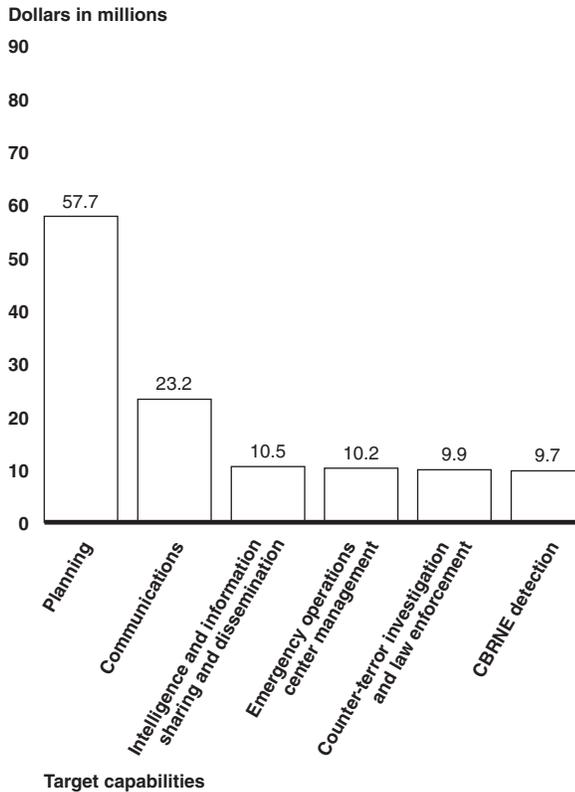
Grantees use FEMA's Grant Reporting Tool to report twice a year on planned and actual grant obligations and progress made on grant projects. According to annual grant guidance, recipients must account for all grant funds and the funds must be linked to one or more projects that support specific goals and objectives in a state's homeland security strategy and the corresponding urban area's security strategy. The Grant Reporting Tool is updated by the grantee primarily with the dollar amounts

²⁶ FEMA's Grant Programs Directorate provides administrative oversight on federal grant funding efforts, while FEMA's National Preparedness Directorate has responsibility for measuring national preparedness.

associated with specific grant projects, national priorities associated with each project, and the preparedness capabilities recipients believe will be enhanced by each proposed project. The Grant Reporting Tool also contains data on the funds allocated to specific categories of activities—planning, organization, equipment, training, and exercises. For each project, UASI grantees are to identify at least one of the national priorities to be addressed by the project as well as the primary capability to be developed. However, they can also identify additional national priorities and capabilities they intend to improve as a result of the proposed project.

We analyzed data from FEMA’s Grant Reporting Tool from fiscal year 2006 through fiscal year 2008 to determine the types of preparedness capabilities that UASI regions associated with their projects that supported the National Priority to Expand Regional Collaboration. Of the 2,847 UASI grant projects funded under the UASI program during this time period, we reviewed all those projects that supported the National Priority to Expand Regional Collaboration—a total of 446 such projects. Of these 446 projects, 303 projects funded a single preparedness capability. (The remaining 143 projects funded multiple capabilities.) In terms of funding, of the 37 preparedness capabilities, these projects primarily sought to develop six: (1) Planning, (2) Communications, (3) Intelligence and Information Sharing and Dissemination, (4) Emergency Operations Center Management, (5) Counter-Terror Investigation and Law Enforcement, and (6) Chemical/Biological/Radiological/Nuclear and/or Explosive (CBRNE) Detection (See fig. 1). For example, one UASI project to expand regional collaboration through the planning capability was intended to “develop/enhance plans, procedures, and protocols.” According to the project description, the specific activities the UASI region planned to fund included conducting a business impact threat assessment that will drive the development of plans to ensure continuity of operations for critical information technology infrastructure and applications. Another project—to provide funding to purchase interoperable systems and establish an emergency operations center— was intended to expand regional collaboration through the communications preparedness capability.

Figure 1: UASI Projects Related to Regional Collaboration: Top Six Preparedness Capabilities (in dollars for Fiscal Years 2006 through 2008)



Source: GAO analysis of FEMA Grant Reporting Tool data as of December 2008.

Note: The dollar amounts represent funding allocated to 303 UASI regions' projects that (1) supported the National Priority to Expand Regional Collaboration, and (2) identified a single preparedness capability to be funded. CBRNE stands for Chemical/Biological/Radiological/Nuclear and/or Explosive.

According to FEMA officials, the agency used data from the Grant Reporting Tool to publish the first Federal Preparedness Report in January 2009. In summarizing the achievement of the UASI grant program, the report noted that 64 percent of UASI grant recipients reported progress in implementing their UASI strategies' program goals and objectives. The report assessed the achievement of the National Priority to Expand Regional Collaboration in terms of the funding allocated to this priority— noting that states and urban areas had allocated nearly \$1.1 billion in homeland security grant funds from fiscal year 2004 to fiscal year 2007 to projects that were intended to improve regional collaboration. FEMA also reported that states and UASI regions have supported regional preparedness through “plans, initiatives, and other programs.”

FEMA uses the Grant Monitoring Tool primarily to record the results of program analysts' visits to UASI regions. On a 2-year cycle, FEMA officials visit each UASI region to interview officials and use the system to document their observations regarding grant activities. The Grant Monitoring Tool contains a series of questions about UASI regions' progress in achieving their goals and objectives as well as national priorities, and FEMA program analysts are to discuss the priorities with grantees to measure their progress in implementing each national priority. FEMA uses data from this tool to report on the overall performance of the UASI program in OMB's Program Assessment Rating Tool (PART). In 2008, FEMA measured the UASI program's overall performance against three long-term measures as reported by UASI officials:²⁷

- percent of significant progress made toward implementation of the National Priorities—70 percent;
- percent of grantees reporting significant progress toward the goals and objectives identified in their state homeland security strategies—67 percent; and
- percent of analyzed capabilities performed acceptably in exercises—79 percent.

