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EMERGENCY PREPAREDNESS

FEMA Faces Challenges Integrating Community Preparedness Programs into Its Strategic Approach





Highlights of GAO-10-193, a report to congressional requesters

EMERGENCY PREPAREDNESS

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Why GAO Did This Study

Individuals can reduce their need for first responder assistance by preparing for a disaster. By law, the Federal Emergency Management Agency (FEMA) in the Department of Homeland Security (DHS) is to develop a National Preparedness System (NPS) that includes community preparedness programs. These programs account for less than 0.5 percent of FEMA's budget. They include the Citizen Corps Program (CCP) and partner programs, e.g., Fire Corps, which provide volunteers to assist first responders. FEMA's Ready Campaign promotes preparedness through mass media. GAO was asked to review federal efforts to promote community preparedness. GAO was asked to address (1) challenges, if any, FEMA faces in measuring the performance of CCP, its partner programs, and the Ready Campaign, and (2) actions, if any, FEMA has taken to develop a strategy to encompass how these programs are to operate within the context of the NPS. GAO analyzed documents on preparedness plans and strategies and compared reported performance data with observations during 12 site visits, selected primarily on the basis of major disasters. While not projectable, the results add insight.

What GAO Recommends

GAO recommends that FEMA examine ways to verify local CCP and partner programs' data, and develop timelines and milestones for completing preparedness strategies. DHS concurred with these recommendations.

View GAO-10-193 or key components. For more information, contact William O. Jenkins, Jr. at (202) 512-8777 or jenkinswo@gao.gov.

What GAO Found

FEMA faces challenges measuring performance for CCP, its partner programs. and the Ready Campaign because (1) it relies on states to verify data for local program units and (2) it is unable to control the distribution of the Ready Campaign messages or measure whether the messages are changing the behavior of individuals. GAO's past work showed the importance of ensuring that program data are of sufficient quality to document performance and support decision making. FEMA includes the number of local volunteer organizations registered nationwide as its principal performance measure for community preparedness, but does not verify that registration data are accurate. For example, 5 of the 17 registered Citizen Corps councils GAO contacted were not active as councils. FEMA relies on state officials to verify the accuracy of the data, and does not have staff or processes for this purpose. FEMA officials agreed that the data are inaccurate, and have plans to improve the registration process, but this process is not designed to ensure accurate data because states will continue to be responsible for verifying the accuracy of data. FEMA counts requests for literature, Web site hits, and the number of television and radio announcements made to gauge performance of the Ready Campaign, but it does not control when information is accessed or viewed. Also, changes in behavior can be the result of a variety of factors, including campaigns sponsored by other organizations. GAO's past work stated that agencies should measure performance based on accurate, clear, and reliable data that are clearly linked to program goals, but also recognized that programs like the Ready Campaign may need to rely on substitute measures that it uses such as Web site hits. GAO recognizes that FEMA is challenged measuring the performance of CCP, partner programs, and the Ready Campaign, but examining the feasibility of approaches to verify data on CCP and its partner programs could position FEMA to begin to (1) explore why programs that no longer exist were disbanded and (2) develop possible strategies for reconstituting local programs or developing new ones.

FEMA's challenges in measuring the performance of community preparedness programs are compounded because it has not developed a strategy to show how its community preparedness programs and the Ready Campaign are to operate within the context of the NPS. In April and October 2009, GAO reported that FEMA's National Preparedness Directorate (NPD), responsible for community preparedness, had not developed a strategic plan; rather it used an operating plan, which lacked key elements of an effective national strategy, such as how to gauge progress. GAO recommended that NPD develop a strategic plan that contains these key elements. FEMA agreed and reported that it is taking actions to strengthen strategic planning. While officials said an NPD strategic plan and a community preparedness strategy are being developed, NPD has not developed timelines with milestone dates for completing these strategies. By doing so, consistent with standard management practices for implementing programs, FEMA would be better positioned to show progress and provide insights into how these plans can be used as building blocks for the national preparedness strategy.

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Abbreviations

Ad Council	National Advertising Council
CCP	Citizen Corps Program
CERT	Community Emergency Response Team
DHS	Department of Homeland Security
FEMA	Federal Emergency Management Agency
HSPD-8	Homeland Security Presidential Directive 8
MRC	Medical Reserve Corps
NPD	National Preparedness Directorate
Post-Katrina Act	Post-Katrina Emergency Management Reform Act
	of 2006
PSA	Public Service Announcement

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United States Government Accountability Office Washington, DC 20548

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Congressional Requesters

The public plays an important role in national emergency preparedness.¹ By preparing their families and property before an event, individuals can often reduce a disaster's impact on them and their need for first responder assistance, particularly in the first 72 hours following a disaster. For example, having at least a 72-hour supply of food and drinking water on hand can both sustain the individual and family in a disaster's aftermath and reduce the immediate demands for food and water delivered by first responders whose priority may be search and rescue. They can also potentially support first responders as trained volunteers, since the average person will likely be the first on the scene of a disaster. However, research shows that Americans could be better prepared for disasters, particularly based on two key indicators-the degree to which people report having disaster supplies set aside and having a household emergency plan.² According to Citizen Corps national surveys for 2003 and 2007, about half (50 and 53 percent, respectively) of U.S. households had disaster supplies in their homes, and fewer had supplies set aside in their

¹Individuals, the public, and community are used interchangeably in this report when discussing preparedness for nongovernmental community members. The terms encompass both citizens and noncitizens. Community nonprofit and private businesses are part of community preparedness, but were not within the scope of our work.

²Federal Emergency Management Agency, *Citizen Preparedness Review: A Review of Citizen Preparedness Research, Fall Update* (Washington D.C.: 2007).

car or workplaces.³ Those who responded that they are personally prepared may have taken some of the actions recommended, such as having water set aside but not having extra batteries for their flashlights. In 2003, 58 percent, and in 2007, 42 percent, of survey respondents reported having a household emergency plan. Although it is unrealistic to expect first responders to assist everyone in a disaster, 37 percent of those surveyed in 2007 said that the primary reason they were unprepared was because they believed emergency personnel would help them in the event of a disaster. Also, the 2003 and 2007 Citizen Corps surveys reported that 62 and 57 percent of respondents, respectively, said that they expected to rely on emergency responders in the first 72 hours following a disaster.

