



Testimony Before the Subcommittee on Emergency Preparedness, Response, and Communications, Committee on Homeland Security, House of Representatives

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NATIONAL PREPAREDNESS

FEMA Has Taken Steps to Strengthen Grant Management, But Challenges Remain in Assessing Capabilities

Statement of Chris Currie, Director, Homeland Security and Justice Issues Highlights of GAO-18-512T, a testimony to Subcommittee on Emergency Preparedness, Response, and Communications, Committee on Homeland Security, House of Representatives.

Why GAO Did This Study

The Department of Homeland Security (DHS), through FEMA, provides preparedness grants to state, local, tribal, and territorial governments to improve the nation's readiness in preventing, protecting against, responding to, recovering from and mitigating terrorist attacks, major disasters and other emergencies.

According to DHS, the department has awarded over \$49 billion to a variety of DHS preparedness grant programs from fiscal years 2002 through 2017, to enhance the capabilities of grant recipients. For example, the State Homeland Security Program which awards grants to the nation's 56 states and territories, and the Urban Areas Security Initiative which awards grants to urban areas based on DHS's risk methodology, are the largest of the preparedness grant programs (see figure).

This statement addresses progress and challenges in FEMA's efforts to manage preparedness grants and GAO's prior recommendations to strengthen these programs. This statement is based on prior GAO reports issued from March 2011 through February 2016 and selected updates conducted in December 2017 through April 2018. To conduct the prior work and updates, GAO analyzed relevant FEMA data and documentation and interviewed relevant officials.

What GAO Recommends

GAO has made prior recommendations designed to address the challenges discussed in this statement. FEMA has taken actions to address some but not all of these recommendations.

View GAO-18-512T. For more information, contact Chris P. Currie at (404) 679-1875 or CurrieC@gao.gov.

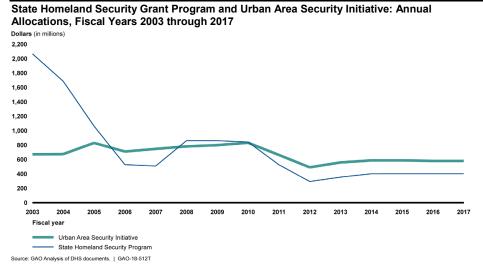
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What GAO Found

In February 2012, GAO identified coordination challenges among Federal Emergency Management Agency (FEMA) grant programs that share similar goals and fund similar projects, which contribute to the risk of duplication among the programs. GAO recommended that FEMA take steps, as it develops its new grant management system, to collect project information with sufficient detail to identify potential duplication among the grant programs. FEMA has since addressed these recommendations. Specifically, in 2014, FEMA modified a legacy grants data system to capture more robust grant project-level data, and in fiscal year 2017, procured a software tool and developed a set of standard operating procedures to assist its staff in identifying potentially duplicative projects. These actions should help FEMA strengthen the administration and oversight of its grant programs. Furthermore, FEMA is also developing a new grants management modernization system to consolidate and better manage its grants. GAO is currently reviewing the system for this Committee and will report out next year.



GAO reported in March 2011 on the need for FEMA to improve its oversight of preparedness grants by establishing a framework with measurable performance objectives for assessing urban area, state, territory, and tribal capabilities to identify gaps and prioritize investments. Specifically, GAO recommended that FEMA complete a national preparedness assessment of capability gaps at each level based on tiered, capability-specific performance objectives to enable prioritization of grant funding. FEMA has taken some steps to address GAO's prior recommendation. Specifically, in February 2018, FEMA reported developing capability-specific performance objectives that will enable a national preparedness assessment of capability gaps. However, FEMA plans to finalize these efforts in 2020 and it is too early to tell how this will impact grant allocations. Until these efforts are completed, GAO will not be able to determine the extent that they address past challenges and recommendations.

Chairman Donovan, Ranking Member Payne, and Members of the Subcommittee:

I appreciate the opportunity to participate in today's hearing to provide an update on the efforts of the Federal Emergency Management Agency (FEMA)—a component of the Department of Homeland Security (DHS)—to manage preparedness grants and measure and assess national preparedness capabilities. Our work over the last seven years has focused on FEMA's efforts to coordinate federal interagency preparedness and manage and assess the impact of FEMA's preparedness grants on state and local preparedness. As described in more detail below, our recommendations have identified additional steps FEMA can take to improve the efficiency and effectiveness of these efforts, including enhancing coordination and providing guidance on preparedness. FEMA has taken actions to address some of these recommendations, but more fully addressing all of them could lead to additional savings, better services to the public, improved program performance and accountability, and, ultimately, a better prepared nation.

