



United States Government Accountability Office

Report to Congressional Requesters

May 2016

DISASTER RECOVERY

FEMA Needs to Assess Its Effectiveness in Implementing the National Disaster Recovery Framework

Why GAO Did This Study

Coordination challenges among the different levels of government have been a concern during past disaster recovery efforts. As part of the Post Katrina Emergency Management Reform Act of 2006, Congress required FEMA to create a national disaster recovery strategy. In response, FEMA developed the NDRF—a comprehensive framework intended to facilitate coordination of recovery assistance across all levels of government.

GAO was asked to examine FEMA's implementation of the NDRF. This review assessed (1) the roles and responsibilities of FEMA and state emergency management offices in implementing the NDRF and (2) the extent to which FEMA has worked with selected states to implement the NDRF. GAO selected for review five states—Alaska, Arizona, Colorado, New York, and Oklahoma—based on factors including the range and type of disasters. GAO reviewed state recovery plans and other documents and interviewed state officials. GAO also reviewed statutes, FEMA plans and policies, and interviewed FEMA officials, including 5 of its 10 regional offices.

What GAO Recommends

GAO recommends, among other things, that FEMA conduct a systematic analysis of its assessments to determine the effectiveness of its NDRF outreach efforts; and develop and disseminate best practices and lessons learned for conducting NDRF outreach to FEMA regional offices. DHS concurred with the recommendations and described the actions it planned to take in response.

View [GAO-16-476](#). For more information, contact Michelle Sager at (202) 512-6806 or sagem@gao.gov.

DISASTER RECOVERY

FEMA Needs to Assess Its Effectiveness in Implementing the National Disaster Recovery Framework

What GAO Found

The Department of Homeland Security's (DHS) Federal Emergency Management Agency (FEMA) is responsible for implementing the National Disaster Recovery Framework (NDRF) and working in partnership with states as they play a lead role in the recovery process. As shown in the figure below, FEMA coordinates federal recovery stakeholders using six Recovery Support Functions—structures through which federal coordinating agencies provide assistance to state and local communities, before and after a disaster. FEMA's regional offices facilitate pre-disaster recovery planning at the state and local level, promote state adoption of NDRF principles into state pre-disaster recovery plans, and coordinate collaboration between federal, state, local, and tribal governments. Under the NDRF, states have primary responsibility for managing recovery in their communities, including developing pre-disaster recovery plans based on the principles and structures in the NDRF.

The National Disaster Recovery Framework's Recovery Support Functions and Corresponding Federal Coordinating Agencies

Recovery Support Function	Federal Coordinating Agency
 Community Planning and Capacity Building	Department of Homeland Security/Federal Emergency Management Agency
 Economic	Department of Commerce/Economic Development Administration
 Health and Social Services	Department of Health and Human Services
 Housing	Department of Housing and Urban Development
 Infrastructure Systems	Department of Defense/Army Corps of Engineers
 Natural and Cultural Resources	Department of the Interior

Source: GAO analysis of Federal Emergency Management Agency (FEMA) information. | GAO-16-476

Through a number of outreach activities, such as workshops, technical assistance, and training, FEMA took action to promote state adoption of the NDRF. Nevertheless, officials in four of the five selected states GAO reviewed said they did not understand aspects of the NDRF, including how it related to other FEMA disaster programs and the level of federal technical assistance available. Moreover, GAO found that only two of the five states had developed pre-disaster recovery plans based on the NDRF. FEMA officials estimated that nationwide, more than three-quarters of states do not have NDRF-based recovery plans. Further, GAO found that although FEMA employs readiness assessments to track and assess its regional NDRF implementation efforts, it has not used these assessments to systematically analyze changes over time and across regional offices. As a result, FEMA has not used these assessments to help it identify management challenges, inform decision making, or identify best practices and lessons learned across its regional offices. Such analyses could help enhance outreach efforts among FEMA's regional offices and potentially improve implementation of the NDRF nationwide.

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Abbreviations:

CPCB	Community Planning and Capacity Building
DHS	Department of Homeland Security
FDRS	Federal Disaster Recovery Coordinator
FEMA	Federal Emergency Management Agency
FIOP	Federal Interagency Operational Plan
F-RAP	FEMA Readiness and Assessment Program
HUD	Department of Housing and Urban Development
ICD	Interagency Coordination Division
LDRM	Local Disaster Recovery Manager
NDRF	National Disaster Recovery Framework
PA	Public Assistance
PKEMRA	Post-Katrina Emergency Management Reform Act of 2006
PPD-8	Presidential Policy Directive 8: National Preparedness
RSF	Recovery Support Function
RSFLG	Recovery Support Function Leadership Group
SDRC	State Disaster Recovery Coordinator

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May 26, 2016

Congressional Requesters

Communities affected by catastrophic disasters, such as Hurricane Katrina and Hurricane Sandy, often face years of recovery. A key lesson from these and other disasters is that recovery is a complex and costly process that can quickly overwhelm state and local communities and requires strong coordination and involvement across all levels of government. Recognizing the importance of improving our nation's approaches to disaster recovery, Congress passed the Post Katrina Emergency Management Reform Act of 2006 (PKEMRA).¹ Among other things, PKEMRA required the Federal Emergency Management Agency (FEMA) to develop a national disaster recovery strategy for federal agencies involved in recovery. In response to this mandate, FEMA developed the National Disaster Recovery Framework (NDRF) in 2011 to facilitate effective coordination and recovery planning, both before and after a disaster.² The framework established a comprehensive structure to enhance the nation's ability to work together and effectively deliver recovery assistance through the coordinated efforts of federal, state, local, and tribal governments and nongovernmental organizations.

In 2012—soon after the NDRF's issuance—we testified that while the NDRF was a significant step forward, implementation of the framework would be key to determining its ultimate success.³ We also reported that the collaboration between recovery partners could be enhanced by periodically evaluating and reporting on what worked, what could be improved, and what more needed to be done to address long-term recovery goals. Concerns have since been raised about the status of the NDRF's implementation and whether it is achieving its intended purpose.

¹PKEMRA was enacted as Title VI of the Department of Homeland Security Appropriations Act, 2007, Pub. L. No. 109-295, 120 Stat. 1355, 1394 (Oct. 4, 2006). Under PKEMRA, the FEMA Administrator was required to submit a report to the appropriate committees of Congress describing the National Disaster Recovery Strategy and any additional authorities needed to implement the Strategy no later than 270 days after enactment.

²FEMA, *National Disaster Recovery Framework: Strengthening Disaster Recovery for the Nation* (Washington, D.C.: September 2011).

³GAO, *Disaster Recovery: Selected Themes for Effective Long-Term Recovery*, [GAO-12-813T](#) (Washington, D.C.: June 6, 2012).

You asked us to review FEMA's implementation of the NDRF. This review assesses (1) the roles and responsibilities of FEMA and state emergency management offices in implementing the NDRF and (2) the extent to which FEMA has worked with selected states to implement the NDRF.

To determine the roles and responsibilities of FEMA and state emergency management offices, we reviewed relevant federal statutes and policy directives. We also analyzed components of the NDRF to identify the pre- and post-disaster NDRF implementation responsibilities of federal and state entities.⁴ Further, we interviewed officials from FEMA and the other five federal coordinating agencies under the NDRF's Recovery Support Functions.⁵ The five other federal coordinating agencies are the Departments of Commerce, Health and Human Services, Housing and Urban Development (HUD), and the Interior, and the Army Corps of Engineers.

To assess the extent to which FEMA has worked with selected states to implement the NDRF, we analyzed recovery plans from emergency management offices in five selected states. We also analyzed NDRF implementation plans and other outreach and education materials from the five corresponding FEMA regional offices designed to help states adopt the NDRF into their recovery operations. The five states are Alaska, Arizona, Colorado, New York, and Oklahoma. We selected states that (1) were affected by disasters that activated three or more Recovery Support Functions from 2012 through 2013; (2) represented a range of disaster types which occurred in 2012 and 2013; and (3) represented a geographically diverse range of FEMA regions.⁶ See figure 1 for

