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REPORT BY THE

Comptroller General

OF THE UNITED STATES

States Can Be Better Prepared To Respond To Disasters

GAO reviewed sections of six States' emergency plans developed or updated with Federal funds provided under the Disaster Relief Act of 1974. These plans show the role State agencies will perform during and after a disaster.

Some State agencies had not developed adequate procedures to determine how tasks would be performed. None of the States had developed training programs to prepare State and local personnel to implement assigned tasks. In five States, local communities' emergency plans were not compatible with State plans.

This report makes a number of recommendations to the Director of the Federal Emergency Management Agency to effect the needed improvements.



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MARCH 31, 1980





COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-197570

The Honorable Norman Y. Mineta
Chairman, Subcommittee on Oversight
and Review
Committee on Public Works and
Transportation
House of Representatives

HSE 3107

Dear Mr. Chairman:

In response to your request, we reviewed State preparedness in responding to the coastal flooding in the February 1978 disaster in Massachusetts. As a result of problems found, your office requested we expand our review to six other States. This report summarizes the results of our work in Massachusetts and the six other States. Another report will cover the coordination problems of Federal disaster assistance programs in the Massachusetts disaster.

As arranged with your office, unless you publicly announce its contents earlier, no further distribution of this report will be made until 7 days after the report date. At that time, we will send copies to interested parties and make copies available to others upon request.

Sincerely yours,

Comptroller General
of the United States

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AGC 00460



COMPTROLLER GENERAL'S REPORT
TO THE SUBCOMMITTEE ON
OVERSIGHT AND REVIEW
COMMITTEE ON PUBLIC WORKS
AND TRANSPORTATION
HOUSE OF REPRESENTATIVES

STATES CAN BE BETTER
PREPARED TO RESPOND
TO DISASTERS

D I G E S T

Under the Disaster Relief Act of 1974, the Federal Disaster Assistance Administration provided a one-time grant of up to \$250,000 to each State for the development or revision of a State emergency/disaster plan. (See pp. 2 and 3.)

AGCOO/160

After a major disaster occurred in Massachusetts, the Subcommittee on Oversight and Review, House Committee on Public Works and Transportation, asked GAO to evaluate how well Massachusetts had been prepared to respond to this disaster. GAO found that State agencies incurred problems in implementing tasks assigned under the State emergency plan because procedures had not been developed to show how tasks were to be performed. (See ch. 2.)

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The subcommittee later asked GAO to review preparedness in six other States with regard to the development of implementing procedures for use by State agencies in carrying out tasks assigned under the State emergency plans. (See p. 15.) This review in Connecticut, Georgia, Mississippi, Missouri, New Hampshire, and Oklahoma disclosed that

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- most State agencies did not have adequate implementing procedures for disaster tasks assigned,
- local communities' emergency plans either were not compatible with State emergency plans or needed to be reviewed for compatibility, and
- States have not developed training programs to train State and local personnel in their responsibilities during a disaster. (See ch. 3 and 4.)

In July 1979, the functions of the Federal Disaster Assistance Administration and the Defense Civil Preparedness Agency were transferred to the Federal Emergency Management Agency. (See pp. 1 and 2.)

NEED FOR IMPLEMENTING PROCEDURES

GAO's review of selected functions in the six other State emergency plans revealed that the plans assigned various functions to State agencies and also assigned specific tasks to be performed by each State agency. However, in the New Hampshire plan, some functions were not clearly assigned. The State emergency plans did not provide detailed procedures for accomplishing the tasks. State agencies in these six States were required to develop procedures during the development grant period. (See pp. 16 and 17.) Based on the opinions of Federal Disaster Assistance Administration officials, GAO selected some States that were good in emergency preparedness and some that were poor. (See p. 5.)

A majority of the State agencies had not developed standard operating procedures for their assigned tasks or had developed documents which did not provide detailed procedures to allow agencies to adequately fulfill their responsibilities. (See p. 19.) Agencies indicated a variety of reasons why such procedures had not been developed. (See p. 28.)

Agencies reviewed included those assigned individual assistance programs--emergency food stamps, individual and family grants, crisis counseling--as well as agencies assigned other functions. The only individual assistance program which had detailed procedures in each State was the individual and family grant program which provides Federal and State shared grants of up to \$5,000 to individuals or families with disaster-related expenses or serious needs. The States have a built-in incentive to develop standard operating procedures in this program, because the Federal Disaster Assistance Administration

will not provide funds to a State unless it has such procedures developed and approved. (See p. 19.)

GAO believes that States should be required to develop standard operating procedures for all State-operated programs or functions funded by the Federal Emergency Management Agency. (See p. 32.)

Emergency preparedness agencies in the six States were unable to require other State agencies to develop operating procedures for their disaster tasks; they could only encourage development. In four States, emergency preparedness agencies provided little encouragement to State agencies to develop such procedures. (See pp. 26 and 27.)

NEED FOR REVISING LOCAL EMERGENCY PLANS

According to officials in five States, local emergency plans needed revising to conform with the State emergency plan or had not been reviewed by the State to determine whether they conform with the State plan.

The sixth State--Oklahoma--had reviewed local plans during the development grant period. Local communities were assisted in revising their plans and State officials told GAO that local plans were in conformance.

Although four States had sent guidance to local communities to assist them in revising their plans, GAO believes that the States must expend greater resources on monitoring and assisting local communities in developing or revising their local plans. (See pp. 30 and 32.)

NEED TO DEVELOP TRAINING PROGRAMS FOR STATE AND LOCAL PERSONNEL

Generally, each State agency appoints an emergency liaison official who is responsible for coordinating the agency's disaster relief efforts with the State civil preparedness agency. In addition, other State agency personnel would be responsible for implementing various tasks assigned to the agency by the State emergency plan. (See pp. 35 and 36.)

None of the six States GAO reviewed had established disaster training programs with minimum standards for liaisons or for other State agency personnel during the development grants. Some liaison personnel had participated in training courses or mock exercises; others had not. Other State agency personnel had received little or no training in their responsibilities during a disaster. (See pp. 36 to 39.) The States provided some training and exercises for local officials under Federal Disaster Assistance Administration grants, but none had developed training programs that set minimum standards for local officials.

Some local officials received civil defense training under training activities of the Defense Civil Preparedness Agency. The basic civil defense seminar devotes little time to training related to Federal disaster assistance programs. State officials told GAO that civil defense training of local officials is similar to disaster emergency training in that officials can be dealing with similar problems. However, many local civil defense directors had not attended the basic seminar for local officials. (See pp. 42 to 45.)

GAO believes that emergency preparedness training for disasters is particularly important where the duties of State and local personnel differ from their regular duties. (See p. 47.)

The Federal Emergency Management Agency has not determined the minimum disaster training needed by State and local personnel nor helped States by providing them with minimum training standards that would better assure an adequate level of performance during a disaster. (See pp. 45 to 47.)

RECOMMENDATIONS TO THE DIRECTOR OF THE FEDERAL EMERGENCY MANAGEMENT AGENCY

The Director of the Federal Emergency Management Agency should set minimum standards for disaster-type training of State and local personnel. The Director should

incorporate both disaster training and civil defense training into a single training program for emergency preparedness officials. (See p. 48.)

The Director should also request that each Governor

- require the State civil preparedness agency and other State agencies to develop standard operating procedures for their disaster functions and training programs for State and local personnel in accordance with Federal Emergency Management Agency guidance and

- require or request local communities to develop or revise their emergency plans to make them compatible with the State emergency plan. (See pp. 33, 48, and 49.)

For State-operated programs or functions it funds, the Federal Emergency Management Agency should require the States to develop standard operating procedures and obtain the Agency's approval of the procedures before participating in the programs. (See p. 33.)

The Agency and the States GAO visited generally concurred with GAO's recommendations. However, two State officials expressed concern about the lack of adequate Federal funding to develop procedures and provide training. (See pp. 34 and 49.)



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ABBREVIATIONS

DCA	Massachusetts Department of Community Affairs
DCPA	Defense Civil Preparedness Agency
DMH	Massachusetts Department of Mental Health
FDAA	Federal Disaster Assistance Administration
FEMA	Federal Emergency Management Agency
GAO	General Accounting Office
SOPs	standard operating procedures

CHAPTER 1

INTRODUCTION

On August 17, 1978, the Chairman, Subcommittee on Oversight and Review, House Committee on Public Works and Transportation, requested that we review the Federal and State relief activities that provided assistance to victims of coastal flooding which occurred in Massachusetts in February 1978. In addition, we were asked to evaluate the adequacy of State preparedness in responding to this disaster.

As a result of the preliminary work done in Massachusetts, the subcommittee requested us to undertake two separate reviews; one concerning the adequacy of State preparedness, relating to the development of implementing procedures for use by State agencies in carrying out their assigned tasks under the State emergency plan, the results of which are addressed in this report. The other review concerns the adequacy of coordination between Federal disaster assistance programs. A report on this review is expected to be issued later this year.

In the past, we have reviewed and issued reports on various aspects of Federal, State, and local preparedness in dealing with various emergencies. 1/

On June 19, 1978, the President transmitted to the Congress, Reorganization Plan No. 3 of 1978 which was to improve Federal emergency management and assistance. The plan called for the establishment of the Federal Emergency Management Agency (FEMA). Under the provisions of law governing executive reorganizations (5 U.S.C. 901 et seq.), the Congress approved the plan effective September 16, 1978.

FEMA was created by the transfer of various emergency preparedness and disaster assistance functions in two phases: the first phase was effective on April 1, 1979, and the second, on July 15, 1979. The first phase established FEMA in accordance with the congressionally approved

1/"Areas Around Nuclear Facilities Should Be Better Prepared for Radiological Emergencies" (EMD-78-110, Mar. 30, 1979); "Continuity of the Federal Government in a Critical National Emergency--A Neglected Necessity" (LCD-78-409, Apr. 27, 1978); "Civil Defense: Are Federal, State, and Local Governments Prepared for Nuclear Attack?" (LCD-76-464, Aug. 8, 1977).

Reorganization Plan and transferred certain agencies and responsibilities to the new agency. In the second phase, the functions of the Federal Disaster Assistance Administration (FDAA) and the Defense Civil Preparedness Agency (DCPA), in addition to certain other functions, were transferred to FEMA under an Executive order. Originally, FDAA was an agency in the Department of Housing and Urban Development and DCPA was part of the Department of Defense. We shall refer to them in this report by their original names to differentiate their functions.

If an emergency or disaster situation is beyond the capabilities of local or State governments, the Governor may request that the President declare a "major disaster" or an "emergency," 1/ thereby providing various types of Federal assistance under the Disaster Relief Act of 1974. Major disasters are those that the President has determined to have caused damage of sufficient severity and magnitude to warrant major disaster assistance above and beyond emergency service of the Federal Government to supplement the efforts of the State, local governments, and private relief organizations. An emergency is a disaster that requires Federal emergency assistance to supplement State and local efforts to save lives and protect property, public health and safety, or to avert or lessen the threat of a disaster.

FEDERAL GRANTS TO DEVELOP AND IMPROVE STATE EMERGENCY PLANS

FDAA has been delegated the authority under section 201 of the Disaster Relief Act of 1974, 42 U.S.C. 5131, to provide grants of up to \$250,000 to each State for development of a comprehensive emergency or disaster plan, 2/ with up to an additional \$25,000 per year to improve and maintain this plan. State emergency plans assign to State agencies various responsibilities for responding to or recovering from disasters and emergencies. Improvement grants are provided on a matching basis, while the development grants require no State matching funds. Prior to receiving grant funds, each State must submit

1/A major disaster or emergency can be any hurricane, tornado, storm, flood, earthquake, landslide, snowstorm, drought, fire, explosion, or other catastrophe.

