

FEMA Recovery Division 2005 Hurricane Season After-Action Report

**PREPARED FOR
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JUNE 26, 2006

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Appendices

A. Acronyms and Abbreviations

This appendix includes a list of all the acronyms and abbreviations used in this document.

B. Questionnaire Data

This appendix includes raw data from the online questionnaire, including unedited comments by questionnaire participants/respondents.

C. Interview Data

This appendix includes the scripts and notes from the various interviews, but does not include the name of the interviewee, in an effort to preserve confidentiality.

C-1 Interview Scripts

C-2 Interview Results

D. Conference Data

This appendix includes several issue templates for each program area as reported out at the end of the April After-Action Conference. The issue templates include the issue statement, causes, effects, and proposed short- and long-term solutions.

E. Initial Recommendations

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EXECUTIVE SUMMARY

On August 29, 2005, after affecting nearly \$2 billion in damage and 14 deaths as a Category 1 storm in Florida, Hurricane Katrina slammed into the Gulf Coast as a dangerous Category 4, taking more than 1,800 lives¹, causing more than \$115 billion in damages, and launching the largest natural disaster response and recovery effort in United States history. More than one million Louisiana, Mississippi, and Alabama residents were displaced as a result of the hurricane, requiring feeding and sheltering operations on a scale never before seen, including the provision of millions of meals ready-to-eat and massive relocations and sheltering for hundreds of thousands in multiple states throughout the country.

FEMA's Katrina response began in earnest on August 25. Shortly thereafter, the Regional Response and National Response Coordination Centers ramped up to prepare for the storm's first and second landfalls and coordinate an extremely multifaceted and complicated response effort. The storm's challenges continued during the recovery phase. As the fall and winter wore on, Hurricane Katrina's aftermath presented many unique challenges, from the complexity of conducting Public Assistance debris removal operations on such a large scale to the provision through Individual Assistance of hotel rooms to hundreds of thousands of evacuees to the difficulty of providing enough trained Community Relations staff members to meet the demand for their services.

The purpose of this after-action report is to examine how FEMA addressed the challenges wrought by Hurricane Katrina as they relate to response and recovery. The magnitude of this disaster meant that unique problems arose and spur-of-the-moment innovative solutions had to be developed or programs adapted to be appropriate for an effort of this scale. While the response presented many successes, the lessons to be learned pertaining to catastrophic disaster response are many. This internal FEMA Recovery Division report aims to identify and address the challenges revealed by Hurricane Katrina to ensure that FEMA continues to improve its disaster response as the 2006 Hurricane Season begins.

The After-Action Report Process

In an effort to assess its performance, FEMA tasked an outside contractor to gather data from FEMA employees, contractors, other Federal agency partners, non-governmental partners, and others who had been involved in the Hurricane Katrina response. Data was collected for the period from several days prior to landfall to approximately three months thereafter.

Information was gathered in three different ways—through an online questionnaire available to thousands who had participated in the response, targeted interviews with key individuals in all FEMA Recovery Division program areas, and an After-Action Review Conference where individuals met in subject area groups to identify and address some of the challenges posed by Hurricane Katrina. Both statistical and qualitative data were

¹ Over 1,800 more are still officially considered missing.

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collected through the online questionnaire and the interviews and this information was used to identify, analyze, and synthesize issues to be discussed at the conference.

Issues and Recommendations

Input generated through the survey, interviews, and conference naturally generated both area-specific issues and recommendations, but also revealed some concerns that were systemic and affected programs throughout FEMA. This report presents these broader issues and those that cut across program areas, as well as issues that are unique challenges within a particular program area.

The broad issues had a particularly devastating impact on the effectiveness of response and recovery as they were spread across nearly all programs. Survey and interview input revealed numerous systemic issues, including:

- The adequacy of staffing levels;
- Staff training and emergency management experience;
- The effectiveness of Recovery Division organization;
- The implementation of the National Incident Management System (NIMS) and the Incident Command System (ICS) within recovery operations;
- Management for the Governor-to-Governor Initiative;
- Policy generation and implementation processes; and
- Implementation of the National Response Plan (NRP).

FEMA faced several larger challenges during the Katrina response, including the need to adapt to new and untested structures, plans and relationships while conducting a major disaster response. In addition, the limited capabilities and capacities of the disaster response and recovery systems to meet disasters that are catastrophic in nature proved to be a trial. Finally, recurring issues surrounding program implementation, but not necessarily attributable to the magnitude of Hurricane Katrina, hindered the response and recovery when quick decisions and prompt program execution were required.

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1. INTRODUCTION

This After-Action Report outlines the lessons learned by the FEMA Recovery Division during the 2005 Hurricane Season and makes relevant recommendations. It is a synthesis of information obtained from an online questionnaire (see Appendix B), telephone and face-to-face interviews (see Appendix C), and a conference (see Appendix D) with relevant FEMA, other Federal agencies (OFAs), State, non-governmental organizations (NGOs), and other partners.

1.1. QUESTIONNAIRE

The questionnaire was made available online to all Recovery Division program staff and partners between February 27 and April 28, 2006. All responses were completely anonymous and the information provided will not be attributed to specific individuals, though general demographic information was obtained. Of those respondents providing demographic information, 35 percent were Regional FEMA staff (Permanent Full-Time [PFTs] and Disaster Assistance Employees [DAEs]) and 23 percent were contractors. Approximately 10% identified themselves as being from Headquarters (HQ—7%), states (2%), or voluntary agencies and NGOs (1%). The remainder identified themselves as “Other Federal” (17%) or “Other” (16%—e.g., National Processing Service Centers (NPSCs), local hire). A total of 917 people responded to the questionnaire—of whom 331 completed the entire questionnaire. The raw results of the questionnaire are provided in Appendix B.

Questionnaire respondents were asked to provide information for the period covering Katrina one week prior to landfall on the Gulf Coast to 85 days after landfall. Although the questionnaire frequently referred to the Katrina response time frame, the respondents were reminded that the time period also included Hurricane Rita Landfall + 60 days, as well as Hurricane Wilma Landfall + 30 days.

Respondents were asked to answer only those questions pertaining to the programs in which they worked during the Katrina response. Some questions required the respondents to rate the effectiveness of particular programs. The effectiveness scale provided was related to a program being able to achieve its intended purpose. The following scale was used to rate effectiveness:

- Highly effective—exceeding the goals of the program to meet applicant needs.
- Effective—meeting the goals of the program to meet applicant needs.
- Somewhat ineffective—not meeting some of the goals of the program to meet applicant needs.
- Ineffective—not meeting the goals of the program to meet applicant needs.

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Respondents were also asked to indicate what factors were helpful or hindering to the effectiveness of the program:

- Helpful—facilitating effective accomplishment of program goals.
- Hindering—impeding effective accomplishment of program goals.

Respondents were provided the opportunity to explain why some program aspects were effective or ineffective and how the factors affected program goals and accomplishments. These comments as well as the percent responses for multiple-choice questions (described above) are provided in Appendix B.²

1.2. INTERVIEWS

A pre-selected group of 144 managers and participants in Recovery Division's Katrina operations were interviewed via telephone and in person between February 27 and March 24, 2006, for more in-depth observations, with a focus on identifying the most successful innovations and the most problematic program elements. The interviews were intended to fill in any potential gaps not covered by the questionnaire. The questions were aimed at isolating and defining issues. Although interview scripts were prepared (see Appendix C-1), interviewers were not required to follow the scripts exactly. They were simply used as a guide to assist interviewers in obtaining the most useful information and interviewers were encouraged to deviate from the scripts as appropriate as issues arose during the interview.

Comments from the interviewee were subsequently entered into a database and were cataloged by program areas—e.g., Individual Assistance (IA), Public Assistance (PA), Community Relations (CR)—and program elements (e.g., management, planning, training) to help analyze the data. Appendix C-2 presents the cataloged interview comments. Please note that a comment may be attributable to more than one program area and/or more than one program element.