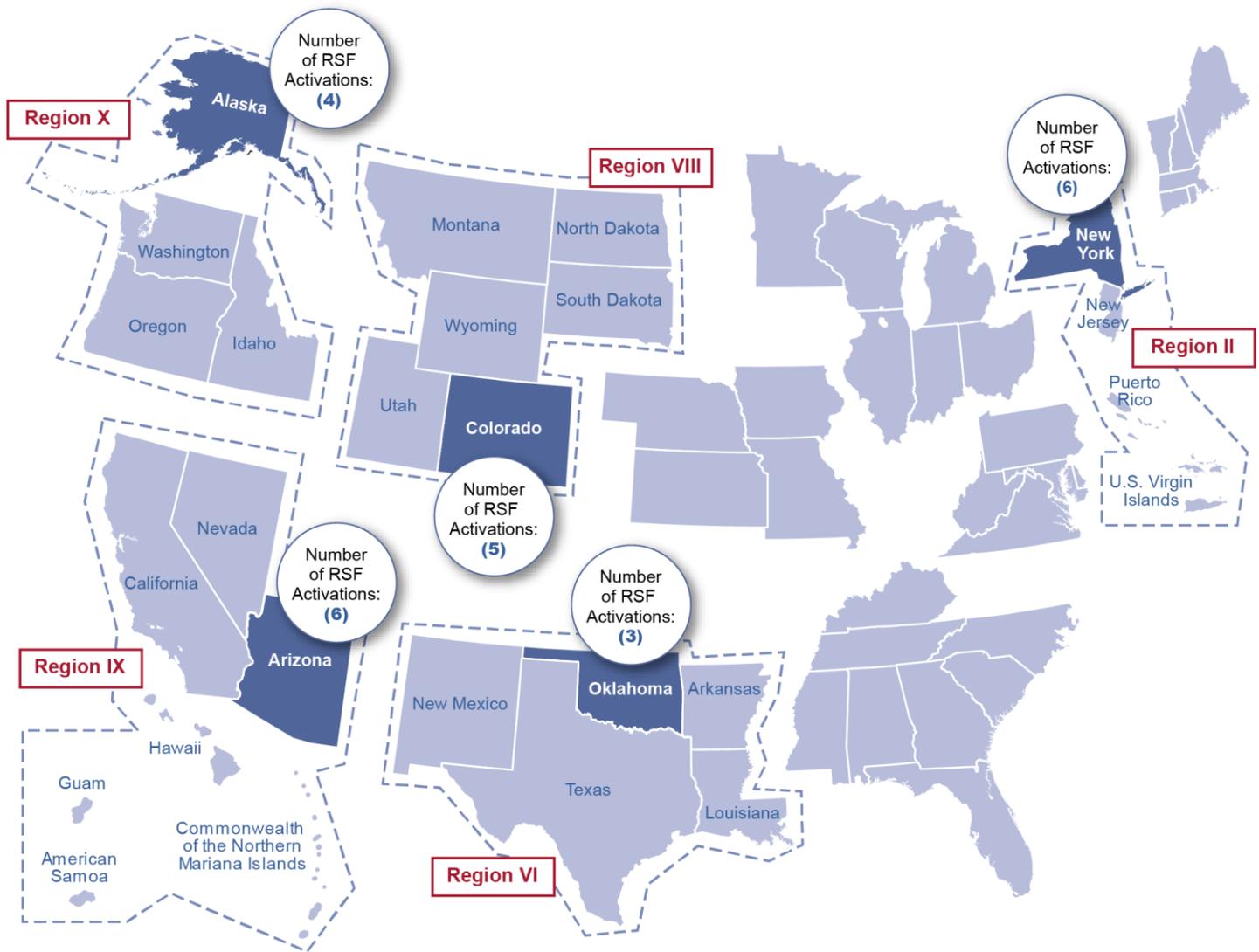
⁴For purposes of this report, our review was limited primarily to the roles and responsibilities of FEMA and selected states in implementing the NDRF. We recognize, however, that a range of stakeholders, including federal, state, local, and tribal governments, nongovernmental organizations—such as faith-based and nonprofit groups—and the private sector, are involved in the NDRF's implementation.

⁵Recovery Support Functions (RSF) are coordinating structures created by the NDRF through which federal agencies provide assistance and support to state and local communities, both before and after a disaster.

⁶RSF activation refers to post-disaster coordination, information-sharing, and the exchange of effective practices by stakeholders. RSF activation occurs when the relevant coordinating agency within the RSF is asked to provide assistance to an actual or potential disaster incident. Such assistance may include post-disaster coordination and information sharing.

additional detail. The results of our study are not generalizable to NDRF implementation efforts across all states.

Figure 1: The Five Selected States Affected by Three or More Recovery Support Activations and Corresponding Federal Emergency Management Agency (FEMA) Regional Offices



Source: GAO analysis of Federal Emergency Management Agency (FEMA) information. | GAO-16-476

Note: Recovery Support Function (RSF) activation refers to post-disaster coordination, information-sharing, and the exchange of effective practices by stakeholders. RSF activation occurs when the relevant coordinating agency within the RSF is asked to provide assistance to an actual or potential disaster incident. Such assistance may include post-disaster coordination and information sharing.

We also analyzed federal agency documents, including after-action and inspectors general reports, to corroborate evidence obtained from the interviews. Further, we reviewed the documents and information we gathered and evaluated them using *Standards for Internal Control in the Federal Government*,⁷ leading management practices identified in our prior work on human capital, and leading practices identified in the Project Management Institute's *The Standard for Program Management*.⁸ More detailed information on our objectives, scope, and methodology is contained in appendix I.

We conducted this performance audit from April 2015 to May 2016 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

The Origins of the NDRF Can Be Traced to PKEMRA

PKEMRA called for the coordination of prevention, protection, mitigation, response, and recovery efforts for national disasters. PKEMRA required the President to establish both a *National Preparedness Goal*, which identified and defined the core capabilities necessary for preparedness, and a *National Preparedness System* to reach the goal's objective by identifying risks and building required capabilities.⁹ In addition, PKEMRA

⁷GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

⁸Project Management Institute, Inc., *The Standard for Program Management*®, Third Edition (Newtown Square, PA: 2013). *The Standard for Program Management*® describes, among other things, how resource planning; goals, milestones, and performance measures; and program monitoring and reporting are good practices that can enhance management for most programs.

⁹The National Preparedness Goal refers to these capabilities as core capabilities, which replace what had been previously called target capabilities. Issued by the Department of Homeland Security in September 2011, the National Preparedness Goal defines success for national preparedness as "a secure and resilient Nation with the capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk." Department of Homeland Security, *National Preparedness Goal* (Washington, D.C.: September 2011).

directed the Administrator of FEMA—in coordination with other federal agencies and departments, state and local governments, and appropriate nongovernmental organizations—to develop, coordinate, and maintain a *National Disaster Recovery Strategy* to guide recovery efforts.

To fulfill many aspects of PKEMRA, in March 2011, the White House issued *Presidential Policy Directive 8: National Preparedness* (PPD-8), which focuses on strengthening the security and resilience of the nation.¹⁰ PPD-8 also called for the development of a national preparedness system that included a series of integrated national planning frameworks for each of the five mission areas: prevention, protection, mitigation, response, and recovery. These frameworks were to serve as the basis for mission area activities within FEMA, throughout the federal government, and at the state and local levels. Among other functions, the frameworks assigned key roles and responsibilities to federal agencies, recommended roles and activities for state governments, and helped determine how resources are to be applied to develop national preparedness.

PPD-8 charged FEMA with ensuring that the frameworks, including a recovery framework, work in coordination with each other to build and sustain national preparedness and included public outreach and community-based and private-sector programs to enhance national resilience and promote effective recovery assistance. In September 2011, FEMA issued the NDRF to define how the nation will approach recovery and establish new coordination structures, leadership roles, and responsibilities.¹¹ In addition, the NDRF guides recovery planning at all levels of government before a disaster occurs. The framework seeks to bring together federal agencies and resources to better assist disaster-affected communities by adapting and leveraging existing federal agency resources to disaster recovery efforts. It has an overall goal of establishing partnerships and operating in a unified and collaborative manner across all levels of government, as well as the nonprofit and private sectors. While the NDRF provides the overarching interagency coordination structure for the recovery phase of incidents under the

¹⁰White House, *Presidential Policy Directive 8: National Preparedness* (Washington, D.C.: Mar. 30, 2011).

¹¹Development of the NDRF was the result of a joint interagency effort of the Long-Term Disaster Recovery Working Group. Co-chaired by officials from both FEMA and HUD, the working group consisted of more than 20 federal departments, agencies, and offices.

Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), elements of the framework may also be used for significant non-Stafford Act incidents.¹² According to FEMA, the intent is that frameworks such as the NDRF are built upon scalable, flexible, and adaptable coordinating structures and are integrated to ensure interoperability across all of the mission areas.

The NDRF Calls for a Whole Community Approach to Recovery and Emphasizes Pre-Disaster Planning

The NDRF calls for a “whole community” approach to recovery, which recognizes the shared responsibility and contributions of a broad range of stakeholders, including federal, state, local, and tribal governments, nongovernmental organizations—such as faith-based and nonprofit groups—and the private sector.¹³ The framework describes the roles and responsibilities needed across the whole community to lead, coordinate, and support resolution of a wide range of challenges faced in recovering from disasters. Further, the NDRF emphasizes the importance of recovery planning at all levels of government before a disaster. It defines strategies for collaboration following a disaster to best meet the recovery needs of individuals and communities.

Under the guiding principles of the NDRF, a recovery plan, present at the outset of a disaster and having been developed before the disaster, could help ensure a coordinated post-disaster recovery and implementation effort. As stated in the NDRF, these recovery plans are instrumental in laying out the roles and responsibilities and coordinating structures in the event of a disaster. Under the NDRF, pre-disaster recovery planning provides an opportunity to develop partnerships at all levels of government, reduce confusion once a disaster has occurred, and promote better decision making. Further, pre-disaster recovery planning can help identify goals and priorities and potential resources prior to a disaster.

¹²The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, defines the federal government’s role during disaster response and recovery. The Stafford Act also establishes the programs and processes through which the federal government provides disaster assistance to state, tribal, territorial, and local governments, as well as certain nonprofit organizations and individuals. 42 U.S.C. § 5121 et seq.

¹³FEMA has also referred to the term “whole community” to describe its conceptual approach to emergency management to include preparedness efforts and delivery of the core capabilities.