2/These plans assist the States in dealing with emergencies and major disasters that may occur and are referred to as State emergency plans in this report.

a grant proposal or work plan detailing the efforts to be undertaken with grant funds. These work plans must be reviewed and approved by FDAA prior to the grant award.

According to the Disaster Program Officer in the FDAA Central Office, FDAA did not approve State emergency plans. The format, design, and content of an emergency plan was left up to the State. FDAA's role was to monitor a State's compliance with its approved work plan.

All States 1/ received development grants from FDAA under the Disaster Relief Act of 1974 generally for the full \$250,000. FDAA had disbursed a total of \$11.8 million, as of June 30, 1979. As of December 11, 1979, all States--except New Mexico--had completed the preparation or updating of their emergency plans under the development grants. As of December 31, 1979, one or more improvement grants had been awarded to 45 out of 57 States 1/ with obligations totaling about \$1.92 million.

Prior to the 1974 act, two other disaster relief acts provided financial assistance to States for the development and/or maintenance of State emergency plans. However, many States did not take advantage of grant funds available under these acts.

Under the Disaster Relief Act of 1969 (Public Law 91-79), States were also authorized up to \$250,000 in financial assistance for development of emergency plans, however, States were required to match Federal funds on a dollar-for-dollar basis. Under this act, 14 States (includes Guam and the Trust Territories) received grants from the Federal Government with disbursements totaling only \$206,189.

The Disaster Relief Act of 1970 (Public Law 91-606) provided the same \$250,000 grants on a matching basis, but eliminated the requirement that States complete and submit their State plans by a certain date, as was required under the 1969 act. In addition, the 1970 act provided for an annual grant of up to \$25,000 for States to improve and maintain their emergency plans. Eleven States received development grants under the 1970 act totaling \$639,268. Five States (includes the Trust Territories) received improvement grants under the 1970 act totaling \$163,364.

1/Includes the District of Columbia, Puerto Rico, Virgin Islands, Guam, American Samoa, Northern Marianas, and the Trust Territories.

In total, 20 States, Guam, and the Trust Territories received development grant funds under one or both of the prior two acts and used these funds to develop State emergency plans. All 22 have also received grant funds for the same purpose under the current act.

According to the Disaster Program Officer in the FDAA Central Office, this did not necessarily result in duplication. Some of the States used 1974 act funds to revise their existing plans, noting that the 1974 act resulted in changes in Federal assistance procedures that required States to adjust their plans significantly. However, this official did note that some States that received funds under the prior acts, as well as the 1974 act, developed totally new plans with grant funds under the 1974 act.

FEDERAL ASSISTANCE TO
THE SIX SELECTED STATES

The following six States in four FDAA regions were selected for review (see scope for selection criteria):

- Connecticut/New Hampshire (FDAA Region 1)
- Georgia/Mississippi (FDAA Region 4)
- Oklahoma (FDAA Region 6)
- Missouri (FDAA Region 7)

Each of the six States selected for review was awarded the full \$250,000 development grant under the 1974 act. In addition, FDAA approved the following improvement grants for the six States as of December 31, 1979:

	<u>Fiscal year</u>	<u>Federal funds</u>
Connecticut	78	\$25,000
	79	25,000
New Hampshire	79	25,000
Georgia	None awarded	
Mississippi	78	22,392
	79	22,382
Oklahoma	78	21,850
	79	23,300
Missouri	78	18,750
	79	25,000

In addition to development and improvement grants, the Federal Government has provided direct financial assistance to the six States and its citizens as a result of major

disaster or emergency declarations by the President. Appendix I summarizes the financial assistance FDAA has provided since fiscal year 1975 as a result of major disaster declarations only. Information does not include funds expended by other Federal agencies. Appendix II summarizes the total number and amounts of disaster loans made by the Small Business Administration and the Farmers Home Administration in the Department of Agriculture as a result of disasters. In addition to presidentially declared disasters, loan information includes disaster loans approved in those States by the two agencies as a result of disaster declarations made by the Administrator of the Small Business Administration or the Secretary of Agriculture under their independent authority.

SCOPE OF REVIEW

We reviewed the effectiveness of the State of Massachusetts in implementing its emergency plan as a result of the presidentially declared disaster in February 1978. Based on the problems experienced by Massachusetts during the recovery period (see chapter 2 for specifics), we reviewed the preparedness of six other States as related to the development of implementing procedures for use by State agencies in carrying out their assigned tasks under the State emergency plans. The results of that work are discussed in chapter 3. Chapter 4 discusses State training programs for disasters.

Based on the opinion of FDAA Central Office and regional office officials, we selected States which were judged as being good or poor in emergency preparedness in order to provide balanced results. For example, FDAA officials in the Central Office considered States in region 4 as generally the better States nationwide regarding emergency preparedness.

We interviewed officials from the FDAA regional offices and its Central Office in Washington, D.C. At the State level, we talked with emergency preparedness and planning officials. We reviewed State emergency plans for the six States, State agencies' implementing procedures and local emergency plans, and pertinent correspondence in FDAA grant files.

No reviews of State preparedness have been performed by the Inspector General of the Department of Housing and Urban Development nor FEMA's Inspector General staff which is currently being organized.

CHAPTER 2

LACK OF IMPLEMENTING PROCEDURES BY

STATE AGENCIES IN MASSACHUSETTS

Due to winds and high tides, accompanied by a severe snow storm, coastal areas in Massachusetts received significant damage from flooding in February 1978. Many of the State agencies were not prepared to perform tasks assigned to them by the State emergency plan, in that, procedures had not been developed to show exactly how tasks were to be performed. As a result, victims of the flooding received untimely assistance, assistance was not provided on a consistent basis, and State agencies operated in an uncoordinated manner.

DEVELOPMENT OF THE STATE EMERGENCY PLAN FOR MASSACHUSETTS

Massachusetts was the first State to receive approval for a development grant under section 201 of the Disaster Relief Act of 1974. This grant was approved for \$250,000 for the purpose of developing a State emergency plan. The grant period was from December 1974 through December 1977.

The Massachusetts emergency plan became effective for the State when the Secretary of Public Safety signed it in January 1978.

The emergency plan was developed under a grant proposal or work plan approved by FDAA. The approved work plan required State agencies to develop, during the grant period, appropriate implementing procedures for tasks assigned by the State emergency plan. These procedures are generally referred to as State agency plans or standard operating procedures (SOPs). State agencies were aware of their assigned tasks because each was involved in developing those tasks for inclusion in the plan.

Most State agencies did not have SOPs to implement tasks assigned under the State emergency plan. Upon completion of the development grant period in December 1977, only 8 of 25 State agencies with assigned disaster tasks had developed SOPs.

FDAA was aware of the inadequacies in the Massachusetts SOPs. The FDAA Central Office reviewed a draft of the Massachusetts emergency plan and State agencies' SOPs and provided the following comments to its regional office:

--It is obvious that many very important State agencies have not completed SOPs or have not submitted them.

--Those SOPs that were developed were of varying quality and limited detail in that the SOPs did not state what the agencies were to do nor how they were to do it.

Although the Central Office's review was not provided directly to the State, the FDAA regional office notified the State (Secretary of Public Safety) by letter dated July 19, 1977, of its concern with the lack of adequate implementing procedures by State agencies.

MAJOR DISASTER STRIKES MASSACHUSETTS IN FEBRUARY 1978

The most severe blizzard to strike the Boston metropolitan area in over 109 years began on the afternoon of February 6, 1978. Before it ended, the storm was to set State records for the most snow accumulated from one storm--27.1 inches. High tides were recorded at more than 15 feet above the mean low water level. Violent, swirling northeast winds, together with full moon tides, resulted in flooding along the State's coastal communities and, according to the American Red Cross, left 99 dead, 4,587 injured, and many homes destroyed or damaged--336 homes were destroyed, 1,427 homes sustained major damage, and 5,480 homes sustained minor damage. According to a State of Massachusetts report, the storm was the most destructive in the history of the State.

On February 7, 1978, the President announced a Federal emergency declaration for snow removal and other assistance to the State. On February 10, 1978, the President expanded this declaration to a "major disaster" for eight coastal counties. To receive Federal assistance, the Governor had to implement the State emergency plan.

The Federal Government expended about \$180 million for both individual (private citizens and businesses) and public (State and local government) assistance. Most of the Federal assistance provided went to individuals and businesses. The following schedule shows the various types of assistance and the estimated or actual dollar amounts expended by the various Federal agencies in Massachusetts as a result of the February 1978 storm:

Small Business Administration

Home repair loans	\$ 66,334,297
Business repair loans	51,029,200

Department of Housing and
Urban Development

Block grant (note a)	6,000,000
Note b	

Department of Agriculture

Food stamps	5,372,671
Farm loans	872,501

Federal Disaster Assistance
Administration

Temporary housing	7,115,718
Individual and family grants	2,926,382
Crisis counseling	461,526
Disaster unemployment assistance	<u>334,575</u>

Total individual assistance	140,446,870
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Public assistance (FDAA)	<u>39,667,452</u>
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Total	<u><u>\$180,114,322</u></u>
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a/Special grant to meet disaster-related needs not covered under other programs--repairs and replacement of public facilities, unmet needs of disaster victims, and coastal flood-proofing activities.

b/In addition, the Federal Insurance Administration (now part of FEMA) made Federal flood insurance payments of about \$18 million to victims.

PROBLEMS IN IMPLEMENTING
TASKS ASSIGNED TO STATE AGENCIES

State agencies had not developed SOPs or had inadequate SOPs at the time of the February 1978 disaster. As a result, various State agencies encountered problems in implementing tasks assigned. We reviewed State activities in three programs--temporary housing, emergency food stamps, and crisis counseling--concerning their lack of SOPs. In some cases, the lack of SOPs appeared to be the primary factor causing a problem, but in others, it was only one of a number of factors

contributing to a problem. Problems encountered as a result of a lack of SOPs generally resulted in

- delays in implementing a program and, therefore, untimely assistance to victims;
- a lack of coordination between agencies; and
- assistance not being provided on a consistent basis.

After State agencies had completed their disaster relief activities, they prepared an "after action" report summarizing the actions taken in the relief effort and discussing some of the problems encountered in implementing their tasks. Included in the report were various suggestions to improve the agencies' preparedness in the next disaster.

Temporary housing

After a Presidential declaration, FDAA can provide disaster victims with temporary housing in the form of rented or purchased property, including mobile homes. In lieu of such housing, owner-occupied private homes may be repaired or restored to a habitable condition if restoration can be done quickly at minimal cost. During the Massachusetts recovery period, the FDAA Administrator delegated the temporary housing function to the Assistant Secretary of Housing in the Department of Housing and Urban Development.

Under the Massachusetts emergency plan, the Department of Community Affairs (DCA) has the responsibility for administering the temporary housing program. According to a Massachusetts disaster planning official, DCA has the responsibility whether or not a disaster is declared by the President. However, with a Presidential declaration, the State expected that a Federal agency would take over the program from DCA after a period of time and, therefore, DCA would be responsible for providing short-term housing--subject to FDAA funding--whereas the long-term needs would be a Federal responsibility.

In total, DCA put about 700 families into short-term temporary housing at a cost of \$947,370. This cost is subject to reimbursement by FDAA. The balance of the temporary housing costs (see p. 8) was incurred by the Department of Housing and Urban Development and reimbursed by FDAA.

Prior to the February 1978 disaster, DCA had done little planning for implementing the temporary housing program and,

therefore, had no implementing procedures. The day after the storm, DCA began developing SOPs and completed them 3 days later. However, these SOPs were hastily developed and did not provide the necessary details to adequately administer the temporary housing program.