1.3. CONFERENCE

The information obtained through the questionnaire and interviews was compiled and analyzed, and the major issues were synthesized and presented by program area (e.g., PA, IA) at the FEMA Recovery Division After-Action Conference, which was held in Lansdowne, Virginia, on April 4-6, 2006. Each program area was presented with the relevant identified issues and was tasked with refining the issue statement, noting the causes and effects of each issue, and providing short- and long-term recommendations to address the issue. This information was recorded for each issue addressed at the conference and is provided in Appendix D.

² Note that in Appendix B the percent response includes the "I don't know" option; whereas, percent calculations provided in the report do not include the "I don't know" option.

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There was not enough time during the conference to discuss each issue identified; however, all issues and recommendations identified from the questionnaire, interviews, and conference are provided in this report, as well as any additional recommendations from SRA.

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2. STORM AND DECISION NARRATIVE

2.1. PREFACE

In May 2005, before hurricane season had even begun, the National Oceanic and Atmospheric Administration (NOAA) and the National Weather Service (NWS) predicted a record-breaking season for 2005 with 12 to 15 tropical storms, of which seven to nine were predicted to become hurricanes, and three to five of which could become major hurricanes. Three months later, on August 2, NOAA and the NWS continued to forecast a 95-100% chance of an above-normal hurricane and tropical storm season.

Of the 12 named storms and 3 hurricanes that developed during the 2005 season prior to Katrina, three impacted the U.S. (Arlene, Cindy, and Dennis).³ The season started early with Tropical Storm Arlene forming on June 9 and making landfall near Pensacola, Florida on June 11. With sustained winds of approximately 60 mph, it caused little damage.

Hurricane Cindy made landfall near Grand Isle, Louisiana on July 5. With maximum sustained winds of near 75 mph, a Category 1 hurricane, Cindy caused heavy rainfall and inland flooding as it tracked northeastward across the eastern U.S., weakening to a tropical depression and ultimately dissipating.

Hurricane Dennis reached Category 4 strength on July 8/9 and hit the Florida Panhandle and the Alabama Coastline on July 10 as a Category 3 storm, activating the first hurricane response of the 2005 Hurricane Season, though the response to Dennis failed to even hint at the magnitude of things yet to come. Wind speeds were approximately 120 mph at the time of landfall and led to more than 400,000 power outages along the coast and inland in Mississippi, Alabama, and Georgia. Heavy rainfall also resulted from the storm leading to localized flooding in parts of the Southeast. Partly as a result of rainfall associated with both Cindy and Dennis, Alabama and Georgia ranked the 5th wettest on record for the month of July.

As the season wore on, FEMA's Recovery Division, and the IA program area in particular, began to ramp up for the more dangerous months of late summer and early fall by conducting an IA Steering Committee to hash out policy items identified during the 2004 season in preparation for 2005, including matters surrounding housing, applicant privacy and other issues. Immediately following the Steering Committee was a full-scale IA Conference, which drew participants from all FEMA Regions, FEMA HQ, other Federal agency partners and non-governmental organizations active in disaster response. The conference, which took place a mere week before Katrina's landfall, was valuable in improving the buy-in of the stakeholders and to make sure they were all on the same page as the most devastating natural disaster in U.S. history was about to unfold.

³ Information regarding Arlene, Cindy, and Dennis is from NOAA.
<http://www.ncdc.noaa.gov/oa/climate/research/2005/hurricanes05.html#arlene#arlene>.

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What eventually became Hurricane Katrina formed off the coast of the Bahamas on August 23 and was dubbed by the NWS as Tropical Depression (TD) Twelve. Soon after, a tropical storm watch was issued for portions of the Florida Keys and Florida's Atlantic coastline. By August 24, TD Twelve had strengthened into Tropical Storm Katrina, the season's eleventh named storm, which spurred FEMA to activate and deploy its Hurricane Liaison Team to the National Hurricane Center (NHC). FEMA's Region IV was also poised to assist in Georgia or Alabama, as needed.

In preparation for the storm's landfall on the Florida coast, FEMA pre-positioned 100 truckloads of ice, 35 truckloads of food, and 70 truckloads of water in Georgia. Additional preparation included pre-staging 400 truckloads of ice, nearly 200 truckloads of food, and over 500 truckloads of water at logistics centers throughout Alabama, Louisiana, Texas, South Carolina, and other locations in Georgia.

2.2. FIRST LANDFALL AND PREPARATIONS (FLORIDA)

Thursday, August 25

By Thursday morning, Katrina had developed into a Category 1 hurricane with further strengthening forecast. At 10:00 a.m., FEMA issued a press release "encouraging Floridians to take the necessary precautionary measures for the looming storm."⁴ FEMA also conducted its first daily video teleconference that day in an effort to coordinate Federal, State, and local response and to ensure that assistance programs and support were available and on call.

FEMA's National Response Coordination Center (NRCC) Red Team was activated at a modified Level 2 and the NRCC Emergency Support Functions (ESFs) 1, 3, 4, 5, 7, 14, and 15 were activated, as was a military liaison. Also, the Regional Response Coordination Center (RRCC) in FEMA Region IV that had been active at Level 3 in Thomasville, GA was moved to Atlanta and upgraded to Level 2.

By approximately 6:30 p.m., Hurricane Katrina made its first landfall in Southern Florida as a Category 1 storm, inflicting billions of dollars in damages and taking 14 lives.⁵

2.3. SECOND LANDFALL (GULF COAST)

Friday, August 26

After striking Florida, Hurricane Katrina advanced into the Gulf of Mexico and rapidly began strengthening. FEMA Director Michael Brown warned Gulf Coast residents that Katrina could quickly become a Category 4 storm and that the potential strike zone for the more dangerous hurricane stretched from the Western Louisiana coast to the Florida Panhandle. Alabama's Emergency Operations Center (EOC) was activated and Kathleen Blanco, Louisiana's Governor, declared a state-level State of Emergency.

⁴ <http://www.fema.gov/news/newsrelease.fema?id=18417>.

⁵ <http://www.cdc.gov/mmwr/preview/mmwrhtml/mm5509a5.htm>

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Saturday, August 27

Anticipating a landfall in Louisiana, President George W. Bush declared a Federal State of Emergency for the State of Louisiana, which allowed FEMA the authority to “identify, mobilize, and provide at its discretion, equipment and resources necessary to alleviate the impacts of the emergency.”⁶ The Louisiana and Mississippi EOCs were also activated and Mississippi Governor Haley Barbour declared a State of Emergency. Emergency Response Teams-Advanced (ERT-As) were activated and deployed to the Mississippi and Alabama EOCs, as well as Region IV’s RRCC in Atlanta.

The NRCC at FEMA HQ transitioned to 24-hour operations at Level 1 as the Emergency Management Assistance Compact (EMAC) was activated. Additionally, several more ESFs were activated, including ESF 2, ESF 6 led jointly by the American Red Cross (ARC) and the FEMA Recovery Division, and ESF 9. The RRCCs in Region IV and VI activated all ESFs.

In addition, supplies for the second landfall were pre-staged at Camp Beauregard in Louisiana and at the FEMA Logistics Center in Fort Worth, Texas, which included 540,000 liters of water; 680,000 pounds of ice; 15,120 tarps; 328,320 Meals Ready to Eat (MREs); and 102 trailers holding additional water and MREs. Also, 1,300 disaster assistance workers were pre-deployed to the area prior to landfall. Meanwhile, the Recovery Division readied approximately 40 CR staff and kept another 40 on call for deployment to Orlando to be deployed further where needed at a moment’s notice.

By 5:00 p.m., “contra flow” began on Mississippi and Louisiana highways to allow for more effective evacuation. Late on August 27, William Lokey was appointed the Federal Coordinating Officer (FCO) for Louisiana.

Sunday, August 28

On the heels of the previous day’s Presidential Declaration, FEMA issued a special announcement to “warn residents along Gulf Coast states to take immediate action to prepare for dangerous Hurricane Katrina as it approaches land.” In addition to the NRCC Red Team, which was activated for the first landfall, the Emergency Response Team-National (ERT-N) Blue Team was fully activated, as were Regions IV and VI.

Early in the day, a Presidential Emergency Declaration was issued for Mississippi, and William Carwile was appointed the FCO for that disaster, closely followed by another Emergency Declaration in Alabama, for which Ron Sherman was appointed FCO. Alabama Governor Bob Riley also declared a State of Emergency. By 5:00 p.m. contra flow ceased on Mississippi and Louisiana interstate highways.