The NDRF Created New Structures for Coordinating Recovery

The NDRF introduced new coordinating structures—referred to as Recovery Support Functions (RSF)—as the mechanisms through which federal agencies would provide assistance and support to state and local communities, both before and after a disaster. These RSFs are intended to, among other things, facilitate problem solving, improve access to resources, ensure more effective and efficient use of federal, state, nongovernmental and private sector funds, and foster coordination among state and federal agencies and nongovernmental entities. To expedite recovery in the affected disaster areas, the NDRF created six RSFs: (1) Community Planning and Capacity Building; (2) Economic; (3) Health and Social Services; (4) Housing; (5) Infrastructure Systems; and (6) Natural and Cultural Resources. As shown in figure 2, each RSF is led by a federal coordinating agency.

Figure 2: Overview of the National Disaster Recovery Framework’s Recovery Support Functions and Corresponding Federal Coordinating Agencies

Recovery Support Function	Example of a Pre-disaster Activity	Example of a Post-disaster Activity	Federal Coordinating Agency
 <p>Community Planning and Capacity Building</p>	Helps state, local, and tribal governments to develop pre-disaster recovery plans.	Maintains communications throughout the recovery process between the federal government and all other recovery partners and identifies the disaster's effects in the impacted area.	Department of Homeland Security/Federal Emergency Management Agency
 <p>Economic</p>	Identifies potential gaps, inconsistencies, and unmet needs in economic recovery.	During disaster recovery, works closely with local community leadership to provide technical assistance and data related to economic development.	Department of Commerce/Economic Development Administration
 <p>Health and Social Services</p>	Develops strategies to address recovery issues for health, behavioral health, and social services.	Identifies and coordinates with other recovery partners to assess food, animal, water, and air safety conditions.	Department of Health and Human Services
 <p>Housing</p>	Identifies strategies to address issues such as planning, zoning, design, production, logistics, codes, and financing.	Encourages rapid and appropriate decisions regarding land use and housing location in the community or region.	Department of Housing and Urban Development
 <p>Infrastructure Systems</p>	Works with partners to identify critical facilities and ensure considerations are made to reduce risk pre-and post-disaster.	Coordinates damage and community needs assessments to integrate infrastructure considerations into post-disaster planning.	Department of Defense/Army Corps of Engineers
 <p>Natural and Cultural Resources</p>	Identifies programs that support preservation, protection, recovery, and restoration of natural and cultural resources.	Coordinates across jurisdictional, multistate, or regional issues related to natural and cultural resources to ensure consistency in the application of federal support.	Department of the Interior

Source: GAO analysis of Federal Emergency Management Agency (FEMA) information. | GAO-16-476

RSFs may be activated when the relevant federal coordinating agency within the RSF is asked to provide assistance to an actual or potential disaster incident. Such assistance may include post-disaster coordination and information sharing. RSFs may be activated in the event of a large-scale or catastrophic disaster or when significant impacts to particular sectors of the community are reported. FEMA makes the decision about whether to activate an RSF based on an initial assessment of the needs of the particular disaster.

Each RSF coordinating agency is assisted by one or more primary federal agencies, which have significant authorities, roles, resources, or capabilities for a particular function within an RSF. Federal coordinating agencies are also assisted by supporting organizations which have specific capabilities or resources that support primary agencies in executing the RSF's mission.¹⁴ For example, the American Red Cross is a supporting organization under the Health and Social Services RSF. As a supporting organization, it is to assist the coordinating agency—the Department of Health and Human Services—and various primary agencies by providing services, such as requests to the public for post-disaster blood donations. The coordinating agency is responsible for ensuring ongoing communication and coordination between the primary agencies and supporting organizations, as well as between the federal agencies and state, local, and tribal governments and nongovernmental organizations. Each RSF coordinating agency is to designate a senior-level official to serve as the RSF national coordinator. The RSF national coordinator is to provide leadership and management for the RSF and ensure ongoing communication and coordination between the primary agencies and support organizations within the RSF. RSF national coordinators are also to ensure coordination and communication between the relevant federal agencies and their state and local governmental counterparts.

FEMA is the lead federal coordinating agency for the Community Planning and Capacity Building (CPCB) RSF. The primary agencies and supporting organizations in this RSF are to collaborate to identify needs and coordinate resources that can assist state, local, and tribal governments in planning for and managing the complexity of the recovery process. Under the NDRF, FEMA's specific responsibilities as the lead for the CPCB RSF include providing assistance and guidance in both pre- and post-disaster contexts, such as

- helping state, local, and tribal governments develop effective pre-disaster recovery plans;
- developing multidisciplinary recovery tools and best practices;

¹⁴Primary agencies coordinate federal support within their functional areas for a state or community affected by a disaster. The principal distinction between a primary and a supporting agency is the frequency with which the agency may be expected to actively participate in an RSF operation.

-
- identifying and leveraging programs that assist communities to prepare, collect, and analyze relevant data necessary to plan for and manage disaster recovery; and
 - integrating recovery and other pre-disaster plans into existing state, local, and tribal community-wide planning and development activities.

According to the NDRF, the CPCB RSF's efforts should enhance interagency coordination of resources. They also should support building community capacity and community recovery planning and improve the planning process.

New State and Local Leadership Positions Were Created under the NDRF

To allow for a more concentrated focus on community recovery, the NDRF calls for state and local governments to create key recovery leadership positions, such as a State Disaster Recovery Coordinator (SDRC) and a Local Disaster Recovery Manager (LDRM). According to FEMA, the primary role of the SDRC and LDRM is to manage and coordinate the redevelopment of the community, and given this responsibility, the individuals occupying these positions should be able to represent and speak on behalf of their respective chief executives.

FEMA Is Responsible for Implementing the NDRF, while States Lead the Overall Recovery Process

FEMA Coordinates NDRF Implementation among Federal Recovery Stakeholders

More than 30 coordinating, primary, and supporting agencies and organizations are to work together under the NDRF. Coordinating them is the responsibility of FEMA's RSF Leadership Group (RSFLG), which is composed of a committee of senior officials led by FEMA's Field Operations Directorate. Its Interagency Coordination Division (ICD) is responsible for coordinating federal interagency guidance and policy implementation and overseeing NDRF-related planning efforts. Among its other activities, the RSFLG serves as a vehicle for information exchange among its members and is to provide them with updates on programs that directly affect the roles and responsibilities of the RSFs.

A senior official from FEMA's Field Operations Directorate chairs the RSFLG, while officials from the ICD staff the RSFLG's Secretariat. The

RSFLG's Secretariat acts as the primary point of contact for coordination of all RSFLG activity. The ICD provides RSFLG members with interagency support for the development of their RSFs. Also, through the RSFLG, the ICD facilitates and coordinates RSF-related activities. Examples of these activities include the creation of RSF standard operating procedures; the development of guidance to build capacity within each RSF; and the planning of NDRF-related outreach to nonfederal partners.

In regularly convened meetings, RSFLG members are to discuss a variety of issues, which according to the group's charter can include

- resolving national interagency recovery preparedness issues and promoting cohesiveness in planning, organization, and training;
- addressing interagency policy issues and recommendations affecting the recovery interagency community;
- serving as the senior leadership steering committee for all phases of interagency recovery planning and development, including planning strategy, reviewing courses of action and draft plans, and facilitating federal recovery exercise coordination; and
- carrying out post-incident and after-exercise reviews and performing substantive reviews of after-action reports, including identifying specific corrective measures to be taken by the interagency group to remedy deficiencies and shortfalls.

In addition, the RSFLG may establish ad-hoc working groups to guide the development of the needed procedures for recovery activities under the NDRF. These working groups can also provide input from appropriate subject matter experts to resolve recovery issues of immediate concern to the RSFLG.

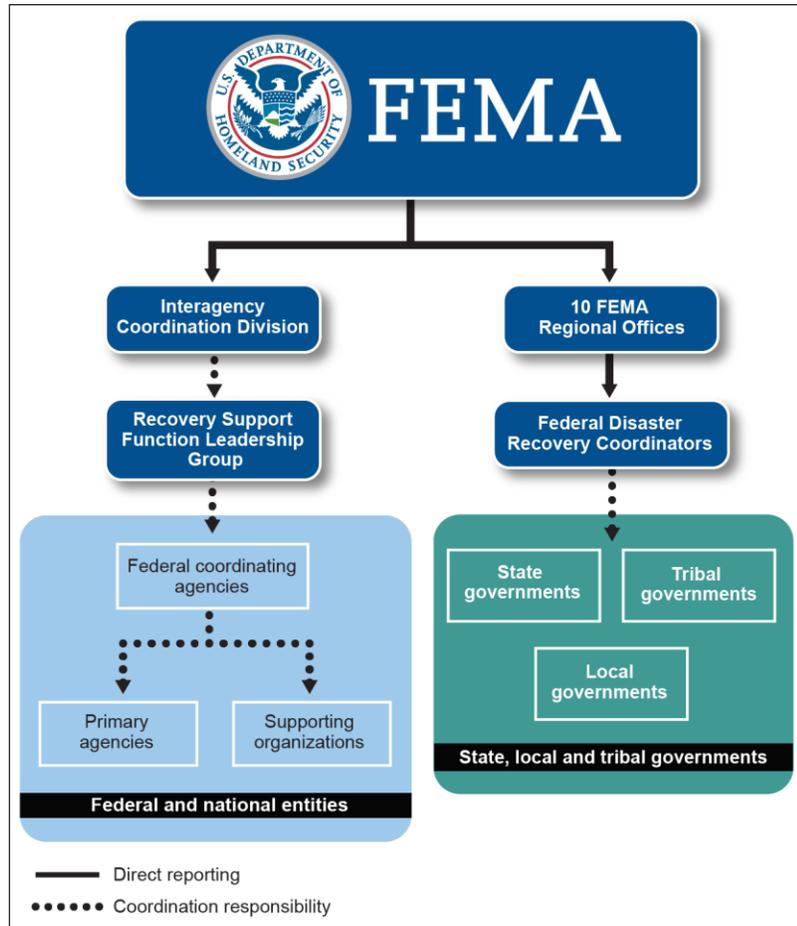
FEMA Coordinates Efforts to Promote the NDRF among State and Local Governments

The NDRF created the position of Federal Disaster Recovery Coordinator (FDRC) within each of FEMA's 10 regional offices. The FDRC serves to facilitate pre-disaster recovery planning at the state and local level and coordinate the collaboration between federal, state, and local governments, which includes promoting state adoption of NDRF principles into state pre-disaster recovery planning efforts. According to FEMA management officials, when not assigned to post-disaster work, regional FDRCs should devote the majority of their time to preparedness

and readiness activities with the states and localities within their respective region. FDRCs are supported in these efforts by regional staff for the CPCB RSF.