The Federal Emergency Management Agency (FEMA) encourages public preparedness through the Community Preparedness Division's Citizen Corps program, which is designed to bring together government and community leaders to involve citizens in all-hazards emergency preparedness and resilience, and the Ready Campaign, which makes literature and mass media content available to promote preparedness to individuals, families, and businesses.⁴ Citizen Corps is designed to

³DHS, 2003 Citizen Corps Survey of U.S. Households: Final Survey Report, (Washington, D.C.: 2003), and FEMA, Personal Preparedness in America: Findings From the (2007) Citizen Corps National Survey (Washington, D.C.: June 2009). FEMA conducted national household surveys in 2003, 2007, and 2009. We included 2009 survey results in our October 1, 2009, testimony providing preliminary observations on FEMA's efforts to promote community preparedness (see GAO, Emergency Management: Preliminary Observations on FEMA's Community Preparedness Programs Related to the National Preparedness System, GAO-10-105T (Washington, D.C.: Oct. 1, 2009). Subsequently, FEMA officials notified us on October 30, 2009, that they omitted California in their original 2009 national survey sample. FEMA officials have corrected their estimates for 2009 based on data collected from large California urban areas. However, the new estimate may not be reflective of the national population. Our October 1, 2009 testimony also mischaracterized one aspect of FEMA's 2009 survey data. Specifically, we stated that 56 percent of the respondents said that they did not have an emergency supply kit when, in fact, FEMA's data showed that 56 percent of the respondents had kits. In December 2009, we revised GAO-10-105T to replace data from FEMA's 2009 survey with data from the Citizen Corps 2007 National Survey and to correct our error regarding respondents' possession of emergency supply kits. We did not include the results of FEMA's 2009 survey in the revised version of the testimony or in this report because of the corrections made by FEMA. However, FEMA's 2009 survey results are similar to results reported in the earlier surveys, indicating that Americans could be better prepared.

⁴According to FEMA officials, FEMA also encourages public preparedness through speaking engagements, the media, and social networking tools that were beyond the scope of our review. Regarding the Ready Campaign, we focused on its efforts for individual and family preparedness. The Ready Campaign's Business and Kid Campaign were not within the scope of our review.

promote collaboration between local government and community leaders via local Citizen Corps Councils. Individual councils are to promote preparedness activities and to encourage volunteering with federally sponsored programs that support first responders, referred to as Citizen Corps partner programs. According to FEMA officials, individual Council activities may include outreach and localized preparedness education, training, and exercises. Citizen Corps promotes five partner programs, two of which are funded by FEMA—the Community Emergency Response Team (CERT) and Fire Corps.⁵ According to FEMA officials, Citizen Corps also encourages Councils to work with the 27 national affiliate organizations with which FEMA has official agreements, including the American Red Cross, National Safety Council, Meals on Wheels, Civil Air Patrol, and the American Association of Community Colleges. The operating budgets for community preparedness programs currently represent less than one-half of 1 percent of FEMA's total budget. In fiscal year 2009, FEMA's overall budget was about \$7.9 billion, of which about \$5.8 million was dedicated to operating community preparedness programs and \$2.1 million was for the Ready Campaign.

FEMA's Citizen Corps and partner program officials encourage state, local, regional, and tribal governments and private and nonprofit communitybased organizations to establish and sustain local Citizen Corps Councils and partner programs, partly through federal funding for local efforts. Local Citizen Corps Councils, CERTs, and Fire Corps all are considered "grass roots" organizations that provide volunteer opportunities in their respective communities. Citizen Corps Councils and CERT programs are registered and approved online and are potentially eligible to apply for federal grant funding through the state to support their programs.⁶ According to Department of Homeland Security (DHS) data, approximately \$269 million in FEMA homeland security grants (including

⁵The Fire Corps program is administered by the National Volunteer Fire Council for FEMA. The Department of Health and Human Service's Office of the Surgeon General within the Office of Public Health and Science administers a third partner program, the Medical Reserve Corps (MRC). Also, the Department of Justice sponsors two other partner programs—Volunteers in Police Service and Neighborhood Watch.

⁶Under FEMA's Homeland Security Grant Program, states, territories, urban areas, and transportation authorities are eligible for FEMA grants to bolster national preparedness capabilities and protect critical infrastructure. These grants can be used to establish and sustain Citizen Corps Councils; purchase equipment for CERTs, Fire Corps, and other partner programs; and support planning or training efforts. Local community preparedness organizations can also receive funding from state, local, or tribal governments or private and nonprofit community-based preparedness organizations.

grants for Citizen Corps Councils, CERT, and Fire Corps) were awarded for community preparedness projects from fiscal years 2004 through 2008. In fiscal year 2008, funding for community preparedness grants represented about 1.9 percent of the total FEMA grant funding. Specifically, in fiscal year 2008, approximately \$56 million went to community preparedness projects, out of more than \$3 billion awarded in DHS grants to strengthen prevention, protection, response, and recovery capabilities at all levels of government. Appendix I provides additional information on DHS grants awarded for community preparedness purposes from fiscal year 2004 through fiscal year 2008.

In April 2009 we issued a report that discussed, among other things, the National Preparedness System—a continuous cycle of (1) establishing policy and doctrine, (2) planning and allocating resources, (3) conducting training and exercises to gather lessons learned, and (4) assessing and reporting on the training and exercises to evaluate preparedness, including identifying any gaps in capabilities.⁷ Assessments and reports resulting from the National Preparedness System are to be used to inform decision makers on what improvements are needed and how to target finite resources to improve preparedness for disasters.⁸ Our report recognized that developing and integrating the elements of the National Preparedness System is a challenge for FEMA, and more specifically the National Preparedness Directorate (NPD), the FEMA component responsible for carrying out the key elements of the National Preparedness System, in coordination with other federal, state, local, tribal, nonprofit, and private sector organizations. We reported that the size and complexity of the nation's preparedness activities and the number of organizations involved—both public and private—pose a significant challenge to FEMA as it leads the nation's efforts to develop and sustain a National Preparedness System. We further stated that, to develop an effective system, FEMA is to coordinate and partner with a broad range of stakeholders. As part of the nation's preparedness system, the status of citizen and community preparedness can affect the demands on first responders in the immediate aftermath of a disaster.

⁷GAO, National Preparedness: FEMA Has Made Progress, but Needs to Complete and Integrate Planning, Exercise, and Assessment Efforts, GAO-09-369 (Washington, D.C.: Apr. 30, 2009).

