



July 2023

# COAST GUARD

## Clarifying Emergency Policies and Assessing Needs Could Improve Unit Disaster Preparedness

# GAO Highlights

Highlights of [GAO-23-106409](#), a report to congressional committees

## Why GAO Did This Study

The Coast Guard's operational units in the field lead its disaster response efforts, which include rescuing persons in distress and responding to marine pollution incidents. These units are often situated along major waterways and coastlines throughout the U.S. As such, personnel stationed at these units may be vulnerable to a wide variety of natural disaster risks.

The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 includes a provision for GAO to review the availability of appropriate emergency supplies at Coast Guard units. This report examines the extent to which the Coast Guard (1) has clear policies and procedures for obtaining and maintaining emergency food and water for personnel at shore-based field units, and (2) has assessed and documented shore-based field units' needs for emergency food and water.

GAO reviewed Coast Guard policies and disaster response plans from across its field operations. GAO also conducted a nongeneralizable survey of 32 smaller, remotely located Coast Guard field units, and interviewed headquarters and field officials.

## What GAO Recommends

GAO is making three recommendations, including that the Coast Guard clarifies (1) emergency food and water requirements, and (2) procurement policies and procedures; and (3) ensures that its field units assess and document their emergency food and water needs. The Department of Homeland Security concurred with these recommendations.

View [GAO-23-106409](#). For more information, contact Heather MacLeod at (202) 512-8777 or [MacLeodH@gao.gov](mailto:MacLeodH@gao.gov).

July 2023

## COAST GUARD

### Clarifying Emergency Policies and Assessing Needs Could Improve Unit Disaster Preparedness

## What GAO Found

Although Coast Guard field personnel serve as first responders for natural and human-made disasters, agency policies about maintaining emergency food and water for field personnel are unclear. For example, Coast Guard disaster preparedness policies do not identify a clear requirement for field units to maintain emergency food and water for their personnel. As a result, many of the Coast Guard field units GAO surveyed (20 of 32) reported they did not maintain these supplies. Field personnel we met with or surveyed said they did not believe agency policy required their unit to maintain these supplies, or they were unsure about the policy. In addition, agency policies and procedures about procuring emergency food and water are unclear and incomplete. This has resulted in confusion among personnel at several levels of Coast Guard field operations. Clearer policies and procedures about obtaining and maintaining emergency food and water could enhance field unit disaster preparedness.

#### Emergency Food and Water at a Coast Guard Field Unit



Source: GAO. | GAO-23-106409

Coast Guard disaster preparedness efforts include various field unit plans and risk assessments, but the agency has not comprehensively assessed and documented field units' emergency food and water needs. Coast Guard policy does not require field units to assess and document these needs. Instead, unit commands are expected to assess and address risks and needs, as they deem appropriate. Almost two-thirds of the Coast Guard field units GAO surveyed (20 of 32) responded that their unit discussed emergency food and water needs. But these needs were generally not documented. Coast Guard headquarters officials agreed that assessing and documenting field unit emergency food and water needs is important. Without a clear assessment of these needs, Coast Guard field units may not be maintaining adequate supplies for their personnel, placing them at greater risk. Assessing and documenting emergency food and water needs, and maintaining supplies based on those needs can improve field unit disaster preparedness. This is especially important at units more likely to experience no- or short-notice events (e.g., earthquakes, tornados), or at units in remote areas without ready access to food and water through the local economy.

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July 25, 2023

The Honorable Maria Cantwell  
Chair  
The Honorable Ted Cruz  
Ranking Member  
Committee on Commerce, Science, and Transportation  
United States Senate

The Honorable Sam Graves  
Chairman  
The Honorable Rick Larsen  
Ranking Member  
Committee on Transportation and Infrastructure  
House of Representatives

The U.S. Coast Guard—a maritime military service within the Department of Homeland Security—conducts numerous missions and its operational units in the field serve as first responders who aid those impacted by natural and human-made disasters.<sup>1</sup> These Coast Guard field units are often situated along major waterways and coastlines in all regions of the country.<sup>2</sup> The tens of thousands of personnel stationed at these units may be vulnerable to a wide variety of natural disaster risks, such as hurricanes, tornados, winter storms, floods, earthquakes, and tsunamis,

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<sup>1</sup>The Coast Guard’s 11 primary statutory missions—identified in the Homeland Security Act of 2002, as amended—are: marine safety; search and rescue; aids to navigation; living marine resources; marine environmental protection; ice operations; ports, waterways and coastal security; drug interdiction; migrant interdiction; defense readiness; and other law enforcement. 6 U.S.C. § 468(a).

<sup>2</sup>For this report, we use the term “field units” to refer to the various types of shore-based units in the Coast Guard’s field organization, such as area commands, districts, sectors, and subordinate field units (subunit). We use the term “subunits” to refer to field units that are situated below the sector level. We discuss the Coast Guard’s field structure in more detail later in this report.

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which are projected to occur more frequently.<sup>3</sup> According to the Federal Emergency Management Agency, maintaining emergency food and water is essential to disaster preparedness. Without adequate emergency food and water, Coast Guard personnel at field units may be at risk of not being able to survive a disaster or subsequently contribute to response efforts.

The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 includes a provision for GAO to review the availability of appropriate emergency supplies at Coast Guard units.<sup>4</sup> This report examines the extent to which the Coast Guard: (1) has clear policies and procedures for obtaining and maintaining emergency food and water for personnel at shore-based field units; and (2) has assessed and documented shore-based field units' needs for emergency food and water.

To address our first objective, we reviewed Coast Guard policies and procedures related to emergency management, disaster preparedness, personnel readiness, financial management, and procurement. For example, we reviewed the Coast Guard's Emergency Management Manual, which provides the basis for emergency management planning policy across all agency missions and contingencies.<sup>5</sup> We also reviewed the Coast Guard's Financial Resource Management Manual, which outlines the agency's policies and procedures for using agency funds to purchase goods and services.<sup>6</sup>

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<sup>3</sup>According to the U.S. Global Change Research Program's Fourth National Climate Assessment, the observed and projected effects of climate change include increases in the incidence of extremely high temperatures, heavy precipitation events, and high tide flooding events along the coastline. Jay, A., D.R. Reidmiller, C.W. Avery, D. Barrie, B.J. DeAngelo, A. Dave, M. Dzaugis, M. Kolian, K.L.M. Lewis, K. Reeves, and D. Winner, 2018: Overview. In *Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II* [Reidmiller, D.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, K.L.M. Lewis, T.K. Maycock, and B.C. Stewart (eds.)]. U.S. Global Change Research Program, Washington, D.C.

<sup>4</sup>Pub. L. No. 117-263, § 11420, 136 Stat. 2395, 4126 (2022). This review focuses on the emergency food and water that Coast Guard field units have available for use in the event of a disaster or emergency for the purposes of personnel self-preservation and continuity of unit operations.

<sup>5</sup>Department of Homeland Security, U.S. Coast Guard, *Emergency Management Manual*, Vol. I (Washington, D.C.: Dec. 7, 2020).

<sup>6</sup>Department of Homeland Security, U.S. Coast Guard, *Financial Resource Management Manual* (Washington, D.C.: June 26, 2019).

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To address our second objective, we reviewed the Coast Guard manuals mentioned above, as well as documents related to agency disaster planning and risk assessment efforts. For example, we reviewed disaster response plans, such as all-hazards concept plans, for the Coast Guard's two area commands, nine districts, and nine selected sectors.<sup>7</sup>

To address both of our objectives, we interviewed Coast Guard officials to better understand agency policies and procedures about obtaining and maintaining emergency food and water for field personnel, and disaster planning and risk assessment efforts. Specifically, we met with headquarters officials from the Office of Emergency Management and Disaster Response, Office of Boat Forces, Office of General Law, Office of Safety and Environmental Health, and the Financial Management Policy Division. We also met with field officials from both area commands, all nine districts, and the nine selected sectors. The results from our sector interviews are not generalizable, but provide insights on field officials' understanding of agency policies and procedures, any challenges field units experienced obtaining and maintaining emergency food and water, and risk assessment efforts.

To further address both of our objectives, we surveyed 32 selected subordinate field units (subunit)—specifically, boat stations and aids to navigation teams.<sup>8</sup> We selected between two to four subunits from each of the Coast Guard's nine districts, prioritizing subunits that we identified as being at greater risk because they were not co-located with larger Coast Guard field units and were located in remote areas (outside of

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<sup>7</sup>The Coast Guard organizes its field structure under two area commands that oversee nine districts across the U.S., which are subdivided into 37 sectors. From each district, we selected a sector that had one or more subunits of a specific type that (1) were not co-located with larger field units such as a sector, base, or air station, and (2) were located outside of an urban area. One district did not have a sector with subunits that met both of these criteria, so we selected the parent sector of the two subunits in the district that met the first criteria. We discuss the types of Coast Guard subunits we focused on for this review later in this report.

<sup>8</sup>The Coast Guard had 165 boat stations and 64 aids to navigation teams, as of February 2023. Boat stations are traditionally associated with search and rescue, but may conduct the full range of Coast Guard missions. Aids to navigation teams are responsible for maintaining maritime navigational aids, such as lighthouses and buoys. These teams also support other agency missions and may be part of the initial response to natural disasters such as hurricanes and floods.