As stated in the NDRF, in the post-disaster context, the FDRC is the focal point for incorporating recovery and mitigation considerations early in the post-disaster response and recovery decision-making processes. Following a disaster, the FDRC's primary role is to serve as a central coordinator and leader for the federal recovery effort. As part of this role, the FDRC is responsible for activating the RSFs, serves as the coordinating lead for RSF activities related to that specific disaster, and provides the leadership and direction that will guide RSF recovery activities. An FDRC could be assigned to a disaster within his or her designated region or could be deployed and reassigned to act as a disaster-specific FDRC in another FEMA region. See figure 3 for FEMA's organizational structure of the entities responsible for implementing the NDRF.

Figure 3: Organizational Structure of Entities Responsible for the National Disaster Recovery Framework's Implementation



Source: GAO analysis of Federal Emergency Management Agency (FEMA) information. | GAO-16-476

To facilitate pre-disaster planning and outreach to states and localities, each of FEMA's 10 regional offices developed NDRF implementation plans in 2012 that were intended to address pre-disaster (also referred to as steady-state) operations.¹⁵ Developed at the direction of FEMA

¹⁵Post-disaster NDRF activities are reflected in the Recovery Federal Interagency Operational Plan (FIOP). The Recovery FIOP describes how the federal government will deliver core capabilities for recovery mission areas.

management, these plans identified goals, objectives, activities, and time frames intended to achieve NDRF implementation in the region. The plans were also designed to assist other stakeholders involved in recovery efforts within the region, such as state and local communities. For example, for the five regional offices in our review, implementation plans included key objectives, such as improving the overall understanding of the NDRF and building the recovery capacity of state and local governments within their regions. Examples of NDRF regional implementation plan activities included

- facilitating training opportunities for RSF national coordinators and SDRCs;
- providing technical assistance to states to develop a pre-disaster recovery plan that aligned with the RSF organizational structure identified in the NDRF; and
- facilitating the sharing of best practices for recovery planning, including developing pre-disaster recovery plans.

Under the NDRF, States Play a Lead Role in Recovery

Under the NDRF, states have primary responsibility for the recovery of their communities and play a lead role in planning for and managing all aspects of community recovery. Accordingly, states act in support of their communities, evaluate their capabilities, and assist overwhelmed local governments. States also serve as a conduit to local governments for key federal recovery assistance programs, such as FEMA's Individual Assistance, Public Assistance (PA), and Hazard Mitigation programs.¹⁶ States are to manage various federally provided resources and may develop programs or secure funding that can help finance and implement recovery projects.

¹⁶The largest of FEMA's disaster assistance programs, PA provides grants to fund debris removal and the repair, replacement, or restoration of disaster-damaged facilities. PA also funds certain types of emergency protective measures that eliminate or reduce immediate threats to lives, public health, safety, or improved property. FEMA's Individual Assistance program provides, among other things, housing assistance, disaster unemployment assistance, crisis counseling, and legal services. Individuals and households may be eligible for financial assistance or direct services if, due to the disaster, they have been displaced from their primary residence, their primary residence has been rendered uninhabitable, or they have necessary expenses and serious needs that are unmet through other means, such as insurance. FEMA's Hazard Mitigation program provides additional funds to states to assist communities in implementing long-term measures to help reduce the potential risk of future damages to facilities. All three programs are funded by the Disaster Relief Fund.

The NDRF recommends several pre-disaster roles and activities for states. For example, these include

- developing a pre-disaster state recovery plan using the RSF structure that addresses, at a minimum, five RSF functions: (1) Economic; (2) Health and Social Services; (3) Housing; (4) Infrastructure Systems; and (5) Natural and Cultural Resources;¹⁷
- identifying recovery activities that are either primarily the responsibilities of state governments or beyond the capabilities of local governments;
- identifying responsibilities for the position of SDRC or equivalent;
- providing technical assistance and training to local governments and nongovernmental organizations on state plans, programs, and other resources for disaster recovery; and
- identifying their own pre-disaster recovery plan, such as Continuity of Governments and Continuity of Operations plans, to protect and assist their employees.

Two of the five states in our review—Arizona and Colorado—had developed state pre-disaster recovery plans based on the principles and structures contained in the NDRF. As we discuss later in this report, three states in our review had not developed pre-disaster recovery plans based on elements of the NDRF. Arizona’s pre-disaster recovery plan (Recovery Plan) is an annex to the state’s Emergency Response and Recovery Plan.¹⁸ Arizona officials told us that they recognized the importance of having a state pre-disaster recovery plan that identifies disaster recovery programs, services, and other types of resources that communities could access to assist them with their recovery efforts. First published in February 2012, the Recovery Plan was originally developed with RSF structures that closely aligned with the RSF structure in the

¹⁷According to FEMA officials, states may also establish a Community Planning and Capacity Building RSF to ensure that planning and capacity support is available to their communities.

¹⁸The state of Arizona officially refers to its plan as the Arizona Disaster Recovery Framework.

NDRF. In March 2014, Arizona updated the plan to tailor it to the state's specific needs. Among the changes, the updated Recovery Plan more clearly delineates the SDRC's roles and responsibilities, including how the SDRC is to interact with the FDRC at the federal level. Arizona officials told us that they used the Recovery Plan in 2014 in recovering from severe storms and flooding that occurred in La Paz and Maricopa Counties.

Colorado's pre-disaster recovery plan (Recovery Plan), an annex to Colorado's State Emergency Operations Plan, uses concepts and components contained in the NDRF. Published in March 2015, the Recovery Plan is based largely on the NDRF's organizational structure, such as its alignment of recovery efforts with RSFs and its assignment of roles and responsibilities to recovery partners. A Colorado emergency management official told us that because Colorado's state government has a fundamentally different organizational structure than the federal government, they tailored the Recovery Plan's organizational structure to fit their needs. This official told us that Colorado's RSFs are more numerous and task-oriented than the federal RSFs. She added that since Colorado's RSFs do not completely align with the RSF structure in the NDRF, Colorado's emergency management office created a cross-walk to link the two plans. The official also told us that the learning experiences gleaned from actual recovery operations served to reinforce the importance of designating these roles in Colorado's Recovery Plan. For example, during severe storms, flooding, and mudslides that occurred in and around Boulder County in September 2013, some of the various agencies involved in recovery efforts had not anticipated the full spectrum of responsibilities and tasks that would be needed. However, in the course of recovery operations, the agencies learned about the necessity of assigning state agencies specific responsibilities to ensure they coordinated their efforts during recovery operations. A Colorado emergency management official told us that the experience of the September 2013 disasters underscored the need for a recovery plan and designation of specific responsibilities to ensure efficient interagency cooperation during recovery operations.

FEMA Promoted Adoption of the NDRF, but Few Selected States Have Used It and FEMA Has Not Evaluated the Effectiveness of Its Efforts

FEMA Took Action to Promote Adoption of the NDRF with Partners, Including States

Between 2011 and 2012, following publication of the NDRF, FEMA undertook a number of efforts to promote the NDRF with a range of stakeholders across federal, state, and local levels of government, along with NGOs and the private sector.¹⁹ FEMA's Office of Response and Recovery conducted a series of meetings and workshops across all 10 FEMA regional offices that covered a range of organizational and operational issues. FEMA officials told us that these activities were designed to familiarize stakeholders with key concepts in the framework and facilitate the adoption of the NDRF as a national set of principles. Examples of these workshops include

- **Kickoff Forum in New Orleans in Region VI.** Held in December 2011, FEMA headquarters and regional officials sponsored a full-day workshop on the NDRF for federal, state, local, and nonprofit recovery stakeholders, such as Louisiana's Office of Homeland Security and Emergency Preparedness, the Mayor of New Orleans, the President and School Board Superintendent of St. Bernard Parish, and emergency managers from neighboring states. In addition to a number of presentations on NDRF concepts, the workshop provided attendees with practical experience with the NDRF by using facilitated discussions, based on hypothetical disaster scenarios.