FEMA Does Not Assess How Collaborative Efforts Help Build UASI Regional Preparedness Capabilities

While executive, departmental, and agency guidance all direct FEMA to assess how regional collaboration builds national preparedness capabilities, FEMA has not yet established measures to do so. Specifically:

- Homeland Security Presidential Directive 8 requires that the national preparedness policy establish measurable priorities (such as the national priority to expand regional collaboration) and targets and include metrics that support the national preparedness goal, including standards for preparedness assessments and a system for assessing the nation's overall preparedness.
- DHS's National Preparedness Guidelines, the national preparedness policy, state that regional collaboration is critical to national preparedness, identify the need to expand regional collaboration as a

²⁷ The first two measures are gathered through FEMA's Grant Programs Directorate's monitoring activities; the third measure is gathered through FEMA's National Preparedness Directorate's capability activities, according to FEMA officials. FEMA defines "significant progress" as a 2 percent increase in the average progress toward (1) all national priorities or (2) all objectives in the grantees strategy from one fiscal year to the next based on discussions with UASI region officials. Regarding exercises, "performed acceptably" is based on the results of exercises reported as acceptable, partially acceptable, or unacceptable in after-action reports submitted by UASI regions.

national priority, and establish the need to develop measurable capability objectives, assess current levels of capabilities, and find ways to close any gaps.

- FEMA’s UASI grant guidance identifies the need to tie together the established priorities and objectives of the National Preparedness Guidelines, including the national priority to expand regional collaboration, with efforts to establish preparedness capabilities, conduct capability assessments, and make adjustments to better ensure that the national investment yields measurable improvements in the nation’s preparedness.

Moreover, leading management practices recognize the importance of establishing performance measures in achieving results.²⁸ When designed effectively, performance measures help managers (1) determine how well a program is performing, (2) identify gaps in performance, and (3) determine where to focus resources to improve results. However, FEMA has no measures in place to assess the extent to which the funds appropriated by Congress—approximately \$5 billion for the UASI program since 2003—have achieved the goal to build regional preparedness through collaboration efforts.

The National Preparedness Guidelines state that, because major events often have regional impact, it is vital to enhance collaborative efforts by federal, state, local, tribal, and territorial entities to communicate and coordinate with one another, the private sector, nongovernmental organizations, and individual citizens. However, the Guidelines do not identify any means of assessing regional collaboration outputs and activities, or the connection between regional collaboration activities and the achievement of regional preparedness capabilities. In addition, none of FEMA’s other strategies, guidance, and policies—such as FEMA’s Grant Programs Directorate Strategy for 2009-2011 and FEMA’s agencywide

²⁸ GAO, *Executive Guide: Effectively Implementing the Government Performance and Results Act*, [GAO/GGD-96-118](#) (Washington, D.C.: June 1996).

strategy for 2008-2013—provide output or outcome measures to assess the effect of UASI regions’ collaborative efforts on preparedness capabilities.²⁹

FEMA’s Federal Preparedness Report acknowledges this limitation, citing a lack of specific targets that define how or whether national priorities—including the National Priority to Expand Regional Collaboration—are achieved. The report does not identify or specifically discuss the effects of collaborative efforts or how they contributed to improvements in regional preparedness capabilities associated with UASI grant program investments. In gathering data from states, FEMA directed states to describe their current capability under the National Priority to Expand Regional Collaboration, but this was limited to a general description of factors related to collaboration.³⁰ While these factors are related to states’ and urban areas’ efforts to enhance regional collaboration, they do not provide a means to assess how regional collaboration activities help build preparedness capabilities.

In accordance with the Post-Katrina Act, FEMA has an effort underway to establish a comprehensive assessment system to assess the nation’s capabilities and overall preparedness for preventing, responding to, and recovering from natural and man-made disasters. As part of this effort, FEMA is to collect information on state capability levels and report on federal preparedness to Congress, including the results of the Comprehensive Assessment System. Moreover, FEMA is currently working to develop measurable targets related to each of the 37 preparedness capabilities. While we previously reported challenges FEMA faces in developing and implementing the comprehensive assessment system, FEMA could build upon its current efforts to assess overall preparedness by developing and including measures related to the

²⁹ Outputs describe the level of activity that will be provided over a period of time, including a description of the characteristics (e.g., timeliness) established as standards for the activity. Outputs refer to the internal activities of a program (i.e., the products and services delivered). Outcomes describe the intended result of carrying out a program or activity. They define an event or condition that is external to the program or activity and that is of direct importance to the intended beneficiaries and/or the public. For a tornado warning system, outcomes could be the number of lives saved and property damage averted. While performance measures must distinguish between outcomes and outputs, there must be a reasonable connection between them, with outputs supporting (i.e., leading to) outcomes in a logical fashion.

³⁰ These factors include: (1) governance structures, committees, and partnerships; (2) regional coordination of expenditures; (3) formalized mutual aid agreements; and (4) exercises testing mutual aid agreements.

collaboration efforts of UASI regions and their effect on building regional preparedness. FEMA officials cited the National Preparedness Guidelines, which note that the challenge for government officials is to determine the best way to build capabilities for bolstering preparedness and achieving the guidelines, and that the “best way” to do so will vary across the nation. According to the Guidelines, the results of national preparedness assessments will be used to refine strategies and update the national priorities, and FEMA officials said that the agency is considering updating the National Preparedness Guidelines in 2010. FEMA officials stated that their current efforts to develop measurable preparedness capabilities will determine progress in building preparedness, but officials said that there are no program plans to develop measures to assess how UASI collaborative efforts build preparedness. We recognize the challenges associated with establishing a single set of measures related to collaboration activities for the UASI program, such as deciding how information and data from different sources will be used to inform any such measures, and coordinating with numerous federal, state, and local stakeholders during this process. However, developing measures to assess how UASI regions’ collaborative efforts enhance regional preparedness capabilities could provide FEMA with more meaningful information on the national return on investment for the approximately \$5 billion in grant expenditures for regional collaboration through the UASI program to date.