Following the federal response to Hurricane Katrina in 2005, Congress enacted the Post-Katrina Emergency Management Reform Act of 2006 (Post-Katrina Act). In response to the act, among other things, DHS centralized its preparedness grants under FEMA's Grant Programs Directorate (GPD) to better integrate and coordinate grant management. The act also requires that FEMA develop a national preparedness system and assess preparedness capabilities to determine the nation's preparedness. GPD provides preparedness grants to state, local, tribal, and territorial governments, as well as transportation authorities, nonprofit organizations, and the private sector, to improve the nation's readiness in preventing, protecting against, responding to, recovering from and mitigating terrorist attacks, major disasters and other emergencies. In fiscal year 2017, DHS announced the availability of 10 preparedness grant programs totaling more than \$1.6 billion for fiscal year 2017. According to DHS, from fiscal years 2002 through 2017 the department has awarded over \$49 billion to a variety of DHS preparedness grant programs to enhance the capabilities of state, local, tribal, and territorial grant recipients to carry out the above activities related to terrorist attacks and other disasters.

¹The 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 (2006).

My testimony today covers our prior work on FEMA preparedness efforts from March 2011 through February 2016 and selected updates conducted in December 2017 and February 2018. This statement specifically addresses FEMA's efforts to manage preparedness grants and our prior recommendations.

To conduct our prior work, we reviewed relevant presidential directives, laws, regulations, policies, strategic plans, and key program documents; and interviewed federal, state, and local officials, among others. More detailed information on our scope and methodology can be found in each of the reports cited throughout this statement. To update our work, we interviewed relevant FEMA officials to obtain updates on efforts to improve coordination among preparedness grant programs. The work upon which this testimony is based was conducted 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

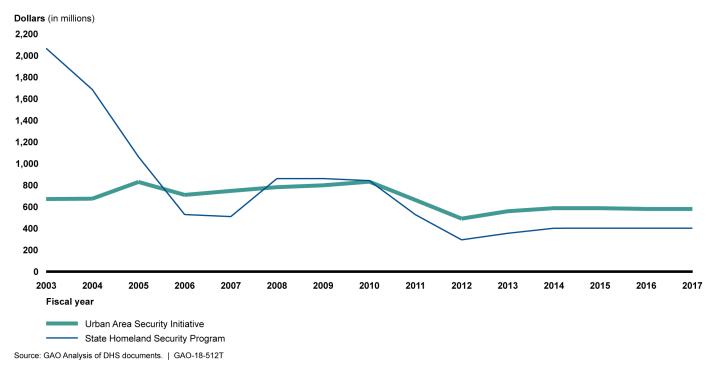
Over the past decade, the federal government has expanded financial assistance to public and private stakeholders for preparedness activities through various grant programs administered by DHS through its component agency, FEMA. Through these grant programs, DHS has sought to enhance the capacity of states, localities, and other entities, such as ports or transit agencies, to prevent, respond to, and recover from a natural or manmade disaster, including terrorist incidents. Two of the largest preparedness grant programs are the State Homeland Security Program and the Urban Areas Security Initiative.

- The State Homeland Security Program provides funding to support states' implementation of homeland security strategies to address the identified planning, organization, equipment, training, and exercise needs at the state and local levels to prevent, protect against, respond to, and recover from acts of terrorism and other catastrophic events. FEMA allocated \$402 million for the program in fiscal year 2017.
- The Urban Areas Security Initiative provides federal assistance to address the unique needs of high-threat, high-density urban areas, and assists the areas in building an enhanced and sustainable capacity to prevent, protect, respond to, and recover from acts of

terrorism. FEMA allocated \$580 million for the program in fiscal year 2017.

The State Homeland Security Program (SHSP), awarded to the nation's 56 states and territories, and the Urban Areas Security Initiative (UASI), awarded to urban areas based on DHS's risk assessment methodology, are the largest of the preparedness grant programs, accounting for about 60 percent of Fiscal Year 2017 grant funding. See figure 1 for a history of funding levels for these programs. Eligible candidates for the FY 2017 UASI program are determined through an assessment of relative risk of terrorism faced by the 100 most populous metropolitan statistical areas in the United States, in accordance with the Homeland Security Act of 2002, as amended.

Figure 1: State Homeland Security Grant Program and Urban Area Security Initiative: Annual Allocations, Fiscal Years 2003 through 2017



Note: Amounts presented are actual funding amounts, not adjusted for inflation, and are rounded.