The following problems resulted from a lack of adequate SOPs by DCA prior to the disaster.

The after action report notes that there was a great need for social services for people housed in short-term temporary housing. As a result, DCA also assisted victims in housing with other problems which hampered its primary mission to provide housing.

For example, DCA was not prepared to handle special needs of the elderly--home nursing care and other services. A DCA official stated that hospitals and nursing homes were full. As a result, DCA staff were required to provide such services--some elderly victims needed constant attention--at a time when they should have been placing other victims in temporary housing.

According to a DCA official, there were no procedures for coordination with the Red Cross which also placed victims into emergency housing. Red Cross provided housing for only a 3-day period after which victims had to go to DCA to be placed in other housing units. If procedures had been established for coordination between Red Cross and DCA, victims may have been saved the time and confusion of applying to DCA and relocating to other housing. The after action report identified the need to require DCA to coordinate the temporary housing mission.

The State emergency plan specifically tasks DCA to assist emergency preparedness agencies in determining availability of housing units from local government officials. In some cases we found DCA officials did not know who to contact at the local level in order to identify unoccupied housing units. No master list of contacts had been developed by DCA. This resulted in some delays in contacting appropriate local officials.

According to DCA staff involved in the temporary housing program, time was wasted in the beginning because nobody knew what to do. As a matter of fact, most of the staff we talked with had never heard of the temporary housing program prior to the disaster.

Due to a lack of adequate SOPs, DCA had not developed application forms for temporary housing. Instead,

application forms from a regular housing program were used. According to the after action report prepared by DCA officials, these application forms did not contain the kind of information or the format most useful for processing temporary housing applicants. This report cited the need for a standardized application form for this purpose. In addition to the lack of standard application forms, there was a lack of standardized contracts or contract provisions for housing providers (e.g., hotels, motels, and boarding houses).

As shown above, DCA encountered many problems as a result of not developing SOPs to implement its disaster responsibilities. DCA recognized in its after action report that problems had occurred and specifically identified a need for (1) SOPs and other reference material, (2) eligibility criteria, (3) information handouts, and (4) standardized application forms.

According to the after action report, at the time of the disaster, all emergency staff were quickly instructed verbally, but a lack of standardized procedural reference material resulted in "unavoidable inconsistencies and inaccuracies, not to mention excessive phone communications where the possibility of misunderstanding is always present." The report further states:

"Although the State Plan provides a general outline"--of the tasks to be performed--, "more detailed administrative guidelines are required for administrative accuracy and efficiency throughout all phases of the housing mission."

Concerning eligibility criteria, the after action report states that:

"Reliable and consistent criteria must be thoughtfully established in order to guide field staff in taking applications for housing. Greater reliance was placed upon practical judgment and integrity of the emergency staff and volunteers in reviewing applicant need."

The after action report noted that information about the housing program that was needed by disaster victims had to be given orally and this resulted in confusion at best or failure to provide needed services at worst. Information

about available programs and services and application requirements should be available for the use of both the disaster victim and agency personnel.

Emergency food stamps

With or without a major disaster declaration by the President, the Secretary of Agriculture is authorized to independently evaluate whether an area should be declared a disaster for food stamp purposes. The purpose of the food stamp assistance is to ensure that adequate amounts of nutritious food are available for low-income households.

As a result of the February 1978 storm, the Secretary of Agriculture approved the issuance of emergency food stamps for a 2-week period in nine counties in Massachusetts. As a result of the declaration, about \$5.37 million in food stamps and vouchers--issued in lieu of stamps where stamps were temporarily unavailable--were given to disaster victims in the State.

As tasked by the Massachusetts emergency plan, the Department of Public Welfare administered the emergency food stamp program through its service offices in the nine counties in addition to eight temporary sites. The Welfare Department did have a two-page SOP approved by the U.S. Department of Agriculture prior to the disaster; however, the SOPs were general and lacked detail on how the program was to be implemented.

In administering a program with a large number of field offices without adequate detailed operating procedures, the Welfare Department had to rely strictly on verbal communications. This required policies and procedures to be passed by telephone between its central office through its regional offices and then, in turn, to its local offices. According to the after action report,

"This led to misinterpretations of policy, misunderstanding of policy, and lack of policy clarifications being received by people responsible for carrying them out."

Initially, all nine counties were authorized to issue food stamps for a 2-week period only. However, some welfare offices began by giving out stamps for the normal food stamp period of 1 month. Therefore, recipients received twice the amount of stamps as authorized.

Five days after the Secretary of Agriculture authorized the issuance for a 2-week period, the authorization period was

changed to 1 month but only for four communities (located in these counties) that received significant damages. Food and Nutrition Service regional staff of the Department of Agriculture audited emergency food stamp activities of the Massachusetts Welfare offices. Of welfare offices reviewed, 38 were only authorized to issue food stamps for a 2-week period. Of these, 18 were found to be in violation because of having issued stamps for a 1-month period.

The Administrative Assistant to the Assistant Commissioner for Public Assistance, Massachusetts Department of Welfare, stated that the erroneous issuance of stamps was due to the misinterpretations of verbal instructions and the use of untrained personnel. The verbal communication of authorization periods would always be necessary in the emergency food stamp program. However, the lack of detailed SOPs in the Massachusetts situation may have been a contributing factor in the issuance of stamps for inappropriate periods.

According to this official, local offices were told verbally how to issue 2-week period food stamps, by voiding the second half of the normal monthly authorization card, thus making it a semi-monthly allotment. However, there were no written procedures available on how this was to be done. The official informed us that welfare offices used volunteers and clerical staff to issue the stamps and that it was possible that these people never understood the instruction.

In its after action report, the Welfare Department recommended that a series of disaster plans or procedures be developed to address different situations that might take place. Each plan would specify the criteria to use in a particular circumstance.

The use of non-welfare personnel was also the result of inadequate SOPs. Prior to the disaster, the Welfare Department had not determined which personnel would be essential to its emergency food stamp program. When statements were made in the press that essential personnel were to report, no one knew who was essential. Also, when welfare personnel tried to report for duty at welfare offices, some had difficulty in getting through police roadblocks due to a lack of identification--during snow clean-up a driving ban was in effect. Many of the needed staff did not report initially and non-welfare personnel were used to issue stamps. In its after action report, the Welfare Department recognized the need for a "great deal of advance planning to identify who are essential personnel" and providing identification to them.

Crisis counseling

The Massachusetts Department of Mental Health (DMH) is tasked by the State emergency plan to provide crisis counseling to disaster victims. As a result of the February 1978 blizzard, DMH received a \$461,526 grant on March 8, 1978, from the National Institute of Mental Health to provide crisis counseling--3,824 storm victims were counseled. The grant provided by the National Institute of Mental Health was funded by FDAA under the 1974 act.

At the time of the February 1978 disaster, DMH had no SOPs explaining how it would implement its disaster responsibilities. Also, SOPs had not been developed concerning the application procedures for obtaining a grant from the National Institute of Mental Health. As a result, delays were encountered in obtaining grant funding which delayed the program. It took about 4 weeks after the disaster before the program actually became operational.

According to a DMH area director involved in the crisis counseling program, the delay in the program becoming operational resulted in some disaster victims with mental health needs not being served in a timely manner. Only those victims who were judged to be the most severe cases, such as suicidal and severely disturbed victims, received counseling immediately after the storm. DCA staff, who were responsible for the State's temporary housing program, also noted that they placed in hotels some victims who were in need of crisis counseling immediately after the disaster, but DMH counselors were not available to help these people.

Delays were encountered by DMH in obtaining grant approval from the National Institute of Mental Health which DMH officials attributed to several factors, including (1) the lack of SOPs, (2) a lack of understanding at the Federal level--FDAA or National Institute of Mental Health--as to which agency had the power to make final recommendations concerning funding, (3) extensive red tape involved in getting the grant proposal approved, and (4) lack of training materials for DMH staff and staff hired to provide counseling under the grant. We believe that if DMH had previously developed detailed SOPs, regarding the grant application process, the delay attributed to this latter factor may have been minimized. With detailed SOPs, the Federal agency with the authority for providing grant funds should be clearly identified as well as the exact application process to be followed in obtaining a grant. A DMH official noted that if SOPs had been developed the crisis counseling program could have started 2 weeks sooner and critical services to

the many serious cases could have been provided in a more timely manner.

DMH officials noted that detailed SOPs would also have been beneficial in areas other than that concerning the delay in obtaining the grant. For instance, it would have been helpful to set up a procedure where DMH area directors in nondisaster areas would be apprised of a serious situation and requested to provide staff to the area of the State affected by a disaster. In the February 1978 disaster, some of the 40 area directors in the State were not aware of the serious situation in the coastal area and did not send staff as early as possible to assist affected DMH area offices.

Another problem which SOPs may have minimized concerns outpatients who were unable to receive their scheduled treatment and medication at community mental health centers which were closed for about a week after the storm. According to a DMH official, SOPs could have provided alternate sources of assistance, such as area hospitals, for these outpatients.

The after action report for the DMH crisis counseling program recognized the lack of detailed SOPs as a problem in the recovery effort. Specifically, it noted that DMH:

"* * * had no plan to fall back on outlining a comprehensive response to the mental health needs of disaster victims. This meant there were no procedures, no forms to document staff activities or client information, and no training materials."

CONCLUSION

Most of the problems discussed in our report on the February 1978 disaster in Massachusetts were identified in the State's after action report. In addition, the report makes a number of recommendations for improvements, including the development of SOPs. We, therefore, are not making any recommendations in regard to these problems. We believe that the impact of these problems could have been reduced significantly if adequate SOPs had been developed prior to the disaster.

Based upon our work in Massachusetts, the subcommittee requested that we evaluate the State disaster preparedness in six other States relating to the development of SOPs for use by State agencies in carrying out their assigned tasks under the State emergency plans. The results of our review of these six States in four FDAA regions are found in chapters 3 and 4.

CHAPTER 3

NEED TO DEVELOP DETAILED PROCEDURES

FOR DISASTER RESPONSIBILITIES

State agencies generally are not prepared to effectively implement the disaster response and recovery tasks assigned to them under their respective State emergency plan, because they have not developed detailed procedures on how to accomplish the tasks. We believe that without such procedures, many of these agencies would encounter significant problems in providing relief services to disaster victims on a timely basis.

STATE EMERGENCY PLANS

As of December 11, 1979, all States--except New Mexico--had comprehensive emergency plans developed or updated with funds provided under the Disaster Relief Act of 1974. New Mexico had not completed its plan. These plans are to be used by the States in responding to and recovering from an emergency or disaster situation. Emergency plans assign various disaster responsibilities or functions to State agencies and volunteer groups such as the Red Cross. The process for requesting a Presidential declaration and obtaining Federal disaster assistance is also specified in the plans.

Emergency plans assign primary or support responsibilities for one or more functions to State agencies or volunteer agencies. A disaster function is an activity such as crisis counseling, mass feeding, emergency shelter, issuance of emergency food stamps, or temporary housing. If a State agency is assigned primary responsibility for a disaster function, the agency is responsible for providing that type of assistance and coordinating with all supporting agencies. An agency with support responsibility will generally be required to assist the primary agency in providing assistance in a disaster situation. We refer to the State emergency preparedness agencies as those State agencies having responsibility for emergency preparedness planning for the States. Preparedness agencies were responsible for the development of the State emergency plans.

We reviewed selected sections of the State emergency plans in the six States selected for our review. In five of the six States disaster functions we reviewed were clearly assigned by the plans to specific State agencies or volunteer agencies. However, we found the New Hampshire emergency plan did not always assign disaster functions to a State agency.