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urban areas).<sup>9</sup> See appendix I for additional details about our survey methodology, and appendix II for a copy of the survey instrument.

We assessed the information we collected about field units' understanding of agency policies and procedures related to obtaining and maintaining emergency food and water against the agency's emergency management, readiness, and risk management manuals.<sup>10</sup> We also assessed the collected information against federal internal control standards related to designing control activities.<sup>11</sup> In addition, we compared information we collected about Coast Guard efforts to assess and document field units' emergency food and water needs against agency policies related to disaster preparedness and risk assessment, as well as federal internal control standards related to documentation.<sup>12</sup>

We conducted this performance audit from December 2022 to July 2023 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.

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## Background

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### Coast Guard's Field Organization and Disaster Response Roles

The Coast Guard's field organization is divided into two area commands (Atlantic and Pacific), and subdivided into nine districts and 37 sectors (see fig. 1). Coast Guard sectors oversee smaller subunits, such as boat stations and aids to navigation teams. Each area command, district, sector, and subunit is responsible for managing its assets and personnel to accomplish the missions within its area of responsibility, including assisting with disaster response.

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<sup>9</sup>Subunits, such as boat stations and aids to navigation teams, are generally smaller (e.g. fewer personnel and resources) than their parent sector.

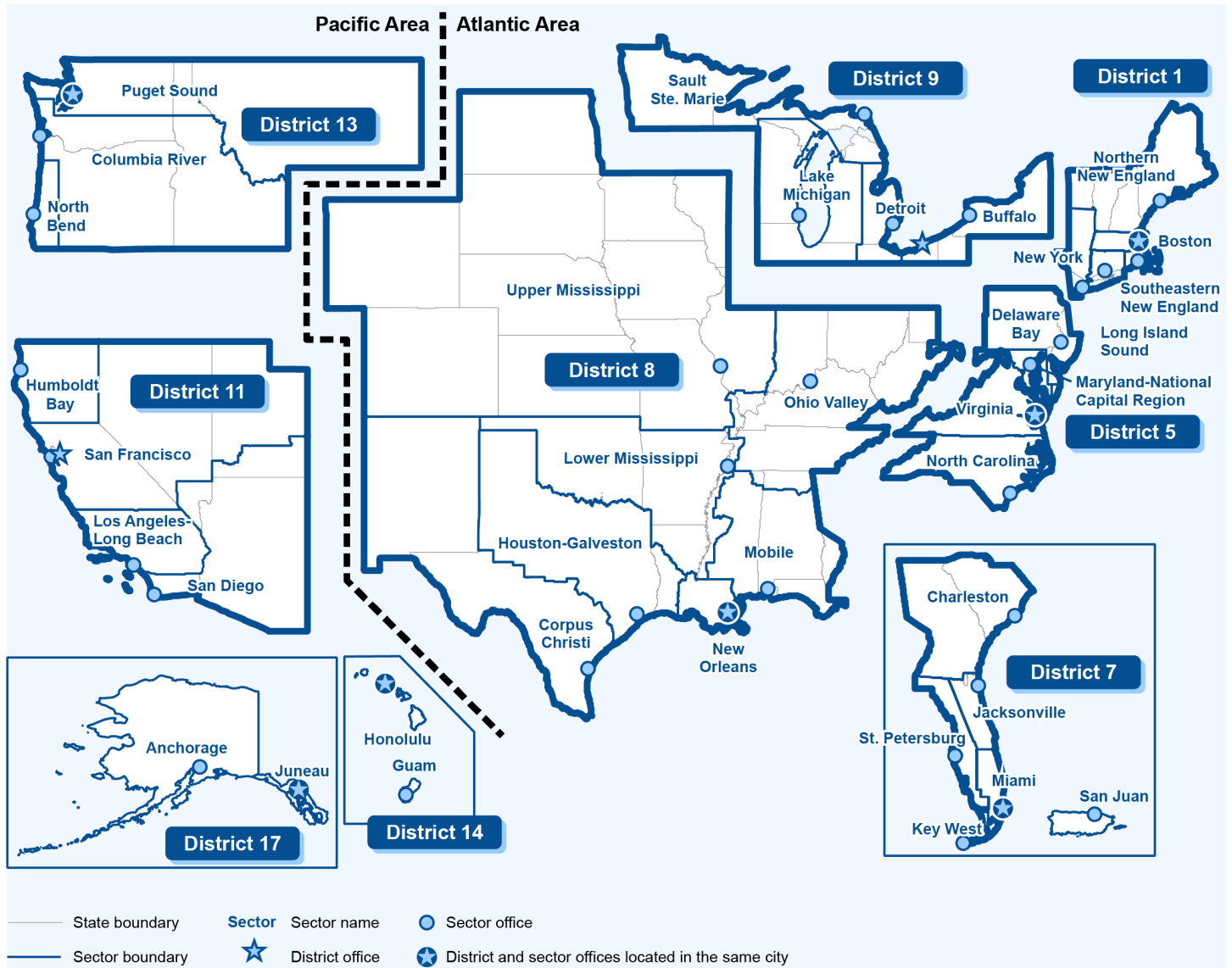
<sup>10</sup>Department of Homeland Security, U.S. Coast Guard, *Emergency Management Manual*, Vol. I; *Definition of Readiness* (Washington, D.C.: March 31, 2020); and *Risk Management* (Washington, D.C.: March 5, 2018).

<sup>11</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

<sup>12</sup>Department of Homeland Security, U.S. Coast Guard, *Financial Resource Management Manual*. [GAO-14-704G](#).



**Figure 1: Map of the U.S. Coast Guard Area Commands, Districts, and Sectors**



Source: GAO analysis of U.S. Coast Guard data. | GAO-23-106409

The Coast Guard's primary disaster-related roles include locating and rescuing persons in distress; identifying and addressing oil or hazardous material spills in the marine environment; and securing and reconstituting ports, waterways, and critical maritime infrastructure.<sup>13</sup> Figure 2 shows selected images of Coast Guard disaster response efforts for hurricanes Irma in 2017 and Ian in 2022.

**Figure 2: Selected Images of U.S. Coast Guard Disaster Response Efforts for Hurricanes Irma and Ian**

**Hurricane Irma (2017)**



Coast Guard rescue operations in Jacksonville, Florida after Hurricane Irma.

**Hurricane Ian (2022)**



Coast Guard flights over parts of western Florida to locate survivors and assess damage after Hurricane Ian.

Source: U.S. Coast Guard. | GAO-23-106409

<sup>13</sup>The Coast Guard is a primary agency for two emergency support functions under the National Response Framework—search and rescue, and oil and hazardous material response—and is a support agency for 10 functions, such as transportation and firefighting. According to the Federal Emergency Management Agency, the National Response Framework is a guide to how the nation responds to all types of disasters and emergencies. Emergency support functions are the primary incident response coordinating structures at the federal level. Primary agencies are designated based on their authorities, resources, and capabilities. Support agencies are assigned based on resources or capabilities in a given functional area.

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## Coast Guard's Disaster Preparedness Program

The Coast Guard prepares for a wide range of risks including natural or human-made disasters.<sup>14</sup> The Coast Guard's Office of Emergency Management and Disaster Response is responsible for managing and overseeing agency preparedness efforts for such events. These responsibilities include developing, maintaining, and overseeing emergency preparedness policy; providing preparedness guidance and direction to field units; and developing preparedness metrics and using them to monitor performance in the field.

To help ensure that it is able to carry out its disaster-related roles, the Coast Guard has implemented a preparedness cycle, which consists of five phases and represents the agency's process for achieving and improving mission readiness (see fig. 3).

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**Figure 3: U.S. Coast Guard Preparedness Cycle**



Source: U.S. Coast Guard. | GAO-23-106409

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<sup>14</sup>According to the Coast Guard, a natural disaster is a major adverse event resulting from natural processes of Earth (e.g., flood, hurricane, volcanic eruption, earthquake, or landslide). A human-made disaster is a major adverse event resulting from human intent, negligence, or error (e.g., equipment failure, power outage, industrial accident, or arson).

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- **Plan phase.** Coast Guard field units develop plans for risks that can be reasonably anticipated to occur within their areas of responsibility.
  - **Organize and equip phase.** Field units identify competencies personnel should have, develop appropriate operational structures, and acquire the equipment needed to deliver a specific capability.
  - **Train phase.** Field unit personnel acquire the skills and proficiency needed to perform key tasks through instruction and practice.
  - **Exercise and execute phase.** Field units test and validate plans, perform core capabilities, and demonstrate proficiency and competency in critical tasks.<sup>15</sup>
  - **Evaluate and improve phase.** Field units evaluate exercises and responses to real-world events to identify lessons learned and best practices, and develop recommendations for improvement.<sup>16</sup>

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## Coast Guard Policies and Procedures for Obtaining and Maintaining Emergency Food and Water Are Unclear

### Coast Guard Lacks a Clear Policy Requirement Regarding Emergency Food and Water for Field Units

Coast Guard disaster preparedness policies do not include a clear requirement for field units to maintain emergency food and water, and as a result, many of these units do not maintain these supplies. For example, the Coast Guard's Emergency Management Manual provides guidance stating that field units should be prepared to respond to a natural disaster with organic resources for up to 3 days without receiving outside support.<sup>17</sup> However, the guidance does not explicitly require these units to maintain emergency food and water. According to the manual, this

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<sup>15</sup>The Coast Guard manages its exercise program through its Integrated Preparedness Planning process. Through this annual process, the agency assesses risks and preparedness gaps, and develops a multiyear training and exercise schedule.

