April 29, 2019

The Honorable Pat McCarthy
Washington State Auditor
P.O. Box 40021
Olympia, WA 98504-0021

Dear Auditor McCarthy:

Thank you for the opportunity to review and respond to the State Auditor’s Office performance audit report, “Opportunities to Improve Washington’s Preparedness Efforts in Emergency Management.” The Military Department’s Emergency Management Division (EMD) and Office of Financial Management worked together to provide this response.

We appreciate the report’s recognition that the Emergency Management Division has improved its process for local authorities to request resources from the state. EMD has spent considerable time standardizing its resource request form and process to ensure the state’s response to a disaster is timely and effective. EMD will continue to work with local jurisdictions to address software issues and further streamline and improve this process.

We recognize the value of the SAO’s recommendation to develop a statewide credentialing program. It is important to note, however, that we lack sufficient funding to implement this type of program across the state. Additionally, per guidance from the Federal Emergency Management Agency (FEMA), EMD lacks the authority to establish, communicate and administer the qualification and credentialing process for incident management teams. In the meantime, EMD is participating in a pilot program offered by FEMA that provides a centralized system to identify people with specific skill sets, as well as working on a credentialing program for those who work in the State Emergency Operations Center.

We also appreciate the SAO’s recognition that the department has implemented strategies to promote two-way communication with our local partners and agree there is always room for improvement. We will continue to work with our stakeholders to develop additional strategies to keep the lines of communication open.

Additionally, we agree that roles and responsibilities need to be clearly defined, and as indicated in the audit, EMD has taken steps to provide clarification to its local partners. EMD, and all emergency managers, follow guidance from the National Incident Management System and the National Response Framework, which spell out the roles and responsibilities of individuals, communities, the private sector, volunteer organizations, and local, tribal, state and federal governments. Furthermore, NIMS explains the responsibilities and guiding doctrine of incident management teams and emergency operations centers.

Finally, we want to address the report’s suggestion to consider diverting existing resources or obtaining additional resources to address some of the recommendations. EMD’s budget is made up
of 12 fund sources, most of them federal, which have narrow stipulations and conditions for their use. This restricts the activities of employees maintained by those funds and limits our flexibility to repurpose FTEs to activities recommended by the auditor. Adding work or repurposing FTEs will result in an immediate impact to high priority activities such as planning for catastrophic events, providing exercise and training support to local jurisdictions, conducting public outreach and education, coordinating recovery planning, and/or maintaining the capability to provide 24/7 alert and warning for the state. We believe it would be prudent to submit a 2020 supplemental budget request to address gaps identified in the report, but recognize the funding decision will be at the discretion of the Legislature.

Please thank your staff for their collaborative approach throughout the audit process. The attached action plan addresses the areas for improvement identified in the report.

Sincerely,

Bret Daugherty, Major General
The Adjutant General
Military Department

David Schumacher
Director
Office of Financial Management

cc: David Postman, Chief of Staff, Office of the Governor
Kelly Wicker, Deputy Chief of Staff, Office of the Governor
Drew Shirk, Executive Director of Legislative Affairs, Office of the Governor
Pat Lashway, Deputy Director, Office of Financial Management
Scott Merriman, Legislative Liaison, Office of Financial Management
Keith Phillips, Director of Policy, Office of the Governor
Inger Brinck, Director, Results Washington, Office of the Governor
Tammy Firkins, Performance Audit Liaison, Results Washington, Office of the Governor
Scott Frank, Director of Performance Audit, Office of the Washington State Auditor
This management response to the State Auditor’s Office performance audit report received on April 8, 2019, is provided by the Office of Financial Management and the Washington Military Department’s Emergency Management Division.

Sao Performance Audit Objectives:
The SAO designed the audit to answer:

1. Do state and local emergency management personnel have clearly defined roles and responsibilities when responding to disasters?
2. What improvements can EMD make to request, track and mobilize resources more effectively during disasters?
3. What improvements to communication can EMD make to strengthen collaboration with local partners?

Sao Recommendation 1: Provide guidance and training to local jurisdictions to more clearly define the roles and responsibilities of the EMD liaison, including how the liaison will work with local authorities in charge of an incident.

State Response: It is important to note that the audit reported that representatives from just two of nine regions said they were unfamiliar with the roles and responsibilities of the EMD liaison. Regardless, we acknowledge that our local partners need to understand the roles and limitations of this position, as they play a critical role during a disaster response, but are limited in their authority. The liaison is present to inform the responding agencies of the state’s capabilities to support the incident and communicate local needs to the State Emergency Operations Center.