Monday, August 29

FEMA continued preparations by pre-staging Rapid Needs Assessment Teams (RNATs) in Louisiana, Mississippi, and Alabama, while deploying nine Urban Search and Rescue (US&R) task forces and Incident Support Teams (ISTs) from Florida, Indiana, Maryland,

⁶ <http://www.fema.gov/news/event.fema?id=4808>

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Missouri, Ohio, Tennessee, Texas, and Virginia. Additionally, 31 National Disaster Medical System (NDMS) teams were deployed to staging areas in Anniston, Memphis, Houston, Dallas, and New Orleans, which included 23 Disaster Medical Assistance Teams (DMAT's). Also as part of NDMS, FEMA deployed two Veterinary Medical Assistance Teams (VMAT's) to support pet rescue and medical care.

Just after 7:00 a.m., Hurricane Katrina made its second landfall, hitting Southeast Louisiana as a dangerous Category 4 storm. Within two hours came the first report of levee breaches, and New Orleans began to flood. In response to the destruction, President Bush issued Major Disaster Declarations (FEMA-1603-DR-LA, FEMA-1604-DR-MS and FEMA-1605-DR-AL) for Louisiana, Mississippi, and Alabama, respectively, to increase the Federal funding available by triggering the provisions of the Stafford Act. Additionally, the declarations freed up FEMA IA and PA program funds for selected counties and parishes.

FEMA Director Brown also requested an additional 1,000 Department of Homeland Security (DHS) employees to be available within 48 hours of landfall and 2,000 within seven days to serve as CR liaisons. The requested volunteers were to establish positive working relationships with affected communities and residents, make referrals as needed, identify potential community issues requiring attention, convey a positive image of disaster operations to government and the public, and perform outreach to community leaders to detail available Federal disaster assistance.

FEMA's National Processing Service Centers (NPSCs), which field applicant calls, were fully operational and staffed with more than 1,150 operators to register disaster victims for assistance and provide referrals to other services. In the week immediately prior to landfall, 426 agents were trained to enhance their capability for the burgeoning 2005 Hurricane Season.

Finally, to address the mass care needs of the evacuated population, shelters were opened in several states. ESF 6 reported between 30,000 and 52,000 sheltered on August 29 residing in the following states:

- 38 facilities in Alabama
- 13 in Florida
- 68 in Mississippi
- 11 in Texas
- 74 in Louisiana

Other agencies quickly became involved to assist disaster victims. ARC provided vouchers to allow evacuees to move out of congregate care shelters and into hotels and motels. While this program is customary, it was being offered in larger numbers than ever before as a result of the impact of Hurricane Katrina. The Internal Revenue Service (IRS) provided 600-650 personnel, as requested by FEMA, to staff their call centers for tele-registration.

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2.4. POST-LANDFALL

Tuesday, August 30

In light of the previous day's events, DHS Secretary Michael Chertoff declared Hurricane Katrina an Incident of National Significance and appointed FEMA Director Brown as the Principal Federal Official (PFO) in charge of the response. The purpose of the PFO was to provide a primary point of contact for Federal disaster response in the area, as well as to increase local awareness, act as a channel for media and public communications, and interface with government officials at all levels.

Additionally, FEMA requested Department of Defense (DOD) assets, such as ships and helicopters, including the Navy amphibious assault ship USS Bataan. The Navy also indicated that several other ships, including a rescue and salvage vessel, as well as the USS Iwo Jima, were on their way from Norfolk, VA. The USNS Comfort, a Baltimore-based floating hospital with surgical capability and a large number of beds, also planned to depart, staffed by a medical crew from the National Naval Medical Center of Bethesda, MD.

Throughout the day, the movement of supplies into the affected area continued, including water, ice, MREs, generators, tents, tarps, and associated equipment. More DMAT's, US&R task forces, and ISTs were sent in while others were also being readied for deployment. FEMA also began to circulate a memo throughout DHS to request personnel to fill key roles in CR and IA to supplement staff already in the field as part of the response.

Wednesday, August 31

FEMA's priorities 48 hours after landfall included meeting the immediate life-saving and life-sustaining needs of the affected population. To accomplish this, FEMA was coordinating one of the largest mass mobilizations in U.S. history for search and rescue efforts, emergency housing, feeding, and medical care.

Agencies across the Federal government were feverishly working to address critical needs. FEMA's Recovery Division was working with a multi-state housing task force to address potential continued sheltering and eventual longer-term housing needs. US&R task forces had been working in Louisiana and Mississippi, joined by eight swift water teams from California, which brought total search and rescue personnel to more than 1,200. Fifty-one NDMS teams had been deployed. Additionally, the Department of Transportation (DOT) and the Louisiana National Guard had mobilized to support logistics and security, respectively, as well as the movement of evacuees to the Houston Astrodome. DOT also supported a team of 66 transportation experts to complete damage assessment on the highways, railroads, airports, transit systems, ports, and pipelines, as well as support detour planning and critical system repairs to get the population moving once again.

ESF 6 at FEMA HQ also requested 800 DOD personnel to assist with feeding and sheltering victims in Louisiana and Mississippi. Forty-eight hours after landfall, more

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than 54,000 people were housed in 317 shelters and already more than 82,000 meals had been served. Meanwhile, the Recovery Division had procured 20,000 manufactured housing units for approximately \$1 billion to address longer-term needs and planned to buy another 100,000 units. It also purchased 30 office trailers for use in implementing IA field operations due to the lack of available facilities in the impacted area.

Thursday, September 1

Federal disaster operations for Alabama transferred from the Region IV RRCC to a Joint Field Office (JFO) in Montgomery. Additionally, the Regional Area Command (RAC) was established to coordinate policies and efforts across the impacted states. Though it was based on a National Incident Management System (NIMS) concept of an area command, in practice the concept was quickly abandoned due to its staffing requirements and the need to address some issues in state-specific ways.

To marshal the personnel and resources to begin fulfilling evacuee needs and rebuilding communities, FEMA announced guidelines for contractors interested in doing business with the department.⁷ Contractors hired to inspect damaged property also began returning data to the NPSCs to expedite the payment of IA funds to eligible applicants. Because of insufficient FEMA staff, IA Technical Assistance Contractors (IA-TACs) began to be utilized to address Mass Care tracking and program requirements at FEMA HQ and to establish Disaster Recovery Centers (DRCs). Plans were also initiated to activate IA-TACs to supplement U.S. Army Corps of Engineers (USACE) damage assessments. Also, FEMA HQ continued to work with deployment administrators to ensure that its own staff was being efficiently utilized and that JFO resource requests were met.

Several states began to offer to take in displaced persons, and the FEMA Office of General Counsel (OGC) began to work with these State governments to negotiate their offers. An agreement was also reached with the ARC to provide for FEMA to cover the hotel costs incurred by storm victims in the Transient Accommodations (TA) program either under Section 403 or 408 of the Stafford Act, which involve different funding streams and eligibility requirements. The NPSCs also moved to 24-hour service and the IRS call centers continued to operate at full capacity.

To manage an influx of donations, FEMA held meetings with the DHS Private Sector Office, which culminated in an agreement to streamline the receipt of offers through the Web-based National Emergency Resource Registry (NERR—www.nerr.gov or www.swern.gov). Meanwhile, referrals were also being made to the National Voluntary Organizations Active in Disaster (NVOAD); donors were strongly encouraged to give cash. All manner and size of donations were being received, from a few dollars here and there to multi-million dollar corporate contributions of goods and services. A toll-free number and call center were established to begin operations the following day at FEMA HQ.

⁷ <http://www.fema.gov/news/newsrelease.fema?id=18518>

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Friday, September 2

To support the states offering to take in evacuees from the affected areas, the first Emergency Sheltering Declarations were issued for states not directly impacted by the storm, including Arkansas and Texas. These Declarations would be issued to nearly every state over the next four weeks to support funding for sheltering provisions in multiple locations. Other State and Federal agencies were also coordinating with FEMA to provide commodities such as food, water, fuel, and ice to the affected area. In addition, FEMA distributed 30 million MREs.