UASI Officials Described Program Features That Support Regional Collaboration but Cited Continuing Challenges; Some UASI Regions Increased their Membership in Response to Changes in the 9/11 Act

UASI program officials described program features that support regional collaboration, many of which reflect practices we have identified that can enhance and sustain collaboration. UASI officials also described a number of continuing challenges they faced in their efforts to expand regional collaboration, which mirror collaboration challenges we identified in earlier work examining coordination among federal agencies.³¹ In addition, some UASI regions reported changes in membership planned or undertaken in response to FEMA's use of metropolitan statistical areas to assess risk, as called for in the 9/11 Act.

UASI Program Features Demonstrate Practices That Support Regional Collaboration

Certain UASI program features reflect practices we have identified that can enhance and sustain collaboration. For example, the UASI program requires that each UASI region develop and maintain a strategy and define its membership and governance structure. The program requirements also include the need for written charters and mutual aid agreements between local governments and agencies, as well as biannual reporting—the types of practices we have reported that agencies perform to enhance and sustain their collaborative efforts, as summarized in table 4. Monitoring, evaluating, and reporting the results of collaborative efforts—one of the leading practices we identified—could be strengthened if FEMA develops measures to assess how UASI regions' collaborative efforts enhance regional preparedness capabilities.

³¹ [GAO/GGD-00-106](#).

Table 4: Collaborative Practices Reflected in the UASI Program

Collaborative practice	UASI program feature
Defines and articulates a common outcome(s).	<ul style="list-style-type: none"> Urban Area Homeland Security Strategy
Establishes mutually reinforcing or joint strategies to achieve the outcome.	
Achieves mutual agreement(s) on agency roles and responsibilities.	<ul style="list-style-type: none"> UASI program membership and governance requirements:
Establishes compatible policies, procedures, and other means to operate across agency boundaries.	<ul style="list-style-type: none"> Urban Area Working Group UASI Charter Mutual Aid Agreements
Identifies and addresses needs by leveraging resources.	
Develops mechanisms to monitor, evaluate, and report the results of collaborative efforts.	<ul style="list-style-type: none"> UASI grant program reporting; this feature could be strengthened if FEMA develops measures to assess how UASI regions' collaborative efforts enhance regional preparedness capabilities
Reinforces agency accountability for collaborative efforts through agency reports.	

Source: GAO analysis of UASI Program Requirements and [GAO-06-15](#).

Additionally, in our survey of UASI participants and during our site visits, UASI officials described various program features that they said greatly or somewhat helped support regional collaboration, and their responses generally reflect factors related to organization, flexibility, planning, and funding that we have found support effective regional collaboration in preparedness efforts. The results of our survey can be found in appendix II.

Collaborative regional organization: In September 2004, we reported that a collaborative regional organization enhances preparedness and includes representation from many different jurisdictions and disciplines.³² Moreover, our prior work on key practices to enhance and sustain collaboration identified the establishment of mutually reinforcing or joint strategies and the mutual agreement of roles and responsibilities as important elements. In the UASI program, mutual aid agreements are one way jurisdictions and agencies within UASI regions define organizational roles and responsibilities during those times when one locality needs the resources of nearby localities. Of the 49 UASI regions we surveyed, 46 said

³² [GAO-04-1009](#).

they have active mutual aid agreements, of which 38 identified that such an agreement either “greatly helps” or “somewhat helps” measure regional capability-building. Mutual aid agreements promote collaboration across governments or agencies when they explicitly identify how certain regional response efforts are to be accomplished and by whom. In addition, 39 UASI regions stated that agreements such as charters and bylaws are a UASI-wide program feature, of which 26 said that this either “greatly helps” or “somewhat helps” measure regional capability-building (15 and 11 respectively).

Officials in all six UASI regions we visited said that their UASI regional organization included representation from many jurisdictions and disciplines. UASI region officials in our site visits stated that they rely on subcommittees within their organization to develop proposed projects for their grant application. These subcommittees, for example, can be organized based on a particular project (e.g., communications, exercises, and training, etc.) or based on a response discipline (e.g., all fire departments) across the urban area. According to UASI officials, grant project proposals are then provided to the voting officials of the UASI region for approval. This structured approach helps subcommittee officials focus on operational planning while UASI officials can focus on strategic planning, according to UASI officials from 2 sites we visited.

Flexibility in membership and geographic area: In our prior work, we reported that when the membership and geographic area of the regional organization is flexible it fosters interjurisdictional coordination and enhances regional preparedness.³³ Further, we reported addressing needs by leveraging resources as a leading practice for effective collaboration. Officials from three UASI regions we visited in California—Los Angeles/Long Beach, Anaheim/Santa Ana, and Riverside—described a long-standing tradition of flexibility in working among response disciplines, leveraging the expertise of diverse members such as fire and public health departments across jurisdictions to prepare and respond to actual events such as frequent wildfires and periodic earthquakes. Officials from jurisdictions in these three UASI regions used this expertise to develop and refine California’s incident management system, which became the foundation for the National Incident Management System

³³ [GAO-04-1009](#).

(NIMS).³⁴ UASI region officials in Miami and Ft. Lauderdale, Florida said that NIMS, in turn, has been very useful for expanding regional collaboration as the system integrates first responders under a commonly understood incident command structure. Similarly, all 49 UASI regions we surveyed reported that they use NIMS compliance for first responders to build regional capabilities.

Training and exercise activities can be developed to provide flexible opportunities to bring in as many or as few multidisciplinary and multijurisdictional stakeholders within the region, as needed, to learn and test organizational preparedness responsibilities. All UASI regions we visited identified training and exercises as key activities that help bring together jurisdictions and first responders. In addition, 44 of the 49 UASI regions we surveyed reported that their UASI-wide training and exercises are an activity they use regionwide that builds regional capabilities.

Strategic planning: Our prior work found that planning activities can enhance regional preparedness and collaboration.³⁵ All but one of the 49 UASI regions we surveyed identified their strategic planning activities as building their urban areas' regional capabilities. In addition, officials at all six of the UASI regions we visited said the annual UASI grant planning process required by FEMA enhances regional collaboration because the process establishes an annual, organized effort to identify a region's needs based on its strategic plans and preparedness capabilities.³⁶ UASI region officials said that FEMA requires UASI regions to develop and submit their Urban Area Homeland Security Strategy—along with the UASI region's grant program proposals—as the basis for requesting funds. The evaluation of needs and identification of gaps in capabilities are important steps for UASI regions in their development of a homeland security strategy and annual grant proposals.