¹⁹As mentioned previously, FEMA considers many nonfederal entities as stakeholders to the NDRF. Some of these entities include state, local, and tribal governments (and component offices within these governments such as emergency management and community development offices), nonprofit organizations, and private businesses.

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- **Workshop in Salt Lake City in Region VIII.** In conjunction with the Utah Emergency Management Association’s annual conference in January 2012, FEMA officials delivered a presentation to nearly 300 state and local emergency managers about the key concepts underlying the NDRF and their importance in pre- and post-disaster planning efforts. As part of this effort, FEMA officials led a panel discussion on the NDRF’s guiding principles, challenges to its implementation, and the importance of coordination to ensure the success of the “whole community” concept. FEMA also organized break-out sessions to facilitate further discussion among participants.

Following the 10 rollout events, FEMA developed executive summaries for each event that highlighted a number of key issues, challenges, and suggestions raised by attendees. For example, attendees at most of the events pointed to pre-disaster recovery planning as an important consideration in achieving an efficient recovery effort. Attendees also identified a number of challenges, such as the need for more clarity and guidance on the RSFs’ roles and responsibilities, how to conduct recovery planning, and ways to identify and leverage existing resources for rebuilding. Among the suggestions for improvement, some attendees highlighted a need for ongoing outreach to recovery stakeholders—such as state and local governments—and its importance to the success of NDRF implementation and to maintaining the momentum of FEMA’s implementation efforts.

In support of its ongoing efforts to educate stakeholders, FEMA developed leadership training events aimed at implementing the NDRF. For example, since July 2013, the Office of Response and Recovery has periodically sponsored NDRF courses to a total of almost 350 federal, state, local, and tribal recovery stakeholders through FEMA’s Emergency Management Institute.²⁰ Focused on pre- and post-disaster recovery roles and responsibilities at the federal state, local, and tribal levels of government, the course included a tabletop exercise that provided an opportunity for practical application.

All five FEMA regional offices in our review also promoted state adoption of the NDRF by conducting various types of outreach to state and local

²⁰The Emergency Management Institute provides training to federal, state, local, tribal, volunteer, public, and private sector officials to strengthen emergency management core competencies for professional, career-long training.

partners within their region after the NDRF's launch. Specifically, the FDRCs and CPCB coordinators in the five regions provided technical assistance, training, and peer-to-peer meetings, among other outreach efforts, to state and local officials. Some FEMA regional office officials told us they focused on conducting outreach to state partners as part of pre-disaster planning activities, while staff from other regional offices told us that they primarily focused on post-disaster recovery efforts to promote the NDRF.

As an example of outreach integrated with pre-disaster planning, FEMA Region IX worked jointly with the California Governor's Office of Emergency Services to incorporate NDRF-based recovery concepts and objectives into the draft 2015 Bay Area Earthquake Plan, a joint federal-state plan aimed at responding to catastrophic earthquakes in the San Francisco Bay Area.²¹ According to FEMA regional officials, the Bay Area Earthquake Plan, first published in 2008, was due for an update. The 2008 version addressed response operations only and had not included recovery-related operations. Region IX officials told us that they provided assistance to state officials in updating the plan to reflect pre-disaster recovery operations, based on elements included in the NDRF. For example, in keeping with the NDRF's concept of operations, the updated 2015 Bay Area Earthquake Plan identified federal and state Disaster Recovery Coordinators as key entities in organizing and coordinating recovery efforts. Additionally, the earthquake plan's recovery coordination structure and recovery objectives were organized using the NDRF's RSF structure. Further, Region IX officials told us that, in addition to California, they reached out to officials from a number of other states, such as Hawaii and Nevada, to encourage them to adopt NDRF concepts in their long-term recovery plans.

Officials from a number of other regional offices in our review stated that they conducted the majority of their NDRF outreach as part of a post-disaster operation. For example, after a series of tornadoes significantly affected communities in Faulkner County, Arkansas, in 2014, Region VI staff—including the CPCB RSF—collaborated with the Department of Commerce's Economic Development Administration and the National Association of Development Organizations to provide a recovery training workshop for state and local officials. The workshop, which brought

²¹The California Governor's Office of Emergency Services is responsible for overseeing and coordinating emergency preparedness, response, recovery, and homeland security activities within the state of California.

together state and local stakeholders from affected states and communities, provided training on effective recovery planning and management practices. It also created a forum for sharing lessons learned from past disaster recovery efforts. Region VI staff also organized and facilitated a peer-to-peer meeting with officials from Faulkner County, Arkansas, and Joplin, Missouri. As shown in figure 4, Joplin had sustained extensive damage from a severe tornado in 2011. Joplin officials and others—including the city planner, Chamber of Commerce president, and local Disaster Recovery Manager—shared best practices and lessons learned with Faulkner County officials, based on their experiences with Joplin’s recovery. Region VI officials told us they believe peer-to-peer interactions are an effective approach to encouraging states to adopt the NDRF in that these types of interactions can provide concrete and practical examples of how the NDRF can help states and localities recover after a disaster.

Figure 4: Property Damaged by 2011 Tornado in Joplin, Missouri



**Joplin, MO
Tornado event-2011**

In May 2011, a severe tornado rapidly intensified and struck Joplin, Missouri—a town with a population of about 50,000 people. With winds estimated at over 200 miles per hour, the tornado devastated a significant portion of the town, resulting in 161 fatalities and more than 1,000 injuries. The storm also damaged nearly 7,500 residential structures such as single-family homes and over 500 businesses, generating billions of dollars in property damage. Rather than request the President issue a new disaster declaration, Missouri had the option of requesting that the Joplin event be added to an existing declaration that had been issued months earlier in the state.

Source: Federal Emergency Management Agency (FEMA)/Jace Anderson. | GAO-16-476

Officials in Four of Five Selected States Did Not Understand Aspects of the NDRF and Three Did Not Have NDRF-Based Recovery Plans

State emergency managers in four of the five states in our review did not have a clear understanding of aspects of the NDRF, such as how the NDRF related to other FEMA disaster response or recovery programs, the level of federal technical assistance available under the NDRF after a disaster, and how states should integrate the NDRF into their post-disaster recovery operations.²² For example, Alaska emergency management officials told us they had been confused about how to interpret aspects of the NDRF regarding resilient rebuilding and its relationship with FEMA federal assistance programs, such as Public Assistance (PA), and the types of rebuilding projects that would be eligible for this program. Specifically, the NDRF recognizes resilient rebuilding as one of the keys to recovery success, stating that it provides communities with an opportunity to reduce risk from future disasters and avoid unintended negative environmental consequences by retrofitting, elevating, and removing from harm vulnerable structures. Alaska emergency management officials told us that, after the community of Galena, Alaska, was severely affected by river flooding, local officials solicited bids for rebuilding a power plant that included flood resiliency and efficiency upgrades (see figure 5).

²²Establishing clear guidelines and effectively coordinating with key partners in long-term recovery have been challenges for FEMA over the years. We reported previously that, prior to the NDRF's development, FEMA faced challenges in coordinating with state and local governments on recovery. For example, the criteria for activating Emergency Support Function-14—which supported long-term recovery—for specific disasters were vague. This resulted in uncertainty among states and other federal agencies. Also, FEMA in some cases did not coordinate well with state and local governments on the timing of recovery efforts, getting involved before states and localities were ready for assistance. See GAO, *Disaster Recovery: FEMA's Long-term Assistance Was Helpful to State and Local Governments but Had Some Limitations*, [GAO-10-404](#) (Washington, D.C.: Mar. 30, 2010).

Figure 5: River Flooding in Galena, Alaska



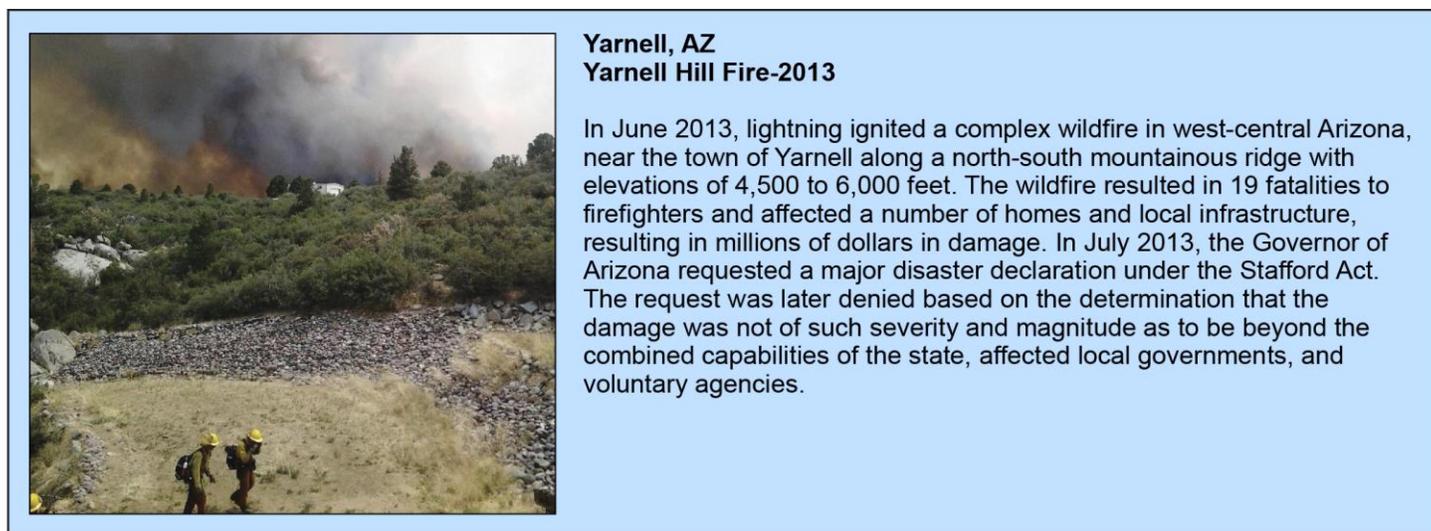
Source: Federal Emergency Management Agency (FEMA). | GAO-16-476