As the ESF 14 (Long-Term Community Recovery) lead, FEMA worked with other State and Federal officials to develop long-range plans for Gulf Coast recovery. Initial plans included the development of temporary housing for several thousand New Orleans residents. At this point, ESF 6 was also coordinating with the Department of Housing and Urban Development (HUD) to support housing requirements. HUD also announced its disaster assistance programs aimed at addressing the anticipated housing needs of the affected population.

Saturday, September 3

FEMA Director Brown announced that Federal aid had been made available to the State of Texas to supplement its momentous efforts to assist evacuees. FEMA also purchased 30 mobile DRCs and requested additional production of the units for future purchases.

By this point, the shelter population had reached more than 135,000 in nearly 500 facilities, and air evacuations had commenced in earnest, moving approximately 10,000 people a day out of the affected area. The FEMA FCO Cadre assigned to New Orleans coordinated with the National Guard and receiving states to expedite this movement, which was the largest emergency domestic airlift in U.S. history.

Due to clogged phone lines and ever-increasing demand for services, FEMA augmented the existing NPSC capability with two additional contract call centers.

Sunday, September 4

As future housing needs became clearer, FEMA announced a \$236 million, six-month contract with Carnival Cruise Lines for use of three of their ships: the Ecstasy, the Sensation, and the Holiday. These ships housed the elderly, special-needs victims, and families with small children who were residing in shelters at that time.

By this point, nearly 12,500 evacuees were being housed at the Houston Astrodome, the largest congregate shelter, and the overall population was 151,409 in 563 shelters spread across ten states. Additionally, FEMA reported that 44,000 people had relocated internally within Louisiana; 237,000 to Texas; 10,000-15,000 to Tennessee; and 3,000 to Arkansas. Also by this point, the Recovery Division had received more than 10,000 charitable offers through NERR and state donations. Volunteer coordination hotlines had been activated in both Alabama and Mississippi.

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Monday, September 5

To assist Brown as the PFO, DHS appointed Vice Admiral Thad Allen as Deputy PFO in New Orleans. At FEMA HQ, the IA management cell initiated a strategy to address evacuee needs that included deploying teams to register evacuees, activating expedited financial assistance, facilitating the relocation of evacuees out of the heavily-impacted area, and establishing a gradual transition from special procedures to standard operating procedures (SOPs) and program implementation.

At the Astrodome, 150 FEMA inspectors were in place, preparing to register evacuees. AT&T had also set up a phone bank there for evacuees to register themselves. By mid-week, 550 additional personnel were to be deployed in 200 teams to the Dallas Convention Center and 350 teams to large shelters in Mississippi and Alabama to assist with registration. Two more DRCs were also opened in Mississippi. Finally, PA disbursed \$102 million for Category B emergency protective services.

Tuesday, September 6

A week after landfall, many evacuees were struggling financially and the allocation of some cash assistance hinged on determining individuals' eligibility, so FEMA commenced the allocation of Expedited Assistance (EA), which authorized \$2,000 for eligible households under the housing assistance component of the Individuals and Households Program (IHP). In coordination with the Department of the Treasury, it would provide debit cards for many displaced persons who were unable to provide account information to enable a standard electronic funds transfer (EFT). The first cards, however, were not actually received until September 9. Evacuees were permitted to use it in whatever manner they deemed fit and did not have to account for its expenditure.

The Hurricane Katrina "Blue Roof" Program was announced under PA.⁸ Blue Roof provided plastic roof sheeting and installation through the USACE to mitigate further home damage and allow as many residents as possible to remain in their dwellings. The Recovery Division decided upon and provided the criteria for establishing DRCs to the Focus and states. In this disaster, the shortage of personnel to staff DRCs and provide the necessary local, State, and Federal services presented an obstacle to optimum functioning of the DRCs. Additionally, because of insolvable deficiencies in facility suitability, mobile DRCs were deemed the most effective option in many locations. IA reported that five DRCs were opened in Louisiana in conjunction with the State.

ESF 6's primary emphasis at this point was stabilizing shelter operations and food distribution in the State of Louisiana, where the demand was extremely high. Also, emergency group travel-trailer sites were being located in Mississippi.

In response to gubernatorial requests, the Recovery Division outlined an interim policy for designating counties for IA funding before damage assessments had completely validated the impact. This would allow repairs to begin earlier. Additionally, Disaster Specific Guidance (DSG) #1 was disseminated to "clarify procedures to be followed by each JFO in the proper notification for projects greater than one million dollars as

⁸ http://www.fema.gov/txt/rt/rt_100505.txt

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required by the Stafford Act.”⁹ These clarifications were made to expedite the disbursement of funds to applicants to enable them to fund restoration without forcing the affected local governments into bankruptcy.

Wednesday, September 7

FEMA continued to address the challenges of both temporary and longer-term housing in several ways. Along with DHS, FEMA worked with faith-based organizations to help place evacuees in housing resources available through those organizations. FEMA also benefited from ongoing U.S. Department of Agriculture (USDA) Rural Development housing assistance to evacuees and worked with the private sector to identify available rental properties.

FEMA HQ issued DSG #3, entitled “Hurricane Katrina Private Property and Debris Removal in Coastal Areas” to outline the procedures to be followed for debris removal from private property in the following areas:¹⁰

- Alabama: Baldwin and Mobile counties;
- Louisiana: Jefferson, Lafourche, Orleans, Plaquemines, St. Bernard, St. Charles, St. Tammany, and Washington parishes; and
- Mississippi: George, Hancock, Harrison, Jackson, Pearl River, and Stone counties.

Thursday, September 8

More than 500 travel trailers were in place on sites in the Gulf Region and ready for immediate occupancy, 200 of which were located in Slidell, Louisiana, to house displaced police and firefighters necessary to keep the area’s public safety capability operational. More than 2,800 more units were being prepared to be placed in Baton Rouge, and 3,500 were waiting to be deployed where required.

FEMA also announced its contracts with five major national corporations to speed emergency housing relief to Gulf Coast families. These contracts were administered by a new Housing Area Command (HAC) created to address the region’s most pressing problem, housing more than one million displaced residents. Nearly 165,000 Louisiana residents were currently in congregate care shelters and needed housing quickly. The HAC included FEMA, private sector contractors, and partners from HUD, USACE, and ARC. The HAC’s primary mission was to secure emergency housing for victims and develop longer-term plans.

Additionally, a hotline was activated in Louisiana to field calls offering donations and volunteers at the state level.¹¹

⁹ Nancy Ward, RAC Director, “Million Dollar Queue Notification for Hurricane Katrina,” DSG #1, September 6, 2005.

¹⁰ Nancy Ward, RAC Director, “Private Property Debris Removal in Coastal Areas,” DSG #3, September 10, 2005.

¹¹ Anecdotal evidence from After Action Review Conference.

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Friday, September 9

The Recovery Division accelerated its PA Infrastructure Program to assist public agencies with immediate and critical emergency repair needs. Assistance through this program would normally be delivered later in the recovery process to allow more time for evaluating the extent of public infrastructure damage, but the exceptional nature of the damage in this case revealed a need much earlier in the process for Hurricane Katrina. Infrastructure teams consisting of PA and support staff rapidly fanned out throughout the devastated areas to determine the need for repairs, and projects were identified through the Preliminary Damage Assessment (PDA) process. Under the repair program, eligible disaster-related costs were to be reimbursed to governments and certain nonprofit organizations providing essential services in the areas of emergency protective measures, debris removal, and restoration of public facilities.

To better meet the needs of states willing to host hurricane victims, FEMA adapted their Stafford Act capabilities to cover the cost of hosting the massive influx of evacuees, which could easily overwhelm local financial capabilities. Section 403 of the Stafford Act would be used until a longer-term strategy could be crafted to implement IA programs. DSG #2 was released to clarify the Federal financial responsibility for State emergency sheltering reimbursement, and applied not only to evacuation-related costs, but also to short-term sheltering, interim sheltering, and medical care, transportation, and EOC costs.¹² The first travel trailers were delivered to commercial sites in Mississippi on Friday as well.