³⁴ The National Incident Management System establishes standardized incident management processes, protocols, and procedures that all federal, state, tribal, and local responders are to use to coordinate and conduct response actions. NIMS has become the national standard for incident management.

³⁵ [GAO-04-1009](#).

³⁶ As we noted in June 2008, DHS adopted an effectiveness assessment for fiscal year 2006 to determine the anticipated effectiveness of the various risk mitigation investments proposed by urban areas, which affected the final amount of funds awarded to eligible areas. See [GAO-08-852](#).

Regional funding: Our 2004 report found that funding regional organizations provides incentives for collaborative planning activities to enhance preparedness regionwide.³⁷ A number of UASI regions have used the grant program as a means to consolidate administrative functions and procurement activities regionally. For example, 42 of 49 UASI regions we surveyed said that they use UASI-wide cost-sharing activities across jurisdictions—such as purchasing larger quantities of equipment at lower overall costs in order to take advantage of economies of scale. Also, 33 UASI regions said that they work with their state to take advantage of economies of scale. Leveraging federal funds across grant programs is another collaboration activity that 44 UASI regions reported in our survey. One example where DHS grant funds—UASI and State Homeland Security Grant funds—are leveraged to build regional capabilities is in Florida, where the Miami and Fort Lauderdale UASI programs are both in the same state-designated region for security planning purposes. According to officials, both UASI regions work with the state to coordinate the sources of project funding. Miami or Fort Lauderdale UASI regions pool a part of their funds each year to make them available for their state-designated security region’s needs, regardless of whether the jurisdiction in need is the Miami or Fort Lauderdale UASI region. For example, the Fort Lauderdale UASI region provided a portion of its UASI funding to support training for a local government within the Miami UASI region area.

UASI Officials Described Continuing Challenges Including Conflicting Missions, Jurisdictional Concerns, and Incompatible Systems to Their Efforts to Collaborate

In addition to the positive impact of a variety of program features on regional collaboration described above, UASI officials also described a number of continuing challenges they faced to expand regional collaboration reflecting those challenges we previously identified that federal agencies may encounter when they attempt regional collaboration.³⁸ These challenges include conflicting missions, concerns regarding jurisdiction and control over resources, and incompatible processes or systems that can make reaching a consensus on strategies and priorities difficult. Specifically:

Conflicting missions: As we reported in 2000, one challenge concerns missions that are not mutually reinforcing or that may even conflict, making reaching a consensus on strategies and priorities difficult. As part of our survey, we posed a series of possible challenges, based in part on

³⁷ [GAO-04-1009](#).

³⁸ [GAO/GGD-00-106](#).

our prior work, which may occur between UASI regions' goals and objectives and the goals and objectives of FEMA and other related federal programs. In response, 30 of the 46 surveyed UASI regions reported that "changing federal homeland security goals and objectives" presented a regional challenge for their urban area. Of these, 28 UASI regions cited this as a challenge that "greatly" or "somewhat" impairs regional collaboration (4 and 24 respectively). In addition, 19 UASI regions identified "unclear federal homeland security goals and objectives" as a regional challenge, with 18 of these UASI regions saying that this "greatly" or "somewhat" impairs regional collaboration (5 and 13 respectively).

According to the National Preparedness Guidelines, FEMA is committed to working with its homeland security partners in updating and maintaining the Guidelines and related documents as part of a unified National Preparedness System, which should help ensure coordinated strategies, plans, procedures, policies, training, and capabilities at all levels of government. For example, in January 2009, FEMA reported the results of its discussions with state and local emergency management and homeland security agencies from 20 states (that included 15 UASI regions), finding the most significant challenges the agencies identified to be "balancing the varied, and often competing, interests (ie. missions, goals and objectives) from the full spectrum of stakeholders on the design and management of preparedness programs."³⁹ The report notes that these challenges are common to the management and coordination of homeland security preparedness initiatives but that the resulting recommendations will help to overcome those challenges, noting, for example, that "efforts are already underway in updating policy, and coordinating preparedness assistance." Moreover, as FEMA implements the recommendations from our report on the National Preparedness System to improve development of policies and plans, national capability assessments, and strategic planning—all of which contain preparedness goals and objectives—should help better align local, state, regional, and federal missions.⁴⁰

Jurisdictional concerns: Another significant barrier to collaboration our prior work identified related to concerns about protecting jurisdiction over federal missions.⁴¹ Our survey found, for example, that 22 UASI

³⁹ Federal Emergency Management Agency, *Analysis of State and Local Officials' Views on Federal Preparedness Requirements* (Washington, D.C.: January 2009.).

⁴⁰ [GAO-09-369](#).

⁴¹ [GAO/GGD-00-106](#).

regions identified the lack of written authority and agreements as a regional challenge. Eighteen of these UASI regions cited this as a challenge that “greatly” or “somewhat impairs” regional collaboration (4 and 14 respectively). However, 31 UASI regions said that “difficulty in reaching consensus in decision making among jurisdictions” was not a challenge that they face within their region. Further, 36 UASI regions said that “difficulty in reaching consensus in decision making among response disciplines (e.g. police, fire, EMS, etc.)” was not a challenge within their urban area; although 13 of 49 UASI regions said this was a challenge, none of these 13 UASI regions said this challenge greatly impairs regional collaboration, 10 regions said this challenge somewhat impairs regional collaboration, while the remaining 3 cited no impairment. Although our survey found some UASI regions facing challenges over jurisdiction, fewer UASI regions reported issues related to control and access to resources within the region. The Grant Programs Directorate’s Cost-to-Capability initiative, currently under development, is intended to help FEMA and localities better target their use of federal grant funds and enable comparisons across jurisdictions in evaluating grant proposals, which should help UASI regions in their efforts to reach consensus in decision making among jurisdictions.