<sup>16</sup>The Coast Guard monitors the resolution of issues resulting from exercises and real-world events through its corrective action program. Field units may request funding through this program to help them address identified issues.

<sup>17</sup>Department of Homeland Security, U.S. Coast Guard, *Emergency Management Manual*, Vol. I.

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guidance represents the agency's desired state of preparedness. Other Coast Guard manuals contain similar guidance. For example, the Coast Guard's Financial Resource Management Manual recommends storing 3 days' worth of emergency food and water when planning for emergencies, and its Boat Operations and Training Manual states that field units should consider maintaining 3 days' worth of emergency food and water for disaster preparedness.<sup>18</sup>

Because Coast Guard policy documents provide guidance to field units for disaster planning but do not clearly identify a requirement to maintain emergency food and water, many of these units are not maintaining these supplies and there is confusion about what units are required to do. For example, almost two-thirds of the subunits we surveyed (20 of 32) indicated that they did not maintain emergency food or water.<sup>19</sup> Of these 20 subunits, 12 indicated that agency policy did not require them to maintain food or water, and 11 indicated that they were unsure if agency policy required them to maintain these supplies.<sup>20</sup>

Senior officials from the Office of Emergency Management and Disaster Response told us that the language in the Emergency Management Manual about "organic resources" to sustain a field unit's response for up to 3 days without outside support implies that these units should maintain emergency food and water. One of these officials added that food and water are key elements of disaster preparedness, and that field units should interpret the policy to mean that these supplies are required for disaster events. However, none of the area, district, or sector officials we met with believed that Coast Guard policy required field units to maintain emergency food and water. Furthermore, officials from all districts and the nine sectors we interviewed stated that they lack specific procedures to ensure that their subunits have adequate amounts of these supplies. Officials from four districts and four sectors explained that their unit does

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<sup>18</sup>Department of Homeland Security, U.S. Coast Guard, *Financial Resource Management Manual*; and *Boat Operations and Training Manual*, Vol. I (Washington, D.C.: Feb. 5, 2020). The Boat Operations and Training Manual prescribes policy, doctrine, and training requirements for field units with boat forces, such as boat stations and aids to navigation teams.

<sup>19</sup>These results relate to questions 3 and 9 from our survey. See appendix II for more information.

<sup>20</sup>The number of responses (12 and 11) exceed the total number of respondents (20) because this statement presents results from two questions from our survey—questions 6 and 12. See appendix II for more information.

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not oversee subunits' supplies because they are not required to maintain them.

Coast Guard field officials also identified the lack of a clear requirement to maintain emergency food and water as a contributor to challenges their field units had with obtaining and maintaining these supplies. Specifically, field officials identified challenges with sufficient or consistent funding, adequate staffing, and sufficient storage space. We found that many of the field units we interviewed and surveyed reported experiencing these same challenges. For example:

- **Funding.** Officials from three of nine districts and eight of the nine sectors stated that their unit or their subunits did not have enough or consistent unit funds to purchase emergency food or water. In addition, almost half of our surveyed subunits (15 of 32) indicated that they did not have enough or consistent unit funds to purchase these supplies.<sup>21</sup>
- **Staffing.** Officials from four districts, four sectors, and almost half of our surveyed subunits (14 of 32) indicated that their unit or their subunits did not have staff to properly manage emergency food or water inventories, which could result in expired and unusable supplies.<sup>22</sup>
- **Storage space.** Officials from five districts and six sectors stated that their unit or their subunits did not have space to store emergency food or water. In addition, over one-third of our surveyed subunits (13 of 32) indicated that they lacked space to store these supplies.<sup>23</sup>

Coast Guard headquarters officials stated that they were aware of these challenges and examined each of them on a case-by-case basis. However, headquarters and field officials noted that if agency policy included a clear emergency food and water requirement, it would be

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<sup>21</sup>These results relate to questions 8 and 14 from our survey. See appendix II for more information.

<sup>22</sup>The survey results relate to questions 8 and 14 from our survey. See appendix II for more information.

<sup>23</sup>These results relate to questions 8 and 14 from our survey. See appendix II for more information.

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easier for field units to justify requests for financial, staff, and space resources to address these challenges.<sup>24</sup>

Given the confusion and challenges related to obtaining and maintaining emergency food and water, headquarters officials agreed that the Coast Guard's emergency management policy could more clearly identify what field units are required to do. Coast Guard officials stated that requiring all field units to maintain a minimum amount of emergency food and water at all times might not be sensible given the variety of factors that influence what each unit might need to maintain. Instead, headquarters officials said they are considering an update to agency policy to include a general requirement for all field units to maintain the amount of emergency food and water that addresses their risks. Headquarters officials also recognized that all relevant manuals should reflect the updated emergency food and water policy and cross-reference each other to better ensure clarity. However, this effort is still under consideration and not yet initiated.

In addition to the above policies, the Coast Guard's readiness and risk management policies discuss the importance of addressing nutritional and physiological needs of personnel to ensure operational readiness and crew endurance, resilience, and safety.<sup>25</sup> Standards for Internal Control in the Federal Government also state that management should design control activities, which includes policies, to achieve objectives and respond to risks.<sup>26</sup> By updating its disaster preparedness policies to clearly identify requirements about maintaining emergency food and water at field units, the Coast Guard would be better able to achieve its desired state of disaster preparedness.

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<sup>24</sup>For example, according to headquarters officials, to address funding challenges, field units may request funding from various sources, including the Coast Guard's corrective action program. To address staffing challenges, field officials suggested that field units could request the support of Coast Guard Auxiliarists (volunteer personnel) or Reservists (part-time military personnel), if policy allowed for this. Regarding storage space, headquarters officials noted that a cargo container may be a suitable option for some field units, and that units can request to purchase one.

<sup>25</sup>Department of Homeland Security, U.S. Coast Guard, *Definition of Readiness; and Risk Management*.

<sup>26</sup>[GAO-14-704G](#).

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## Coast Guard Lacks Clear Policies and Procedures for Procuring Emergency Food and Water

The Coast Guard's key document outlining its policies and procedures regarding the purchase of emergency food and water for its personnel is unclear and incomplete. As a result, Coast Guard field units have experienced challenges obtaining these supplies. Specifically, the Coast Guard's Financial Resource Management Manual, which officials identified as their key source for information on allowable uses of funds, authorizes the purchase of emergency food under certain circumstances.<sup>27</sup> However, this manual also contains unclear and incomplete guidance regarding the emergency food and water that field units are authorized to purchase and how to obtain approval for purchase requests. For example, the manual:

- prohibits bottled water purchases except under limited circumstances;<sup>28</sup>
- limits emergency food purchases to the field unit's duty section— personnel who remain at the unit during emergencies to respond to mission demands; and
- recommends that field units maintain a 3-day supply of emergency food and water.

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<sup>27</sup>Department of Homeland Security, U.S. Coast Guard, *Financial Resource Management Manual*.

<sup>28</sup>Specifically, the manual identifies the three circumstances as: (1) no potable water is available within 200 feet of the place where people normally work; (2) the water is contaminated (a local health official or the applicable Coast Guard safety and environmental health officer determines that the water is unfit due to noncompliance with recommended maximum contaminant levels); or (3) there is an urgent need for water that could not otherwise be met. Other Coast Guard guidance states that the third circumstance applies to deployed personnel who are dependent on the Coast Guard for a water source.



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### Emergency Food and Water at a Coast Guard Boat Station

To prepare for its natural disaster risks, a Coast Guard boat station in the Pacific Northwest stored more than 3 days' worth of freeze-dried food and bottled water for all unit personnel.



Source: GAO. | GAO-23-106409

Field personnel we met with have interpreted this guidance to limit what they can purchase, and how much, in advance of emergencies.<sup>29</sup> In contrast to the manual language, headquarters officials from the Office of General Law stated that field units are authorized to purchase emergency food and water, including bottled water, for more than just the duty section and which lasts more than 3 days, with the proper written and approved justification (see sidebar). But, as these officials and others from the Financial Management Policy Division acknowledged, neither the Financial Resource Management Manual nor its supporting procedures manual clearly state that Coast Guard policy allows these purchases for disaster preparedness.<sup>30</sup>

These manuals also do not specify or provide examples of the types of justification that field units can provide to support these types of purchase requests, or the process for obtaining approval. For instance, Coast Guard headquarters officials explained that they consider each request individually, and would accept local, state, and Federal Emergency Management Agency disaster preparedness guidance as support for purchase requests that exceeded the written limitations or recommendations. But this information is not included in the Financial Resource Management Manual or its supporting procedures manual. Coast Guard headquarters officials noted that in June 2022 they had provided procurement officials in the field with information about purchasing emergency food and water, including a template for requests and a frequently asked questions document. However, this information is not included in the Financial Resource Management Manual or its supporting procedures manual.