Alaska state officials reported that, based on their interpretation of the NDRF’s core recovery principles of resiliency and sustainability, they applied for PA funding for rebuilding the power plant, which was located within the flood plain of the Yukon River.²³ The funding would allow for flood resiliency and efficiency upgrades for rebuilding the plant. FEMA did obligate some PA funding toward repairing damages to Galena’s power plant. However, FEMA determined that the flood resiliency and efficiency upgrades were not cost effective and, therefore, not eligible for PA funding. The town of Galena was also able to use its insurance funds to make needed repairs to the power plant, which addressed the city’s immediate recovery needs, but was not able to fully fund the flood resiliency and efficiency upgrades they had hoped to make. A local official in Galena indicated that the community still has not been able to identify other grant opportunities to support these initiatives and therefore has lacked the funding to implement them.

²³We have previously reported on challenges states and localities experienced in rebuilding resiliently after Hurricane Sandy. See, GAO, *Hurricane Sandy: An Investment Strategy Could Help the Federal Government Enhance National Resilience for Future Disasters*, [GAO-15-515](#) (Washington, D.C.: July 30, 2015).

Arizona emergency management officials told us they were not clear about the degree of technical support FEMA would provide under the NDRF following a disaster. As shown in figure 6, a 2013 wildfire near the unincorporated town of Yarnell resulted in significant damage to the town's only water system.

Figure 6: Wildfire along a Mountainous Ridge near Yarnell, Arizona



Source: U.S. Department of Agriculture. | GAO-16-476

Under a fire management assistance declaration, the state received federal assistance from FEMA through a fire management assistance grant.²⁴ However, because the fire did not result in a major disaster declaration under the Stafford Act, Arizona and the town of Yarnell were ineligible for funding under FEMA's PA program, which would have helped offset the cost of restoring the town's water system.²⁵ In addition,

²⁴A fire management assistance declaration is initiated when a state submits a request for assistance to the FEMA Regional Director at the time a "threat of major disaster" exists. The process is accomplished on an expedited basis and a FEMA decision is rendered in a matter of hours. The fire management assistance grant makes funding available for reimbursement of 75 percent of the eligible fire suppression costs.

²⁵Under the Stafford Act, a major disaster is defined as any natural catastrophe, fire, flood, or explosion determined by the President to warrant the additional resources of the federal government to alleviate damages or suffering caused by the disaster.

because the water system was owned by a private cooperative—the Yarnell Water Improvement Association—state funding under the Governor’s Emergency Fund was not able to cover the damage and the association was unable to afford the repairs to its system.²⁶ Arizona’s emergency management officials reached out to FEMA for technical assistance and coordination in helping the state identify opportunities to leverage existing resources, based on their understanding of the NDRF. That is, the NDRF calls for leveraging and coordinating disaster and public and nongovernmental organization assistance programs to accelerate the recovery process.²⁷ Additionally, the NDRF calls for communities to seek input and coordinate outside sources of help.

Arizona officials told us that, consistent with the NDRF, they reached out to FEMA for help in identifying alternative funding options through other federal and nongovernmental agencies. However, according to these officials, the assistance FEMA provided did not meet the state’s or community’s needs. They explained that while FEMA provided some suggestions about how the NDRF had been applied to other incidents, it did not provide the technical assistance and coordination the state had expected to receive to help Arizona partner with other federal and nongovernmental agencies. Subsequently, state emergency management officials said they collaborated on their own initiative with various state and federal partners to identify alternate sources to fund the project. Specifically, the Department of Agriculture’s Rural Development Agency and Arizona’s Water Infrastructure Finance Authority worked with the Yarnell Water Improvement Association to secure funding in the form of grants, new loans, or a restructuring of current loans to restore the community’s water system.²⁸

Emergency management officials in two other states in our review, when asked about the NDRF, did not have a clear understanding of the

²⁶The Yarnell Water Improvement Association is an Arizona member-owned nonprofit cooperative corporation, formed under Title 10, Chapter 1, Article 16 of the Arizona Revised Statutes and Internal Revenue Code 501(c)(12).

²⁷The NDRF articulates that strong coordination across all levels of government, nongovernmental organizations, and the private sector is needed for effective recovery.

²⁸The Water Infrastructure Finance Authority of Arizona, an independent agency of the state of Arizona, is authorized to finance the construction, rehabilitation and/or improvement of drinking water, wastewater, wastewater reclamation, and other water quality facilities and projects. Generally, the agency offers borrowers below-market interest rates on loans.

purpose and underlying precepts of the NDRF and how it related to recovery operations in their states. For example, one state emergency management official was unfamiliar with the NDRF and told us she did not use it as part of the state's recovery operations. This official referred to the framework as one of many federally driven post-disaster recovery programs. An emergency manager from another state told us that, based on his understanding, the NDRF was a federal report that included such information as the demographics of affected communities after a disaster occurred.

Further, only two of the five states in our review—Arizona and Colorado—had developed a pre-disaster recovery plan based on the NDRF. While Alaska and New York had developed recovery plans, officials from both states told us that the NDRF did not suit their states' recovery needs. An Alaska emergency manager reported that his experience with a FEMA recovery exercise with other federal, state, and local stakeholders left him discouraged about being able to use the NDRF as a functional and useful recovery framework. He told us that many of the federal coordinating agencies that attended the exercise were not well-informed about the NDRF, resulting in a great deal of confusion about the roles and responsibilities of the RSFs. Emergency management officials from Oklahoma stated that although the state had not developed an NDRF-based recovery plan, they could consider developing such a plan in the future.

Consistent with our findings, FEMA officials estimated that nationwide, more than three-quarters of state emergency management offices do not have NDRF-based recovery plans. Further, FEMA officials told us that of the states with NDRF-based recovery plans, some have not conducted training or recovery exercises, which, according to FEMA, are needed to validate these plans.²⁹ A FEMA official told us that if a state has not conducted a recovery exercise to validate its plan, much of the state's post-disaster recovery work may still be done on an ad-hoc basis after the disaster has occurred.

Emergency managers in four of the five states in our review told us that they could benefit from additional NDRF training or recovery exercises to assist them in their recovery planning. For example, emergency

²⁹A recovery exercise is a meeting in which relevant officials are given a disaster scenario and asked to describe how they would use their state's plans and resources to coordinate and perform recovery activities.

managers from three states said that state staff could benefit from a better understanding of how to apply NDRF concepts, such as coordinating resources in non-presidentially declared disasters. Further, FEMA is aware of the need for additional training and outreach, including recovery exercises with states that have NDRF-based recovery plans to test their processes and identify the extent to which those processes work. FEMA officials told us that in the aftermath of Hurricane Sandy, resources were diverted to Sandy response efforts and NDRF outreach efforts were largely put on hold for nearly a year. One FEMA official told us that he recognized that many state officials do not have a clear understanding of the NDRF, including the importance of coordinating and partnering with officials from other state agencies.

According to FEMA regional officials, the ability of regional staff to conduct training and recovery exercises has been constrained by staffing limitations—particularly a shortage of FDRCs. FEMA currently has 9 FDRCs assigned to its 10 regional offices. FEMA officials said they estimate a need for 23 FDRCs to fully support ongoing recovery readiness activities in all 10 FEMA regional offices. FEMA officials told us that at the time of the NDRF's launch in September 2011, FEMA had established 1 FDRC position per FEMA region for a total of 10 FDRC positions. FEMA officials also told us that FEMA filled these 10 positions in 2012 over the course of 6 months. As noted earlier in this report, when not assigned to post-disaster work, the FDRC is responsible for facilitating pre-disaster recovery planning at the state and local level and for coordinating the collaboration between federal, state, and local governments. Specifically, according to FEMA officials, about 60 percent of an FDRC's time should be spent on preparedness and readiness activities such as pre-disaster planning with the region's states and localities, as well as on conducting recovery-related trainings and exercises. However, FDRCs from several regions reported that the current number of FDRCs cannot fully support these NDRF implementation efforts.

Further, emergency managers in three of the five states in our review told us that a lack of permanent leadership, including turnover of regional FEMA staff, has resulted in challenges to working with FEMA on various recovery issues. For example, one emergency manager told us that the lack of permanent leadership in the regional office has limited the state's ability to develop important collaborative relationships with FEMA, which is a key component of effective recovery management.