Vice Admiral Allen was appointed as the PFO for Hurricane Katrina, replacing FEMA Director Brown as the head of hurricane relief operations. EFT and debit card EA continued to be disbursed—nearly \$460 million had been provided to individuals in the 48 hours since the program commenced. More than 230,000 eligible displaced individuals in all 50 states and the District of Columbia received the \$2,000 allotment. Debit cards were used primarily to target the largest shelter populations in Houston, San Antonio, and Dallas, while most others would receive their EA by EFT. Debit cards were not additional to EFT or postal checks, the third method of assistance delivery.

Saturday, September 10

Nearly two weeks after Hurricane Katrina devastated the Gulf Coast and the Federal government had launched an unprecedented relief effort:

- Nearly \$690 million in Federal aid had been distributed;
- More than 330,000 households had either received or been processed for a \$2,000 payment;
- More than \$315 million had been disbursed through the U.S. Postal Service (USPS);
- More than \$350 million had been disbursed through EFT;
- Nearly \$17 million in debit cards had been given to evacuees; and

¹² Nancy Ward, RAC Director, "Eligible Costs for Emergency Sheltering Declarations," DSG #2, September 9, 2005.

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- Families temporarily residing in all 50 states and the District of Columbia were receiving assistance.

DHS streamlined procedures for debris removal to expedite the return of properties to livable conditions and eliminate threats to public health and safety. Also part of the effort to provide more housing and shelter, two cruise ships arrived in New Orleans with a primary mission of housing both disaster victims and first responders or essential recovery personnel.

Monday, September 12

FEMA Director Brown announced his resignation as Under Secretary and President Bush named R. David Paulison, a 30-year fire and rescue veteran and former FEMA Preparedness Director, as FEMA's Acting Director.

FEMA also announced that State and local governments in 22 declared Alabama counties would be reimbursed for 100% of Hurricane Katrina eligible debris removal costs incurred in the first 60 days after President Bush's August 29 disaster declaration for Alabama. FEMA PA also stated its intent to reimburse local governments for all approved emergency protective measures, including police overtime, incurred in the same period. After the initial 60 days, the funding formula would refer to the standard 75% Federal, 25% non-Federal cost-sharing arrangement.

IA applicant services also changed significantly on September 12. Debit card distribution was halted, although EA would still be available through either EFT or a Treasury check. ESF 6 continued work on transitioning evacuees from shelters to temporary or interim housing with an initial target date for all transitions to take place by October 1, 2005. However, the transition process was notably slowed by a low return rate for inspections. To address this issue, FEMA allowed inspections to be performed without the applicant being present at the time.

2.5. INITIAL RECOVERY

Wednesday, September 14

FEMA established an auto-dialer service at the NPSCs to generate automated calls to inform applicants when their applications had been received. This reduced the volume on the already overburdened Helpline.

Thursday, September 15

To address the Helpline volume issues, the NPSCs doubled their capacity to take applications via the Internet. To reduce duplicate applications, FEMA also implemented a script in the application to acknowledge if a particular social security number had already been used for registration.

Friday, September 16

IA determined that the fixed EA of \$2,000 would not be considered a duplication of benefits with Temporary Housing Assistance (THA) and would not, therefore, be subject

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to recoupment. This decision had the effect of lessening the required volume of casework, allowing more focus on streamlining and processing the numerous claims while avoiding the public perception that bureaucracy took precedence over applicants' welfare.

Saturday, September 17

Federal operations for Mississippi began to transition from the RRCC to the JFO in Jackson.

Sunday, September 18

Mike Bolch replaced Ron Sherman as FCO for DR 1605 in Alabama.

Monday, September 19

The JFO in Jackson, MS, became fully operational. Additionally, FEMA authorized assistance for those households who became geographically separated as a result of the disaster. This allowed THA funds to be allocated to multiple applicants within a household as long as those people were displaced to different areas by the storm. This decision was illustrative of FEMA's flexibility in changing policies to deal with the unique circumstances of this catastrophic event.

IA also announced that the cost for transportation or housing associated with hosting evacuees incurred by an individual, family, or group would not be reimbursable under IHP. Additionally, FEMA released reminders that evacuees were potentially eligible for additional aid through State and local governments and voluntary agencies.

FEMA HQ also published DSG #5 pertaining to the lease of warehouse space to house donated goods. The guidance specifically allowed State governments to "enter into leases to support the storage and distribution of donated goods" for six months with possible extensions thereafter.¹³ This decision alleviated an important pressure point for states where donated goods were piling up.

Tuesday, September 20

IA announced free crisis counseling for disaster victims under Section 416 of the Stafford Act, which allowed FEMA to fund mental health assistance and training in declared disaster areas. The counseling primarily took the form of short-term interventions, and delivery was largely achieved through face-to-face outreach to applicants themselves.

Wednesday, September 21

Vice Admiral Allen was appointed FCO for Louisiana, Mississippi, and Alabama, making him the first ever PFO-FCO. Additionally, the Small Business Administration (SBA) announced once again that it would provide home disaster loans to homeowners and renters, not solely to businesses, with hurricane damage.

¹³ Libby Turner, RAC Chief, "Leasing of Warehouse Space for Donated Goods," DSG #5, September 19, 2005.

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Friday, September 23

In conjunction with HUD, FEMA announced a comprehensive transitional housing assistance program for Katrina evacuees. The measures instituted were designed to accelerate the delivery of Federal housing assistance to allow evacuees a greater measure of stability and flexibility while housing options were being reestablished in the Gulf Coast area. Those evacuees not eligible for IHP were informed that they may still be eligible for HUD's Katrina Disasters Housing Assistance Program (KDHAP).

Saturday, September 24

Hurricane Rita made landfall in Texas and Louisiana as a Category 3 storm, compounding the difficulty of Katrina response and recovery efforts.¹⁴ Alexander S. Wells (Scott Wells) was appointed the new FCO for the affected area, replacing Vice Admiral Allen.¹⁵

Sunday, September 25

IA clarified the registration process and eligibility for evacuees impacted by both Hurricane Katrina and Hurricane Rita to guarantee that needs resulting from both were met while still ensuring that replacement housing, for example, was not duplicated.

Monday, September 26

FEMA halted EA for Hurricane Katrina, as the majority of affected households had already registered, 75% of which had already received EA. At this point, FEMA had awarded more than \$1.6 billion in EA to 803,088 applicants in three affected states. Additionally, FEMA continued efforts to move evacuees from congregate care shelters into other forms of housing. According to ESF 6, approximately 80,289 evacuees were housed in 853 shelters in 18 states by this date.

Wednesday, September 28

FEMA officially initiated THA rental payments in the amount of \$2,358 pursuant to Stafford Act Section 408. Applicants in the most heavily impacted areas of Louisiana and Mississippi received three months of rental assistance based on the national average of fair market rental (FMR) rates.

Inspection measures were approved to streamline damage verification within a more reasonable timeframe. Due to the magnitude and severity of the damage in some locations, and the inability of residents to return or, in some cases, for inspectors to visit, FEMA identified particular areas that would be verified using a combination of rapid needs assessment team information, map overlays, and Geographic Information System (GIS) data. This alternate method allowed much more assistance to be delivered to applicants in a much shorter time frame.

¹⁴ While this report focuses on Hurricane Katrina, it is necessary to mention Hurricane Rita inasmuch as it affects Katrina response and recovery efforts and available resources. In addition, many evacuees were affected by both storms.

¹⁵ <http://www.fema.gov/news/newsrelease.fema?id=19143>

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PA also provided guidance to simplify the administrative burden of segregating emergency protective measures costs between Hurricane Katrina and Rita, endorsing good faith efforts to attribute eligible costs to the appropriate declarations. This streamlined the process for States and localities to receive reimbursement.

Thursday, September 29

FEMA announced the Facilitated Relocation Program (FRP), consisting of three components:

- 1) **Family reunification:** Transportation would be provided for evacuees who were separated from family members during the evacuation process and who were residing in hotels, shelters, and motels in different locations and states. This option would be available through October 27, 2005.
- 2) **Interim housing in other locations:** Transportation would be provided for evacuees currently staying in shelters, hotels, and motels to interim housing in different locations through December 26, 2005.
- 3) **Returning to home state:** Transportation would be provided for evacuees to return to their home states from interim housing in other locations. This option would be available for up to 18 months after the date of declaration.