The Coast Guard's unclear emergency food and water procurement policies and procedures have caused confusion and uncertainty among several levels of Coast Guard field operations. Specifically, field personnel we met with and surveyed consistently identified lack of clarity in the Financial Resource Management Manual or the manual's listed

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<sup>29</sup>For example, a field unit may need emergency food and water for additional personnel at the unit beyond the regular duty section or for an event that may last for more than 3 days.

<sup>30</sup>The Financial Resource Management Manual has a supporting procedures manual, Financial Resource Management Manual—Procedures, which includes detailed responsibilities, procedures, and definitions. Department of Homeland Security, U.S. Coast Guard, *Financial Resource Management Manual – Procedures* (Washington, D.C.: June 26, 2019).

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restrictions as the key limitations prohibiting them from purchasing bottled water or food in advance of disasters. For example, over half of our surveyed subunits (18 of 32) indicated that Coast Guard policy prohibited the purchase of emergency food or water, or they were unsure if agency policy prohibited the purchase of these supplies.<sup>31</sup> Further, officials from seven of nine districts and five of the nine sectors told us that they or personnel at their subunits believed these procurement policies or procedures were unclear.

Officials from seven districts and eight sectors stated that procuring these supplies was challenging because of the Coast Guard's unclear policies and multistep approval process for emergency food and water requests. For example, officials from one sector stated that if the Financial Resource Management Manual had more specific policies regarding what field units are able to purchase, that would help streamline the process. In addition, about one-third of our surveyed subunits (11 of 32) indicated that the process for obtaining approval to purchase emergency food or water was difficult.<sup>32</sup>

The Coast Guard's Emergency Management Manual states that preparedness is critical to successful incident management and crisis response, and that emergency management requires, most critically, well-prepared incident responders.<sup>33</sup> Further, Standards for Internal Control in the Federal Government state that management should effectively document internal control activities to establish and communicate the who, what, when, where, and why of internal control execution to personnel responsible for internal controls.<sup>34</sup>

In March 2023, officials from the Coast Guard's Financial Management Policy Division, who are responsible for managing the Financial Resource Management Manual, acknowledged that the manual did not fully reflect what field units are allowed to purchase and how to obtain approval. They also agreed that Coast Guard policies and procedures should be clarified and cross-referenced across manuals, where appropriate. These officials

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<sup>31</sup>These results relate to questions 8 and 14 from our survey. See appendix II for more information.

<sup>32</sup>These results relate to questions 8 and 14 from our survey. See appendix II for more information.

<sup>33</sup>Department of Homeland Security, U.S. Coast Guard, *Emergency Management Manual*, Vol. I.

<sup>34</sup>[GAO-14-704G](#).

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stated that they are currently updating the Financial Resource Management Manual and its supporting procedures manual, and plan to clarify the emergency food and water procurement policies and procedures as part of this process. However, officials could not tell us when they planned to complete this effort. Given the confusion and uncertainty among field personnel, clarifying these procurement policies and procedures would better position field units to obtain the emergency food and water they may need.

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## Coast Guard Has Not Comprehensively Assessed and Documented Field Units' Emergency Food and Water Needs

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### Coast Guard Disaster Risk Assessments and Plans Do Not Address Field Units' Emergency Food and Water Needs

Coast Guard's disaster preparedness efforts include its field units, such as areas, districts, sectors, and subunits, developing various types of risk assessments and operational plans (see table 1). However, there is no requirement to assess and document emergency food and water needs as part of these assessments and plans. Specifically, headquarters officials stated that there is no overarching requirement for field units to assess and document their emergency food and water needs. Our review of Coast Guard guidance and a selection of field unit operational plans also showed no requirement to assess and document emergency food and water needs.<sup>35</sup>

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<sup>35</sup>We reviewed agency guidance for all-hazards concept plans, continuity of operations plans, emergency management assessments, and facility emergency action plans. We also reviewed all-hazards concept plans for both areas and all nine districts, and reviewed severe weather plans for six of our nine selected sectors. While these plans did not include an assessment of field unit emergency food and water needs, many of them included recommendations to obtain emergency food or water prior to a disaster.

**Table 1: Coast Guard Field Unit Documented Risk Assessments and Operational Plans for Natural Disasters**

Name	Description	Requirement and relevant field unit
All-hazards concept plan	Describes, among other things, a field unit’s operational response plans for natural disaster risks. Units are to exercise and review their plan annually and formally update it every 3 years.	Required for areas and districts
Continuity of operations plan	Details a field unit’s plan for maintaining continued operations from alternative locations when its primary operating site is rendered unusable. Units are to exercise and review their plan annually and formally update it every 3 years.	Required for areas, districts, sectors, and marine safety units with captain of the port authority <sup>a</sup>
Emergency management assessment	Identifies a field unit’s top risks and preparedness gaps, among other things. This assessment originates at the sector and is the first step of the Coast Guard’s annual Integrated Preparedness Planning process. District officials are to periodically visit sectors to ensure that risks are appropriately assessed.	Required for areas, districts, sectors, and marine safety units with captain of the port authority <sup>a</sup>
Severe weather plan or checklist	Details the tasks for a field unit to conduct when preparing for and responding to severe weather incidents. Units may review and update these plans annually and after exercises or real-world events.	Developed voluntarily by sectors and subunits
Facility emergency action plan	Outlines procedures and tasks for a field unit to follow in response to events that could reasonably occur in the workplace or in its geographic location. Coast Guard headquarters personnel are to periodically visit units to ensure they are appropriately addressing their risks. Units are to review plans annually and with any significant change to their facilities or threats, and update them accordingly.	Required for all field units

Source: GAO analysis of U.S. Coast Guard information. | GAO-23-106409

<sup>a</sup>A Coast Guard marine safety unit is an operational command that provides marine safety, security, and environmental protection oversight, compliance, and enforcement. The captain of the port is the Coast Guard officer designated by the Commandant to enforce, within his or her respective area of responsibility, port safety, security, and maritime environmental protection regulations, including, regulations for the protection and security of vessels, harbors, and waterfront facilities.

### Subunits Generally Discuss but Do Not Assess and Document Their Emergency Food and Water Needs

Coast Guard officials told us that subunits—smaller field units that are situated below the sector level—generally consider their emergency food and water needs through discussions about disaster risks. However, their determinations about the need for these supplies are generally not formally assessed and documented. Our survey of 32 subunits confirmed this practice as 20 of them indicated that their command cadre determined, through risk discussions, the amount of emergency food or water to maintain at the subunit.<sup>36</sup> Nine subunits indicated that they

<sup>36</sup>These results relate to questions 7 and 13 from our survey. See appendix II for more information.

conducted a formal, documented risk assessment that included an assessment of emergency food and water needs.<sup>37</sup>

Officials from the Coast Guard’s Office of Emergency Management and Disaster Response also said that field units, including subunits, are not required to assess and document their emergency food and water needs. Instead, according to these officials and field personnel we met with, a field unit’s command staff is ultimately responsible for unit preparedness, and is expected to ensure that risks and needs are assessed and addressed, as the command deems appropriate. Coast Guard headquarters and field officials explained that field units should assess their own emergency food and water needs because these needs can vary based on several unit-specific factors. Some of the factors officials noted include the types of disasters a field unit may experience, its specific facilities, its location, and the ability of personnel to evacuate the unit, if necessary (see table 2).

**Table 2: Selected Factors that Influence a Field Unit’s Need to Maintain Emergency Food and Water**

Factor	Field unit may need to maintain emergency food and water?	
	Yes	No
Type of disaster risk	Unit faces risk of short- or no-notice events, such as earthquakes and tsunamis, and may not be able to obtain food and water immediately before or after the event.	Unit faces risk of advance notice events, such as hurricanes and severe storms, and is likely to be able to obtain food and water in advance.
Unit facilities <sup>a</sup>	Unit does not have onsite dining facility or exchange that maintains food and water for daily use or sale.	Unit has onsite dining facility or exchange that has sufficient food and water that personnel can use in an emergency, or has access to alternate water sources, such as a well.
Unit location	Unit is located in a remote area and has limited access to food and water through the local economy.	Unit is located in a non-remote area and has ready access to food and water through the local economy.
Unit evacuation plan	Unit intends to maintain a small crew of critical personnel or have personnel shelter in place during a disaster.	Unit intends to evacuate all personnel prior to a disaster.

Source: GAO analysis of interviews with Coast Guard officials. | GAO-23-106409

<sup>a</sup>According to the Coast Guard, field unit dining facilities provide nutritious, well-balanced meals to all authorized personnel and Coast Guard exchanges sell a wide variety of merchandise, including food and drink, to authorized personnel.

<sup>37</sup>These results relate to question 15 from our survey. See appendix II for more information.