Action Steps and Time Frame:

- Replace the title “EMD liaison” with “EMD agency representative” to align closer with NIMS/ICS common terminology. By July 1, 2019.
- Develop a position description for the EMD agency representative along with associated duties and qualification requirements. By July 1, 2019.
- Develop education materials to be provided at regional meetings and state conferences to help local jurisdictions understand the role and duties of EMD agency representatives. By June 30, 2021.
SAO Recommendation 2: Assist IMTs by coordinating regional training sessions with local partners to educate them on the role of the IMTs. EMD should also:

a) Work with IMTs to ensure the training materials they develop are consistent across the state

b) Send an EMD representative to each regional training session to answer questions about state operations

c) Redirect existing resources or request additional resources as needed

STATE RESPONSE: Unfortunately, there is not a ‘one-size-fits-all’ approach to incident management teams (IMTs), as the role is dictated by the jurisdiction that employs the IMT as either incident command or augmenting jurisdictional staff in their EOC. In normal circumstances, the roles, responsibilities and authorities of the IMT are outlined in the delegation of authority by the jurisdiction’s elected official. Moreover, there is no formal plan, agreement, or charter in the state that brings all IMTs together under one umbrella.

Additionally, regional training sessions sponsored, managed, and funded or co-funded by EMD would cause a significant risk to the department’s budget and reduce the amount of staff time available to conduct current training program activities. Some factors to consider are:

- A NIMS all-hazards position specific course averages 30-40 hours in length and costs between $4,000 and $12,000 to conduct, depending on the type of course.

- Conducting four NIMS all-hazards position specific courses during the year with current resources would require EMD’s training program to redirect more than 25 percent of its time and 100 percent of its budget.

Action Steps and Time Frame:

» Assess all IMT stakeholders’ interest in participation in an education and training program. If there is no consensus, regional training sessions would not be an effective means to educate customers on the roles, responsibilities and capabilities of IMTs. By October 1, 2019.

» If there is consensus among IMTs, agree to standardized training materials and develop a concept for a training program. Because the conduct of IMTs is not currently regulated, legislation would be required to amend chapter 38.52 RCW. We would also need legislative support for additional funding to implement this program (one FTE and an increase of $20,000 in EMD’s training budget). By TBD.

SAO Recommendations 3-4:

3. Continue to work with local jurisdictions to identify and resolve WebEOC software issues.

4. Identify opportunities for EMD and local jurisdictions to use WebEOC more frequently as a way to increase familiarity with the system, such as conducting practice exercises.

STATE RESPONSE: Training and improvements to WebEOC are continuous as software changes, capabilities are altered, and staff turnover at the local jurisdictional level necessitates ongoing training. Training on WebEOC is available at any time upon request, as well as through the State EOC Foundations course. It is also routinely used during state exercises for on-the-job training.
In early 2018, the WebEOC administrator partnered with Seattle Emergency Management to improve the Resource Tracking Board. To ensure as much collaboration from our stakeholders as possible, a workgroup made up of multiple local jurisdictions provided feedback. The updated resource tracker will be previewed at the April 2019 Partners in Emergency Preparedness Conference where numerous stakeholders will be present. The current plan is to test the new resource tracking board, develop and deliver training, and then implement it later this year.

Numerous other improvements have been implemented with individual local jurisdictions and with state agencies. The WebEOC administrator has developed customizable boards to fit individual stakeholder needs and is guided by the customer during development. For instance, the administrator recently worked with the Red Cross to develop a status board that provides WebEOC users with the location of emergency shelters. The administrator has also worked with the state Department of Transportation to develop traffic maps that display local, county and state transportation routes, as well as boards that display the status of local airports. Additionally, EMD has successfully increased the number of exercises that incorporate scenarios that require the use of WebEOC to maintain situational awareness, request resources, and track resource requests to provide local partners more opportunities to practice and test their WebEOC skills.

And at least twice a year, EMD conducts drills involving at least five local jurisdictions and as many state agencies as possible to execute resource requests through the use of WebEOC software. Participants have gained a more in-depth knowledge of the WebEOC software, its capabilities and how to use the system.