2.6. LONGER-TERM RECOVERY

Week of October 2 – October 8

FEMA clarified the policy pertaining to home inspections to allow evacuees located in Georgia, Kentucky, North Carolina, South Carolina, and Tennessee to have their homes inspected without being present. FEMA-contracted inspectors would contact residents who were due an inspection to set up a date and time and if applicants were not able to be present, they could identify another authorized agent to meet the inspector.

Jack Schuback, lead for the IA Management Cell at HQ, held the first large conference call (including more than 400 participants) on transitional housing. The call was sponsored by the National Law Center on Homelessness and Poverty, the National Low Income Housing Coalition, the National Alliance to End Homelessness, and the Enterprise Foundation.

FEMA elected not to use private sector universities and associates to assist in staffing long-term recovery. Additionally, a housing site/project review committee was established in an effort to carry out a systematic and efficient site evaluation process in Louisiana to speed up the placement of mobile homes and travel trailers (MH/TT). Finally, during this week, 100% funding for mission assignments (MAs) was extended to the USACE.

Week of October 9 – October 15

The Recovery Division established an alternative arrangement to ensure that PA complied with the National Environmental Policy Act (NEPA) requirements.

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- To ensure that all evacuees were registered and their eligibility was determined, as well as to give them relevant referrals;
- To explain the IHP program and the resulting benefits if eligibility was determined; and
- To inform evacuees of hotel assistance deadlines and to outline other housing options.

The guidance outlining the timeline for the transition from Stafford Act Section 403 to Section 408 funding (indicating the terminus of hotel assistance under the sheltering provision) established that as of December 1, hotel funding paid under the CLC agreement with FEMA would cease, that States would stop allowing new hotel stays, and that States and localities would restrict new or extended 403 Program apartment leases. Additionally, as of March 1, 2006, all 403 to 408 transitions would be complete. These deadlines would later be extended multiple times.

Finally, a fact sheet was also released on November 15 outlining FEMA's progress toward assisting the evacuees.

Week of November 20 – November 26

FEMA developed the Declaration of Funds Use and Continued Need for Housing Declaration form to ensure that applicants were notified of eligibility requirements for recertification. Guidance was issued authorizing applicant receipt of initial rental recertification by submitting the Funds Use Declaration in lieu of providing the standard receipts documenting use of such assistance. This streamlined the recertification process, as there were nearly 40,000 applicants requiring recertification by this time.

FEMA and the Louisiana Office of Homeland Security and Emergency Preparedness announced that all DRCs in the State would be closed on Sunday's beginning on November 26, 2005. An announcement was also made regarding a two-week extension to the hotel program deadlines through December 15, 2005. Additionally, the ten states with the highest evacuee concentrations were given the chance to apply through the Governor for an extension of the program in their State through January 7, 2006.¹⁹

A deadline was also announced for FEMA-funded housing voucher programs. Beginning on December 1, 2005, FEMA would no longer sign apartment leases under Section 403 of the Stafford Act, the emergency sheltering provisions. All current 403 apartment leases would end by March 1, 2006, and after that point, evacuees would be expected to pay for their apartment through the IHP funds they received through the FEMA assistance process, through HUD's KDHAP, or through their own financial means. If evacuees elected not to stay in the apartment through the end of their lease, FEMA also offered to pay the penalties for early lease termination.

¹⁹ <http://www.fema.gov/news/newsrelease.fema?id=20818>

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Week of November 27 – December 3

An additional \$4.2 million in PA funds was approved and disbursed to Alabama, of which more than \$1.4 million went to offset Alabama Department of Conservation and Natural Resources costs to remove debris at Dauphin Island.²⁰ The debris scattered over 6,800 underwater acres created immense navigational hazards and was a threat to public health and safety.

Weeks of December 4 – December 31

FEMA IA authorized FCO's to extend the Other Needs Assistance (ONA) generator purchase eligibility period to additional areas, as power outages required.²¹

The registration period for Louisiana residents was extended from January 11, 2006 to June 1, 2006 as the continuing registration intake flow indicated that many more registrations had yet to be submitted. Additionally, later in the month, registration periods for Alabama, Mississippi, and Texas were extended to March 11, 2006.

Conclusion

The recovery for Hurricane Katrina will continue even long after the 2005 Hurricane Season has drawn to a close. Its profound effects on over a million families will require support and services through IA, PA, Long Term Community Recovery and other programs for years to come.

Overall, the 2005 season was marked by two of the costliest disasters in US history. Hurricane Katrina affected an area three times as large as Hurricane Andrew did in 1992, caused more than six times its economic damage and claimed 20 times more lives. The storm's magnitude made it the greatest challenge FEMA has ever faced and stretched its capability and capacity to the limit.

FEMA's Recovery Division faced momentous difficulties in responding to a catastrophic disaster of this scale. The immediate and profound need for surge staff stretched IA, PA and CR to complete everything from damage assessments to inspections, while providing support staff to numerous JFOs and AFOs. Once staff was acquired, training thousands of new employees and contractors posed new challenges. In addition, the volume of registrations and Helpline calls also revealed capacity issues with both online and phone services to assist applicants. Finally, the sheer numbers of evacuees presented serious challenges when it came to sheltering and longer-term housing, as many evacuees could not return to their homes anytime in the foreseeable future.

These trials and others were addressed in innovative ways. This after action report aims to identify these issues and innovations to expand on and change them to ensure even stronger responses in 2006.

²⁰ <http://www.fema.gov/news/newsrelease.fema?id=20919>

²¹ <http://www.fema.gov/news/newsrelease.fema?id=21598>

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3. OVERARCHING ISSUES

The issues in this section are those common to all or most programs that require both program-specific solutions and Division-level coordination and management to ensure consistency and efficiency across the agency. There are also some issues that are not specific to any one program but that require Division-level policy decisions and management. At the same time, by their very nature, each issue presented in this section is also congruent with agency-wide or department-wide problems; therefore, any Division solution must be in accordance with the existing or revised agency or department directives.

3.1. STAFFING/ORGANIZATION ISSUES

3.1.1. *Staffing Levels*

Issue: There is a chronic shortage of qualified staff throughout the Recovery Division, due to inadequate authorized staffing levels, diversion of authorized positions to other organizations, and inability to fill authorized vacancies.

The Division (and FEMA as a whole) went into the 2005 hurricane season with chronic staffing shortages. Some authorized positions had been diverted to other needs within the DHS and key HQ and Regional vacancies remained unfilled. After Katrina's landfall, this created a domino effect, as permanent on-board personnel were constantly moved into incident-driven priority positions, leaving behind temporary vacancies to be filled on an ad-hoc basis. Inevitably, this led to poor matches of individuals to positions and lack of staff continuity, all while forcing individuals to manage multiple assignments. A variety of staffing surge mechanisms were employed, including the utilization of temporary hires, DAEs, those on detail from OFAs, and support contractors, but none of these surge staff were integrated into a coherent Division-wide plan. This resulted in intermittent staff surpluses for some programs while others continued to suffer from shortfalls. Additionally, positions were filled by individuals who lacked the experience and/or training to execute the mission. Overall, the staffing problem can be divided into two distinct issues: managing permanent staff and improving surge staff capability.

Recommendations:

- Develop a Division-level strategy for ensuring adequate permanent staffing levels to address the chronic permanent staff shortages. This strategy should include the following:
 - Identify and fill the highest priority positions in each program that will be covered by the current agency hiring initiative.
 - Identify any key positions that may remain unfilled, and develop a backup plan for pre-arranged interim backfills.