Incompatible systems: Another barrier to effective collaboration, which we reported in 2000, is the lack of consistent data collected and shared by different agencies, which prevents the federal government from achieving interagency goals and objectives.⁴² For a UASI region, this collaboration barrier can occur as a part of its efforts to establish or sustain fusion centers.⁴³ As we reported in 2007, almost all states and several local governments have established or are in the process of establishing fusion centers to collaborate and share information across federal, state, and local governments and agencies and address gaps in information sharing.⁴⁴ Our survey found, for example, that intelligence sharing activities are a

⁴² [GAO/GGD-00-106](#).

⁴³ According to the Global Justice Information Sharing Initiative, a fusion center is generally “a collaborative effort of two or more agencies that provide resources, expertise, and information to the center with the goal of maximizing their ability to detect, prevent, investigate, and respond to criminal and terrorist activity.” Fusion centers may include a range of federal, state, tribal and local entities and collect and analyze and disseminate information related to homeland security, terrorism, and law enforcement.

⁴⁴ GAO, *Homeland Security: Federal Efforts Are Helping to Alleviate Some Challenges Encountered by State and Local Information Fusion Centers*, [GAO-08-35](#) (Washington, D.C.: Oct. 30, 2007).

part of 41 UASI regions; while the remaining 8 UASI regions reported that they are in the process of building this capability. In addition, 34 UASI regions reported no regional challenges related to sharing intelligence. Of those 14 UASI regions we surveyed that cited conflicts about intelligence sharing as a regional challenge, 13 reported that this either greatly or somewhat impaired regional collaboration (5 and 8 respectively; 1 response was “don’t know”). As we stated in the 2007 report, DHS, recognizing the importance of fusion centers in information sharing, has efforts under way to address challenges fusion center officials identified in establishing and operating their centers. DHS concurred with our recommendation that the federal government should determine its long-term fusion center role and whether it expects to provide resources to centers to help ensure their sustainability, and said it was reviewing strategies to sustain fusion centers as part of the work plan of the National Fusion Center Coordination Group. In September 2008, officials in DHS’s Office of Intelligence and Analysis reported that DHS has committed to dedicating resources to support and develop the state and local fusion center network and will continue to deploy personnel and resources to centers to augment their capabilities. Specifically, officials reported that DHS continues to provide personnel to certain fusion centers, has augmented training and technical assistance efforts, and has provided additional centers with networks and systems for information sharing. In December 2008, DHS issued additional guidance for interaction with fusion centers. While these efforts address DHS’s efforts to define its role in fusion centers, the efforts are ongoing and specific questions regarding the timing and amount of these resources have yet to be determined.

Similarly, interoperable communications has been both a common need across all urban areas, and a long-standing barrier. According to FEMA, interoperable communications is the ability of public safety agencies (police, fire, EMS) and service agencies (public works, transportation, hospitals, etc.) to talk within and across agencies and jurisdictions via radio and associated communications systems. According to FEMA, it is essential that public safety agencies have the intra-agency operability they need, and that they build its systems toward interoperability. Of the 49 UASI regions we surveyed, 27 UASI regions reported that interoperable communications between first responders present a regional challenge within their UASI region, with 21 of these regions reporting that this “greatly” or “somewhat” impairs regional collaboration (6 and 15 respectively). However, 6 of the 27 UASI regions said it does not impair regional collaboration. FEMA’s Federal Preparedness Report reported on the extent that urban areas were achieving interoperable communications. In 2007 DHS assessed which of these regions were in one of four stages of

implementation—“Early” through “Advanced.”⁴⁵ DHS has several programs designed to help build national interoperable communications capabilities in varying stages of implementation.⁴⁶

UASI Officials Described Program Activities Such as Exercises and Training That Helped Them Assess Their Collaborative Efforts

In response to our survey and at all 6 of the UASI regions we visited, officials described their views of what constituted effective regional collaboration and how they assess their collaborative efforts. Many UASI regions identified program activities and processes that helped them build regional capabilities and assess their performance as a region. For example, according to our survey:

- Thirty-seven UASI regions said a needs assessment or analysis of gaps in preparedness capabilities is a UASI-wide program feature. All 37 UASI regions said that this either “greatly helps” or “somewhat helps” measure regional capability-building (27 and 10 respectively). In addition, 35 of these 37 UASI regions also said that this feature either “greatly helps” or “somewhat helps” them measure regional performance (24 and 11 respectively).
- Thirty-one UASI regions identified operational planning as an activity they use to build regional collaboration.
- Sixteen UASI regions said that their regional operations plan greatly or somewhat helps measure regional performance (8 and 8 respectively).
- Thirty-six UASI regions identified tactical planning as a regional activity they use to build regional collaboration.⁴⁷
- Thirty-nine UASI regions reported that they have a UASI-wide exercise plan. Thirty-six of these said that this exercise plan either “greatly helps” or “somewhat helps” measure regional capability-building (24 and 12 respectively), and 37 of these 39 UASI regions said that this feature either “greatly helps” or “somewhat helps” them measure regional performance (25 and 12 respectively).

⁴⁵ Department of Homeland Security, *Tactical Interoperable Communications Scorecards: Summary Report and Findings* (Washington, D.C.: January 2007).

⁴⁶ GAO, *Radio Communications: Congressional Action Needed to Ensure Agencies Collaborate to Develop a Joint Solution*, [GAO-09-133](#) (Washington, D.C.: Dec. 12, 2008); *Homeland Security: Federal Leadership and Intergovernmental Cooperation Required to Achieve First Responder Interoperable Communications*, [GAO-04-740](#) (Washington, D.C.: July 20, 2004).

⁴⁷ Tactical plans identify individual tasks, actions, and objectives tailored to specific situations and fact patterns at an operational level. Tactical planning is meant to support and achieve the objectives of the operations plan.