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Field officials we met with explained how these factors might affect a field unit's need to maintain emergency food and water. For example,

- Officials from two West Coast sectors said that their unit and their subunits may need to stockpile emergency supplies in advance of a no-notice disaster such as an earthquake because supplies could be very difficult to obtain after an event. In contrast, officials from an East Coast sector said its vulnerable subunits would typically have sufficient advance notice to prepare or evacuate, if faced with an event such as a major hurricane.
- District and sector officials we met with stated that some field units may not need emergency food because they would rely on food in their dining facilities. In addition, officials in one district said that its field units may not need bottled water if they have access to alternate fresh water sources such as a lake.
- Officials from a sector in the Northeast told us that it would be difficult to deliver supplies to some remote subunits in the event of a disaster, whereas less remote subunits could access their larger local economy to prepare for a disaster.
- Officials from two East Coast sectors stated that their unit would maintain a small crew of critical personnel during a hurricane event while officials from a Gulf Coast sector stated that their unit would evacuate all personnel from certain subunits before a disaster because of the significant dangers to those subunits.

The Coast Guard's Financial Resource Management Manual states that when preparing for emergencies involving Coast Guard facilities the anticipated risks should be assessed and appropriate actions taken such as acquiring sufficient emergency food and water.<sup>38</sup> While discussions among field unit command staff to consider emergency food and water needs are important, if not documented, the key decisions and knowledge gained may be lost given the agency's rotation policy, which typically moves personnel every 3 to 4 years. This could affect unit preparedness and put personnel at risk. Further, Standards for Internal Control in the Federal Government state that documentation provides a means to retain

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<sup>38</sup>Department of Homeland Security, U.S. Coast Guard, *Financial Resource Management Manual*.

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organizational knowledge and mitigate the risk of having that knowledge limited to a few personnel.<sup>39</sup>

Officials from the Coast Guard's Office of Emergency Management and Disaster Response agreed that assessing and documenting field units' emergency food and water needs is important. However, over one-third of our surveyed subunits (12 of 32) indicated that their subunit does not have sufficient staff or the expertise to conduct an assessment of these needs.<sup>40</sup> Further, headquarters officials and some district and sector officials stated that requiring subunits to assess and document these needs would add to their already high administrative burden.

However, the Coast Guard could lessen the administrative burden on subunits, and other field units, by including the assessment of emergency food and water needs into an existing risk assessment that field units are required to conduct. To further limit the burden on subunits specifically, headquarters officials noted that they are examining how sector staff could be better leveraged to assist their subunits with assessments. This consideration is consistent with our survey results, which showed that over half of the subunits that had not previously received sector assistance with assessing emergency food and water needs (12 of 22) indicated that sector support would be helpful.<sup>41</sup>

Coast Guard headquarters officials said they are considering an update to agency policy to include a general requirement for all field units to assess their risks to determine their emergency food and water needs. However, this effort is still under consideration and not yet initiated. Without a clear assessment of emergency food and water needs, Coast Guard field units may not be maintaining adequate supplies, placing these personnel at risk. This is especially true for personnel at field units more likely to experience no- or short-notice events (e.g., earthquakes, tsunamis, tornados), and those in more remote locations without ready access to food and water through the local economy. Further, by documenting field units' assessed emergency food and water needs, Coast Guard

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<sup>39</sup>[GAO-14-704G](#).

<sup>40</sup>These results relate to questions 8 and 14 from our survey. See appendix II for more information.

<sup>41</sup>These results relate to questions 16 and 16a from our survey. See appendix II for more information.

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personnel would be better able to maintain awareness of unit disaster preparedness needs when staff rotate to new assignments.

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## Conclusions

Thousands of Coast Guard personnel stationed at field units serve as first responders for natural disasters and other emergencies. However, if not prepared with basic emergency supplies such as food and water, the personnel at these units could become victims of a disaster rather than survivors and responders. Unclear agency policies about maintaining and procuring emergency food and water, and the lack of a requirement to assess and document field unit needs for these supplies have all contributed to increasing this risk to Coast Guard personnel. Clearly identifying policy requirements about maintaining emergency food and water, and clarifying agency procedures for procuring these supplies would help reduce the confusion and uncertainty about steps field units can take to better prepare for a disaster or emergency.

Once the policy requirements about maintaining food and water are identified, it is also important for field units to assess and document their specific emergency food and water needs to ensure the supplies they request address their assessed risks. This is particularly critical for units that may be at greater risk—such as those in remote regions or in locations with a greater likelihood of experiencing severe no- or short-notice events such as an earthquake or tornado. Collectively, taking these steps would help to enhance field unit preparedness and better equip the Coast Guard's frontline personnel to survive a major disaster.

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## Recommendations for Executive Action

We are making the following three recommendations to the U.S. Coast Guard:

The Commandant of the U.S. Coast Guard should ensure that agency disaster preparedness policies are updated to clearly identify requirements about maintaining emergency food and water at field units. (Recommendation 1)

The Commandant of the U.S. Coast Guard should ensure that the Financial Resource Management Manual and its supporting procedures manual are updated to clarify policies and procedures for procuring emergency food and water. (Recommendation 2)

The Commandant of the U.S. Coast Guard should ensure that field units assess and document their emergency food and water needs in accordance with updated agency disaster preparedness policies. (Recommendation 3)



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## Agency Comments and Our Evaluation

In June 2023, we provided a draft of this report to the Department of Homeland Security for review and comment. In its comments, reproduced in appendix III, the department agreed with all three of our recommendations and described the Coast Guard's planned actions to address all of them by July 31, 2024. The department also provided technical comments, which we incorporated into the report as appropriate.

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We are sending copies of this report to the appropriate congressional committees and the Secretary of Homeland Security. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at 202-512-8777 or [MacLeodH@gao.gov](mailto:MacLeodH@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.



Heather MacLeod  
Director, Homeland Security and Justice

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# Appendix I: Objectives, Scope, and Methodology

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The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 includes a provision for GAO to review the availability of appropriate emergency supplies at Coast Guard units.<sup>1</sup> This report examines the extent to which the Coast Guard: (1) has clear policies and procedures for obtaining and maintaining emergency food and water for personnel at shore-based field units; and (2) has assessed and documented shore-based field units' needs for emergency food and water.

To address our first objective, we reviewed the Coast Guard's Emergency Management Manual and Financial Resource Management Manual.<sup>2</sup> The Emergency Management Manual provides the basis for emergency management planning policy across all agency missions and contingencies. The Financial Resource Management Manual outlines the agency's financial management policies and procedures related to using agency funds to purchase services and goods, such as emergency food and water. We also reviewed additional Coast Guard policies and procedures related to unit disaster preparedness, personnel readiness, and procurement.<sup>3</sup>

To address our second objective, we reviewed the agency manuals mentioned above, as well as documents related to Coast Guard disaster planning and risk assessment efforts. For example, we reviewed documentation on the Coast Guard's Integrated Preparedness Planning process, through which the agency assesses risks and preparedness gaps, and develops a multiyear training and exercise schedule. We also

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<sup>1</sup>Pub. L. No. 117-263, § 11420, 136 Stat. 2395, 4126 (2022). This review focuses on the emergency food and water that Coast Guard field units have available for use in the event of a disaster or emergency for the purposes of personnel self-preservation and continuity of unit operations. For this report, we use the term "field units" to refer to the various types of shore-based units in the Coast Guard's field organization, such as area commands, districts, sectors, and subordinate field units (subunit). We use the term "subunits" to refer to field units that are situated below the sector level.

<sup>2</sup>Department of Homeland Security, U.S. Coast Guard, *Emergency Management Manual*, Vol. I (Washington, D.C.: Dec. 7, 2020); and *Financial Resource Management Manual* (Washington, D.C.: June 26, 2019).

<sup>3</sup>Department of Homeland Security, U.S. Coast Guard, *Boat Operations and Training Manual*, Vol. I (Washington, D.C.: Feb. 5, 2020); *Definition of Readiness* (Washington, D.C.: March 31, 2020); *Risk Management* (Washington, D.C.: March 5, 2018); and *Financial Resource Management Manual – Procedures* (Washington, D.C.: June 26, 2019). The Boat Operations and Training Manual prescribes policy, doctrine, and training requirements for field units with boat forces, such as boat stations and aids to navigation teams. The Financial Resource Management Manual—Procedures includes detailed financial management responsibilities, procedures, and definitions.

reviewed operational disaster response plans for the Coast Guard's two area commands, nine districts, and nine selected sectors.<sup>4</sup> Specifically, we reviewed all-hazards concept plans for both area commands and all nine districts, and examples of severe weather plans and checklists for six of our nine selected sectors.

To address both of our objectives, we interviewed Coast Guard headquarters officials to better understand agency policies and procedures about obtaining and maintaining emergency food and water for field personnel, and disaster planning and risk assessment efforts. Specifically, we met with officials from the Office of Emergency Management and Disaster Response, Office of Boat Forces, Office of General Law, Office of Safety and Environmental Health, and the Financial Management Policy Division. We also met with field officials from the Coast Guard's area commands, all nine districts, and the nine sectors to better understand field officials' understanding of relevant agency policies and procedures, any challenges field units experienced with obtaining and maintaining emergency food and water for personnel, and field unit efforts to assess disaster risks and needs for these supplies.<sup>5</sup> The results from our sector interviews are not generalizable, but provide insights on agency efforts and field unit challenges.