⁸A key part of the system involves the development of quantifiable standards and metrics called target capabilities, defined as the level of capability needed to prevent, respond to, and recover from natural and man-made disasters—that can be used to assess existing capability levels compared with target capability levels.

In this context, you requested that we review FEMA efforts to promote community preparedness. On October 1, 2009, we testified before the Subcommittee on Emergency Communications, Preparedness, and Response, House Committee on Homeland Security, to provide our preliminary observations.⁹ This report supplements our testimony and provides the final results of our work to address (1) what challenges, if any, FEMA faces in measuring the performance of Citizen Corps, its partner programs, and the Ready Campaign, and (2) what actions, if any, FEMA has taken to develop a strategy to encompass how Citizen Corps, its partner programs, and the Ready Campaign are to operate within the context of the National Preparedness System.

To address what challenges, if any, FEMA faces in measuring the performance of Citizen Corps, its partner programs, and the Ready Campaign, we reviewed applicable laws, guidance, and reports on community preparedness. We also interviewed FEMA officials, including officials representing Citizen Corps, CERT, Fire Corps, and the Ready Campaign at DHS headquarters in Washington D.C. to gain an understanding of these programs and how they operate. In addition, we analyzed Citizen Corps documents, including Citizen Corps and CERT registration guidance, and data on the number of registered Citizen Corps Councils and partner programs to determine how FEMA measures the performance of its programs. We reviewed documents pertinent to the collection of these data and discussed the processes FEMA has in place to ensure the accuracy of the registration data. We had questions about the reliability of these data, as discussed later in this report. We also interviewed officials at selected registered Citizen Corps Councils and partner programs during our site visits to 12 selected locations in five states-California, Florida, Nevada, Oklahoma, and Texas-and verified whether local registered units were active. We selected four of these states because they had the highest number of major disaster declarations since 1953. We also visited Nevada to observe a full-scale exercise with CERT participation and interviewed selected officials in Nevada. In total, we conducted 41 interviews covering 53 organizations in the 5 states.¹⁰ The results from our interviews in the 5 states are not generalizable, but provide insights into the operations of local Citizen Corps and partner

⁹GAO-10-105T.

¹⁰This included 17 Citizen Corps Councils, 12 CERTs, 5 Fire Corps programs, and officials representing 19 other preparedness and emergency management organizations, such as local emergency managers and state officials in four of the five states we visited.

programs. Once we completed our site visits, we compared FEMA's performance measures for Citizen Corps and its partner programs with criteria from our past work on best practices for measuring performance.¹¹ We also used the performance measurement criteria discussed in our past work to assess the Ready Campaign's efforts to measure its performance. Finally, we analyzed data from the 2008 Ready Campaign national tracking survey and National Advertising Council's (Ad Council) 2008 data on media time donated to the Ready Campaign. To determine the reliability of the Ready Campaign's tracking survey and donated media data, we reviewed documents and interviewed Ready Campaign officials and Ad Council officials to discuss their process for ensuring data accuracy. We determined that the tracking survey and donated media data were sufficiently reliable for purposes of this report.

To address what actions, if any, FEMA has taken to develop a strategy to encompass how Citizen Corps, its partner programs, and the Ready Campaign are to operate within the context of the National Preparedness System, we reviewed pertinent laws, guidance, and reports on strategic planning. We also reviewed and analyzed DHS's and FEMA's strategic plans for fiscal years 2008 through 2013, and the National Preparedness Directorate's 2009 operating plan and compared these documents with criteria in our past work that discusses the six characteristics of an effective national strategy.¹² In addition, we interviewed cognizant FEMA officials in Washington, D.C., to discuss their efforts to develop a strategy

¹²GAO-04-408T and GAO-09-369.

¹¹GAO-09-369; GAO, Results-Oriented Management: Strengthening Key Practices at FEMA and Interior Could Promote Greater Use of Performance Information GAO-09-676 (Washington, D.C.: Aug. 17, 2009); Influenza Pandemic: Gaps in Pandemic Planning and Preparedness Need to Be Addressed, GAO-09-909T (Washington, D.C.: July 29, 2009); Information Sharing Environment: Definition of the Results to Be Achieved in Improving Terrorism-Related Information Sharing Is Needed to Guide Implementation and Assess Progress GAO-08-492 (Washington, D.C.: June 25, 2008); Combating Terrorism: Evaluation of Selected Characteristics in National Strategies Related to Terrorism. GAO-04-408T (Washington, D.C.: Feb. 3, 2004); Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures, GAO-03-143 (Washington, D.C.: Nov. 22, 2002); Agency Performance Plans: Examples of Practices That Can Improve Usefulness to Decisionmakers GAO/GGD/AIMD-99-69 (Washington, D.C.: Feb. 26, 1999); Performance Plans: Selected Approaches for Verification and Validation of Agency Performance Information, GAO/GGD-99-139 (Washington, D.C.: July 30, 1999); Agencies' Annual Performance Plans Under the Results Act: An Assessment Guide to Facilitate Congressional Decisionmaking, GAO/GGD/AIMD-10.1.18 (Washington, D.C.: February 1998); and Executive Guide: Effectively Implementing the Government Performance and Results Act, GAO/GGD-96-118 (Washington, D.C.: June 1, 1996).

for integrating Citizen Corps, its partner programs, and the Ready Campaign into the National Preparedness System.

We conducted this performance audit from February 2008 to January 2010 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Responsibility for helping to prepare members of the community for all hazards is shared by federal, state, local, and tribal entities, and nongovernmental organizations. At the federal level, FEMA is responsible for developing national strategies, policies, and guidelines related to emergency preparedness, response, and recovery. To achieve the goals of a national strategy, however, requires a close relationship with nonfederal partners, based on the premise that resilient communities—those that can quickly recover from a disaster—begin with prepared individuals and depend on the leadership and engagement of local government and other community members. According to DHS, emergency management agencies at the jurisdiction level are to develop preparedness plans for their localities that are consistent with plans at the state and federal levels. States submit requests for federal Homeland Security funding for state, local, and regional projects, including projects related to community preparedness.