Specifically, it was not clear what agency would handle the crisis counseling and emergency food stamp programs. An FDAA Central Office review of a draft of the State emergency plan also concluded that the plan did not clearly identify which State agencies would be responsible for each program authorized in the 1974 act, for example, individual and family grants and temporary housing. A subsequent FDAA review of the final published plan indicated that this was not corrected.

Except as noted above, we found that the emergency plans generally assign specific tasks to State agencies in regard to their primary or support functions. For example, an agency may be assigned primary responsibility for the function of health and medical. Under this function, the emergency plan would then assign an agency a number of tasks. For instance, one could be immunization. The Oklahoma Department of Health is assigned such a task by the Oklahoma emergency plan:

"Immunization: Administer or cause to administer vaccines to people of disaster area for the prevention and spread of disease."

The State emergency plans do not, however, provide detailed procedures on how a State agency is to perform a task. We refer to implementing procedures as standard operating procedures. State agencies are usually responsible for developing their own detailed SOPs for all tasks assigned to them by the plan.

WORK PLANS REQUIRED SOPs

Prior to receiving a grant under the Disaster Relief Act of 1974, each State prepared a work plan detailing the efforts to be undertaken during the grant period. FDAA reviewed and approved these work plans before awarding the grant. Work plans for the six States we reviewed required State agencies to develop SOPs for tasks assigned. In two States, work plans specifically required SOPs. In the other four, the requirement was not specifically stated in the work plan. However, State emergency preparedness officials in the four States said that it was their understanding that work plans required the State agencies to develop SOPs during the grant period.

Although State agencies were required to develop SOPs during the grant period, FDAA grant funds were generally not used for this work. Only the activities of the planners who were responsible for developing the State emergency plans were paid with FDAA grant funds. Generally, the scope of the planners' work as related to SOPs was to

coordinate with and assist State agencies in developing their SOPs. The Disaster Program Officer in FDAA's Central Office noted that, of all the States, only one or two were provided grant funds for developing SOPs.

IMPORTANCE OF HAVING
STATE AGENCIES SOPs

The problems encountered by some State agencies in Massachusetts after the February 1978 disaster demonstrate the importance of having detailed SOPs. (See ch. 2.)

On January 5, 1979, we met with FDAA Central Office officials to inform them of the results of our review in Massachusetts and the further work planned in other regions. FDAA officials agreed that detailed SOPs are important for State agencies to implement their disaster responsibilities.

In a January 18, 1979, letter, the FDAA Administrator instructed all regional directors to assess the status of State agency SOPs in their regions. In the letter, the Administrator noted that:

"Many of the State Emergency Plans do not include operating plans or procedures for the various State agencies with responsibilities in disasters. These need not be a part of the SEP [State emergency plan], of course; agencies whose disaster duties would not differ appreciably from normal may not even need disaster SOPs. Nevertheless, it is essential to a workable SEP that all agencies with disaster responsibilities accept them and know how to carry them out."

A summary description, prepared by the Massachusetts emergency preparedness agency, concerning work done under the FDAA development grant, noted that an emergency plan is only useful to the extent State and local agencies are ready to implement their responsibilities contained in the plan. Officials of many State agencies responsible for administering disaster relief programs told us that detailed SOPs were needed or would be beneficial to assist them in carrying out their disaster responsibilities.

We talked with the FDAA regional directors in those regions covered by our review and they generally agreed on the importance of SOPs. However, the Regional Director of FDAA Region 6--Dallas, Texas--stated that the need for SOPs varied depending on the type of disaster and the disaster experience of the people in each State. Where States

have people who are experienced in handling disasters over a period of years, less emphasis can be placed on SOPs. On July 25, 1979, the Director of FDAA Region 7--Kansas City, Kansas--told us that SOPs are very important. He indicated that Iowa had recently been struck by several large tornadoes; the first major disaster in Iowa in over 5 years. Many of the State agencies' personnel had never dealt with assistance to disaster victims. However, he said that "things went very well" because State agencies had developed good written procedures for their personnel to follow.

LACK OF ADEQUATE SOPS FOR STATE AGENCIES

Our review of selected State agencies in the six States indicated that:

--A majority of the State agencies either had not developed SOPs to implement assigned disaster tasks or had developed documents called SOPs that lacked the necessary detail for them to adequately implement their responsibilities.

--Other State agencies had not developed specific SOPs for their disaster responsibilities but indicated that detailed SOPs developed for their normal day-to-day operations were sufficient. However, in some cases, we believe these SOPs are not adequate for the agency to carry out its disaster responsibilities.

Our review covered those State agencies responsible for the following individual assistance programs--emergency food stamps, individual and family grants, crisis counseling, and temporary housing--and various other disaster responsibilities, such as search and rescue and damage assessment.

The only individual assistance program that was covered by detailed SOPs in every State we reviewed was the individual and family grant program. Under this program, grants of up to \$5,000 can be provided to individuals or families adversely affected by a major disaster to meet disaster-related necessary expenses or serious needs. The State administers the program subject to 75 percent Federal reimbursement of the cost of all grants made and the total administrative costs up to certain limits. Under FDAA regulations, the State is required to develop SOPs and have them approved by FDAA prior to becoming eligible for participation in this program. Therefore, States have a definite incentive to develop the needed SOPs.

Following is a discussion of the results of our review of SOPs in each State. Generally, we discussed SOPs with the disaster liaison individual in each State agency. State agency liaisons are responsible for coordinating emergency preparedness matters within their respective agencies and with the State emergency preparedness agency.

New Hampshire

The State emergency plan became effective in September 1978. In May 1979 when we met with officials of the State emergency preparedness agency they were unaware of the status of SOPs for State agencies with disaster functions and could not provide us with any information on the overall status of SOP development by State agencies.

We visited three State agencies--the Division of Welfare, the Housing Commission, and the Fish and Game Department. We found that the Division of Welfare had not developed SOPs for the vast majority of its disaster responsibilities, while the Housing Commission had no SOPs at all. The Fish and Game Department had no SOPs for one of the two assigned disaster tasks reviewed by us; the other task was covered by its regular (nondisaster) SOPs.

The Division of Welfare had responsibility for many important disaster recovery functions, such as individual and family grants, emergency food stamps, mass feeding, mass shelter, crisis counseling, and other human need functions. Detailed SOPs, however, had been developed for only the grant program. The welfare liaison official expressed the belief that SOPs are needed. He added that the responsibilities assigned his agency by the State emergency plan are not completely understood and additional guidance is needed. The first time this official became aware of the need for SOPs was when he was informed in writing of our audit by the State emergency preparedness agency.

The Housing Commission which is responsible for providing temporary housing also had not developed SOPs for its disaster responsibilities. According to an official of this agency, SOPs are a low priority and probably would not be developed unless the State placed greater emphasis on completing SOPs. This official stated that he had spent more time with us discussing his agency's role in the emergency plan--about 1 hour--than at all other times combined. He believes that there is a need for SOPs, especially if a major disaster were to occur.

Our review of the Fish and Game Department covered its search and rescue and damage assessment responsibilities

in the emergency plan. We found that the department's SOPs for its day-to-day operations would generally cover its disaster responsibilities for search and rescue; however, these SOPs did refer to the prior State emergency plan and not the current plan. Also, the department did not have SOPs for its damage assessment responsibilities. The department's disaster liaison stated that, although not in writing, the procedures are understood by the department staff. He stated that damage assessment reports would be filed with the State Attorney General's office. The State emergency plan, however, requires that damage assessment reports be submitted to the emergency preparedness agency, not the Attorney General's office.

Connecticut

The State emergency plan became effective in October 1978. In May 1979, the Chief Planner of the Natural Disaster Branch of the State emergency preparedness agency informed us that the agency was unaware of the status of SOPs for most State agencies with disaster responsibilities.

We visited four State agencies to determine the existence and adequacy of SOPs--the Department of Income Maintenance, the Department of Human Resources, the Judicial Department, and the Department on Aging. We found that the Department on Aging was the only agency which had SOPs for its disaster tasks, but even in this case, not all disaster responsibilities were covered by the SOPs.

The Departments of Income Maintenance and Human Resources were formerly one agency which was reorganized into two separate agencies in January 1979. According to disaster liaisons from these agencies, SOPs have not yet been developed since the two new agencies had not agreed with disaster tasks reassigned to each agency. However, when these departments were one agency, no SOPs, with the exception of the individual and family grant program, were developed for its disaster responsibilities. These responsibilities included emergency food stamps, crisis counseling, operation of disaster assistance centers, and temporary housing. The two new agencies intend to develop SOPs after agreeing to their assigned disaster tasks.

The Judicial Department's disaster responsibilities include providing Spanish interpreters in public information, disposal of civil and criminal actions arising out of an emergency or disaster situation, crisis counseling, and public safety. The department also has no SOPs for any of its assigned disaster tasks although the department agreed

with its assigned disaster tasks in January 1978. The Department on Aging developed detailed SOPs for only four of the six tasks assigned it under the State emergency plan. According to the agency's disaster liaison, the SOPs for its disaster responsibilities were prepared at the Department on Aging's own initiative. The Department on Aging did not request or receive any assistance from the State emergency preparedness agency in developing its SOPs.

Oklahoma

The State emergency plan became effective in May 1976. We visited the Welfare Department which has responsibility for emergency food stamps, individual and family grants, and other tasks. We found that the Welfare Department had SOPs for most of the tasks assigned but not all. The emergency food stamp program had some procedures but they were generally inadequate. The agency liaison stated this is a "speeded-up" regular food stamp program and existing SOPs from this regular program are used. However, the results of our work in Massachusetts indicated that this approach is not likely to work well. The emergency food stamp program does not operate similarly to the regular food stamp program--eligibility criteria is not the same and the eligibility period for emergency food stamps may differ from the regular program. (See pp. 12-13.)

Missouri

The State emergency plan became effective in September 1977. Earlier in the grant period, the State emergency preparedness agency contacted State agencies concerning the development of SOPs to implement their disaster responsibilities. About one-half of the State agencies submitted SOPs to the emergency preparedness agency. Based on our review we found that these SOPs, however, were not sufficiently detailed to implement the disaster tasks. According to an official of the emergency preparedness agency, the remaining State agencies felt that detailed SOPs specifically for their disaster tasks were not necessary due to the similarity of their normal duties.

We selected the following six State agencies to determine if additional SOPs had been developed and if developed, the adequacy of such procedures.

- Division of Health.
- Department of Mental Health.
- Highway Patrol.
- Highway Department.
- Disaster Planning and Operations.
- Division of Family Services.

The Division of Health did not have any SOPs for its two primary disaster tasks. The Department of Mental Health which has primary responsibility for crisis counseling did not have SOPs. An official of the Division of Health noted that the agency was in the initial stages of writing SOPs, but could use assistance in doing this.

The Disaster Planning and Operations Office--the State emergency preparedness agency--had detailed SOPs for only three of its seven assigned functions. In each of the seven functions, it had only coordination responsibility.

The Division of Family Services had SOPs for its three primary disaster tasks. These included the individual and family grant program and the emergency food stamp program.

The Highway Department had primary responsibility for debris clearance but had no SOPs for this function. However, highway officials believed that SOPs were unnecessary because it was a normal job performed throughout the year. The Highway Patrol had detailed SOPs covering their primary functions.

Georgia

The Georgia emergency plan became effective in February 1978.

Overall, all State agencies with primary functions assigned to them had submitted documents called SOPs to the State emergency preparedness agency. However, only 23 percent of the support function assignments to agencies had such documents on file with the preparedness agency at the time of our review.