Some UASI Regions Reported Changes in Membership Planned or Undertaken in Response to FEMA's Use of MSAs to Assess Risk

A provision within the 9/11 Act required FEMA to perform a risk assessment for the 100 largest MSAs by population, beginning in fiscal year 2008. In response, FEMA's fiscal year 2008 grant program guidance stated that, while UASI officials were not required to expand or contract existing urban area participation to conform to MSAs, UASI regions were encouraged to involve regional preparedness partners (for example, contiguous jurisdictions, mutual aid partners, port authorities, rail and transit authorities, campus law enforcement, and state agencies) in their 2008 UASI program activities. Of the 49 UASI regions we surveyed, 27 said that there were jurisdictions within the MSA that were not part of their UASI region; the remaining 22 UASI regions responded that their UASI included all jurisdictions within the MSA.

In our survey, 27 UASI regions had jurisdictions within the MSA that were not part of their UASI region, and we asked them to describe the actions, if any, they planned to take or had taken in response to FEMA's use of MSAs for its risk calculations. UASI officials' responses to the grant guidance varied. Of the 27 UASI regions that said there were jurisdictions within the MSA that weren't part of their UASI region:

- Twenty-two said that they either had taken or had plans to take some action(s) in response to FEMA's risk calculation change; 5 UASI regions said they had not taken and did not plan to take any of the actions cited (e.g., initiating a dialogue and assessing the need to include new jurisdictions) to expand their membership.
- Seventeen UASI regions reported that they already assessed and evaluated the need to include new jurisdictions and 3 UASI regions said they plan to do this, while 7 UASI regions said they had no plans to assess and evaluate the need to include new jurisdictions.
- Twelve UASI regions said they have already initiated dialogue to collaborate with new jurisdictions and 3 UASI regions have reported that they plan to do this, while 12 UASI regions said they had no plans to initiate dialog with new jurisdictions.
- Seven UASI regions reported that they have already included new jurisdictions in advisory committees and 4 UASI regions reported that they plan to do this, while 16 UASI regions said they have no plans to include any new jurisdictions in advisory committees.
- Six UASI regions reported that they have plans to increase the number of jurisdictions in their UASI region urban area working group and 1 UASI region reported that it had already done so, while 20 UASI regions said they have no plans to do this.

In a follow-up question to these 27 UASI regions, we asked whether there were specific reasons why some jurisdictions are not included in their

UASI region, e.g., because other jurisdictions were not a possible provider of prevention, medical surge, resources, or evacuation capabilities. Overall, 11 of the 27 UASI regions reported at least one of the possible issues we posed within our survey as a reason why some jurisdictions were not part of their UASI region. Specifically, 5 UASI regions reported that excluding a jurisdiction was due to that outside jurisdiction's lack of capacity to provide, for example, first responder support or medical surge capabilities, and 4 UASI regions reported excluding a jurisdiction because that jurisdiction was not a provider of support for recovery efforts or evacuation efforts. Two UASI regions also cited the lack of mutual aid agreements as a reason for not including a new jurisdiction. UASI officials from 14 regions provided additional comments stating that the reason why additional jurisdictions were not included in the UASI region was that their UASI region was either part of an existing state-defined region developed for strategic planning and response purposes, or their UASI region's composition was based on existing regional bodies such as councils of governments or regional planning commissions. Another common reason cited by officials in 10 UASI regions who provided additional comments was that these other jurisdictions were remote and not adjacent to the urban area, and lacking in population or critical infrastructure.

Conclusions

Natural and man-made disasters often have a regional impact, affecting multiple jurisdictions; therefore it is vital to ensure that federal, state, local, tribal, and territorial entities collaborate effectively in the protection, prevention of, response to, and recovery from a disaster. The UASI program is intended to enhance regional preparedness through expanded regional collaboration. However, FEMA currently has no measures to determine the impact of the UASI regions' collaborative efforts on regional preparedness. With such measures, FEMA would be better positioned to determine the national return on investment for the more than \$5 billion awarded in UASI grant funds to date.

Recommendation for Executive Action

We recommend that the FEMA Administrator develop and implement measures to assess how regional collaboration efforts funded by UASI grants build preparedness capabilities.

Agency Comments

We requested comments on a draft of this report from FEMA. FEMA did not provide official written comments to include in our report. However, in e-mails received June 26, 2009, the DHS liaison stated that FEMA

concur with our recommendation and will work toward addressing it. DHS also provided technical comments which we incorporated into our report, as appropriate.

We are providing copies of this report to interested congressional committees, the FEMA Administrator, and the Secretary of Homeland Security. This report will also be available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staff have any questions concerning this report, please contact me at (202) 512-8757 or e-mail at jenkinswo@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix III.

A handwritten signature in black ink, reading "William O. Jenkins, Jr." with a large, stylized flourish at the end.

William O. Jenkins, Jr.
Director
Homeland Security & Justice Issues

Appendix I: DHS's Target Capabilities List

As we noted in 2005, Department of Homeland Security (DHS) developed the National Preparedness Guidelines to comply with HSPD-8.¹ The National Preparedness Guidelines are intended to generally define “how well” all levels of governments and first responders are to prepare for all-hazards, through a capabilities-based preparedness planning process based on common tools and processes of preparedness including the Target Capabilities List. The purpose of this approach is to provide capabilities suitable for a wide range of threats and hazards.

According to DHS, the Target Capabilities List is a comprehensive catalog of capabilities to perform homeland security missions. In July 2005, we reported that the application of this capabilities-based preparedness process involves three stages: (1) defining target levels of capability, (2) achieving target levels of capability, and (3) assessing preparedness.² As of September 2007, the list identified 37 capabilities needed to perform critical tasks across all events—prevention, protection, response, and recovery. The Target Capabilities List also provides guidance on each specific preparedness capability and levels of capability that federal, state, local, and tribal first responders will be expected to develop and maintain.

Table 5: DHS's Target Capabilities List

Common Mission Area	Respond Mission Area
1. Communications	21. Animal Disease Emergency Support
2. Community Preparedness and Participation	22. Citizen Evacuation and Shelter-in-Place
3. Planning	23. Critical Resource Logistics and Distribution
4. Risk Management	24. Emergency Operations Center Management
5. Intelligence/Information Sharing and Dissemination	25. Emergency Public Information and Warning
Prevent Mission Area	26. Environmental Health
6. Chemical/Biological/Radiological/Nuclear/ Explosive (CBRNE) Detection	27. Explosive Device Response Operations
7. Information Gathering and Recognition of Indicators and Warnings	28. Fatality Management

¹ GAO-05-652.