According to FEMA officials, it has been challenging to commit to supporting state and federal partners because FEMA has had to redeploy

FDRCs to different regions for post-disaster work. For example, the FDRC for Region X told us that she was redeployed to do post-disaster work in Region VIII, leaving no FDRC available to provide NDRF outreach to the four states, nearly 270 federally recognized tribes, and multiple local jurisdictions under Region X. This official explained that FDRCs have no dedicated staff to assist them with their pre-disaster duties such as reviewing state and local recovery plans, supporting recovery exercises, and conducting recovery-related training. Recognizing that the current FDRC workforce does not allow the FDRCs to fulfill their pre-disaster duties, FEMA developed a staffing allocation plan, which includes an additional 13 FDRCs. FEMA officials estimated that they will begin the hiring process in fiscal year 2016.

FEMA Does Not Systematically Use Its Assessments to Evaluate Effectiveness and Disseminate Best Practices

FEMA officials told us that they employ readiness assessments to track and assess regional NDRF implementation efforts, including outreach. While these assessments provide information on regional offices' NDRF implementation efforts, we found limitations in FEMA's use of the assessments in evaluating the effectiveness of its outreach efforts and sharing best practices among regional offices.

Beginning in 2013, FEMA began using its FEMA Readiness and Assessment Program (F-RAP) to assess NDRF implementation efforts in its regional offices.³⁰ FEMA officials told us that prior to that time, FEMA collected information from regional implementation plans to assess regional NDRF implementation activities. The F-RAP, administered by a group within FEMA's Office of Response and Recovery, asks regional offices to respond to a number of questions about activities related to NDRF implementation. For example, such questions include

- how regional office efforts built capacity in support of pre- and post-disaster implementation at the federal, state, local, and tribal levels of government;
- which states received outreach in support of NDRF implementation and how those interactions supported states' efforts to build recovery capabilities; and

³⁰In addition to recovery operations, the readiness assessment is intended to assess FEMA's readiness activities across a broad spectrum of evaluation elements including logistical operations, organizational functions, and the management of FEMA's individual programs such as Individual Assistance and Public Assistance.

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- whether resource constraints affected the timeliness of interagency coordination activities.

F-RAP evaluation teams, deployed to regional offices to conduct interviews and review documents, are then to submit the completed readiness assessment reports of their findings to FEMA senior officials.³¹ According to FEMA's F-RAP policy directive, the results of the assessments are to provide information intended to uncover strengths, challenges, and areas for improvement related to mission readiness. FEMA officials provided us with excerpts from readiness assessments that were completed in 2013, 2014, and 2015. The assessments highlighted a number of issues that emerged over the 3-year period related to coordination, funding, implementation, staffing, and training across regional offices.

We found limitations in FEMA's use of the findings to assess the effectiveness of NDRF outreach efforts and develop and share best practices among regional officials. FEMA does not systematically use the information from these assessments to conduct time-trend (changes over time) or cross-cutting analysis (analysis across organizational boundaries such as regional offices) to identify management challenges or inform decision making. Although FEMA officials stated that they have access to and review aspects of the data collected from the readiness assessments, they also acknowledged that FEMA does not systematically analyze changes over time or cross-cutting issues affecting NDRF implementation. Such analyses would better position FEMA to evaluate its effectiveness and identify approaches that have been successful and those that have not been successful and need to be improved.

FEMA officials further acknowledged that the agency does not develop and disseminate best practices or lessons learned to regional offices based on the findings generated through the readiness assessments. While FDRCs told us that they conduct routine conference calls intended to share information about best practices within their regional offices, FEMA has not provided FDRCs with specific practices so they can more effectively promote the NDRF among states. Without fully analyzing the effectiveness of its regional activities to promote state adoption of the NDRF, FEMA cannot create or promote best practices among regional offices in their work with states.

³¹Each FEMA regional office is assessed every other year.

Standards for Internal Control in the Federal Government calls for managers to monitor and evaluate performance information over time.³² In addition, according to the Project Management Institute's *The Standard for Program Management*, agencies should collect, measure, and disseminate performance information and analyze program trends and point to areas in need of adjustment.³³ These standards also emphasize the importance of conducting periodic reviews to assess program viability and of providing a venue to assess program conformance with organizational standards. In the absence of applying these standards to its readiness assessments, FEMA is limited in its ability to identify how well its outreach and education efforts are working and what improvements are needed to enhance its efforts. Without knowing the extent to which states understand and use the NDRF and where improvements may be needed in its outreach efforts, FEMA cannot ensure that it is effectively implementing the NDRF at the state and local levels. This could prevent FEMA from achieving the framework's goals of improving pre-disaster recovery planning, reducing post-disaster confusion, and delivering recovery assistance through coordinated federal, state, and local efforts.

In addition to information from the readiness assessments, FEMA officials told us they planned to begin using annual employee performance plans as a means to evaluate NDRF implementation and outreach efforts in its regional offices. Beginning in 2015, FDRCs' annual performance plans included a performance expectation requiring them to develop a regional NDRF implementation plan to articulate the region's strategy for promoting recovery core capabilities and Recovery FIOF operational principles.³⁴ However, FEMA officials could not explain how the performance expectation and resulting performance rating would be linked to FEMA's organizational goals and priorities for implementation of the NDRF. FEMA officials told us that, after 2012, implementation plans were no longer required of regional offices and that those plans had been intended for use as an initial outreach effort after the NDRF's launch to

³²[GAO/AIMD-00-21.3.1](#).

³³Project Management Institute, Inc., *The Standard for Program Management*®, Third Edition (Newtown Square, PA: 2013).

³⁴As noted earlier, post-disaster NDRF activities are reflected in the Recovery Federal Interagency Operational Plan (FIOF).

integrate the framework into regional processes, programs, and training.³⁵ Further, during our current review, FEMA officials from three of five regional offices told us they did not intend to develop new goals or activities using the implementation plans. We also found that none of the five FEMA regional offices had updated plans or developed new regional implementation plans since 2012.

We have previously reported on the importance of creating a clear linkage between individual performance and organizational success. Specifically, we identified key practices that federal agencies can consider for effective performance management that collectively create a clear linkage between individual performance and organizational success.³⁶ For example, we pointed to the need to align individual performance expectations with organizational goals and stressed the importance of providing and using performance information to track organizational priorities. Without establishing these linkages, FEMA cannot evaluate how effective regional staff's performance is in helping to achieve the implementation of the NDRF.

Conclusions

Successful implementation of the NDRF is critical to avoiding government coordination issues that created challenges during previous disaster recovery efforts. It provides a framework for coordination and recovery planning at all levels of government before and after a disaster, and defines how those entities will work together following a disaster to best meet the recovery needs of individuals and communities. States play a pivotal role in disaster recovery, with primary responsibility for the recovery of their communities, along with local and tribal governments. States also act as a conduit between the federal government and local and tribal governments for key federal recovery assistance programs and are well-positioned to encourage local and tribal governments to adopt the NDRF.

Recognizing the importance of the NDRF and the critical roles states play in recovery, FEMA has taken action to work with states in implementing

³⁵Before the change, Regional Administrators had been responsible for developing the implementation plan as part of their annual performance appraisal in 2012.

³⁶GAO, *Results-Oriented Cultures: Creating a Clear Linkage between Individual Performance and Organizational Success*, [GAO-03-488](#) (Washington, D.C.: Mar. 14, 2003).

the NDRF. However, officials in four of the five selected states in our review did not understand aspects of the NDRF and three states did not have NDRF-based recovery plans. To increase state adoption and improve state officials' understanding of the NDRF, it will be important for FEMA to improve the effectiveness of its outreach to states. Systematically analyzing information that is tracked through readiness assessments would provide FEMA an opportunity to identify approaches to working with states that have been successful and those that have not been successful and need to be improved. Through such analyses, which could include analyzing performance trends over time and across regional offices, FEMA would be well-positioned to develop and disseminate robust best practices to regional offices to assist them in understanding and using the NDRF. Further, providing regional offices and FDRCs with clearer expectations on the use of regional implementation plans, and ensuring that FDRCs' performance plans align with FEMA's goals, would help FEMA to achieve its intended objectives. Without effective outreach, NDRF implementation may be at risk, and affected states and localities may miss opportunities to benefit from the increased efficiencies possible through ongoing evaluation of NDRF implementation.

Recommendations for Executive Action

To enable a more effective approach in working with states to adopt the NDRF, we recommend that the Secretary of Homeland Security direct the Administrator of FEMA to take the following four actions:

- Conduct a systematic analysis of the information generated from FEMA's readiness assessments to determine the extent of regional office efforts to help states implement the NDRF, including conducting education and outreach.
- Develop best practices and lessons learned with regard to conducting NDRF education and outreach to states based on the analysis of readiness assessments and create a mechanism to disseminate and share those best practices and lessons learned to FEMA regional offices.
- Clarify with regional offices and FDRCs the role of the regional implementation plans in FDRC performance plans and how they will be used to assess NDRF regional implementation efforts.
- Align the annual FDRC performance expectations with clearly defined organizational goals and priorities, consistent with key management practices.

Agency Comments and Our Evaluation

We provided a draft of this report to the Department of Homeland Security (DHS) for its review and comment. In its written comments, DHS concurred with our four recommendations. Specifically, DHS stated that the recommendations were in line with FEMA's ongoing efforts to accomplish the objectives of the NDRF and will be incorporated into existing program plans. DHS's comments are reprinted in their entirety in appendix II. DHS also provided technical comments, which we incorporated into this report, where appropriate. In addition, we provided excerpts of the draft report to state emergency management officials in the five states we included in our review. We incorporated their technical comments, where appropriate.