To determine if adequate SOPs were developed to implement primary and secondary support functions assigned to agencies, we reviewed the SOPs developed for two functions--temporary housing and health and social services.

Support agencies were required to develop SOPs and send copies to the primary agency in each function. We did not contact each support agency but reviewed only those SOPs on file with the primary agency. The primary agencies were unaware of the status of SOP development in the support agencies and had taken no action to determine the status.

Based on our review of these two functions, we found most agencies with support responsibilities in these functions had not sent copies of SOPs to the primary agency

and the SOPs that were sent by support agencies and SOPs developed for primary function assignments did not contain detailed procedures on how the agencies would implement their assigned tasks.

Nine State agencies are assigned tasks in the temporary housing function. We found that only four of the nine State agencies, the primary and three support agencies, had developed and submitted documents they called SOPs. However, our review indicated that these documents were general in nature and not much more detailed than information in the plan. The primary agency's SOPs did not contain any specific information on how tasks assigned were to be performed, nor any organization chart, emergency staffing requirements, or notification procedures. The three support agencies' SOPs did not contain specific information on how the agencies would implement their assigned tasks or coordinate with other agencies. In addition, none of the agencies with either primary or support functions had developed application or other pertinent forms needed to accomplish these tasks.

Thirteen State agencies are assigned tasks in the health and social services functions, including crisis counseling, individual and family grants, emergency food stamps, mass feeding, and other human need responsibilities. We found on file at the primary agency only three documents considered SOPs from the primary and two support agencies. Our review of the SOPs developed by these agencies indicated that, except for the individual and family grant program, SOPs were not adequate to implement the disaster tasks assigned the State agencies. The primary agency's SOPs reassign the responsibility of performing tasks to various divisions within its agency and require those divisions to develop detailed procedures. The disaster liaison for the primary agency was unaware of any divisions in the agency that had developed any SOPs concerning the tasks assigned to them. Also, this primary agency's SOPs did not address three of the seven responsibilities assigned to that agency.

Although the primary agency's SOPs did make some suggestions on what should be considered in developing SOPs, the primary agency's SOPs did not contain (1) specific procedures on how to implement the assigned tasks, (2) an organizational chart, (3) eligibility criteria, or (4) application forms. The SOPs developed by the support agencies similarly contained no specific information on how their assigned tasks would be implemented.

According to an official of the agency assigned primary responsibility for the health and social services function in the State plan, the agency's SOPs are being revised, and the revised SOPs will address all tasks assigned to the agency by the State plan. The official also said the revised SOPs will contain more details on how the assigned tasks should be implemented.

Mississippi

The Mississippi emergency plan became effective in October 1977.

In a January 31, 1979, letter, the Mississippi emergency preparedness agency notified the FDAA regional office that only 23 of 35 State agencies had completed SOPs. At the time of our review--August to September 1979--this information was the most current and the only information available on SOP development at the State emergency preparedness agency.

We contacted five State agencies; three were identified by the January 31, 1979, letter as not having SOPs--the Mental Health Department, the Air and Water Pollution Control Commission, and the Welfare Department--and two as having SOPs--the State Board of Health and the Public Service Commission. In addition, we reviewed SOPs for the Forestry Commission and the Highway Safety Patrol which this letter also indicated as having SOPs.

Of the three agencies identified by the letter as not having SOPs, one had regular nondisaster SOPs. Officials of the Air and Water Pollution Control Commission contended that SOPs are not needed since the disaster task assigned--handling hazardous material--is parallel to its day-to-day operations. The commission did have SOPs covering hazardous materials in its regular SOPs.

An official of the Mental Health Department believed that the State emergency plan provided enough detail to carry out its responsibilities, which include crisis counseling. However, our review indicated that the plan was general in nature and did not provide the detailed procedures needed to implement the department's disaster responsibilities.

According to an official of the Welfare Department, each of the 82 counties in Mississippi is responsible for developing its own SOPs and most had developed SOPs. We did not review these SOPs. According to a welfare official, the State plans to consolidate all county SOPs into State SOPs after all county SOPs are complete.

We contacted the four agencies identified as having SOPs by the January 1979 letter. One agency--the Board of Health--did not have SOPs for any of its disaster tasks; however, work on the SOPs had been started by one planner prior to his leaving the agency. The draft copy of the SOPs he developed was dated the spring of 1978. An agency official could not remember when he had left the agency or stopped work on the SOPs. However, we found no indication that any work on the draft had been done since early 1978 and as of the time of our work--September 1979--no one had been assigned to complete the SOP work.

The Public Service Commission is primarily responsible for emergency transportation. The commission's SOPs were only a listing of names and telephone numbers of initial contact persons. The copy of SOPs on file with the State emergency preparedness agency was actually dated in 1977. According to an agency official, updates of the names and telephone numbers are not always sent to the State emergency preparedness agency.

The Highway Safety Patrol has a document which addresses 9 of 10 tasks assigned it. However, our analysis showed that this document did not contain detailed procedures to implement these disaster tasks. This document primarily contained lists of names and telephone numbers to contact in case of a disaster or emergency, but did not specify the exact procedures to be followed.

The Forestry Commission developed a disaster "plan" which essentially reassigns disaster tasks from the State emergency plan to various departments within the commission and does not provide implementing procedures. The departments are responsible for developing internal procedures for implementation of these tasks. However, at the time of our review, none had developed such procedures.

STATE EMERGENCY PREPAREDNESS AGENCIES
UNABLE TO ENFORCE SOPs DEVELOPMENT
REQUIREMENTS

Although the work plans for the six States we visited require State agencies to develop SOPs, according to officials of State emergency preparedness agencies, these agencies cannot force other State agencies to comply with the requirement. Generally, preparedness agencies can only encourage completion of agency SOPs. An FDAA Central Office official indicated that this was true in most States.

Various steps were taken by some of the emergency preparedness agencies to encourage development of SOPs. In most States, the emergency preparedness agency met with State agencies in the grant period to determine what tasks each agency could perform. The need for SOPs was discussed at some of these meetings. In some States, later meetings were held to provide technical assistance to the State agencies in developing SOPs. Only one State--Georgia--provided written guidance to State agencies on what should be included in the SOPs.

In three States, State agencies were requested to file a copy of their SOPs with the preparedness agency, while in two States, State agencies were not requested to send in SOPs. Only in Georgia were agencies required to file copies with the preparedness agency.

However, the amount of encouragement varied significantly between States in our review. In four of the States little was done to encourage or monitor development of SOPs. Whereas, the other two States--Mississippi and Georgia--appeared to have provided greater encouragement to their State agencies in developing SOPs.

For example, the New Hampshire emergency preparedness agency did little to encourage SOP development. The preparedness agency was unaware of the status of SOP development by State agencies. Officials from two State agencies noted that they had received little or no contact from the emergency preparedness agency concerning SOPs. Little assistance was provided to State agencies during the grant period, and, according to an official of the preparedness agency, time did not permit the agency to provide assistance to State agencies in developing SOPs.

The Georgia emergency preparedness agency provided greater encouragement to Georgia State agencies. The Georgia agency provided assistance to State agencies in developing SOPs through frequent meetings and correspondence with State agency personnel. Also, deadlines were established for completion of SOPs.

According to progress reports sent to FDAA, the Georgia preparedness agency also developed prototype SOPs to assist State agencies in developing SOPs. In June 1978, the agency also published a handbook covering the role of State agencies during an emergency and included guidance on developing SOPs.

We received various reasons from State agencies why SOPs had not been developed. Some agencies indicated a lack of staff or a low priority for such work. Some agencies disagreed on the need for SOPs. Others intended to develop SOPs in the future--some had SOPs in draft--but delays occurred due to such causes as a loss of planning personnel, reorganization of State agencies, or higher priority work.

Based on our review, we believe that all State emergency preparedness agencies need to emphasize the importance of SOPs to other State agencies and provide them technical assistance. In order to assist each State emergency preparedness agency, we believe that strong support from the State Governor would provide the agency greater backing.

For example, the Georgia emergency preparedness agency was provided direct backing by the Governor of Georgia in getting agencies to develop SOPs. An executive order was issued in February 1978, requiring each State agency with one or more assigned functions under the Georgia emergency plan to prepare and maintain SOPs.

After our work was completed in Connecticut, the Governor issued a letter to all agencies emphasizing the need to develop SOPs. Also, the State emergency preparedness agency issued a bulletin requesting State agencies to submit certain information relative to SOPs. Officials of the emergency preparedness agency felt that the Governor's letter would add "clout" to the request for SOPs.

NEED FOR GREATER FEDERAL EMPHASIS ON STATES' DEVELOPING SOPs

According to the Disaster Relief Act of 1974, States requesting financial assistance in developing State emergency plans shall submit "a State plan" to the President which shall include provisions for the formulation of necessary regulations and procedures. According to the Disaster Program Officer in the FDAA Central Office, FDAA, in its regulations, interpreted a State plan as the work plan outlining work to be performed under the grant rather than the State emergency plan itself. The FDAA regulations stated that an application for a development grant shall include provisions for the formulation of necessary regulations and procedures to ensure that the plans, programs, and capabilities to be developed can be implemented.

According to this same official, "necessary regulations and procedures" were not defined by FDAA, and FDAA allowed each State to decide what procedures are necessary. The

official stated that FDAA did not require SOPs to be developed but only encouraged States to develop SOPs.

FDAA had not developed guidelines on what should be included in adequate SOPs. In its disaster preparedness checklist, FDAA provided some suggestions as to the types of procedures that may be needed in selected functional areas. States were provided this checklist as areas to consider in developing their work plans and, according to this same official, States were not required to comply with it.

We found that the FDAA Central Office and the FDAA regional offices we reviewed provided little encouragement to the States in developing SOPs. State emergency preparedness officials informed us that FDAA regional offices provided little or no encouragement to develop SOPs. However, in Mississippi, the original disaster planning staff was no longer employed by the State, but other civil defense personnel could not recall any such encouragement. The Disaster Program Officer of the FDAA Central Office stated that the primary emphasis by FDAA was to assure that each State developed and completed its emergency plan; FDAA considered the plan an important first step in improving State preparedness.

In each FDAA region we visited, we reviewed FDAA files concerning quarterly visits FDAA officials made to the States during the grant period. We found that FDAA generally did not document the results of its visits nor any suggestions or advice given during quarterly visits. The only exception to the lack of documentation was found in region 6 which had documentation regarding visits to Oklahoma.

FDAA Region 1 officials indicated that they encouraged New England States by requiring States to include SOP development in their work plans. However, no followup was made by the region as to how State agencies were progressing in developing SOPs.

Georgia was the only State we reviewed where SOPs were to be a part of the State emergency plan. Because they were part of the plan, FDAA required that they be completed and submitted in draft for FDAA review. In March 1977, the Georgia emergency preparedness agency submitted State agency SOPs in draft for the 28 primary function assignments. FDAA advised the State that these SOPs were inadequate in that they did not contain detailed implementing procedures. The format of the plan was later changed to exclude the SOPs, because the plan was going to be bulky and material contained in the SOPs duplicated the plan. Since the SOPs were no longer to be part of the State emergency plan, FDAA did not request nor receive subsequent drafts or revisions of State agency SOPs.

In his January 18, 1979, letter to the regional directors, the Administrator, in referring to SOPs, asked the directors to "confirm that States know their agencies' deficiencies and are either correcting them or are willing to accept responsibility for any inadequate performance." In addition, in a February 1979 memorandum to State emergency preparedness agencies, FDAA encouraged the States to review their need for SOPs, particularly for the key agencies responsible for programs under the 1974 act. It noted that many plans have not yet been backed up with instructions or SOPs.