FEMA is required under the Post-Katrina Emergency Management Reform Act of 2006 (Post-Katrina Act)¹³ to establish a National Preparedness System to ensure that the nation has the ability to prepare for and respond to disasters of all types, whether natural or man-made, including terrorist attacks. The Community Preparedness Division is responsible for leading activities related to community preparedness, including management of the Citizen Corps program. According to fiscal year 2008 Homeland Security Grant Program guidance, the program is to bring together community and government leaders, including first responders, nonprofit organizations, and other community stakeholders as a Citizen Corps

¹³The Post-Katrina Act was enacted as title VI of the Department of Homeland Security Appropriations Act, 2007, Pub. L. No. 109-295, 120 Stat. 1355, 1394-1463 (2006).

Council to collaborate in involving community members in emergency preparedness, planning, mitigation, response, and recovery. Councils and partner programs register online to be included in the national program registries. The Community Preparedness Division also supports the efforts of non-DHS federal "partner programs," such as the Department of Health and Human Services' Medical Reserve Corps, which promote preparedness and the use of volunteers to support first responders.¹⁴ The CERT program's mission is to educate and train people in basic disaster preparedness and response skills, such as fire safety, light search and rescue, and disaster medical operations, using a nationally developed, standardized training curriculum. Trained individuals can be recruited to participate on neighborhood, business, or government teams to assist first responders. According to FEMA officials, training is conducted by local government, typically the fire or police department, which also organizes and supports teams of the trained volunteers in neighborhoods, the workplace, and high schools. The mission of the Fire Corps program is to increase the capacity of fire and emergency medical service departments through the use of volunteers in nonoperational roles and activities, including administrative, public outreach, fire safety, and emergency preparedness education.

FEMA is also responsible for a related program, the Ready Campaign, which works in partnership with the Ad Council, an organization that creates public service announcements (PSA), with the goals of raising public awareness about the need for emergency preparedness, motivating individuals to take steps toward preparedness, and ultimately increasing the level of national preparedness. The program makes preparedness information available to the public through its English and Spanish Web sites (www.ready.gov and www.listo.gov), through printed material that can be ordered from the program or via toll-free phone lines, and through PSAs.¹⁵ The Ready Campaign message calls for individuals, families, and businesses to (1) get emergency supply kits, (2) make emergency plans, and (3) stay informed about emergencies and appropriate responses to those emergencies.

¹⁴Citizen Corps also works with affiliates—nonprofits and federal departments which offer communities resources to help advance Citizen Corps goals, such as the American Red Cross, and U.S. Department of Education.

¹⁵See http://www.ready.gov/america/about/psa.html for an example of a Ready Campaign PSA.

FEMA Faces Challenges Measuring the Performance of Its Community Preparedness Efforts and the Ready Campaign	FEMA faces challenges in measuring the performance of local community preparedness efforts because it lacks accurate information on those efforts. FEMA is also confronted with challenges in measuring performance for the Ready Campaign because the Ready Campaign is not positioned to control the placement of its preparedness messages or measure whether its message is changing the behavior of individuals.
FEMA Faces Challenges Measuring Performance of Community Preparedness Efforts Because It Lacks Accurate Information on Local Programs	 According to FEMA officials, FEMA promotes citizen preparedness and volunteerism by encouraging collaboration and the creation of community Citizen Corps, CERT, and Fire Corps programs. FEMA includes the number of Citizen Corps Councils, CERTs, and Fire Corps established across the country as its principal performance measure for community preparedness. However, FEMA faces challenges ensuring that the information needed to measure the number of established, active units is accurate. In our past work we reported on the importance of ensuring that program data are of sufficient quality to document performance and support decision making.¹⁶ FEMA programs report the number of local units registered nationwide as a principal performance measure, but FEMA does not verify that the registration data for Citizen Corps Councils, CERT, or Fire Corps volunteer organizations are accurate. Our work showed that the number of active units reported may differ from the number that actually exists. For example, as of September 2009 we found the following. Citizen Corps reported having 2,409 registered Citizen Corps Councils nationwide that encompass jurisdictions where approximately 79 percent of the U.S. population resides. However, of the 17 organizations registered as councils that we contacted during our site visits, 12 were active and 5 were not active as councils.

¹⁶GAO-03-143 and GAO/GGD-99-139.

• The CERT program reported having 3,354 registered CERTs. Of the 12 registered CERTs we visited, 11 reported that they were actively engaged in CERT activities, such as drills and emergency preparedness outreach, or had assisted in an emergency or disaster. The 12th registered CERT was no longer active.

State officials in two of the four states we visited also said that the data on the number of registered programs might not be accurate.¹⁷ A state official responsible for the Citizen Corps Council and CERT programs in one state estimated that as little as 20 percent of the registered councils were active, and the state subsequently removed more than half of its 40 councils from the national Web site. Officials in another state said that the database is not accurate and they have begun to send e-mails to or call local councils to verify the accuracy of registrations in their state. These officials said that they plan to follow up with those councils that do not respond, but they were uncertain what they planned to do if the councils were no longer active. These results raise questions about the accuracy of FEMA's data on the number of councils across the nation, and the accuracy of FEMA's measure that registered councils cover 79 percent of the population nationwide.

Although changes in the number of active local programs can be expected based on factors, including changes in government leadership, voluntary participation by civic leaders, and financial support, a FEMA official responsible for the Citizen Corps program acknowledged that the current program registration lists need to be verified to determine whether they are accurate. The official said that FEMA has plans for improving the accuracy of the data as part of a new online registration process for Citizen Corps Councils and CERTs in 2010, which would involve reregistering local programs with the goal of reactivating inactive programs, although it is likely that some inactive programs would be removed from FEMA's registries.¹⁸ However, it is possible that registration data could continue to be inaccurate because, according to a FEMA

¹⁷We interviewed state officials in four of the five states we visited—California, Florida, Oklahoma, and Texas. We did not interview state officials in Nevada. Our Nevada site visit interviews were related to observing exercises with CERT participation.

¹⁸ FEMA is not responsible for the registration of local Fire Corps units. According to the Fire Corps program Acting Director at the National Volunteer Fire Council, a state advocacy program initiated in 2007 may help identify inactive Fire Corps programs as well as promote the program. As of September 2009, there were 53 advocates in 31 states.

official, the Citizen Corps program does not have the authority to require all local units to update information, particularly councils or CERTs that do not receive federal funding. Furthermore, FEMA officials explained that the Homeland Security Grant Program guidance designates state officials as responsible for approving initial council and CERT registrations and ensuring that the data are updated as needed and said that under the new registration process, state officials will continue to be responsible for ensuring that data are updated as needed.¹⁹ A Citizen Corps official told us that the Community Preparedness Division does not monitor whether states are regularly updating local unit registration information as they do not have the staff or processes in place to monitor states' efforts and the Division would look to regional staff to work with state officials. The official said that FEMA is considering the possibility of providing contract support to states that request assistance in contacting local programs as part of the re-registration effort.