To further address both of our objectives, we surveyed 32 selected subordinate field units (subunit)—specifically, boat stations and aids to

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<sup>4</sup>The Coast Guard organizes its field structure under two area commands that oversee nine districts across the U.S., which are subdivided into 37 sectors. From each district, we selected a sector that had one or more subunits of a specific type that (1) were not co-located with larger field units such as a sector, base, or air station, and (2) were located outside of an urban area. District 14 did not have a sector with subunits that met both of these criteria, so we selected the parent sector of the two subunits in the district that met the first criteria. We selected a sector from each district to capture the variation in field units' natural disaster risks and preparedness efforts. We discuss the types of Coast Guard subunits we focused on for this review later in this appendix.

<sup>5</sup>We interviewed emergency management staff from Sectors Northern New England (District 1), Virginia (District 5), Charleston (District 7), New Orleans (District 8), Buffalo (District 9), San Francisco (District 11), Columbia River (District 13), Honolulu (District 14), and Anchorage (District 17).

navigation teams—from across the Coast Guard’s nine districts.<sup>6</sup> We selected between two to four subunits from each district, prioritizing subunits that (1) were not co-located with a Coast Guard sector, air station, or base, and (2) were located in remote areas (outside of urban areas).<sup>7</sup> We considered subunits that met these two criteria as being more vulnerable to the impacts of a natural disaster. We excluded subunits that were co-located with sectors, air stations, or bases because these types of field units are larger, in numbers of employees, and therefore generally better-resourced elements of the Coast Guard’s field organization.<sup>8</sup> We prioritized selecting subunits that were located further from urban areas.<sup>9</sup>

We used the survey to obtain information about selected subunits’ understanding of relevant Coast Guard policy and procedures, any challenges the subunits experienced with maintaining emergency food and water, and the subunits’ efforts to assess disaster risks and needs for these supplies, among other things. The results of our survey are not generalizable to all Coast Guard subunits. However, they provide insights into the extent to which selected subunits are assessing emergency food and water needs and maintaining these supplies. They further provide illustrative examples of some challenges selected subunits may face in

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<sup>6</sup>Coast Guard sectors oversee smaller subunits. We focused our survey population selection on two types of Coast Guard subunits—boat stations and aids to navigation teams—because they are the two most numerous of the Coast Guard’s field units. The Coast Guard had 165 boat stations and 64 aids to navigation teams, as of February 2023. Boat stations are traditionally associated with search and rescue, but they may perform the full range of Coast Guard missions. Aids to navigation teams are responsible for maintaining maritime navigational aids, such as lighthouses and buoys. These teams also support other agency missions and may be part of the initial response to natural disasters like hurricanes and floods.

<sup>7</sup>We were able to select four subunits from Districts 1, 5, 7, 8, 9, 11, and 13, and only two subunits from Districts 14 and 17. District 14 did not have any subunits that met both of our selection criteria. However, there were two subunits in District 14 that met our first criteria, so we selected those subunits for our survey. District 17 only had one subunit that met both of our selection criteria, so we selected that subunit and another subunit that met our first criteria.

<sup>8</sup>We did not exclude boat stations and aids to navigation teams that were co-located with sector field offices, which are subunits of sectors. In general, sector field offices provide various types of support (e.g., operational, logistical, etc.) to other Coast Guard subunits.

<sup>9</sup>According to the U.S. Department of Agriculture’s Economic Research Service, small population size and geographic remoteness often cause economic and social challenges. For example, provision of services, such as groceries and health care, require increased efforts in very rural, remote communities.

addressing their needs. Table 3 shows the subunits that we selected for our survey.

**Table 3: U.S. Coast Guard Boat Stations and Aids to Navigation Teams Selected for GAO’s Survey**

District	Name	State	Co-located with sector, air station, or base?	Located outside urban area?	Distance to closest urban area (in miles)
1	Station Eastport	Maine	No	Yes	89
	Station Jonesport	Maine	No	Yes	61
	Aids to Navigation Team Southwest Harbor <sup>a</sup>	Maine	No	Yes	43
	Station Rockland	Maine	No	Yes	36
5	Station Hatteras Inlet	North Carolina	No	Yes	64
	Station Wachapreague	Virginia	No	Yes	54
	Aids to Navigation Team Chincoteague <sup>a</sup>	Virginia	No	Yes	32
	Aids to Navigation Team Crisfield	Maryland	No	Yes	31
7	Station Marathon	Florida	No	Yes	43
	Station Yankeetown	Florida	No	Yes	21
	Station Port Canaveral	Florida	No	Yes	17
	Aids to Navigation Team Tybee	Georgia	No	Yes	14
8	Aids to Navigation Team Venice	Louisiana	No	Yes	53
	Aids to Navigation Team Eufaula	Alabama	No	Yes	41
	Station Grand Isle	Louisiana	No	Yes	26
	Station Dauphin Island	Alabama	No	Yes	23
9	Station Bayfield	Wisconsin	No	Yes	62
	Station Tawas	Michigan	No	Yes	49
	Station St. Ignace	Michigan	No	Yes	35
	Station Sturgeon Bay	Wisconsin	No	Yes	28
11	Station Rio Vista	California	No	Yes	14
	Station Bodega Bay	California	No	Yes	12
	Aids to Navigation Team Humboldt Bay	California	No	Yes	3
	Station Humboldt Bay	California	No	Yes	3
13	Station Quillayute River	Washington	No	Yes	58
	Station Neah Bay	Washington	No	Yes	57
	Station Tillamook Bay	Oregon	No	Yes	41
	Station Umpqua River	Oregon	No	Yes	21
14	Station Kauai	Hawaii	No	No	Not applicable
	Station Maui	Hawaii	No	No	Not applicable
17	Station Valdez	Alaska	No	Yes	106

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District	Name	State	Co-located with sector, air station, or base?	Located outside urban area?	Distance to closest urban area (in miles)
17	Station Juneau	Alaska	No	No	Not applicable

Source: GAO analysis of U.S. Coast Guard data. | GAO-23-106409

<sup>a</sup>This field unit is co-located with a sector field office, which is a subordinate unit of a Coast Guard sector.

To identify subunits that met the two selection criteria described above, we analyzed address information provided by the Coast Guard. Specifically, we used address information to identify subunits that were not co-located with sectors, air stations, or bases, and to identify subunits that were located outside of urban areas. For the 2020 Census, the U.S. Census Bureau defined an urban area as encompassing at least 2,000 housing units or having a population of at least 5,000. To ensure that we had enough subunits in each district to select from, we defined urban areas as having a population of at least 10,000. We assessed the reliability of Coast Guard’s address information by reviewing the data reliability assessment from a previous GAO engagement that also used these data, and reviewing the data for missing data and obvious errors. Based on these steps, we determined that the address information was sufficiently reliable for the purpose of identifying Coast Guard subunits to select for our survey.

We deployed the survey, which we developed using a PDF fillable format, from March 1 through 27, 2023. Prior to launching the survey, we had our survey instrument peer reviewed by an independent GAO survey specialist and made modifications based upon their recommendations. We also provided the survey to the Coast Guard for technical review and made modifications based on the agency’s comments. Lastly, we pretested the survey with officials from three Coast Guard boat stations to ensure that: (1) the questions were clear and unambiguous; (2) the terminology used was correct; (3) the survey did not place an undue burden on respondents; and (4) the information could feasibly be obtained.<sup>10</sup>

We assessed the information we collected about field units’ understanding of agency policies and procedures related to obtaining and

<sup>10</sup>For a copy of the survey instrument, see appendix II.

maintaining emergency food and water, and any challenges these field units experienced obtaining and maintaining these supplies against the agency's emergency management, readiness, and risk management manuals.<sup>11</sup> We also compared the information we collected about field units' efforts to assess their emergency food and water needs against agency policies related to disaster preparedness and risk assessment.<sup>12</sup> Further, we determined that federal internal control standards related to designing control activities were significant to our first objective and assessed the Coast Guard's policies and procedures about obtaining and maintaining emergency food and water for field personnel against these standards. We also determined that federal internal control standards related to documentation were significant to our second objective and assessed the Coast Guard's disaster preparedness and risk assessment efforts against these standards.<sup>13</sup>

We conducted this performance audit from December 2022 to July 2023 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.

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<sup>11</sup>Department of Homeland Security, U.S. Coast Guard, *Emergency Management Manual*, Vol. I; *Definition of Readiness*; and *Risk Management*.

<sup>12</sup>Department of Homeland Security, U.S. Coast Guard, *Financial Resource Management Manual*.

<sup>13</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

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# Appendix II: GAO Survey on Emergency Food and Water at Coast Guard Boat Stations and Aids to Navigation Teams

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We surveyed 32 selected subordinate field units (subunit)—specifically, boat stations and aids to navigation teams—across all nine Coast Guard districts.<sup>1</sup> We used the survey to obtain information about selected subunits' understanding of Coast Guard policy and procedures about obtaining and maintaining emergency food and water for field personnel, any challenges the subunits experienced with maintaining these supplies, and the subunits' efforts to assess disaster risks and needs for these supplies, among other things. The results of our survey are not generalizable to all Coast Guard subunits. However, they provide insights into the extent to which selected subunits are assessing emergency food and water needs, and maintaining these supplies. They also provide illustrative examples of some challenges selected subunits may face in addressing their needs.