**Action Steps and Time Frame:**

- Continue work with our stakeholders to identify opportunities for improvement with WebEOC and include them in the process. *This effort will be ongoing and does not have an expected completion date.*

- Include opportunities to practice the use of WebEOC during our yearly mandatory exercises and monthly SEOC workdays as much as possible. *This effort will be ongoing and does not have an expected completion date.*

- Increase the use of WebEOC by local jurisdictions when we fill Emergency Management Assistance Compact requests for personnel to deploy to disasters affecting other states and territories. These requests are limited and infrequent; however, when they occur, we offer local jurisdictions the opportunity to deploy and gain real-world experience. *We will continue to increase the use of WebEOC by local jurisdictions to fill EMAC requests as appropriate to the specific situation.*

**SAO Recommendation 5:** Develop and operate a statewide credentialing program to standardize requirements, identify and validate the expertise of incident management teams and emergency operations center personnel across the state. In developing the program, EMD should:

a) Identify and request any statutory changes that would be needed for such a program

b) Work with the Emergency Management Advisory Group subcommittee to identify the resources needed to develop and operate the program at the state and local level

c) Redirect existing resources or request additional resources as needed to achieve these goals. Next steps might include a study to identify resources needed to implement a statewide credentialing program.
STATE RESPONSE: While we agree there would be value in a statewide credentialing program, EMD does not currently have the funding or authority to manage the design, implementation or maintenance of a formal statewide credentialing plan as recommended. Additionally, EMD does not have the flexibility to redirect existing resources to achieve this goal without risking the success of other higher-priority programs. There is no current statutory requirement for the state to have such a plan, nor is there a requirement for local jurisdictions to follow such a plan. In the meantime, within available staff time, EMD is moving forward with a program to credential its own emergency operations center staff. We have offered to local emergency managers the same position task books and EOC skill set task books, so they can consider doing the same within each jurisdiction.

Action Steps and Time Frame:

» Conduct a study to determine the appropriate level of staffing and resourcing necessary to implement and maintain a statewide credentialing program. The study would need to review necessary changes to chapter 38.52 RCW and chapter 1-18 WAC to ensure EMD has the authority to carry out such a program. To be conducted when funding is provided to perform the study.

SAO Recommendation 6: Work with local jurisdictions to develop ways to make EMD’s meetings more effective opportunities for two-way communication. Some of the options to consider are:

a) Sending out appointments to local emergency managers to make them aware of the meetings and related minutes afterwards
b) Providing other ways to participate in meetings and forums when local emergency managers cannot attend in person
c) Allowing additional discussion time so attendees can raise concerns and have them discussed
d) During the semiannual, statewide emergency management conference:
   1. Hold meetings earlier in the event so they are not the final session which is poorly attended
   2. Have feedback meetings stand-alone so that they are not competing with other sessions.

STATE RESPONSE: We are committed to improving the quality of what, how, when and with whom we communicate across the emergency management community. We are committed to become more effective in our communication and work with our local partners and stakeholders to ensure effective two-way communication. We have already taken some steps to address this recommendation. For example, during the April 2019 Partners in Emergency Preparedness Conference, we moved the EMD director’s meeting to the second day instead of the last day of the meeting and scheduled the meeting for a morning session versus an afternoon session. Additionally, we have routinely offered phone-in options for stakeholder meetings to include the Emergency Management Council, Emergency Management Advisory Group and the E911 Advisory Committee. Meeting minutes are provided for the majority of our recurring meetings.

Action Steps and Time Frame:

» Assess which current information sharing venues/meetings are not meeting stakeholder expectations, and, where feasible, shift our techniques appropriately to meet those expectations. By October 1, 2019.
» Be more consistent in sending out calendar invites and meeting minutes. By October 1, 2019.
» Set aside time during EMD-sponsored meetings to ensure our stakeholders have the ability to present issues or concerns. By October 1, 2019.
» Refrain from scheduling meetings at the end of conferences or major events and set aside time to potentially conduct listening sessions. By October 1, 2019.

SAO Recommendation 7: Establish a regional coordinators program or other mechanisms to develop and maintain the necessary relationships with local emergency managers for successful response. Redirect existing resources or request additional resources as needed.

STATE RESPONSE: Unfortunately, EMD does not currently have the funding to staff and resource a regional coordinator program. Redirecting resources would threaten the success and delivery of other high-priority services. Additionally, there is no legal requirement or authorization that supports this recommendation.

With that said, EMD delivers 30 programs across the state, providing many opportunities for local emergency managers to engage with EMD staff and receive technical support and assistance. Additionally, EMD staff located at Camp Murray routinely travel throughout the state to deliver specialized presentations and workshops, allowing for more interaction with our local partners (i.e., Tsunami Roadshow, Limited English Proficiency technical assistance, and various other training workshops).

While EMD has four staff members who are based throughout the state, they support specific activities related to hazardous materials planning and cannot be redirected to perform other regional coordinator activities based on the restrictive nature of the fund sources that support their positions.

EMD has assessed programs in other states and found that most do not have regional coordinators or field staff.

Action Steps and Time Frame:

» Engage stakeholders to determine with which specific EMD programs they need a more productive or proactive relationship. Identify any consistent trends and make necessary changes to improve those relationships. By October 1, 2019.

» Pursue additional funding from the Legislature to support an effective regional coordinators program. As determined by agency legislative priorities.