We will send copies of this report to the Secretary of Homeland Security and appropriate congressional committees. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>. If you have any questions concerning this report, please contact Michelle Sager at (202) 512-6806 or sagerm@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Other major contributors to this report are listed in appendix III.



Michelle Sager
Director, Strategic Issues

List of Requesters

The Honorable Ron Johnson
Chairman
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Michael McCaul
Chairman
The Honorable Bennie Thompson
Ranking Member
Committee on Homeland Security
House of Representatives

The Honorable Daniel M. Donovan, Jr.
Chairman
The Honorable Donald M. Payne, Jr.
Ranking Member
Subcommittee on Emergency Preparedness, Response, and
Communications
Committee on Homeland Security
House of Representatives

The Honorable Martha McSally
House of Representatives

The Honorable Susan Brooks
House of Representatives

Appendix I: Objectives, Scope, and Methodology

The objectives of this study were to review the Federal Emergency Management Agency's (FEMA) implementation of the National Disaster Recovery Framework (NDRF). This review assesses (1) the roles and responsibilities of FEMA and state emergency management offices in implementing the NDRF and (2) the extent to which FEMA has worked with selected states to implement the NDRF.

To address the first objective, we reviewed relevant federal statutes and program and policy directives and analyzed components of the NDRF to identify the pre- and post-disaster NDRF implementation responsibilities of federal and state emergency management offices. We also interviewed FEMA officials from the Office of Federal Disaster Coordination, National Disaster Recovery Planning Division within the Department of Homeland Security, and the other five federal coordinating agencies under the NDRF's Recovery Support Functions.¹ Those agencies include the Departments of Commerce, Health and Human Services, Housing and Urban Development, and the Interior and the Army Corps of Engineers.

To address the second objective, we administered a semi-structured interview to state emergency management officials in five states regarding their experiences in adopting the NDRF as part of their recovery operations. To select these states, we obtained information from FEMA's Office of Response and Recovery on disaster declarations in those states in which a Recovery Support Function (RSF) was activated from 2012 through 2014. We sorted the information based on the number of states that were affected by disasters with three or more RSF activations. We selected 5 states based on geographic diversity, a range of disaster types, and at least three RSF activations, which occurred in 2012 and 2013. Those states included Alaska, Arizona, Colorado, New York, and Oklahoma. (See table 1 for additional information on the selection criteria.) We also analyzed states' disaster recovery plans and other related state recovery planning documents and compared them with the core elements contained in the NDRF, such as the RSF structure, roles and responsibilities, and core principles identified in the NDRF, and whether the plans had been updated since the NDRF's 2011 issuance. The results of our study are not generalizable to NDRF implementation efforts across all states.

¹In October 2015, FEMA undertook an organizational realignment. As a result, the role of the Office of Federal Disaster Coordination has been assumed by the Field Operations Directorate and the role of the National Disaster Recovery Planning Division has been assumed by the Interagency Coordination Division.

Table 1: Characteristics of the Five Selected States Included in GAO’s Review

State	Year of disaster declaration	Type of disaster	Number of Recovery Support Function activations
Alaska	2013	Flooding	4
Arizona	2012	Drought	6
Colorado	2013	Flooding	5
New York	2012	Hurricane	6
Oklahoma	2013	Tornado	3

Source: GAO analysis of Federal Emergency Management Agency information. | GAO-16-467

Further, we administered a semi-structured interview to FEMA officials from the five corresponding regional offices—II, VI, VIII, IX, and X—to discuss NDRF outreach and education efforts, monitoring and evaluation of NDRF implementation efforts, and other related implementation issues. We reviewed FEMA outreach and education materials designed to help states adopt the NDRF into their recovery operations. We also analyzed regional office implementation plans, readiness assessments, FEMA policy directives governing readiness assessments, performance plans, and other documents to identify what actions FEMA took to assess its outreach and education to states and other NDRF implementation efforts. We compared the results of our analyses with these criteria, including internal control standards, program management guidance, and leading practices identified in our previous reports. Specifically, we compared information in our analyses to *Standards for Internal Control in the Federal Government* and leading management practices.² Those practices included program management best practices identified in our

²GAO, *Standards for Internal Control in the Federal Government*, GAO/AIMD-00-21.3.1 (Washington, D.C.: November 1999).

prior work on human capital,³ and leading practices identified in the Project Management Institute's *The Standard for Program Management*.⁴

For both objectives, we interviewed FEMA officials from the Capacity Building Branch of the former National Disaster Recovery Planning Division and from the National Integration Center.

We conducted this performance audit from April 2015 to May 2016 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.

³See GAO, *Human Capital: Senior Executive Performance Management Can Be Significantly Strengthened to Achieve Results*, [GAO-04-614](#) (Washington, D.C.: May 26, 2004) and *Results-Oriented Cultures: Creating a Clear Linkage between Individual Performance and Organizational Success*, [GAO-03-488](#) (Washington, D.C.: Mar. 14, 2003).

⁴Project Management Institute, Inc., *The Standard for Program Management*®, Third Edition (Newtown Square, PA: 2013). *The Standard for Program Management*® describes, among other things, how resource planning; goals, milestones, and performance measures; and program monitoring and reporting are good practices that can enhance management for most programs.

Appendix II: Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, DC 20528



**Homeland
Security**

May 11, 2016

Michelle Sager
Director, Strategic Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Draft Report GAO-16-476, "DISASTER RECOVERY: FEMA Needs to Assess Its Effectiveness in Implementing the National Disaster Recovery Framework"

Dear Ms. Sager:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO's) work in planning and conducting its review and issuing this report.

The Federal Emergency Management Agency's (FEMA's) ability to respond to major disasters is the cornerstone of the organization's mission and the 2011 National Disaster Recovery Framework (NDRF) serves as the vehicle for collaborative planning between FEMA's regional offices and the state and local authorities. The Department is pleased to note GAO's positive recognition of FEMA's outreach activities, including workshops, technical assistance and training, to promote individual state adoption of the NDRF. State governments and organizations play a pivotal role in disaster recovery and their increased understanding and adoption of the NDRF is an important objective for achieving an effective, rapid community recovery.

FEMA will soon release an update to the NDRF that incorporates lessons learned, best practices, and disaster recovery experience since the 2011 publication. The updated NDRF provides an opportunity to further educate stakeholders about the guiding principles and model organizational concepts for enhancing disaster recovery planning, preparedness, and coordination.

The draft report contained four recommendations with which the Department concurs. These recommendations are in line with FEMA's ongoing efforts to accomplish the objectives of the NDRF and will be incorporated into existing program plans. Specifically, GAO recommended that the FEMA Administrator:

Recommendation 1: Conduct a systematic analysis of the information generated from FEMA's readiness assessments to determine the extent of regional office efforts to help states implement the NDRF, including conducting education and outreach.

Response: Concur. FEMA's Office of Readiness Assessment (ORA) launched the 2016 bi-annual FEMA Readiness Assessment Program (FRAP) in April 2016, which includes NDRF related assessment discussions in five FEMA regions. ORA will incorporate into the findings of this year's assessments, a retrospective review of NDRF findings and progress since 2013. Estimated Completion Date (ECD): December 31, 2016.

Recommendation 2: Develop best practices and lessons learned with regard to conducting NDRF education and outreach to states, based on the analysis of readiness assessments and create a mechanism to disseminate and share those best practices and lessons learned to FEMA regional offices.

Response: Concur. The Recovery Support Function Leadership Group initiated an information management workgroup, which shares best practices information as one of its objectives. The workgroup has piloted the use of an existing interagency portal as a potential platform for improved information sharing. FEMA will incorporate the findings from the 2016 FRAP review and best practices collected from regional Federal Disaster Recovery Coordinators (FDRCs) for stakeholder outreach and education into the final platform build-out. ECD: December 31, 2016.

Recommendation 3: Clarify with regional offices and FDRCs the role of the regional implementation plans in FDRC performance plans and how they will be used to assess NDRF regional implementation efforts.

Response: Concur. To achieve greater integration of FEMA's field leadership components, FEMA's Field Operations Directorate convened a Field Leadership Working Group of Senior Subject Matter Experts to conduct a mission analysis of FEMA's Field Leadership function (which includes FDRCs as well as Federal Coordinating Officers and Incident Management Assistance Teams team leads). The working group will develop specific courses of action, policies, and procedures to integrate and strengthen the Agency's capability and capacity for incident field leadership. One of the group's assigned tasks is to develop performance metrics to define a steady state and an operational performance framework for field leaders, to include FDRCs. ECD: November 30, 2016.

Recommendation 4: Align the annual FDRC performance expectation with clearly defined organizational goals and priorities, consistent with key management practices.

Response: Concur. Please see our response to Recommendation 3. The Field Leadership Working Group will implement this recommendation alongside efforts to clarify the role of the regional NDRF implementation plans. ECD: November 30, 2016.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,



Jim H. Crumpacker, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

Appendix III: GAO Contacts and Staff Acknowledgments

GAO Contact:

Michelle Sager, (202) 512-6806 or sagerm@gao.gov

Staff Acknowledgment:

In addition to the contact named above, Brenda Rabinowitz (Assistant Director), Mark Abraham, Tony Bova, Amy Bowser, Katy Donovan, Robert Gebhart, Chris Keisling, Liam O'Laughlin, Robert Robinson, and Walter Vance made key contributions to this report.

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