Our survey was composed of closed-ended and open-ended questions and was developed using a PDF fillable format. We deployed the survey from March 1 through 27, 2023. In this appendix, we include a blank copy of the survey instrument we used. For a more detailed discussion of our methodology, see appendix I.

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<sup>1</sup>The Coast Guard organizes its field structure under two area commands that oversee nine districts across the U.S., which are subdivided into 37 sectors. Coast Guard sectors oversee smaller subordinate field units, such as boat stations and aids to navigation teams.



**Appendix II: GAO Survey on Emergency Food and Water at Coast Guard Boat Stations and Aids to Navigation Teams**



**Questions about Emergency Supplies at Coast Guard Field Units**

**Introduction**

The U.S. Government Accountability Office (GAO) is an independent, nonpartisan agency that serves as the audit and evaluation arm of Congress. GAO's mission is to support the Congress and to help improve the performance and ensure the accountability of the federal government. For additional information about our agency, please visit [www.gao.gov](http://www.gao.gov).

GAO is reviewing the Coast Guard's acquisition and maintenance of emergency supplies for personnel in the field. We are specifically focused on the emergency supplies that Coast Guard field units have available/stored in advance of a disaster or emergency event for personnel to use for the purposes of self-preservation and continuity of operations. To learn more about the emergency supplies that Coast Guard field units maintain, GAO is sending this question set to a sample of remotely located Coast Guard boat stations and aids to navigation teams. We will combine your unit's responses with others to present summary-level results in our publicly available report. If we include any examples from individual responses in our report, we will not report any information that could be used to identify the corresponding unit or person completing this question set. Thank you in advance for your time and participation.

**How to complete this question set:**

This is a fillable PDF form. Before starting to fill out this form, save the file to your computer. Then open it in Adobe Acrobat or Foxit. Please read all notes and instructions for each question. You should re-save your answers periodically as you go and again when you have completed it. You can click buttons and type into highlighted boxes throughout the form; the boxes will accommodate more text than is visible. In addition to clicking or scrolling, you can use the *Tab* key to jump to the next answer block, and use *Shift+Tab* to move backwards.

Please return this completed and saved form to GAO by March 15, 2023 by emailing the form to [CGEmergencySupplies@gao.gov](mailto:CGEmergencySupplies@gao.gov).

If you have any questions, please contact Matt Lowney at 202-512-3253 or [LowneyM@gao.gov](mailto:LowneyM@gao.gov).

**Questions**

General Information

- 1. Who should GAO contact if we have questions about your unit's responses?** (Note: The unit's point of contact should be an E-6 or above.) (Provide the information requested below. Then continue to question 2.)

Name of unit:	<input type="text"/>
Contact person:	<input type="text"/>
Position:	<input type="text"/>
Phone:	<input type="text"/>
Email:	<input type="text"/>

**Appendix II: GAO Survey on Emergency Food and Water at Coast Guard Boat Stations and Aids to Navigation Teams**

2. Does your unit have its own Coast Guard dining facility or galley with one or more personnel assigned (e.g., food service specialist, culinary specialist) or access to such a Coast Guard dining facility or galley? (Select one. Then continue to question 3.)

- Yes
- No

Emergency Food

**Definition – Throughout this section, *emergency food* is a separate supply of nonperishable food that is obtained and maintained (kept on hand) for unit personnel to use only in the event of an emergency or disaster.**

3. For whom does your unit maintain *emergency food* as defined above? (Select one.)

- Not applicable – My unit does not maintain emergency food as defined above. (→ Skip to question 6.)
- All unit personnel (→ Continue to question 4.)
- Duty personnel only (→ Continue to question 4.)
- Other personnel group(s) (Please explain below.) (→ Continue to question 4.)

4. How much estimated *emergency food* does your unit maintain for personnel? (Select one.)

- Less than 72 hours (3 days) worth per person (→ Continue to question 5.)
- 72 hours (3 days) worth per person (→ Skip to question 7.)
- More than 72 hours (3 days) worth per person (→ Skip to question 7.)
- I am unsure or do not know how much emergency food my unit maintains. (→ Skip to question 7.)

**Appendix II: GAO Survey on Emergency Food and Water at Coast Guard Boat Stations and Aids to Navigation Teams**

**5. Why does your unit maintain some but less than 72 hours' worth of emergency food for each person?** (Select yes, no, or unsure for each reason below. Then skip to question 7.)

Reason	Yes	No	Unsure
a. My unit lacks funding to purchase at least 72 hours' worth of emergency food for each person.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. My unit lacks a suitable (i.e., safe and secure) space to store at least 72 hours' worth of emergency food for each person.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. My understanding of Coast Guard policy or guidance is that units are not required to maintain at least 72 hours' worth of emergency food for each person.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. My unit's command cadre discussed my unit's risks and determined that it does not need to maintain at least 72 hours' worth of emergency food for each person.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. My unit does not need to maintain at least 72 hours' worth of emergency food for each person because, in an emergency, personnel would use the food supplies in our own Coast Guard dining facility/galley or a Coast Guard dining facility/galley the unit has access to. (Note: This does not include a kitchen where personnel store/prepare <u>their own food</u> .)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Other reason(s). (If there are other reasons, please explain below.)			

**6. Why does your unit not maintain emergency food?** (Select yes, no, or unsure for each reason below. Then continue to question 7.)

Reason	Yes	No	Unsure
a. My unit lacks funding to purchase any emergency food.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. My unit lacks a suitable (i.e., safe and secure) space to store any emergency food.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. My understanding of Coast Guard policy or guidance is that units are prohibited from purchasing emergency food.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. My understanding of Coast Guard policy or guidance is that units are not required to maintain any emergency food.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. My unit's command cadre discussed the unit's risks and determined that it does not need to maintain emergency food.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. My unit does not need to maintain emergency food because, in an emergency, personnel would use the food supplies in our own Coast Guard dining facility/galley or a Coast Guard dining facility/galley the unit has access to. (Note: This does not include a kitchen where personnel store/prepare <u>their own food</u> .)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Other reason(s). (If there are other reasons, please explain below.)			

**Appendix II: GAO Survey on Emergency Food and Water at Coast Guard Boat Stations and Aids to Navigation Teams**

**7. How did your unit determine the amount of *emergency food* it needs to maintain?** (Select *yes, no, or unsure* for each method below. Then continue to question 8.)

Method	Yes	No	Unsure
a. My unit's command cadre discussed the unit's risks and determined the amount of emergency food it needs to maintain.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. My unit is following Coast Guard policy or guidance.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. My unit is following Sector leadership's recommendations or requirements.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. My unit is following local disaster preparedness guidance.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. My unit is following state disaster preparedness guidance.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. My unit is following other federal disaster preparedness guidance (e.g., FEMA).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Other method(s). (If there were other methods, please explain below.)			

**8. What challenges, if any, does your unit experience with maintaining *emergency food*?** (Select *yes, no, or unsure* for each challenge below. Then continue to question 9.)

Challenge	Yes	No	Unsure
a. My unit does not have enough or consistent funds to obtain and maintain emergency food.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. My unit does not have enough suitable (i.e., safe and secure) space to store emergency food.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. My understanding is that Coast Guard policy or guidance prohibits units from purchasing emergency food.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Coast Guard policy or guidance regarding emergency food is unclear or confusing.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. The procurement process for obtaining approval to purchase emergency food is cumbersome or difficult.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. My unit does not have staff to manage emergency food (e.g., inventory items, monitor expiration dates).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. My unit does not have the staff or expertise to assess our need for emergency food.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Other challenge(s). (If there are other challenges, please explain below.)			

**Appendix II: GAO Survey on Emergency Food and Water at Coast Guard Boat Stations and Aids to Navigation Teams**

Emergency Water

**Definition – Throughout this section, *emergency water* is water for unit personnel to use in the event that the unit's potable water system is inoperable or inaccessible.**

**9. For whom does your unit maintain *emergency water* as defined above? (Select one.)**

- Not applicable – My unit does not maintain emergency water as defined above. (→ Skip to question 12.)
- All unit personnel (→ Continue to question 10.)
- Duty personnel only (→ Continue to question 10.)
- Other personnel group(s) (Please explain below). (→ Continue to question 10.)

**10. How much estimated *emergency water* does your unit maintain for personnel? (Note: 3 days' worth of emergency water for one person is 3 gallons of water—or one gallon of water per day.) (Select one.)**

- Less than 72 hours (3 days) worth per person (→ Continue to question 11.)
- 72 hours (3 days) worth per person (→ Skip to question 13.)
- More than 72 hours (3 days) worth per person (→ Skip to question 13.)
- I am unsure or do not know how much emergency water my unit maintains. (→ Skip to question 13.)