² GAO *Homeland Security: DHS' Efforts to Enhance First Responders' All-Hazards Capabilities Continue to Evolve* GAO-05-652 (Washington, D.C.: July 11, 2005).

Appendix I: DHS's Target Capabilities List

Common Mission Area	Respond Mission Area
8. Intelligence Analysis and Production	29. Fire Incident Response Support
9. Counter-Terror Investigations and Law Enforcement	30. Isolation and Quarantine
	31. Mass Care (Sheltering, Feeding, and Related Services)
	32. Mass Prophylaxis
	33. Medical Supplies Management and Distribution
	34. Medical Surge
Protect Mission Area	Recover Mission Area
10. Critical Infrastructure Protection	35. Economic and Community Recovery
11. Epidemiological Surveillance and Investigation	36. Restoration of Lifelines
12. Food and Agriculture Safety and Defense	37. Structural Damage Assessment
13. Laboratory Testing	
14. Onsite Incident Management	
15. Emergency Public Safety and Security Response	
16. Responder Safety and Health	
17. Emergency Triage and Pre-Hospital Treatment	
18. Search and Rescue (Land-Based)	
19. Volunteer Management and Donations	
20. WMD/Hazardous Materials Response and Decontamination	

Source: Department of Homeland Security - Target Capabilities List, as of September 2007.

Appendix II: Results of GAO's Telephone Survey of 49 UASI Regions

In the absence of objective measures to determine the impact of the Urban Area Security Initiative (UASI) regions' collaboration efforts on regional preparedness, we surveyed UASI regions to solicit officials' views on the impact of program activities on regional collaboration and challenges they faced to support regional collaboration. We surveyed by telephone all 49 UASI regions that were recipients of UASI grant funding in fiscal years 2008 and in at least one fiscal year prior to 2008. We based our survey questions in part on our prior work including best practices for collaboration, factors that support regional collaboration, and challenges to interagency coordination.¹ Our questions were designed to collect information on (1) activities that are incorporated into the UASI regions' collaboration efforts and those features that help UASI regions measure their regional capability-building and performance, (2) whether UASI regions face certain regional challenges and if so, whether those challenges impair the efficiency and effectiveness of their regional collaboration and preparedness efforts, and (3) whether respondents have or plan to make changes in response to FEMA's change to Metropolitan Statistical Areas (MSAs) for risk calculation. We conducted pretests by telephone with representatives of 3 UASI regions to refine our questions, develop new questions, clarify any ambiguous portions of the questionnaire, and identify any potentially biased questions. We obtained a 100 percent response rate to our telephone survey. Because our survey included all 49 UASI regions that received grant funding as described above, there are no sampling errors. The information below represents responses provided by UASI regions to our close-ended survey questions.

¹GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005); *Managing for Results: Barriers to Interagency Coordination*, GGD-00-106 (Washington, D.C.: Mar. 29, 2000); and *Homeland Security: Effective Regional Coordination Can Enhance Emergency Preparedness* [GAO-04-1009](#) (Washington, D.C.: Sept. 15, 2004).

**Appendix II: Results of GAO's Telephone
Survey of 49 UASI Regions**

Q1. Are any of the following activities a part of, or in progress of being a part of, your UASI area? (Check one box each row.)

	Yes, a part of ▼	In progress ▼	No ▼	Don't know ▼
a. Intrastate mutual aid agreements	43	3	3	0
b. Interstate mutual aid agreements	23	4	22	0
c. International mutual aid agreements	3	4	40	2
d. Intelligence sharing	41	8	0	0
e. Leveraging federal funds across grant programs (e.g., Health and Human Services (HHS), the Department of Transportation (DOT), other DHS grants, etc.)	44	2	3	0
f. UASI-wide cost-sharing to take advantage of economies of scale with your state (e.g., purchasing larger quantities of sophisticated equipment at lower overall costs)	33	1	15	0
g. UASI-wide cost-sharing to take advantage of economies of scale across jurisdictions (i.e., cities, counties, and special districts including port or transit authorities)	42	2	5	0
h. Centralization of administrative grant functions	36	0	13	0
i. Centralization of administrative planning	41	1	7	0

**Appendix II: Results of GAO's Telephone
Survey of 49 UASI Regions**

Q2. Does your UASI area face any of the following regional challenges?

Q3. How much, if at all, does this regional challenge impair the effectiveness of regional collaboration in your preparedness efforts?

	Q2 Is regional challenge for UASI?			If "Yes" to Q2 →	Q3 How much impairs regional collaboration?			
	Yes	No	Don't know		Greatly impairs	Somewhat impairs	Does not impair at all	Don't Know
	▼	▼	▼		▼	▼	▼	▼
a. Lack of written authority and agreements	22	27	0	→	4	14	4	0
b. Conflicts about sharing intelligence	14	34	1	→	5	8	1	0
c. Interoperable communications between first responders	27	22	0	→	6	15	6	0
d. Conflicts about sharing existing resources, (e.g., equipment, personnel, tactical teams, technology)	11	38	0	→	2	7	2	0
e. Difficulty in reaching consensus in decision-making among jurisdictions (e.g., for funding)	18	31	0	→	4	10	4	0
f. Difficulty in reaching consensus in decision-making among response disciplines (e.g., police, fire, EMS, etc.,)	13	36	0	→	0	10	3	0
g. Applicability of federal homeland security requirements	20	28	1	→	6	12	2	0
h. Unclear federal homeland security goals and objectives	19	30	0	→	5	13	1	0
i. Changing federal homeland security goals and objectives	30	19	0	→	4	24	2	0
j. Conflicting goals and objectives between federal agencies or programs, (e.g., DHS, HHS, Nuclear Regulatory Commission (NRC), etc.)	18	29	2	→	4	13	1	0
k. Conflicting goals and objectives between your UASI and your State Administrative Agent (SAA)	23	26	0	→	12	9	2	0
l. Changing UASI boundaries to Metropolitan Statistical Areas (MSAs) from center-city plus 10 miles	20	28	1	→	2	14	3	1

Appendix II: Results of GAO's Telephone Survey of 49 UASI Regions

Q4. Are there are any jurisdictions within your MSA that are not a part of the UASI area?