NEED FOR REVISING LOCAL EMERGENCY PLANS

With the development of a State emergency plan local emergency plans may not be in conformance with the new State plan and revisions may, therefore, be needed.

Based on our discussions with State emergency preparedness officials in the six States, we found that most local emergency plans either needed to be revised to conform with the State emergency plan or have not been reviewed by the State to determine if they are in conformance. Of the six States we visited, three had not evaluated their local plans for conformance, while officials in two States noted that their review indicated that their local plans were not in conformance. Emergency preparedness officials from one State indicated that local plans are in conformance with the State emergency plan.

Neither Connecticut, Missouri, nor New Hampshire had evaluated local plans to determine if they conform with the State emergency plan. The Civil Defense Director for New Hampshire noted that although no overall evaluation of local plans has been undertaken, her review of the standard DCPA format used by local communities indicated that local plans are not in conformance with the State emergency plan. Our review of one local plan indicates that it does not provide detailed information relative to disasters or Federal disaster assistance. A New Hampshire official noted that the State intends to use FDAA improvement grant funds to assist local communities in revising their local plans to conform to the State plan. Missouri emergency preparedness officials stated that the State does not monitor local plans for conformance with the State plan, nor is there any requirement that local governments prepare local plans for disaster responsibilities.

Both Georgia and Mississippi have reviewed local plans and found that local plans were not in conformance. Mississippi State emergency preparedness officials have reviewed

all new and revised local plans (about 21) submitted since the State plan was distributed. The majority were found not to be in conformance with the State emergency plan. These local plans contain little, if any, information on FDAA-type disasters. According to Georgia emergency preparedness officials, none of the 123 local emergency plans on file with them conform with the State emergency plan. In August 1978, the Georgia emergency preparedness agency sent a letter to all local civil defense officials which contained a proposed format for six new sections for their local plans. The new sections would incorporate essential information contained in the State plan into local plans, but only two counties responded and the plans they submitted were considered unacceptable.

According to an official of the Oklahoma emergency preparedness agency, local plans were revised during the development grant period and are in conformance with the State emergency plan. Many local governments were visited and given assistance in revising their plans, primarily by adding sections to the local plans covering FDAA-type disaster activities. We reviewed two of these local plans, and both appeared to be compatible with the State emergency plan.

According to FDAA regulations, States were required to provide guidance and assistance to local jurisdictions in the development of their disaster preparedness plans, programs, and capabilities. Most of the States we reviewed had provided at least some guidance to the local governments during the grant period on how to revise or update their emergency plans to be in accordance with the State emergency plan.

At the time of our review, four of the six States we visited had provided written guidance to help local governments conform their local emergency plans with the State emergency plan. Connecticut and Missouri had not distributed any written guidance to local governments. Subsequent to our review, Connecticut did send guidelines to all the local communities on revising their local plans which included information on obtaining State and Federal assistance and their responsibilities in a disaster. In late 1978, Missouri emergency preparedness officials had assisted a county in revising its local plan to conform with the State emergency plan. According to a Missouri official, this plan is available to approximately 400 other local civil preparedness organizations in the State to use as a prototype in revising their plans. However, at the time of our review, none had been sent out because no local governments had requested this document.

Four States--Georgia, New Hampshire, Oklahoma, and Mississippi--provided specific written guidance to local

governments for revising local emergency plans. Georgia had provided local governments instructions for revising their local plans, including a prototype plan. In addition, Oklahoma developed a document that local communities could use as a supplement to their local plans. This document provides a checkoff list of local responsibilities in a disaster.

CONCLUSIONS

Many of the State agencies in the six States we reviewed had not developed SOPs to implement assigned disaster tasks or had developed inadequate documents that did not include detailed implementing procedures.

The only individual assistance function that was covered by detailed SOPs in each State we reviewed was the individual and family grant program. SOPs for the program had been developed by each State because eligibility for assistance under FDAA regulations require a State to develop SOPs and have them approved by FDAA. This provided States with the necessary incentive to develop SOPs for this task. We believe that similar requirements for SOPs should be applied to all State-operated functions funded by FEMA under the 1974 act.

State emergency preparedness agencies were unable to force other State agencies to develop SOPs despite the fact that State agencies were required by the work plans to develop SOPs. Generally, preparedness agencies can only encourage the completion of SOPs. However, in four of the six States, preparedness agencies had done little to encourage other State agencies to develop SOPs.

In addition, FDAA had provided limited guidance to the States on the need for developing SOPs for their disaster responsibilities.

We believe that the development of adequate SOPs by State agencies for those tasks assigned by their State emergency plans is important to State preparedness. Without determining how a task will be implemented prior to the disaster, a State agency may implement the task in an untimely, inefficient manner. We believe that State agencies need greater encouragement to complete SOPs.

Many local emergency plans may not be in conformance with the new State emergency plans. Some States had not reviewed local plans to determine conformance, while others had reviewed plans and found them not in conformance. Although four of the six States we reviewed had provided written guidance to local governments to assist them in revising their

local plans, it appears that States will be required to expend greater resources on assisting and monitoring local governments in their development or revision of local plans and thereby allow local communities to work compatibly with the States during disaster situations.

RECOMMENDATIONS TO THE DIRECTOR OF FEMA

We recommend to the Director that, in future improvement grants to the States, the following tasks be identified as high priority items and the States be required to use improvement grant funds to monitor the completion of these tasks:

- Development of State agency SOPs for disaster tasks assigned by the emergency plans.
- Development or revision of local emergency plans to assure their compatibility with the State emergency plans.

In addition, we recommend that the Director require FEMA regional offices to closely monitor the States during the grant period to assure that adequate SOPs are being developed and local emergency plans are being developed or revised, as appropriate.

We recommend that the Director of FEMA request each Governor to:

- Require State emergency preparedness agencies to evaluate existing SOPs supporting assigned disaster tasks to determine which are inadequate and need revision and to evaluate local government emergency plans to determine if plans need revision to conform with the State emergency plans.
- Require State agencies, without adequate SOPs supporting assigned disaster tasks, to develop SOPs and submit them to the State emergency preparedness agency for review and approval.
- Require or request local governments to develop or revise their local emergency plans to conform to the State emergency plan.

We also recommend that, for State-operated programs or functions funded by FEMA, the Director require States to develop SOPs and obtain FEMA's approval of such SOPs before participating in the programs.

STATES AND FEMA COMMENTS

We discussed our recommendations with FEMA officials who generally concurred with them.

We also discussed our recommendations with officials of the State emergency preparedness agencies in the States we visited. They generally concurred with our recommendations.

The Director of the Massachusetts emergency preparedness agency expressed concern about the limited amount of Federal funds available under the improvement grant to implement our recommendations and to complete other higher priority work. He also noted that the Governor of Massachusetts had issued an executive order directing State agencies to develop needed SOPs. He noted that the order had not worked well because emergency preparedness has remained a low priority function within the State.

Officials in Georgia and Oklahoma commented on our recommendation requiring States to develop SOPs for State-operated programs or functions funded by FEMA and obtain FEMA approval of such SOPs. The Deputy Director of the Georgia preparedness agency did not believe that such a requirement could be applied to some disaster programs such as damage assessment or temporary housing even though they believed SOPs would be desirable for these activities. From a political standpoint, he believed that it would be impossible to deny assistance to a State in the event of a declared major disaster simply because FEMA had not approved SOPs for a program.

We would agree that States should be given adequate time to develop necessary SOPs for such functions, during which time, the States should not be denied funding for declared disasters. However, if a State does not comply within a reasonable amount of time, it may be necessary to deny funding.

The Director of the Oklahoma emergency preparedness agency indicated that FEMA must allow States adequate flexibility in developing SOPs for these functions to recognize the differences between States, for example, population and topography.

CHAPTER 4

NEED TO IMPROVE PREPAREDNESS THROUGH

EXPANDED TRAINING OF PERSONNEL

FDAA has provided only limited guidance to the States concerning the importance of training and the need to develop a continuing training program. FDAA has provided no minimum requirements or standards for training for State and local personnel. As a result, none of the States we visited had developed disaster training programs under their development grants. Limited training for disasters was being provided to State or local personnel having disaster relief responsibilities under State emergency plans.

STATE AND LOCAL EMERGENCY PREPAREDNESS ORGANIZATION

In this chapter we are referring to the disaster planning staff as those State employees in charge of carrying out the provisions of the "work plan" under the development and improvement grants provided by FDAA. This staff developed the State emergency plan and other documents provided for in the work plan. In five of the six States in our review, the planning staff was responsible to the Director of the State civil preparedness agency. However, in Missouri, the planning staff was responsible to the Adjutant General. In New Hampshire, effective with the beginning of the improvement grant on July 1, 1979, the planning staff became a part of the civil preparedness agency. Previously, it was a separate organization within the Governor's office.

As noted earlier, State emergency plans assign specific tasks to State agencies for implementation during or after a disaster. Generally, each State agency having disaster tasks assigned to it will appoint an emergency liaison official with the responsibility to coordinate the agency's disaster activities with the State civil preparedness agency. At the time of a disaster, this may mean reporting to a State emergency operation/coordination center with liaisons from other State agencies to receive instructions from the Governor or the appointed representative on activation of any of the required tasks in the State emergency plan.

The duties and responsibilities of a liaison are in addition to and may differ from his or her normal responsibilities during nondisaster situations. Therefore, a liaison needs emergency training exercises to some degree to develop and maintain a minimum degree of proficiency. For

example, the liaison for the Connecticut Department of Human Resources was its Director of Business Administration.

In addition to State liaison officials, other State agency officials and personnel would be responsible, at the time of a disaster, to set up emergency assistance programs and perform emergency tasks assigned by the State emergency plan. For example, State welfare agency personnel are generally responsible for administering the emergency food stamp program and the individual and family grant program.

Training of State agency liaisons would normally be provided by the State civil preparedness agency. This training would cover the liaison's duties in coordinating with the civil preparedness agency at the time of the disaster. Generally, liaisons report to an emergency operations center or a State coordination office in the area of the disaster.

On the other hand, training of other State agency personnel--those responsible for actually carrying out a task(s) given the agency--would be the responsibility of the agency itself. However, the State civil preparedness agency may assist in providing this training. For example, the Welfare Department is normally in charge of implementing the individual and family grant program and would be responsible for any training of agency personnel assigned to administer that program.

State emergency plans are generally based on the assumption that local government officials will be responsible for taking the necessary initial actions in any disaster. Immediate actions would usually include warning and evacuation of citizens, alleviation of suffering, and protection of life and property. State resources would be provided, when requested, if needed actions are beyond local government capabilities. Some of the plans also briefly explain the role of local officials in the recovery period which can include, in addition to other activities, assessing local damage and initiating requests for FDAA assistance, such as, repairs to public facilities.

LIMITED TRAINING PROVIDED TO STATE AGENCY LIAISONS

None of the six States we reviewed had established a disaster training program with minimum training standards for State agency liaisons under the development grant. Liaisons generally had a number of years of experience in their agencies and in their position as liaisons. In some

States, on-the-job training was provided to liaisons during an actual disaster when a State emergency plan was implemented. Some State agency liaisons have not participated in training courses or mock exercises while others have. In some States, liaisons had received limited training while in other States, liaisons had received a greater amount of training. Some of the training courses and exercises were provided through funding from the Defense Civil Preparedness Agency, rather than FDAA. We believe that a training program with minimal training standards that would require liaisons to participate in certain types of training courses in a certain timeframe would improve their preparedness for a disaster.

Of 10 State agencies having primary responsibilities under the Oklahoma emergency plan, all the liaisons had worked for their agencies at least 5 years and all but one had been the liaison for at least 5 years. All 10 Oklahoma liaisons had attended civil defense training courses and seminars.