FEMA Has
Strengthened Its
Coordination,
Oversight, and
Assessments of
Grants But
Challenges Remain in
the Effectiveness of
FEMA's Grant
Management

FEMA Has Taken Some Steps to Address Coordination Challenges Between Headquarters and Regional Offices, But Some Challenges Still Remain

In February 2016, we reported that FEMA has taken some steps, but has not fully addressed longstanding preparedness grant management coordination challenges between its headquarters and regional offices.² We found that for several preparedness grant programs, FEMA headquarters staff in GPD and regional staff share management and monitoring responsibilities. For example, we found that assessments by GPD and others since 2009 had recommended that regional offices, rather than headquarters offices, be responsible for managing and monitoring preparedness grants to avoid confusion and duplication, and to strengthen coordination with state and local grantees. Further, in July 2011, we found that GPD had efforts underway to regionalize grant management responsibilities and improve coordination of preparedness grants, and that these efforts were consistent with internal control standards.³ However, GPD officials reported that in 2012 it changed

²GAO, Federal Emergency Management Agency: Strengthening Regional Coordination Could Enhance Preparedness Efforts, GAO-16-38 (Washington, D.C.: Feb. 4, 2016).

³GAO, *FEMA Has Made Progress in Managing Regionalization of Preparedness Grants*, GAO-11-732R (Washington, D.C.: July 29, 2011). We reported, for example, that FEMA established a task force as an oversight and evaluation mechanism and developed an implementation plan, which includes a phased approach to piloting and delegating specific grants administration functions for preparedness grants to the regions and delineates an approach, including roles and responsibilities, for key implementation activities such as training and communications. On the basis of the results of our review of GPD's plans and efforts to regionalize grant management functions, we did not make recommendations at that time.

course and decided to continue sharing grant management roles between headquarters and regions, referred to as a hybrid grant management structure. GPD officials told us that they changed course because, among other things, estimates that the costs of regionalization would be greater than the annual savings FEMA identified in an earlier study and concerns that inconsistent program implementation would occur across the regions, and outweighed the potential benefits. GPD officials at that time said they had taken steps to address coordination challenges associated with this hybrid grant management structure.

However, we found in February 2016 that these challenges continue.⁴ For example, states and FEMA regional officials told us that GPD staffs in headquarters and regions did not always coordinate their monitoring visits, which can be disruptive to the state emergency management agency's day-to-day operations. FEMA regional officials also reported that GPD staffs in headquarters and regions sometimes provided inconsistent guidance to grantees. Further, while GPD officials identified some steps they plan to take to address the challenges, we found that GPD lacked a plan with time frames and goals for addressing them. We recommended that FEMA develop a plan with time frames, goals. metrics, and milestones detailing how GPD intends to resolve longstanding challenges associated with its existing hybrid grants management model, which divides responsibilities between regional and headquarters staff. FEMA, however, did not concur with our recommendation, stating that it disagreed with our characterization of longstanding challenges in managing preparedness grants. As we stated in the report, multiple assessments dating back to 2009 have reported challenges with the hybrid model. As also noted in our report, officials from four FEMA regional offices and officials from three states within those regions provided various examples of a lack of coordination between headquarters and regional staff in managing preparedness grants, including instances that took place in 2014 and as recently as September 2015.

In October 2017, FEMA developed a plan—the Milestone Action Plan—to track efforts aimed at improving coordination issues associated with its hybrid grants management model, as we recommended in February 2016. The plan divides responsibilities for the management of preparedness grants between regional and headquarters staff and

⁴Ibid, GAO-16-38.

describes completed, ongoing, and planned efforts taken by FEMA to improve grants management coordination along with steps taken, goals, and time frames, among other things. For example, the plan shows that FEMA developed and finalized the Monitoring Actions Tracker in August 2016, a tool shared by GPD in FEMA headquarters and staff in regional offices. Through the tracker, GPD headquarters and regional staffs are able to view planned and completed monitoring activities related to grants management, as well as the status of any open corrective actions. In addition to developing the Milestone Action Plan, FEMA officials described other efforts taken to improve coordination issues. For example, FEMA officials told us they increased the use of an online collaboration tool, which allows for instant information sharing between GPD and the regions. By taking these steps, FEMA should be better positioned to track and evaluate efforts to improve regional coordination, as we recommended in 2016.