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- Conduct a Division-wide analysis to determine optimum staffing levels for each program (within any revision to the Division organizational structure), and develop a follow-on plan for staffing up to these levels.
- Maintain and optimize those surge staff who effectively met the requirements during the 2004 and 2005 seasons and create a consistent, phased resource-deployment approach to address surge-staffing needs by conducting the following activities:
 - Improve the tracking of personnel throughout the deployment process.
 - Employ phased-deployment practices.
 - Provide resource-coordination training for those FEMA personnel and TAC liaisons involved in surge staffing.
 - Develop program-specific, centralized teams that adjudicate conflicting demands for resources (FEMA and TACs) on a national basis and provide clear communications with field elements regarding staffing resources status.
 - Create a staffing resources database to document experience, skills, and training for resource-allocation purposes.
 - Develop a consistently applied policy for limiting and managing FEMA staff deployments (e.g., 60 to 90 days for catastrophic incidents).

3.1.2. *Emergency Management Experience*

Issue: Recovery Division programs have experienced a significant loss of the programmatic experience and knowledge base over the past several years. This void impacts personnel across the board, requiring new staff to learn their jobs with inadequate guidance and creating excessive demands on the remaining experienced staff.

Recommendation:

- Identify and interview individuals who may be considering leaving the Division as a first step in developing an incentive program to improve retention rates.
- Identify outside sources of individuals with appropriate levels of disaster management experience for targeted recruitment, both for permanent positions and for extended temporary assignments, such as interagency details and Intergovernmental Personnel Act (IPA) assignments. Potential sources include local and State governments, as well as OFAs and NGOs.
- Identify and implement alternative mechanisms for re-acquiring access to experienced former agency personnel on a temporary basis.

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- Identify former personnel who can serve as part of a training cadre for the transfer of experiential knowledge to current staff; acquire and integrate this cadre into existing training programs.

3.1.3. *Division Organization for Natural Disaster Response and Recovery*

Issue: The current Recovery Division organization is not optimal for major natural disaster response and recovery. The Division contains a patchwork of organic programs, support functions, and management and coordination entities. Inter-program and inter-divisional relationships lack clarity, leading to informal, improvised, and personality-based solutions. While this might work on a day-to-day basis, these ad-hoc arrangements fall apart when there are numerous short-notice redeployments demanded by a catastrophic incident.

Recommendation:

- Improve the Division's organizational structure for managing catastrophic events by conducting a short-term assessment of the internal Division organization and transition for such events, with particular attention to the clarification of inter-program relationships and responsibilities. This assessment should take into account any externally mandated reorganization that may occur in the immediate future.
- Pre-plan potential deployments for catastrophic disasters to allow for transitional overlap and to mitigate organizational gaps.

3.2. TRAINING ISSUES

3.2.1. *Training for Program-Specific Responsibilities*

Issue: In general, training for specific positions within each program is inadequate and inconsistent. While appropriate training courses exist, they are not delivered effectively or in a timely manner to the appropriate people. Cross-program training is also not well coordinated.

Recommendation:

- Improve the effectiveness and consistency of current training programs by designating a Division Training Coordinator and key training points of contact for each program, with the objective of ensuring that training is appropriately targeted to the right personnel and that defined inter-program roles and responsibilities are consistently reinforced.

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3.2.2. NIMS/ICS Training and Implementation

Issue: The Recovery Division (and FEMA as a whole) suffers from an inconsistent and incomplete integration of NIMS into program operations. While this is partly due to lack of training and experience, there are also substantial issues regarding how program operations in HQ interface with NIMS-based tactical field organizations. This situation is complicated by the perception of a substantial number of personnel that NIMS organizational models are not appropriate for programmatic operations. Field organizations show considerable variability in the effectiveness of NIMS implementation. This is partly due to a lack of higher-level position-specific NIMS training. Key issues seem to be the geographical versus functional branch orientation and the chain command under the FCO versus the technical supervision of HQ program leads. Resolution of these issues can only occur when all personnel are at least operating from a consistent understanding of basic NIMS principles and concepts and FEMA-specific applications are determined.

Recommendations:

- To address the immediate shortfall in basic NIMS/Incident Command System (ICS) knowledge:
 - Require IS-100/200 online courses to be completed by all Division personnel.
 - Require position-specific training for critical field-deployed staff positions (e.g., planning section chiefs).
 - Provide executive-level training for HQ and Regional senior managers.
- To address inconsistent NIMS implementation:
 - Develop NIMS-compliant organizational templates for ERTs and JFOs.
 - Distribute the draft (or final, if available) Incident Management Handbook (IMH) to all staff.
 - Develop process diagrams to define the interface between tactical operations under NIMS and HQ-level programmatic decision- and policy-making.
 - Assign pre-designated FCOs with pre-designated staff personnel that are aligned with ICS staff responsibilities (e.g., Ops, Planning, Logistics, Finance). These teams should be maintained for deployment during the 2006 Hurricane Season.
 - Designate a senior staff member as the Division NIMS advocate and trouble-shooter, with particular emphasis on improving the interface between HQ program offices and NIMS-based field organizations. This position should also

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serve as the Division coordinator for implementing the anticipated NIMS-related National Response Plan (NRP) amendments.

- In the longer term, integrate NIMS training and performance criteria into the Division's overall personnel management requirements.

3.3. MANAGEMENT PROTOCOL FOR THE GOVERNOR-TO-GOVERNOR INITIATIVE

Issue: There is no established process for communication and coordination among all State, Federal, and NGO partners when a catastrophic disaster necessitates mass interstate relocations. In September 2005, the Governor-to-Governor relocation initiative was characterized by extensive communication and decision-making outside of normal disaster-management channels, complicating the parallel Recovery Division efforts to develop and implement supporting policies.

Recommendations:

- Designate a senior Division manager to work with the National Governors Association (NGA) and the National Emergency Management Association (NEMA) to develop processes for communication and collaboration between FEMA and the States. As part of this effort, prepare guidance on the communication process (for post-emergency declaration), including timelines for notice and coordination of stand-up and stand-down.
- Establish Memoranda of Understanding/Memoranda of Agreement (MOUs/MOAs) between FEMA and all partners to establish processes for transportation, notification, delivery, reception, and tracking, including special populations.
- Develop planning guidance (based on lessons learned from Katrina) for all States to be prepared for either end of the relocation spectrum (i.e., as a State being evacuated and as a receiving State for relocation).
- Request that law enforcement agencies (State and Federal) collaborate to develop a tracking process to prevent losing track of lost/missing children, illegal immigrants, prisoners, registered sexual predators, and others during a mass evacuation.

3.4. POLICY IMPLEMENTATION PROCESSES

Issue: Within the Division, there is a lack of clarity regarding the process to develop, coordinate, disseminate, and implement policies before and during disasters. There is a perceived mismatch between the ways the IA and PA programs develop and disseminate policy. In particular, the process for DSGs should be articulated more clearly, particularly to define the threshold where a field-level issue requires HQ decision-making.

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Recommendations:

- Streamline and clarify the policy-making processes within the Division by ensuring that all key policy makers have timely input and that all new policies are disseminated in a timely and comprehensive manner to all concerned individuals and agencies. To the extent possible, pre-brief State and local partners on proposed policy changes, and ensure that they have access to pre-designated points of contact to obtain answers to their questions and provide feedback.
- For each program, develop clear and concise flow charts for both normal policy development and for the expedited DSG process, indicating review/concurrence checkpoints, time frames, and issue-resolution points. To the extent possible, make these consistent throughout the Division; where inter-program coordination is required, ensure there is a Division-wide default process.
- To address the specific issue of the 403/408 transition:
 - Have IA and PA review the process outlined in the transition section of both programs' current policies to ensure consistency and inter-program alignment.
 - Assign a PA number (9500 series) and an IA number to each policy.
 - Have Division Director sign both policies.
 - Disseminate each program's policy separately.
- To address the specific issue of DSG development:
 - Ensure that the issue is submitted to the JFO Senior Public Assistance Officer (PAO), who will make the decision to elevate it or not and prepare the draft DSG. The affected State PAO should be involved in the discussion.
 - Ensure that the draft DSG may be reviewed by other programs within the JFO prior to sending to HQ.
 - Ensure that the DSG is reviewed and vetted by the Regional Branch Chief, Headquarters, and the JFO chain of command.
 - Have the PAO sign-off on the DSG.
 - Distribute the DSG via hardcopy (memo from PAO), disaster website, and e-mail. Ensure that it is sent to staff and States, and is available to all parties at the JFO.