A key FEMA official told us that they recently drafted a new strategic approach and are considering developing and using outcome measures that are focused on the achievements of Citizen Corps programs as well as the number of programs, as is currently measured. Outcome measures are important because a registered program being active is only a first step in measuring whether local programs are meeting intended program goals. However, our review of the draft showed that it does not state what actions FEMA intends to take to ensure that registrations are accurate and remain up-to-date. Therefore, FEMA does not have reasonable assurance that its data about the number of registrations for local Citizen Corps programs are accurate, which may affect its ability to measure the results of those programs. By developing an approach to ensure the accuracy of local Citizen Corps program data, FEMA managers and others would be better positioned to understand why Citizen Corps programs that no longer exist were disbanded, possible strategies for reconstituting or creating new programs, and a foundation for developing outcome measures that gauge whether local programs are achieving goals associated with enhancing community preparedness.

¹⁹ The Community Preparedness Division Director said that the division proposed changes to the grant guidance that would explicitly require states to maintain the accuracy of the list as part of the grant agreement. However, because the final guidance has not been issued it is unknown whether these proposals have been included.

The Ready Campaign Faces Challenges Measuring Performance Because It Is Not Positioned to Control the Distribution of Its Preparedness Message and Measure Whether Its Message Affects Individual Behavior

Currently, the Ready Campaign measures its performance based on measures such as materials distributed or PSAs shown. For example, according to a DHS official, in fiscal year 2008 the Ready Campaign had

- more than 99 million "hits" on its Web site,
- more than 12 million pieces of Ready Campaign literature requested or downloaded, and
- 43,660 calls to the toll-free numbers.

The Ready Campaign relies on these measures because it faces two different challenges in determining whether its efforts are influencing individuals to be more prepared. First, the Ready Campaign is not positioned to control when or where its preparedness message is viewed. Second, the Ready Campaign is not positioned to measure whether its message is changing the behavior of individuals.

With regard to the Ready Campaign's ability to control the distribution of its message, our past work has shown that it is important for agencies to measure their performance based on clear and reliable data that are linked to program goals, but also recognizes that agencies whose programs rely on others to deliver services, like the Ready Campaign, may need to use substitute measures-such as counts of Web site hits and the number of television announcements—which are not linked to outcomes.²⁰ According to FEMA's Acting Director for the Ready Campaign, the program budget of \$2.5 million for 2010 limits the extent to which they could produce advertisements and purchase commercial space for their placement. The PSAs developed by the Ad Council cannot be used for purchased media placement; rather, the Ready Campaign relies on donations of various sources of media.²¹ As a result, the Ready Campaign does not control what, when, or where Ready Campaign materials are placed when the media are donated. For example, what PSA is shown and the slots (e.g., a specific channel at a specific time) that are donated by television, radio, and other media companies are not under the Ready Campaign's control, and these are not always prime viewing or listening spots. On the basis of a review of Ad Council data, the Ready Campaign's PSAs in 2008 were aired about 5 percent or less of the time by English language and Spanish language television stations during prime time (8:00 pm to 10:59 p.m.), and

²⁰GAO/GGD/AIMD-99-69.

²¹The Acting Director said that because the Ad Council PSAs are created and distributed as public services, they cannot be used for commercial placement as part of their agreement with the Ad Council.

about 25 percent of the PSAs were aired from 1:00 a.m. to 4:00 a.m. Similarly, about 47 percent of English language radio and about 27 percent of Spanish language radio spots were aired from midnight to 6:00 a.m. FEMA officials said because new material is more appealing to PSA directors, they expect better placement with the new PSAs released in September 2009. In November 2009, a FEMA official told us that the new PSAs had been released, but information was not yet available to show whether the new material had received better placement.

Just as the Ready Campaign has no control over the time PSAs are aired, it does not control the type of media (e.g., radio, television) donated. Based on Ad Council data on the dollar value of media donated to show Ready Campaign materials (the value of the donated media is generally based on what it would cost the Ready Campaign if the media space were purchased), much of the value from donated media is based on space donated in the phone book yellow pages. Figure 1 shows the value of various types of media donated to the Ready Campaign to distribute its message during 2008.





Source: GAO analysis of Ad Council data.

The Ready Campaign also faces a challenge determining the extent to which it contributes to individuals taking action to become more prepared—the program's goal. Measuring the Ready Campaign's progress toward its goal is problematic because it can be difficult to isolate the specific effect of exposure to Ready Campaign materials on an individual's level of emergency preparedness. Research indicates that there may be a number of factors that are involved in an individual taking action to become prepared, such as his or her beliefs concerning vulnerability to disaster, geographic location, or income.²² One factor in establishing whether the Ready Campaign is changing behavior requires first determining the extent to which the Ready Campaign's message has been received by the general population. The Ad Council conducts an annual survey to determine public awareness of the Ready Campaign, among other things. For example, the Ad Council's 2008 survey found the following

²²FEMA, *Citizen Preparedness Review: A Review of Citizen Preparedness Research* (Fall 2007).

- When asked if they had heard of a Web site called Ready.gov that provides information about steps to take to prepare in the event of a natural disaster or terrorist attack, 21 percent of those surveyed said that they were aware of the Ready.gov Web site.
- When asked a similar question about television, radio, and print PSAs, 37 percent of those surveyed said that they have seen or heard at least one Ready Campaign PSA.

Another factor is isolating the Ready Campaign's message from other preparedness messages that individuals might have received. The Ad Council's 2008 survey found that 30 percent of those surveyed identified the American Red Cross as the primary source of emergency preparedness information; 11 percent identified the Ad Council.