FEMA Has Taken Steps to Increase Oversight Across Preparedness Grant Programs

FEMA has been delayed in addressing the need for improved coordination among grant programs identified in our prior work. Specifically, we found in February 2012 that multiple factors contribute to the risk of duplication among four FEMA preparedness grant programs the State Homeland Security Program, Urban Areas Security Initiative, Port Security Grant Program, and Transit Security Grant Program—as these programs share similar goals, fund similar projects, and provide funds in the same geographic regions.⁵ Further, we found that DHS's ability to track grant funding, specific funding recipients, and funding purposes varies among the programs, giving FEMA less visibility over some grant programs. Also, DHS's award process for some programs based allocation decisions on high-level, rather than specific, project information, which could further contribute to the risk of duplication. Although our February 2012 analysis identified no cases of duplication among a sample of grant projects, the above factors collectively put FEMA at risk of funding duplicative projects. As a result, in 2012, we included these challenges in our annual report on duplication, overlap,

⁵GAO, Homeland Security: DHS Needs Better Project Information and Coordination among Four Overlapping Grant Programs, GAO-12-303 (Washington, D.C.: Feb. 28, 2012).

and fragmentation in federal programs, agencies, offices, and initiatives. FEMA has not yet taken action to fully address our concerns.⁶

We recommended in February 2012 that as FEMA developed its new grants management information system (the Non-Disaster Grants Management System, or ND Grants at that time), that the agency collect project information with the level of detail needed to better position the agency to identify any potential unnecessary duplication within and across the four grant programs. In December 2012, FEMA officials reported that the agency intended to start collecting and analyzing project-level data from grantees in fiscal year 2014. Further, in December 2017, FEMA took actions to identify potential unnecessary duplication across four preparedness grant programs, as we recommended in February 2012. Although the development of FEMA's grants management information system is ongoing, FEMA issued guidance and adopted interim processes to help identify potential duplication across these preparedness grant programs until the system's capabilities are upgraded over the next several years. For example, in fiscal year 2014. FEMA modified a legacy grants data system to capture more robust project-level data—such as project budget data—for the Homeland Security Grant Program, which includes the State Homeland Security Grant Program and the Urban Areas Security Initiative.

In addition, in fiscal year 2017, FEMA procured a software visualization tool and developed a set of standard operating procedures to assist staff in identifying potentially duplicative projects. Specifically, the visualization tool will use grants award data from the Port Security Grant Program, the Transit Security Grant Program, and compare the grant programs named above to highlight ZIP codes that contain multiple projects. These projects will then be analyzed by FEMA officials. According to the standard operating procedure, if duplication is suspected within a particular geographic area, further collaborative reviews should be conducted in coordination with the Office of Chief Counsel to determine appropriate remedies. Using an interim approach to collect more specific project-level data during the grant application process and utilizing the new software visualization tool should help FEMA strengthen the administration and oversight of its grant programs until FEMA implements its long-term solution for the agency's grants management information system.

⁶GAO, 2012 Annual Report: Opportunities to Reduce Duplication, Overlap and Fragmentation, Achieve Savings, and Enhance Revenue, GAO-12-342SP (Washington, D.C.: Feb. 28, 2012).

FEMA Is Validating Grant Performance Data,

In the area of performance assessment, we reported in June 2013 on limitations in FEMA's ability to validate the performance data it collects.⁷ Specifically, we found that two of FEMA's preparedness grant programs—Emergency Management Performance Grants (EMPG) and Assistance to Firefighters Grants (AFG) programs—collect performance information through a variety of reporting mechanisms but face challenges in identifying verifiable program outcomes. These reporting mechanisms collect performance data used by FEMA regional offices and headquarters for different purposes. For example, headquarters focuses on the development of future program priorities and on reporting progress toward the National Preparedness Goal, while regions use program information to monitor primary grant recipients for compliance. DHS developed agency priority goals that reflect agency-wide, near-term priorities. According to FEMA officials, the EMPG and AFG programs have an indirect link to a DHS agency priority goal, as well as the National Preparedness Goal, because they support states' level of preparedness for disasters. According to FEMA officials, neither program has a standardized tool with which to validate the performance data that are self-reported by recipients; additionally, the regions are inconsistent in their approaches to verifying program performance data. We concluded that the absence of a formal established validation and verification procedure, as directed by the Office of Management and Budget's Circular No. A-11, could lead to the collection of erroneous performance data.

In our June 2013 report, we recommended that FEMA ensure that there are consistent procedures in place at the headquarters' office and regional level to ensure verification and validation of grant performance data that allow the agency to attest to the reliability of EMPG and AFG grant data used for reporting progress toward goals. DHS concurred with our recommendation and stated that FEMA would explore effective and affordable ways to verify and validate EMPG and AFG grant performance data. In April 2015, FEMA officials reported that FEMA was in the process of developing the data verification and validation checks of EMPG grantee performance reporting. For example, according to FEMA officials, they have revised reporting templates and uniform table definitions to make it easier for grantees to submit accurate, complete, and consistent

⁷GAO, Grants Performance: Justice and FEMA Collect Performance Data for Selected Grants, but Action Needed to Validate FEMA Performance Data, GAO-13-552 (Washington, D.C.: June 24, 2013).

information on programmatic activities such as the completion of training and exercise requirements. However, these processes have not yet been fully implemented, and FEMA officials have not yet provided similar tools and checklists for the AFG program. In March 2017, FEMA grants management staff provided us with documentation on the process FEMA uses to verify and validate grantee data from the EMPG and AFG grant programs, as we recommended. As a result of having a consistent approach to verifying data, FEMA's efforts should reduce the collection of erroneous performance data.