In New Hampshire, the three State agency liaisons we contacted had been in their liaison positions from 3 to 10 years. The last training--seminars or exercises--received by any of these liaisons was in 1974 when a DCPA-funded exercise was held. Under the New Hampshire work plan, four FDAA-funded disaster exercises were to be held during the grant period to train State agency liaisons. However, the Governor would not authorize the exercises although he was requested to each year by the civil defense director.

A liaison official from one New Hampshire agency that had not participated in the 1974 exercise--not being a liaison in 1974--had not received any training nor participated in any exercises. However, he did administer a temporary housing program during a small disaster in 1979.

In Georgia, the State civil preparedness agency held a number of briefings and seminars for State agency liaisons concerning their roles in a disaster. In addition, a number of exercises were held, including an exercise to test the entire State plan which was conducted in August 1977. However, according to the work plan, the primary objective of a series of exercises planned was to develop an ongoing periodic testing process for its emergency plan. We were unable to determine how much training was planned under the work plan due to its lack of specificity. However, the work plan required more extensive training than actually performed. Georgia progress reports noted that much of the formalized

training planned for State, local, and regional officials was never provided.

In Missouri, we met with five State agency liaisons and found that four had not attended any training courses or participated in State exercises. The liaison from the Missouri Highway Patrol had attended three or four courses annually and had participated in some training exercises each year. State officials noted that Missouri has had frequent disasters such as tornadoes and floods which are serious enough to involve the participation of liaisons in their disaster coordination roles and provided them on-the-job training.

The only disaster-related training provided to Connecticut State agency liaisons since the FDAA grant began in June 1975 has been three seminars and two disaster simulations. These seminars/simulations varied from 1 to 3 days. One seminar and one simulation were FDAA-funded; the balance, DCPA-funded. However, in talks with four State agency liaisons, we found that these liaisons had attended on the average about one-third of these seminars/simulations available to them since they had become liaisons.

Under the development grant, training seminars were held for agency liaisons in Mississippi to acquaint them with the State emergency plan. In addition, the State conducted two test exercises; one in January 1977 and the other in November 1977. In addition to liaisons, officials from some Federal agencies, local civil defense councils, Red Cross, and others participated.

The first FDAA improvement grant to Mississippi provided funds to conduct five training seminars. However, three of the four that related to training State officials were not held. The State requested that the three seminars be considered completed based on training received during the actual disaster which occurred in April 1979, and FDAA agreed. The three elements were seminars on disaster relief and assistance, a workshop on emergency operating center, and a workshop for Welfare Department personnel. The fourth seminar for State officials was on damage assessment and had been scheduled but not given at the time of our review.

Mississippi has requested a second improvement grant which contains a number of similar training seminars.

TRAINING HAS NOT BEEN PROVIDED TO
PERSONNEL EXPECTED TO IMPLEMENT TASKS
OR PROGRAMS UNDER THE EMERGENCY PLANS

State agencies have not developed training programs to instruct agency personnel on procedures to follow in implementing tasks assigned by the State emergency plans. Little or no training has been given to State agency personnel concerning their responsibilities at the time of a disaster. To ensure that personnel responsible for performing various disaster relief tasks at the time of a disaster are adequately prepared, periodic training is necessary. This may require only annual or semiannual briefings of personnel to discuss the agency's method of operation and responsibilities during a disaster situation. This time could be used to familiarize agency personnel with emergency programs and SOPs applicable in implementing the programs. We believe that top officials in State agencies having disaster responsibilities must be convinced of the importance of providing such disaster-related training to their personnel.

In some agencies, we were informed that certain tasks assigned to a State agency by the State emergency plan were the same tasks performed in an agency's day-to-day operations. For example, the police may be responsible for protection and security necessary to save lives and protect property, enforce laws, and regulate and control traffic. State police may not need disaster training programs for these activities. Training may be provided as a part of regular nondisaster training programs. However, based on our review, many of the tasks assigned, especially those programs related to the 1974 act--individual and family grants, emergency food stamps, and temporary housing--are not the same and require specialized training for disaster or emergency situations.

New Hampshire

Two State agencies we contacted had not provided any internal training to staff that would be involved in operating disaster assistance programs for individuals, such as individual and family grants, emergency food stamps, crisis counseling, and temporary housing.

The liaison for the welfare agency stated that no plans had been made to train welfare personnel in their disaster responsibilities in the immediate future, however, funds for this training have been requested.

In regard to the individual and family grant program, the welfare liaison said that it was fortunate that the two recent disasters in New Hampshire were small because if the State had a substantial disaster "the State would be in trouble" with respect to this program because of the agency's lack of training and poor preparedness. The liaison for the housing agency--the director of the agency--also indicated that the State was fortunate that the recent disasters were small, because he did not believe the housing agency was capable of handling its disaster responsibilities in a large disaster, due to its lack of preparedness.

Connecticut

Our discussions with four State agency liaisons indicate that no training had been provided in these agencies to personnel expected to implement assigned disaster tasks. These agencies included those with primary responsibility for the individual and family grants, emergency food stamp and crisis counseling programs. The only exceptions to this were a briefing--1976 or 1977--given to district welfare directors on the individual and family grant program, briefings given to Directors of local grantees of the Department on Aging, and attendance by two Department of Human Resources personnel at an exercise.

The Director of the Connecticut State preparedness agency agreed that internal training had been weak in Connecticut. At the completion of our review, the Director sent a letter to all State agencies urging them to provide more training to personnel who would be involved in various disaster programs.

Georgia

The Governor of Georgia, in an executive order, required each agency with emergency tasks assigned by the State emergency plan to train its employees to handle tasks under the emergency plan. However, an official in the Georgia emergency preparedness agency indicated that he knew of no such training courses developed by any State agency. In our talks with agency liaisons in two State agencies, we found that neither agency had developed training courses nor provided any training. Both liaisons agreed that training courses are needed.

One of these liaisons indicated that experiences in recent disasters related to the temporary housing program indicated that both State and local officials need "additional" training on their duties and responsibilities in responding to disasters. For example, a dam collapsed on November 6, 1977,

and flooded a college in Georgia. A major disaster was immediately declared by the President on November 7, 1977. As a result of the disaster, the damage assessment, temporary housing, and other functions of the State emergency plan were implemented. According to State officials, the results of the State's involvement revealed the need for the periodic training and exercise of State agency personnel in emergency situations.

The State agency official responsible for administering the temporary housing program reported to the State Civil Defense Director that recovery operations pertaining to the provision of emergency shelter and temporary housing was done in a very effective manner. The report indicated that the agencies' role in this disaster was minimal and it described the agencies' performance as "adequate."

The liaison representing the State agency at the disaster site said housing assistance was primarily handled by FDAA and the American Red Cross which he considered fortunate because of the inexperience of State agency personnel in providing such assistance. He said the State agency's role in assessing housing damage was very minimal, and felt that agency personnel would have encountered severe problems in assessing the damage because of their inexperience, particularly for large housing units such as a dormitory which had been damaged. In fact, two of the State agency employees assigned to assist in making a damage assessment and a repair and/or replacement cost estimation were replaced by personnel from another State agency because of the highly technical nature of the estimation. According to the liaison, the agency's brief and minimal participation demonstrated the need for training for State agency personnel who participate in disaster relief programs.

A former planner said that coordination among the State agencies was a problem; damage assessments were not good and State agency personnel sometimes inappropriately reported information obtained to individuals not concerned with the information.

Mississippi

None of the three State agencies we contacted had developed training programs for their personnel responsible for disaster tasks assigned to the three agencies. Under the improvement grant, a workshop was to be held for welfare personnel to explain the individual and family grant program. However, this was dropped as a result of the experience gained by welfare personnel in the April 1979 flood. Agencies liaisons noted that the actual implementation of the State

emergency plan, as a result of the April 1979 disaster, provided the training needed by agency personnel.

Oklahoma

None of the three State agencies we contacted had developed any training courses for their personnel for tasks assigned under the Oklahoma emergency plan. Officials indicated that the only training that would occur was training concerning their regular day-to-day duties (nondisaster) that would relate to their disaster responsibilities. One agency also noted that a 2-day orientation course for new employees covered disaster functions of the agency.

Missouri

None of the five State agencies we contacted had developed training courses or provided training to their personnel related to tasks assigned in the emergency plan. The only training that would occur would relate to their regular (nondisaster) responsibilities that could also apply to their disaster responsibilities.

NEED TO IMPROVE TRAINING OF
LOCAL EMERGENCY PERSONNEL
CONCERNING DISASTERS

Local government officials do play a significant role during both the emergency and recovery phase of a presidentially declared disaster in assessing needs and damages, requesting FDAA and other Federal assistance and performing and managing work under FDAA grants. According to FDAA's handbook for applicants, local officials are responsible for meeting the needs of the affected individuals throughout the disaster recovery period and performing reimbursable emergency work. In addition, local officials are responsible for managing the projects for permanent restoration work on public facilities subject to FDAA's reimbursement for eligible items. We believe training is important if local officials are to effectively carry out their responsibilities.

In the six States we reviewed, some training and exercises for local officials were accomplished under FDAA development grants. None of the States developed an FDAA-type disaster training program with minimum standards for local emergency preparedness officials under their development grants. By minimum standards, we mean training programs that establish requirements that local officials must participate in certain types of disaster (FDAA-type) training

periodically. However, additional training is being provided to local officials under DCPA-funded State training programs.

For example, in Connecticut, the only training scheduled under the development grant was ten 2-hour seminars for state-wide training of local officials on damage assessments and Federal disaster assistance available from FDAA. Only five seminars were actually held, but were poorly attended; the rest were postponed. As of June 1979, the postponed seminars were planned for the fall of 1979.

In Oklahoma, the only FDAA-funded training provided to local officials was during a test of the State emergency plan. No seminars or courses were planned under the development grant.

In New Hampshire, the only training provided to local officials under the FDAA development grant was a 2-hour seminar given in 15 different locations throughout the State. The seminars covered local responsibilities in an emergency, Federal disaster assistance available to local communities, and hazard prevention. Under the State's current improvement grant from FDAA, no further training was planned for local communities, although the State will visit these communities to provide assistance to them in developing their local emergency plans.

The Georgia civil preparedness agency held a number of briefings and seminars for local personnel on their roles in disaster operations. In addition, a number of tests and exercises were held. However, progress reports on work accomplished during the first 2 years of the development grant indicate that more extensive, formal training sessions were planned, but were not carried out.

Mississippi's training officer agreed that its training program manual for local civil preparedness officials does not address Federal disaster assistance training related to FDAA-type disasters. However, Mississippi has tried in the last 2 years to incorporate such training into its program. Seminars have been given to local officials on Federal assistance programs because the need for such training was demonstrated in recent disasters in the State. The training officer stated that more guidance was needed from FDAA (FEMA) as to the types of training needed by local officials concerning these programs.

According to State civil defense officials in some of the States we visited, most of the training available for or provided to local officials is DCPA-funded courses which can include both FDAA-type and civil defense-type disasters.

This includes a basic civil defense seminar (workshop) and an advanced seminar. More specialized advanced seminars/workshops are given by DCPA. The basic and advanced seminars are generally 2 to 5 days. In addition, home study courses are available through DCPA.

However, the primary emphasis of DCPA-funded training seminars is civil defense, that is, nuclear attack/manmade disasters, and only limited time is provided for training related to FDAA and other Federal disaster assistance programs. For example, in Connecticut, civil defense officials indicated that only 1 hour of its basic seminar is devoted to FDAA and Federal disaster relief programs.