While the Ad Council survey may give a general indication as to the population's familiarity with the Ready Campaign, it does not provide a measure of preparedness actions taken based on the Ready Campaign's promotion; that is, a clear link from the program to achieving program goals. The Ad Council reported that those who were aware of the Ready Campaign's advertising were significantly more likely than those who had not seen it to say that they had taken steps to prepare for disaster, but acknowledged that the Ready Campaign could not claim full credit for the differences. Further, as previous Citizen Corps surveys showed, the degree to which individuals are prepared may be less than indicated because preparedness drops substantially when more detailed questions about specific supplies are asked.²³

²³Similarly, public knowledge of the Ready Campaign may be less than indicated, based on the 2007 Citizen Corps survey. For example, the 2007 survey asked respondents about familiarity with federal preparedness programs and estimated that 16 percent of respondents had heard about Ready.gov. However when asked to describe the program, only 2 percent of respondents reported that they had a firm understanding of the program.

FEMA Has Not
Developed a Strategy
Encompassing How
Citizen Corps, Its
Partner Programs,
and the Ready
Campaign Are to
Operate within the
Context of the
National
Preparedness System

While DHS's and FEMA's strategic plans have incorporated efforts to promote community preparedness, FEMA has not developed a strategy encompassing how Citizen Corps, its partner programs, and the Ready Campaign are to operate within the context of the National Preparedness System. An objective in DHS's Strategic Plan for fiscal years 2008 through 2013 to "ensure preparedness" envisions empowering Americans to take individual and community actions before and after disasters strike. Similarly, FEMA's Strategic Plan for fiscal years 2008 through 2013 envisions a strategy to "Lead the Nation's efforts for greater personal and community responsibility for preparedness through public education and awareness, and community engagement and planning, including outreach to vulnerable populations." FEMA's Strategic Plan delegates to the agency's components the responsibility for developing their own strategic plans, which are to include goals, objectives, and strategies, but does not establish a time frame for completion of the component plans. FEMA's Strategic Plan states that the components' strategic plans are to focus on identifying outcomes and measuring performance.

NPD has not clearly articulated goals for FEMA's community preparedness programs or developed a strategy to show how Citizen Corps, its partner programs, and the Ready Campaign are to achieve those goals within the context of the National Preparedness System. In our past work, we reported that desirable characteristics of an effective national strategy include articulating the strategy's purpose and goals; followed by subordinate objectives and specific activities to achieve results; and defining organizational roles, responsibilities, and coordination, including a discussion of resources needed to reach strategy goals.²⁴ In April 2009, we reported that NPD had not developed a strategic plan that defined program roles and responsibilities, integration and coordination processes, and goals and performance measures for its programs.²⁵ We reported that instead of a strategic plan, NPD officials stated that they used an annual operating plan and Post-Katrina Act provisions to guide NPD's efforts. The operating plan identifies NPD goals and NPD subcomponents responsible for carrying out segments of the operating plan, including eight objectives identified for the division under NPD's goal to "enhance the preparedness of individuals, families, and special needs populations through awareness planning and training." NPD's objectives for meeting this goal did not describe desired outcomes.

²⁴GAO-04-408T and GAO-09-369.

²⁵GAO-09-369.

In late September 2009, NPD provided us a spreadsheet that was linked to the NPD operating plan which outlined more detailed information on NPD's goals and objectives, such as supporting objectives, the responsible NPD division, and projected completion dates.²⁶ However the spreadsheet lacked details about key issues, and did not include all of the elements of an effective national strategy. For example, one of NPD's operating plan objectives—called a supporting goal in FEMA's spreadsheet—for the Community Preparedness Division is to increase "the number of functions that CERTs will be able to perform effectively during emergency response," but neither the plan nor the spreadsheet provide details, such as the functions CERTs currently perform, what additional functions they could perform, and what it means to be effective. The spreadsheet elaborates on this supporting goal with a "supporting objective" to "develop 12 new CERT supplemental training modules that promote advanced individual and team skills" and a completion date of September 30, 2009. FEMA officials said that 6 of the 12 modules were completed as of September 30, 2009, and that the spreadsheet should have identified the effort as ongoing because developing the planning modules was to be completed over a 4-year period ending in 2011.²⁷ The operating plan, spreadsheet, and FEMA officials provided no time frame for when the training is expected to be implemented at the local level to increase the function of individual CERTs, nor did they discuss performance measures and targets for gauging changes in the effectiveness of CERTs, or how local training will be coordinated or delivered. NPD's operating plan and spreadsheet also did not include other key elements of an effective national strategy, such as how NPD will measure progress in meeting defined goals and objectives and the potential costs and types of investments needed to implement community preparedness programs. As a result, NPD is unable to provide a picture of priorities or how adjustments might be made in view of resource constraints.

In our April 2009 report, we recommended that NPD take a more strategic approach to implementing the National Preparedness System to include the development of a strategic plan that contains such key elements as

²⁶NPD provided the spreadsheet on September 29, 2009, 2 days before we testified on our preliminary observations on FEMA's efforts to promote community preparedness. (GAO-10-105T; Oct. 1, 2009). As a result, we did not have time to assess the document and include our review of it in our statement.

²⁷In November 2009, FEMA officials told us that the spreadsheet should have stated that the supporting objective was ongoing, with three modules due each of the 4 years beginning in 2008 and ending in 2011.

goals, objectives, and how progress in achieving them will be measured. DHS concurred with our recommendation and stated that it is making progress in this area and in fully implementing the recommendation. NPD officials stated in September 2009 that DHS, FEMA, and NPD, in coordination with national security staff, were discussing the development of a preparedness and implementation strategy within the context of Homeland Security Presidential Directive 8 (National Preparedness) (HSPD-8).²⁸ They said that community and individual preparedness were key elements of those discussions. At that time, NPD officials did not state when the strategy would be completed; thus, it is not clear to what extent the strategy will integrate Citizen Corps, its partner programs, and the Ready Campaign. NPD officials stated that work is under way on revising the target capabilities, which are to include specific outcomes, measures, and resources for the Community Preparedness and Participation capability. They said that they expect to issue a draft for public comment in the second quarter of fiscal year 2010. Also, in testimony before the Subcommittee on Emergency Communications, Preparedness and Response, Committee on Homeland Security, on October 1, 2009, the NPD Deputy Administrator said that, in recognition of the preliminary observations raised in our testimony, NPD is reformulating the NPD operating plan as a strategic plan. He said that once complete, the strategic plan is intended to integrate Community Preparedness, specifically the efforts of Citizen Corps, its partner programs and affiliates, and the Ready Campaign. However, he said he was not prepared to provide a time frame as to when the strategic plan would be completed. The NPD Deputy Administrator agreed to consult with the Subcommittee staff and other stakeholders as NPD develops the draft strategic plan.