In addition, as part of our September 2016 review of FEMA Fire Assistance Grant program, we reported that FEMA officials said they planned to develop and implement a consolidated grant management system to integrate data used to manage fire grant programs with the data gathered for FEMA's other preparedness grants, and ultimately better measure the impact of fire grants on national preparedness efforts. Specifically, as we reported in May 2016, FEMA plans to develop and implement a new Grants Management Modernization system to provide agency-wide management for all of FEMA's disaster and preparedness grants. Further, we are currently performing an on-going review of FEMA's consolidated grant management system and plan to report on this effort later this year.

FEMA Has Made Progress Assessing Its Grant Preparedness Capabilities, but Continues to Face Challenges Developing a National Preparedness System

We also reported in March 2011 that FEMA needed to improve its oversight of preparedness grants by establishing a framework with measurable performance objectives for assessing urban area, state, territory, and tribal capabilities to identify gaps and prioritize investments.

Specifically, we recommended that FEMA complete a national preparedness assessment of capability gaps at each level based on tiered, capability-specific performance objectives to enable prioritization of grant funding. With such an assessment, FEMA could identify the potential costs for establishing and maintaining capabilities at each level and determine what capabilities federal agencies should provide. We reported in March 2013 that FEMA has made some progress in assessing

⁸ GAO Fire Grants: FEMA Could Enhance Program Administration and Performance Assessment

GAO-16-744 (Washington, D.C.: Sep 15, 2016).

⁹GAO, Opportunities to Reduce Potential Duplication in Government Programs, Save Tax Dollars, and Enhance Revenue, GAO-11-318SP (Washington, D.C.: Mar. 1, 2011).

its preparedness capabilities, but continued to face challenges developing a national preparedness system that could assist FEMA in prioritizing preparedness grant funding. 10 For example, in March 2012, FEMA issued the first National Preparedness Report, which describes progress made to build, sustain, and deliver capabilities. In April 2012, FEMA issued guidance on developing Threat and Hazard Identification and Risk Assessments (THIRA) to facilitate the self-assessments of regional, state, and local capabilities. FEMA requires state, territory, tribal, and urban area governments receiving homeland security funding to annually complete THIRAs and use the results to determine the resources required to achieve the capability targets they set for their jurisdiction. However, we found in March 2013 that FEMA faced challenges that may reduce the usefulness of these efforts. For example, the National Preparedness Report noted that while many programs exist to build and sustain preparedness capabilities, challenges remain in measuring their progress over time. According to the report, in many cases, measures do not yet exist to gauge the performance of these programs, either quantitatively or qualitatively.

FEMA has taken some steps to address our recommendation. Specifically, FEMA reported in February 2018 that the agency has developed capability-specific performance objectives that will enable a national preparedness assessment of capability gaps, but no such report has been issued at this time. FEMA reported that it plans on implementing new methodology for some core capabilities in December 2018 and for all core capabilities by December 2019, and will be able to provide complete results in 2020. In addition, FEMA reported that they are developing a new Threat and Hazard Identification and Risk Assessment (THIRA) methodology that will assist in measuring the effectiveness of state and urban areas' grant projects in reducing risk. According to FEMA, the new methodology will measure changes in state and urban area preparedness through the use of standardized capability targets and key indicators that will show how FEMA preparedness grants are being used to address gaps in capability targets. This should also lead to a better understanding of the Nation's overall preparedness. Regardless, as of February 2018, FEMA had taken steps to assess preparedness capabilities, but had not yet completed a national preparedness assessment with clear, objective, and quantifiable

¹⁰GAO, National Preparedness: FEMA Has Made Progress in Improving Grant Management and Assessing Capabilities, but Challenges Remain, GAO-13-456T (Washington, D.C.: Mar. 19, 2013).

capability requirements against which to assess preparedness, as we recommended. Developing such an assessment would help FEMA to identify what capability gaps exist at the federal level and what level of resources are needed to close such gaps.

Chairman Donovan, Ranking Member Payne, and Members of the Subcommittee, this concludes my prepared statement. I would be happy to respond to any questions you may have.

GAO Contacts and Staff Acknowledgments

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