DISASTER RESPONSE

Criteria for Developing and Validating Effective Response Plans

Why GAO Did This Study
Among the lessons learned from the aftermath of Hurricane Katrina was that effective disaster response requires planning followed by the execution of training and exercises to validate those plans. The Federal Emergency Management Agency (FEMA) is responsible for disaster response planning. This testimony focuses on (1) criteria for effective disaster response planning established in FEMA's National Response Framework, (2) additional guidance for disaster planning, (3) the status of disaster planning efforts, and (4) special circumstances in planning for oil spills. This testimony is based on prior GAO work on emergency planning and response, including GAO's April 2009 report on the FEMA efforts to lead the development of a national preparedness system. GAO reviewed the policies and plans that form the basis of the preparedness system. GAO did not assess any criteria used or the operational planning for the Deepwater Horizon response.

What GAO Found
FEMA's National Response Framework identifies criteria for effective response and response planning, including (1) acceptability (meets the requirement of anticipated scenarios and is consistent with applicable laws); (2) adequacy (complies with applicable planning guidance); (3) completeness (incorporates major actions, objectives, and tasks); (4) consistency and standardization of products (consistent with other related documents); (5) feasibility (tasks accomplished with resources available); (6) flexibility (accommodating all hazards and contingencies); and (7) interoperability and collaboration (identifies stakeholders and integrates plans).

In addition to the National Response Framework, FEMA has developed standards that call for validation, review, and testing of emergency operations plans. According to FEMA, exercises offer the best way, short of emergencies, to determine if such plans are understood and work. FEMA's guidance also suggests that officials use functional and full-scale emergency management exercises to evaluate plans. Other national standards reflect these practices as well. For example, the Emergency Management Accreditation Program standards call for a program of regularly scheduled drills, exercises, and appropriate follow-through activities, as a critical component of a state, territorial, tribal, or local emergency management program.

GAO reported in April 2009 that FEMA lacked a comprehensive approach to managing the development of emergency preparedness policies and plans. Specifically, GAO reported that FEMA had completed many policy and planning documents, but a number of others were not yet completed. In February 2010, the Department of Homeland Security's (DHS) Office of Inspector General reviewed the status of these planning efforts and reported that the full set of plans for any single scenario had not yet been completed partly because of the time required to develop and implement the Integrated Planning System. The Integrated Planning System, required by Annex 1 to Homeland Security Presidential Directive 8 (December 2007), is intended to be a standard and comprehensive approach to national planning.

Oil spills are a special case with regard to response. The National Response Framework has 15 functional annexes that provide the structure for coordinating federal interagency support for a federal response to an incident. Emergency Support Function #10—Oil and Hazardous Materials Response Annex—governs oil spills. Under this function, the Environmental Protection Agency is the lead for incidents in the inland zone, and the U.S. Coast Guard, within DHS, is the lead for incidents in the coastal zone. This difference underscores the importance of including clear roles, responsibilities, and legal authorities in developing operational response plans.

View GAO-10-969T or key components.
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