The FEMA official leading the development of the NPD strategic plan told us that NPD had begun to develop a strategic plan, but it had not developed a timeline with milestone dates for completing it because NPD is waiting to coordinate the plan's development with the revision of HSPD-

²⁸Homeland Security Presidential Directive 8—National Preparedness (Dec. 17, 2003). In December 2003, the President issued guidance that called on the Secretary of Homeland Security to carry out and coordinate preparedness activities with public, private, and nonprofit organizations involved in such activities.

8 and the Quadrennial Homeland Security Review.²⁹ He said NPD would be better able to establish a timeline and milestones for completing the NPD strategic plan once these other documents were revised; but he was uncertain about when these documents would be completed.³⁰ He also stated that NPD had developed a draft strategic approach for community preparedness in response to a request by the Chairman of the Subcommittee on Emergency Communications, Preparedness and Response, Committee on Homeland Security, during the October 1, 2009 hearing. He said that NPD intends to use this strategic approach as a vehicle for discussing community preparedness within the context of NPD's overall strategy. He told us that, as with the draft strategic plan, NPD had not established a timeline with milestone dates for completing the Community Preparedness strategy.

On December 2, 2009, FEMA provided a copy of the draft community preparedness strategic approach that it prepared for the Subcommittee. FEMA's draft represents an important first step because it partially satisfies the elements of an effective national strategy. Specifically, the draft strategic approach broadly discusses why FEMA produced it, the process by which it was developed, and FEMA's overall community preparedness vision. The draft also outlines goals and subordinate goals and discusses the outcomes FEMA expects in achieving them. However, the draft strategic approach lacks key elements of an effective national strategy because, among other things, it does not discuss how progress will be measured in achieving these goals; the roles and responsibilities of the organizations responsible for implementing the strategy, and mechanisms for coordinating their efforts; and the cost of implementation, including the source and types of resources needed and where those investments and resources should be targeted. FEMA's draft did not identify a timeline and milestones for completing the strategy.

The Ready Campaign is also working to develop its strategic direction. According to the FEMA Director of External Affairs, the Ready

²⁹The Quadrennial Homeland Security Review, according to the DHS Web site, is a congressionally mandated, top-to-bottom review by the Secretary of Homeland Security to guide the department for the next 4 years and inform the nation's homeland security policies, programs, and missions. The requirement to conduct the Quadrennial Homeland Security Review is contained in section 2401 of the Implementing Recommendations of the 9/11 Commission Act of 2007, Pub. L. No. 110-53, 121 Stat. 266, 543-46.

³⁰The DHS Web site indicates that the Secretary was to provide her conclusions from the quadrennial review to Congress in a final report by December 31, 2009.

Campaign's strategy is being revised to reflect the transition of the program from DHS's Office of Public Affairs to FEMA's Office of External Affairs, and the new FEMA Director's approach to preparedness. Program officials said that the Ready Campaign will have increased access to staff and resources and is to be guided by a FEMA-wide strategic plan for external communications.³¹ As of September 2009, the plan was still being developed and no date had been set for completion. The Ready Campaign Director said in November 2009 that the plan is not expected to be done before the end of the year, but was not aware of a timeline and milestones for its completion. The Director also said that the Ready Campaign was included in the draft community preparedness strategy.

We recognize that HSPD-8 and the Quadrennial Homeland Security Review are instrumental in articulating the overall national preparedness strategy and FEMA's strategic approach, and that NPD's plan and community preparedness strategies, including the Ready Campaign, are components of efforts to revise these initiatives. Standard practices for project management established by the Project Management Institute state that managing a project involves, among other things, developing a timeline with milestone dates to identify points throughout the project to reassess efforts under way to determine whether project changes are necessary.³² By developing plans with timelines and milestones for completing the NPD and community preparedness strategies, FEMA will be better positioned to provide a more complete picture of NPD's approach for developing and completing these documents. They also would provide FEMA managers and other decision makers with insights into (1) NPD's overall progress in completing these strategies, (2) a basis for determining what, if any, additional actions need to be taken, and (3) the extent to which these strategies can be used as building blocks for the national preparedness strategy and FEMA's strategic approach.

Conclusions

Hurricane Katrina was one of the most devastating natural disasters in our nation's history and will have long-standing effects for years. By their nature, catastrophic events involve casualties, damage, or disruption that will likely overwhelm state and local responders. Americans who are prepared as individuals for disasters, and as trained volunteers, can help to

³¹ FEMA officials said that two additional staff positions for the Ready Campaign are expected to be filled by March 2010.

³² The Project Management Institute, *The Standard for Program Management*.

mitigate the impact of disasters in their local communities, yet the previous FEMA surveys indicate that many Americans are still not prepared. The majority of those responding to the surveys said they plan to rely on assistance from first responders during a major disaster.

While FEMA identifies community preparedness as an important part of its national preparedness strategy, FEMA lacks accurate performance information on its community preparedness programs that would enable it to determine whether these programs are operating in the communities in which they have been established. We recognize that FEMA's Citizen Corps Program and partner programs have relatively small budgets and staff, and that program officials are aware of inaccuracies in the data and are considering options to improve information on local programs, such as re-registering existing programs. However, it is unclear whether these measures will be enough to provide FEMA the assurance it needs that local programs that are registered continue to operate. By having accurate data, FEMA managers and other decision makers would be better positioned to measure progress establishing and maintaining these programs nationwide and in local communities. This would also provide FEMA managers the basis for exploring (1) why programs that no longer exist were disbanded, and (2) possible strategies for reconstituting local programs or developing new ones. Accurate data would also provide a foundation for developing outcome measures that gauge whether local programs are achieving goals associated with enhancing community preparedness.