**Appendix II: GAO Survey on Emergency Food and Water at Coast Guard Boat Stations and Aids to Navigation Teams**

**11. Why does your unit maintain some but less than 72 hours' worth of emergency water for each person?** (Select yes, no, or unsure for each reason below. Then skip to question 13.)

Reason	Yes	No	Unsure
a. My unit lacks funding to purchase at least 72 hours' worth of emergency water for each person.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. My unit lacks a suitable (i.e., safe and secure) space to store at least 72 hours' worth of emergency water for each person.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. My understanding of Coast Guard policy or guidance is that units are not required to maintain at least 72 hours' worth of emergency water for each person.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. My unit's command cadre discussed my unit's risks and determined that it does not need to maintain at least 72 hours' worth of emergency water for each person.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Other reason(s). (If there are other reasons, please explain below.)			

**12. Why does your unit not maintain emergency water?** (Select yes, no, or unsure for each reason below. Then continue to question 13.)

Reason	Yes	No	Unsure
a. My unit lacks funding to purchase any emergency water.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. My unit lacks a suitable (i.e., safe and secure) space to store any emergency water.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. My understanding of Coast Guard policy or guidance is that units are prohibited from purchasing emergency water.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. My understanding of Coast Guard policy or guidance is that units are not required to maintain any emergency water.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. My unit's command cadre discussed my unit's risks and determined that it does not need to maintain emergency water.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Other reason(s). (If there are other reasons, please explain below.)			

**Appendix II: GAO Survey on Emergency Food  
and Water at Coast Guard Boat Stations and  
Aids to Navigation Teams**

**13. How did your unit determine the amount of *emergency water* it needs to maintain?**  
(Select yes, no, or unsure for each method below. Then continue to question 14.)

Method	Yes	No	Unsure
a. My unit's command cadre discussed my unit's risks and determined the amount of emergency water it needs to maintain.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. My unit is following Coast Guard policy or guidance.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. My unit is following Sector leadership's recommendations or requirements.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. My unit is following local disaster preparedness guidance.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. My unit is following state disaster preparedness guidance.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. My unit is following other federal disaster preparedness guidance (e.g., FEMA).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Other method(s). (If there were other methods, please explain below.)			

**14. What challenges, if any, does your unit experience with maintaining *emergency water*?**  
(Select yes, no, or unsure for each challenge below. Then continue to question 15.)

Challenge	Yes	No	Unsure
a. My unit does not have enough or consistent funds to obtain and maintain emergency water.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. My unit does not have enough suitable (i.e., safe and secure) space to store emergency water.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. My understanding is that Coast Guard policy or guidance prohibits units from purchasing emergency water.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Coast Guard policy or guidance regarding emergency water is unclear or confusing.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. The procurement process for obtaining approval to purchase emergency water is cumbersome or difficult.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. My unit does not have staff to manage emergency water (e.g., inventory items, monitor expiration dates).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. My unit does not have the staff or expertise to assess our need for emergency water.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Other challenge(s). (If there are other challenges, please explain below.)			

**Appendix II: GAO Survey on Emergency Food and Water at Coast Guard Boat Stations and Aids to Navigation Teams**

Assessing Risk and the Need to Maintain Emergency Food and Water

**15. Has your unit conducted a formal, documented risk assessment, which includes an assessment of the unit's need to maintain emergency food and water?** (Select one. Then continue to question 16.)

- Yes
- No

**16. Has your unit received support from your Sector with assessing your unit's need to maintain emergency food or water?** (Select one.)

- Yes (→ Skip to question 17.)
- No (→ Continue to question 16a.)

**16a. Do you believe support from the Sector would be helpful for assessing your unit's need to maintain emergency food or water?** (Select one. Then continue to question 17.)

- Yes
- No

Other Types of Emergency Supplies

**17. Does your unit maintain the following *other types of emergency supplies* to use in an emergency or disaster?** (Select yes, no, or unsure for each type of emergency supply below.)

Type of emergency supply	Yes	No	Unsure
a. First aid and medical supplies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Communications equipment (e.g., radio, satellite telephone, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Flashlights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Batteries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Sanitation supplies (e.g., plastic bags, toilet paper, soap, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Small tools (e.g., axe, screwdrivers, pliers, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Berthing supplies (e.g., blankets, sleeping bags, cots, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Other types of emergency supplies. (If you maintain other types of supplies, please generally describe them below. A list of specific items is not necessary.)			

**Question set completed – Thank you for your assistance. Please save and email the completed question set to [CGEmergencySupplies@gao.gov](mailto:CGEmergencySupplies@gao.gov).**



# Appendix III: Comments from the Department of Homeland Security

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



**Homeland  
Security**

July 10, 2023

Heather MacLeod  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Management Response to Draft Report GAO-23-106409, "COAST GUARD:  
Clarifying Emergency Policies and Assessing Needs Could Improve Unit  
Disaster Preparedness"

Dear Ms. MacLeod:

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

DHS leadership is pleased to note GAO's recognition that U.S. Coast Guard field personnel serve as first responders for natural and human-made disasters, which includes rescuing persons in distress and responding to marine pollution incidents. As a part of safeguarding human life during catastrophic events, the Coast Guard is committed to strengthening policy and guidance that will ensure all field units are prepared to sufficiently provide food, water and resources for all employees and their family members.

The draft report contained three recommendations with which the Department concurs. Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO's consideration.

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**Appendix III: Comments from the Department  
of Homeland Security**

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Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

JIM H CRUMPACKER Digitally signed by JIM H  
CRUMPACKER  
Date: 2023.07.10 12:36:53 -04'00'

JIM H. CRUMPACKER, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

Enclosure

**Enclosure: Management Response to Recommendations  
Contained in GAO-23-106409**

GAO recommended that the Commandant of the Coast Guard:

**Recommendation 1:** Ensure that agency disaster preparedness policies are updated to clearly identify requirements about maintaining emergency food and water at field units.

**Response:** Concur. In accordance with the Commandant Instructions (COMDTINST) M7100.3F<sup>1</sup> and other guidance, as appropriate, the Coast Guard Office of Emergency Management and Disaster Response (CG-OEM) will update the pertinent paragraphs in COMDTINST M3010.11E<sup>2</sup> and M3010.24 (series)<sup>3</sup> to identify requirements about maintaining emergency food and water at field units. For those units required to be prepared to maintain a response for 48-72 hours, these updates will also stipulate that these units shall assess, document, and maintain the required resources and appropriate subsistence to sustain a response for, at minimum, three days. Estimated Completion Date (ECD): June 28, 2024.

**Recommendation 2:** Ensure that the Financial Resource Management Manual and its supporting procedures manual are updated to clarify policies and procedures for procuring emergency food and water.

**Response:** Concur. The Coast Guard's Office of Financial Reporting, Policy, Property Oversight and Audit Remediation (CG-84) will update COMDTINST M7100.3F to clarify policies and procedures for procuring emergency food and water. ECD: July 31, 2024.

**Recommendation 3:** Ensure that field units assess and document their emergency food and water needs in accordance with updated agency disaster preparedness policies.

**Response:** Concur. CG-OEM will update the paragraphs in COMDTINST M3010.11E (series) discussing plan verification and requirements to require assessment and documentation of resources, and appropriate subsistence necessary to sustain the units

<sup>1</sup> "Financial Resource Management Manual," dated June 2019; [https://media.defense.gov/2019/Jul/08/2002154279/-1/-1/0/CIM\\_7100\\_3F.PDF](https://media.defense.gov/2019/Jul/08/2002154279/-1/-1/0/CIM_7100_3F.PDF)

<sup>2</sup> "U.S. Coast Guard Emergency Management Manual, Vol I: Emergency Management Planning Policy;" COMDTINST 3010.11E (series), dated January 2019. Additionally, the instruction had a Commandant Change Notice 3010, December 2020. [https://media.defense.gov/2021/Mar/05/2002593952/-1/-1/0/CIM\\_3010\\_11E.PDF](https://media.defense.gov/2021/Mar/05/2002593952/-1/-1/0/CIM_3010_11E.PDF).

<sup>3</sup> "U.S. Coast Guard Emergency Management Manual, Vol IV: Incident Management and Crisis Response," COMDTINST M3010.24A (series), dated October 2020. [https://media.defense.gov/2020/Oct/02/2002509989/-1/-1/0/CIM\\_3010\\_24A.PDF](https://media.defense.gov/2020/Oct/02/2002509989/-1/-1/0/CIM_3010_24A.PDF)

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**Appendix III: Comments from the Department  
of Homeland Security**

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for, at minimum, three days. This update will also include appropriate references  
M7100.3F and other relevant policy for procurement of same. ECD: June 28, 2024.

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# Appendix IV: GAO Contacts and Staff Acknowledgments

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## GAO Contact

Heather MacLeod, (202) 512-8777 or [MacLeodH@gao.gov](mailto:MacLeodH@gao.gov)

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## Staff Acknowledgments

In addition to the contact above, Dawn Hoff (Assistant Director), Matthew T. Lowney (Analyst-in-Charge), Jennifer Bryant, James (Ben) Etheridge, Kevin Reeves, Ben Crossley, Tracey King, Elizabeth Dretsch, Madeline Barch, and John Mingus all made key contributions to this report.

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