There is, however, a close parallel between training for FDAA-type disasters and nuclear attack. According to an Oklahoma planning official, disaster training for tornadoes is similar to training for nuclear attack, except for the nuclear fall-out aspects and its affects on shelter life. Many of the DCPA-funded training exercises are based on natural disasters or hazardous material spills. This was allowed by DCPA under a dual-use concept stated in a 1978 memorandum of agreement between DCPA and FDAA. These agencies agreed to conduct their programs

"* * * with the greatest possible mutual benefit and with continuing emphasis on the dual-use nature of emergency plans, procedures and preparedness programs developed by the States and local governments."

However, limited information developed on DCPA basic training shows that many local civil defense directors have not attended even the basic course. In the six States we reviewed, the percentage of local civil defense directors who had taken or been given credit for the basic seminar ranged from 31 percent to 72 percent with an average for the six States of 41 percent.

Some State emergency preparedness officials agreed that local personnel need more training concerning FDAA-type disaster assistance. The State civil defense training official for New Hampshire stated that more training was needed for local personnel on disasters. The former training officer for the Mississippi emergency preparedness unit stated that FDAA needed to develop an ongoing training program to assist the State in providing training in such areas as damage assessment rather than providing crash courses just after a disaster occurs. The Connecticut emergency preparedness director agreed that training of local personnel had been weak in Connecticut.

In a March 1979 flood occurring in three counties in Georgia, the State agency responsible for temporary housing found that local officials in two of the counties "performed their responsibilities in an extremely poor and inefficient manner." As noted in an after action report, this resulted in delays in providing temporary housing to disaster victims. The report further notes that

"* * * much of the delay resulted from the attitude of local officials * * * that this temporary housing program responsibility was merely one of many local governmental responsibilities and warranted no special priority attention or priority allocation of local resources or manpower."

The report recommends that local officials be provided briefings on the temporary housing program and to stress the critical nature of their responsibilities in the program.

FDAAS HAS PROVIDED LIMITED
GUIDANCE ON THE TRAINING OF
STATE AND LOCAL PERSONNEL

FDAAS's regulation (24 CFR 2205.79(c)) states that applications for development grants shall:

"(3) Include provisions for appointment and training of appropriate staffs, formulation of necessary regulations and procedures, and conduct of required exercises to ensure that the plans, programs and capabilities to be developed can be implemented."

FDAAS has not placed any further requirements on the States regarding the type of training nor developed any specific minimum standards for training or exercises.

A disaster preparedness checklist was issued by FDAAS in December 1974 which provides greater details regarding training and exercises. The checklist is a series of questions which were to be considered by each State in preparation of its work plan.

The portion of the checklist for training and exercises covers such questions as:

"-Is training available for State personnel charged with disaster operations--

-At all levels?"

"-Does the State have a formal or organized training program, including--

-Identified requirements?

-Established standards?"

"-Are exercises or tests conducted--

-On a scheduled, continuing basis?

-On a multijurisdictional basis within the State?"

The checklist, however, is only advisory in nature and States were not required to comply with its implied requirements.

The official in the FDAA Central Office in charge of training agreed that FDAA had no formal or required minimum training program nor standards established for the States. He noted that the only role FDAA has played in the training area is the development of courses for use by FDAA regional officials to provide 1- or 2-day seminars on selected subjects. An FDAA Region 1 official indicated that FDAA tried to emphasize training to the States by requiring them to address the issue in their work plans. This appears to be the case, because the work plans in each State we reviewed did address, to a limited degree, training. In one State-- Georgia--we found documentation of a meeting between an FDAA official and the Georgia planning staff in which FDAA notified Georgia of its failure to adequately address training in its work plan. The FDAA official noted that training was inherent to the plan. Georgia subsequently addressed training in its later amendments to its work plan. However, during this same meeting, Georgia officials complained about the lack of FDAA guidance and assistance in the development of State disaster training.

According to FEMA's Assistant Director for Training and Education, FEMA is currently in the process of evaluating the overall training requirements in the area of emergency preparedness. This process will integrate all training requirements and programs of the agencies that were reorganized into FEMA, including FDAA and DCPA. FEMA will be deciding how best to use existing resources in the training area.

CONCLUSIONS

FDAA has provided only limited guidance to the States on the need for training programs for local and State personnel with disaster responsibilities under the State emergency plan. Training of these personnel is necessary to ensure that disaster tasks will be carried out in an efficient and timely manner. FDAA had not developed any minimum standards for training or training programs or provided guidance on the types of training needed. As a result, none of the States in our review had developed training programs with minimum standards for State agency personnel or for local emergency preparedness officials/personnel concerning Federal disaster assistance programs.

Under the development grants, limited training was provided to State agency liaisons in mock exercises and seminars. Some liaisons have not participated in training courses or exercises, while others have. In addition to the above, officials in some States indicated that actual emergency situations happen frequently and provided on-the-job training for these liaisons.

State agencies, having tasks assigned by the State emergency plans, had not provided training to their personnel and had not developed training programs for these tasks. Although some tasks assigned are similar to an agency's day-to-day activities, many of the tasks assigned are different than day-to-day activities and require training.

The States we reviewed provided some training, including exercises, to some local emergency preparedness officials under the FDAA development grant. In addition, local officials are provided training under a training program developed with DCPA funding and guidance. However, the primary emphasis of the DCPA-funded seminars is civil defense.

In the basic DCPA-funded seminar, States have included some information on FDAA and Federal disaster relief programs. However, many local civil defense directors have not taken the basic seminar.

We believe that emergency preparedness training for disasters is important where the duties of State and local personnel differ from their nondisaster duties.

FEMA has not developed standards for disaster training of State agency liaisons and other State and local personnel. The establishment of minimum standards for training would

provide to the States FEMA requirements for State and local personnel to participate in certain types and amounts of training periodically and better assure a minimum level of performance at the time of a disaster.

With the incorporation of FDAA and DCPA into FEMA, we believe that a more coordinated approach to training of emergency preparedness officials may now be possible. That is, training standards and guidance can be provided that would include FDAA-type disaster training, including Federal disaster relief programs and assistance available, and civil defense-type training in one uniform program.

RECOMMENDATIONS TO THE DIRECTOR OF FEMA

We recommend that the Director of FEMA review the training needs for State and local personnel and develop standards for disaster-type training which, if properly implemented, will help achieve an adequate level of performance during emergency situations and provide necessary guidance to the States on the training needed by State and local personnel. The Director should incorporate the FDAA-type disaster training and the present DCPA training program into a single training program for emergency preparedness officials.

We further recommend to the Director that, in future improvement grants to the States, the following tasks be identified as high priority items and the States be required to use improvement grant funds to monitor the completion of these tasks:

--Development of training programs--in accordance with FEMA guidance--for State agencies' liaisons and other personnel with disaster responsibilities.

--Development of training programs--in accordance with FEMA guidance--for local government officials with disaster responsibilities.

We also recommend that, after FEMA training guidance is published, the Director request each State Governor to require that:

--The State emergency preparedness agencies develop training programs for State agency liaisons and local government officials.

--State agencies develop the necessary training programs for their personnel with disaster responsibilities.

--The State emergency preparedness agencies monitor State agencies' development of such training programs.

STATES AND FEMA COMMENTS

We discussed our recommendations with FEMA officials who generally concurred with them.

We also discussed our recommendations with officials of the State emergency preparedness agencies in the States we visited. They generally concurred with our recommendations.

The Director of the Massachusetts preparedness agency expressed concern that FEMA's funds for training are insufficient to provide all the training needed. The Deputy Director of the Mississippi preparedness agency stated that he understood that FEMA was considering reducing its training budget and he felt that the training area needed additional emphasis, not a reduction in funding.

Officials in Georgia and Oklahoma suggested that FEMA should consult with the States in assessing training needs. The Director of the Missouri preparedness agency suggested that before implementing any new policies those policies be discussed with State and local officials.

TOTAL ESTIMATED COSTS CHARGEABLE
TO THE PRESIDENT'S DISASTER FUND FOR MAJOR DISASTERS
DECLARED IN SELECTED STATES DURING FISCAL YEARS 1975-1979

<u>State</u>	<u>Date of declaration</u>	<u>Type of disaster</u>	<u>Estimated costs</u>
(000 omitted)			
Connecticut	No major disasters declared		
Georgia	Mar. 29, 1975	Tornadoes, high winds, and heavy rains	\$ 1,069
	June 11, 1976	Severe storms, flooding	619
	June 2, 1977	Shrimp loss due to cold weather	231
	Nov. 7, 1977	Dam collapse, flooding	<u>2,562</u>
Total			<u>\$ 4,481</u>
Mississippi	Jan. 30, 1975	Tornadoes	\$ 638
	Apr. 1, 1976	Severe storms, tornadoes, flooding	999
	Apr. 16, 1979	Storms, tornadoes, flooding	31,410
	Sept. 13, 1979	Hurricane Frederic	<u>26,075</u>
Total			<u>\$59,122</u>
Missouri	May 3, 1975	Tornadoes, hail, heavy winds	\$ 393
	July 21, 1976	Severe storms, flooding	504
	May 7, 1977	Tornadoes, flooding	1,246
	Sept. 14, 1977	Severe storms, flooding	14,271
	Apr. 21, 1979	Tornadoes, rains, flooding	<u>5,738</u>
Total			<u>\$22,152</u>
New Hampshire	Feb. 16, 1978	High winds, tidal surge, flooding	\$ <u>741</u>
Total			\$ <u>741</u>
Oklahoma	Nov. 26, 1974	Severe storms, flooding	\$ 1,895
	July 9, 1975	Severe storms, flooding, tornadoes	1,112
	Dec. 10, 1975	Severe storms, tornadoes	302
	Apr. 1, 1976	Severe storms, tornadoes	291
	June 5, 1976	Severe storms, flooding	731
	Apr. 13, 1979	Severe storms, flooding	<u>1,875</u>
Total			<u>\$ 6,206</u>

DISASTER LOANS (note a)SMALL BUSINESS ADMINISTRATION (note b) AND FARMERS HOME ADMINISTRATION
FISCAL YEARS 1975-1979

Fiscal year	Connecticut		Georgia		Mississippi		Missouri		New Hampshire		Oklahoma	
	Loans approved	Amount (000)	Loans approved	Amount (000)	Loans approved	Amount (000)	Loans approved	Amount (000)	Loans approved	Amount (000)	Loans approved	Amount (000)
1975	17	\$ 1,293	419	\$ 9,659	2,191	\$ 94,143	5,385	\$ 82,811	56	\$ 4,064	855	\$ 10,823
1976	93	2,246	101	5,011	2,378	121,249	1,662	52,021	3	79	468	4,388
1977	62	3,841	976	51,141	3,070	150,512	3,460	95,566	9	837	311	9,064
1978	690	10,652	16,543	764,264	9,796	437,569	6,341	136,196	356	5,168	885	58,643
1979 (note c)	272	2,871	7,081	298,399	8,748	296,222	346	10,520	9	1,361	3,693	178,900
Total	<u>1,134</u>	<u>\$20,903</u>	<u>25,120</u>	<u>\$1,128,474</u>	<u>26,183</u>	<u>\$1,099,695</u>	<u>17,194</u>	<u>\$377,114</u>	<u>433</u>	<u>\$11,509</u>	<u>6,212</u>	<u>\$261,818</u>

a/Figures included loans--to home owners, businesses, and farmers--resulting from damages caused by disasters.

b/Also included are economic injury loans resulting from declared disasters.

c/Fiscal year 1979 figures included loans approved as of 7/30/79 for the Small Business Administration and as of 8/31/79 for the Farmers Home Administration.

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