Yes 27

No 22 → If “No,” go to question 8.

Q5. In response to FEMA’s change to MSAs for risk calculation, has your UASI area done, have plans to do, or have no plans to do any of the following with the jurisdictions in your geographic area? (Check one box in each row.)

	Have done this ▼	Have plans to do this ▼	Have no plans to do this ▼	Don't Know ▼
a. Assess/Evaluate need to include new jurisdictions	17	3	7	0
b. Initiate dialogue with new jurisdictions	12	3	12	0
c. Solicit input from new jurisdictions	11	4	12	0
d. Solicit proposals from new jurisdictions	6	4	17	0
e. Include new jurisdictions in Advisory Committees	7	4	16	0
f. Increase the number of jurisdictions in Urban Area Working Group (UAWG) (e.g, your Executive or Steering committee)	1	6	20	0

**Appendix II: Results of GAO's Telephone
Survey of 49 UASI Regions**

Q6. Is each of the statements listed below a reason why there are some jurisdictions that are not part of your UASI area?
 Q7. (For each item in Q6 with a "Yes," ask:) Does your UASI intend to enter into this kind of relationship with all, some, or none of these jurisdictions?

	Q6 Reason why not part of UASI area?			If "Yes" to Q6 →	Q7 Intend to enter relationship?			
	Yes	No	Don't know		All	Some	None	Don't know
	▼	▼	▼		▼	▼	▼	▼
a. No mutual aid agreement existing	2	25	0	→	0	0	2	0
b. Not a part of prevention activities (e.g., fusion center/information sharing; see TCL)	3	23	1	→	0	0	1	2
c. Not a provider of emergency response support (see TCL)	5	22	0	→	0	1	3	1
d. Not a provider of surge capabilities (e.g., first responders, medical surge; see TCL)	5	21	1	→	0	1	2	2
e. Not a provider of resource capabilities (see TCL)	6	20	1	→	0	1	3	2
f. Not a part of interoperable communications system	4	23	0	→	0	1	2	1
g. Not a provider of support for recovery or evacuation efforts (see TCL)	4	23	0	→	0	0	2	2

**Appendix II: Results of GAO’s Telephone
Survey of 49 UASI Regions**

Q8. In addition to your UASI’s Homeland Security Strategy, does your UASI possess the following program features?
 Q9. (For each item in Q8 with a “Yes”, ask:) How much, if at all, does this program feature help your UASI measure its regional capability-building?
 Q10. (For each item in Q8 with a “Yes”, ask:) How much, if at all, does each of the following program features help your UASI measure its performance?

	Q8 Has program feature?			Q9 How much helps measure regional capability-building?					Q10 How much helps measure regional performance?			
	Yes	No	Don’t know	If “Yes” to Q8	Greatly helps	Somewhat helps	Does not help at all	Don’t know	Greatly helps	Somewhat helps	Does not help at all	Don’t know
	▼	▼	▼	➔	▼	▼	▼	▼	▼	▼	▼	▼
a. Charter and bylaws	39	10	0	➔	15	11	11	2	7	5	23	4
b. Regional Concept of Operations (ConOps)	23	26	0	➔	15	8	0	0	8	8	5	2
c. Standard Operating Procedures (SOPs) (e.g., tactical operational procedures)	28	21	0	➔	14	9	2	3	11	9	4	4
d. Active mutual aid agreements, MOUs, or Intergovernmental Agreements	46	3	0	➔	27	11	7	1	19	12	13	2
e. Needs assessment, evaluation, or gap analysis	37	12	0	➔	27	10	0	0	24	11	2	0
f. Exercise plan	39	10	0	➔	24	12	2	1	25	12	0	2

**Appendix II: Results of GAO's Telephone
Survey of 49 UASI Regions**

Q11. Does your UASI area use any of the following activities to build regional capabilities?

Q12. (For each item in Q11 with a "Yes," ask:) Has your UASI area defined performance measures for this activity?

	Q11 Builds regional capabilities?				Q12 Has defined performance measures?		
	Yes	No	Don't know	If "Yes" to Q11	Yes	No	Don't know
	▼	▼	▼	➔	▼	▼	▼
a. Strategic planning (e.g., homeland security strategic plan)	48	0	1	➔	35	12	1
b. Operational planning (e.g., Continuity of Operations (COOP) and Continuity of Government (COG))	31	17	1	➔	17	9	5
c. UASI-wide tactical planning	36	12	1	➔	18	11	7
d. UASI-wide exercises & training	44	4	1	➔	32	8	4
e. After-action reporting (for exercises and actual events)	47	2	0	➔	37	8	2
f. Corrective action/improvement programs (for exercises and actual events)	45	4	0	➔	35	7	3
g. Fusion centers for information sharing	38	11	0	➔	18	12	8
h. NIMS compliance for first responders within the UASI	49	0	0	➔	46	2	1
i. Regional tactical interoperable communications plan (TICP) - based on the SAFECOM continuum	47	1	1	➔	44	1	2
j. Alerts/warning and notification system	35	13	1	➔	21	10	4
k. Command and control (e.g., UASI-wide emergency operations center)	29	20	0	➔	18	6	5
l. Certification or credentialing system for first responders and volunteers	18	28	3	➔	10	8	0
m. Resource typing	29	20	0	➔	22	5	2

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

William O. Jenkins Jr., (202) 512-8757 or jenkinswo@gao.gov

Staff Acknowledgments

In addition to the contact named above, Chris Keisling (Assistant Director), John Vocino (Analyst-in-Charge), Orlando Copeland, Perry Lusk, Adam Vogt, Linda Miller, David Alexander, Grant Mallie, and Tracey King made key contributions to this report.

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