Challenges in measuring the performance of these programs stem in part from FEMA lacking an overall strategy for achieving community preparedness or defining how these efforts align with the larger National Preparedness System, particularly how Citizen Corps, its partner programs, and the Ready Campaign fit within the strategy. Defining program roles, responsibilities, and coordination mechanisms; identifying performance measures to gauge results; and ensuring the resources needed to achieve program goals would be part of an effective strategy. FEMA has agreed such a strategy is needed and has started to develop strategies for NPD and Community Preparedness, including the Ready Campaign, but has no timeframes or milestone dates for developing and completing them. By having a plan with time frames and milestone dates for completing the NPD strategic plan and its community preparedness strategy, FEMA managers and other decision makers would be better equipped to track NPD's progress. Moreover, they would have a basis to determine what, if any, additional actions are needed to enhance NPD's overall preparedness strategy and community preparedness and insights

	into the extent to which these plans can be used as building blocks for the national preparedness strategy and FEMA's strategic approach.
Recommendations for Executive Action	To better ensure that national community preparedness efforts are effective and completed in a timely fashion, we recommend that the Administrator of FEMA take the following two actions:
•	examine the feasibility of developing various approaches for ensuring the accuracy of registration data of local Citizen Corps Councils and partner programs, and develop plans including timelines and milestone dates for completing and implementing (1) NPD's strategic plan and (2) its Community Preparedness Strategic Approach, including details on how Citizen Corps, partner programs, and the Ready Campaign are to operate within the context of the National Preparedness System.
Agency Comments	We requested comments on a draft of this report from the Secretary of Homeland Security. The department declined to provide official written comments to include in our report. However, in an e-mail received January 19, 2010, the DHS liaison stated that DHS concurred with our recommendations. FEMA provided written technical comments, which were incorporated into the report as appropriate.
	As agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days after its issue date. At that time, we will send copies of this report to the Secretary of Homeland Security, appropriate congressional committees, and other interested parties. In addition, the report will be available at no charge on the GAO Web site at http://www.gao.gov.

If you or your staff have any further questions about this report, please contact me at (202) 512-8777 or email at jenkinswo@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix II.

William Genking

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

List of Requesters

The Honorable Bennie G. Thompson Chairman Committee on Homeland Security House of Representatives

The Honorable Henry Cuellar Chairman Subcommittee on Border, Maritime and Global Counterterrorism Committee on Homeland Security House of Representatives

The Honorable Laura A. Richardson Chairwoman Subcommittee on Emergency Communications, Preparedness, and Response Committee on Homeland Security House of Representatives

The Honorable Sheila Jackson-Lee Chairwoman Subcommittee on Transportation Security and Infrastructure Protection Committee on Homeland Security House of Representatives

Appendix I: Homeland Security Grant Program Funding for Community Preparedness, 2004 through 2008

The Department of Homeland Security (DHS) support for local community preparedness activities is provided through Homeland Security grants, specifically the Citizen Corps grant program, but community preparedness activities are also eligible for support under other Homeland Security grants. Citizen Corps grants are awarded to states based on a formula of 0.75 percent of the total year's grant allocation to each state (including the District of Columbia and Commonwealth of Puerto Rico) and 0.25 percent of the total allocation for each U.S. Territory, with the balance of funding being distributed on a population basis.

For other DHS homeland security grants, states prepare a request for funding, which can include support for the state's community preparedness efforts, as allowed under the guidance for a particular grant. For example, the 2009 Homeland Security Grant Program guidance lists "conducting public education and outreach campaigns, including promoting individual, family and business emergency preparedness" as an allowable cost for State Homeland Security Grants. Grant funding can be used to support Citizen Corps, Citizen Corps partner programs, or other state community preparedness priorities. The Federal Emergency Management Agency's (FEMA) grant reporting database does not categorize grants in a way that allows identification of the amount of funding going to a particular community preparedness program, such as a Community Emergency Response Team (CERT) or Fire Corps.

Table 1 summarizes the approximately \$269 million in DHS grants that were identified by grantees as supporting community preparedness projects from 2004 through 2008. Our selection of projects for inclusion in this summary relied on DHS data on grantees who identified their project as one of three predefined project types that are, according to FEMA officials, relevant for community preparedness, or were projects funded with a Citizen Corps Program grant. Not all grantees may have used these project-type descriptions, so the amount below is an approximation. We worked with grant officials to identify the most appropriate grant selection criteria. To determine the reliability of these DHS grant data, we reviewed pertinent DHS documents, such as the *Grant Reporting Tool User's Manual* and interviewed DHS officials about their process for compiling these data. We determined that the grant data we used were sufficiently reliable for purposes of this report.

Table 1: Homeland Security Grant Program Funding for Community Preparedness Projects 2004 through 2008

Year	Citizen Corps	Urban Area Security Initiative (UASI) ^a	State Homeland Security Grant	Emergency Management Performance Grant	Law Enforcement Terrorism Prevention Program	Other Homeland Security Grants ^⁵	Total
2004	\$33,955,176	\$8,306,020	\$7,735,800	-	\$1,093,911	-	\$51,090,907
2005	13,485,705	8,687,292	11,775,517	595,825	248,988	414,329	35,207,655
2006	19,205,985	16,345,381	15,074,053	6,545,092	969,561	2,028,071	60,168,142
2007	14,549,998	23,608,893	15,754,809	1,026,336	6,705,907	4,895,079	66,541,022
2008	14,572,500	13,498,514	16,640,267	8,620,774	0	2,645,852	55,977,906
Total	\$95,769,364	\$70,446,099	\$66,980,446	\$16,788,026	\$9,018,367	\$9,983,331	\$268,985,634

Source: GAO analysis of FEMA Grant Reporting Data for 2004 through 2008.

Note: Homeland Security Grant projects were included in this summary that met at least one of the following four criteria: indicated the project was to establish or enhance (1) citizen or volunteer initiatives, (2) citizen awareness of emergency preparedness, prevention, and response measures, (3) Citizen Corps Councils, or 4) was supported by the Citizen Corps Program grant. For years with a zero value, a particular grant may not have been part of the Homeland Security Grant package (e.g. the Emergency Management Performance Grant was not part of 2004 grants, and the Law Enforcement Terrorism Prevention Grant in 2008 was not available for community preparedness purposes).

^aIncludes UASI and UASI transit and non-profit grants.

^bIncludes grants for Transit Security programs, Metropolitan Medical Response System, Buffer Zone Protection, Intercity Passenger Rail Security, Interoperable Emergency Communications, Non-Profit Security, and Regional Catastrophic Preparedness.

Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact	William O. Jenkins, Jr., (202) 512-8777 or jenkinswo@gao.gov
Staff Acknowledgments	In addition to the contact named above, John Mortin, Assistant Director, and Monica Kelly, Analyst-in-Charge, managed this assignment. Carla Brown, Qahira El'Amin, Lara Kaskie, Amanda Miller, Cristina Ruggiero- Mendoza, and Janet Temko made significant contributions to the report.

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