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3.5. NRP IMPLEMENTATION

Issue: During the Hurricane Katrina response and recovery, there was a lack of clarity regarding the implementation of portions of the NRP that had not been fully implemented in any previous natural disaster, such as the designation and subsequent operations of the PFO and the roles, relationships, and interactions of the Homeland Security Operations Center (HSOC), Interagency Incident Management Group (IIMG), and NRCC. Confusion regarding the chains of command, duplicative and out-of-sync reporting cycles, and conflicting priorities all adversely affected Division operations. This issue has been recognized in almost every After-Action report to date and has already led to proposed changes in the NRP and its organizational artifacts. These will have a potentially significant impact on operations during the immediate upcoming hurricane season.

Recommendation:

- Require completion of the IS-800 online course regarding the NRP by all Division personnel.
- Designate a senior Division staff member to serve as the NRP action officer to monitor the progress and status of NRP changes and to evaluate their significance as relates to Division programs. Particular attention should be paid to potential staffing demands.
- Ensure that all Division staff members are informed in a timely manner regarding proposed and final NRP changes and consequent changes in Division policies and procedures.
- Designate a lead staff member or manager from each program for outreach to NRP entities who need to be informed about Division program operations; at a minimum, these should include pre-designated PFOs and staff and managers at the proposed National Operations Center (NOC).

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4. ISSUES BY PROGRAM

The issues in this section are divided into Recovery Division Program Areas (e.g., Community Relations, Individual Assistance, and Public Assistance) because the issues and recommendations discussed are program specific.

4.1. FEDERAL COORDINATING OFFICER (FCO)

Although FCO Operations was the functional element within FEMA Recovery Division that was the initial focus of this portion of the Recovery Division After-Action Review, it evolved to address issues of overall operations and management with which FCOs are inherently involved relating to Region Response and Recovery Directors and key HQ personnel.

It is important to note that the respondents interviewed and/or completing the questionnaire for this section included not only the FCOs designated for this disaster, but also their counterpart State Coordinating Officers (SCOs)/State Emergency Management Directors, some local Directors, FCO cadre members filling other key positions during this disaster, Regional Response and Recovery Directors, key HQ personnel, and JFO operations personnel. As such, it is an overall perspective of management and operational issues.

The need for a National Housing Policy and more robust communications capability were two issues raised by the FCOs and Regional Response and Recovery Directors, but these issues are being addressed in the IA Housing section of this document and by the Response Division, respectively.

4.1.1. *NIMS Implementation*

Issue: The implementation of NIMS was inconsistent during the 2005 Hurricane Season with various levels of organizations and different agencies not having a common understanding of unified command and other NIMS principles and, therefore, not applying those principles in the same fashion. This resulted in confusion over roles, responsibilities, and lines of authority, which dramatically hindered coordination and cooperation in Response and Recovery efforts. ESFs at the JFOs, in some cases, seemed to be stovepiped to their parent agencies rather than part of the team supporting the JFO/Unified Command. There was also confusion concerning the applicability of ICS and NIMS for the Recovery Division in that Recovery is program-focused as opposed to Response, which is focused on saving lives. Additionally, some program leads seemed to bypass the FCOs and deal almost exclusively with FEMA HQ program leads.

Recommendations:

- Use the doctrine such as the IMH (being developed) to supplement the required NIMS/ICS self-study courses to educate and train FEMA, ESFs, OFAs, and partners at all levels on how to effectively implement NIMS, practice its implementation

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during exercises and incidents, and develop lessons learned and best practices to improve NIMS implementation. Doing this will help to further its institutionalization throughout disaster operations.

- Leadership should continue to champion the NIMS/ICS as the standard system/structure that will be used by the Recovery Division.

4.1.2. *Centralized vs. Decentralized and Geographical vs. Functional Approaches*

Issue: Inherent in the discussion of NIMS implementation for Recovery programs are controversies over the concepts of centralized vs. decentralized program management and functional vs. geographic organization, which resulted in confusion over who should be and was actually in charge. A functional approach describes centralized program management, while a geographic approach aligns more with decentralized program management. FCOs and those in charge of AFOs or geographical branches, by and large, advocated for decentralized program management, while functional program managers desired centralized program management at HQ. Although the NIMS principle of an individual having only one supervisor is understood, the program person on the ground must be accountable to the FCO but not go against program policy. The principle of unified command perhaps has more applicability in terms of supervision as both the FCO and the program manager need to be in the loop on decisions to ensure effective coordination with the SCO and to ensure program consistency for the disaster. The same analogy also applies to a degree to other Federal agency personnel in ESFs in that they are representatives of their agency, but also have a role within the overall Federal team whether at the NRCC or a JFO.

Recommendations:

- Develop procedures that ensure that all those with geographic responsibilities and those with program responsibilities are coordinating their actions for a unified decision and are not being solely State-, program-, or agency-focused (i.e., “stovepiped”).

4.1.3. *NRP-PFO/FCO and Unified Command Principle for ESFs*

Issue: The NRP and the 2005 Hurricane Concept of Operations (ConOps) did not clearly delineate the working relationship between the PFOs and the FCOs, thus causing confusion in Response operations and in the implementation of Recovery programs. The ConOps was not specific enough to be useful in implementing Response and, particularly, Recovery operations, which resulted in reactive planning, slow response, uncoordinated activities, and inconsistency. During Hurricanes Katrina and Rita, the PFO was given operational responsibilities (perhaps because of concern regarding FEMA’s progress and capabilities) but they were not clearly articulated to all concerned, which led to confusion. According to the questionnaire, a large majority (78%) of the supervisors and managers with an opinion indicated that the NRP was “somewhat ineffective” or “ineffective” in the context of the Katrina response.

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In a related issue, there was delay in making timely decisions because of a general lack of authority to make decisions on the ground level. Decisions made at HQ often brought about unanticipated consequences and were sometimes inconsistent because of a lack of HQ situational awareness.

Additionally, the roles of ESFs as teams integrated into the overall Incident Action Planning and alignment of ESFs in NIMS were not universally understood, resulting in uncoordinated actions. This was evident in the NRCC and at JFOs. This confusion and lack of coordination was widespread, as indicated by the questionnaire responses. Almost 71% of managers and supervisors expressing an opinion in the questionnaire indicated that the “coordination between the NRCC ESFs, IA, and PA staff” was “somewhat ineffective” or “ineffective.” More than 60% indicated that the “operational coordination between the NRCC ESFs and the ESFs at the JFOs” was “somewhat ineffective” or “ineffective.” They also indicated that three main factors that hindered the effectiveness of the ESF coordination were procedures (53%), training (57%), and information flow (63%).

Recommendations:

- Communicate the outcomes from the planned PFO/FCO sessions to all personnel so that the refined working relationships of PFOs/FCOs and the ConOps are approved, understood, and exercised (e.g., during the Regional Hurricane Exercises) prior to hurricane season.
- Ensure that all agencies and personnel involved in ESFs or agency Response and Recovery operations at the NRCC, RRCCs, JFOs, and other sub-elements fully understand and practice their NRP roles, the unified command principle, and integrated Incident Action Planning.
- Establish protocols on who at what level makes which decisions to support NIMS principles and have consistent policies.

4.1.4. *Prevalence of Response Training*

Issue: FEMA personnel who were deployed initially found themselves in the middle of Response operations (e.g., rescue, evacuations, and other life-safety issues) in the disaster area for which most were never trained. The nature of Response operations for a significant incident, such as Katrina, requires a different perspective than normal incidents in terms of training of key personnel and allowing them the authority to make more timely decisions.

Many FCOs and other key personnel have neither the training nor experience in Response. In some instances, timely decisions could not be made during Katrina because FCOs did not have the requisite authority or their decisions were second-guessed by those not understanding the urgency of Response operations, causing delays or failure of needed resources to be delivered. FCOs were not able to obtain the logistical support

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they needed and received inaccurate information about what was to arrive and when. For example, needed base camp facilities were delayed, which in turn delayed service to victims. Decisions were made at HQ by procurement, OGC, and program personnel without coordination with the FCOs. These practices seem to be in conflict with the NIMS principles.

Recommendations:

- Develop response operations training for FCOs and other key personnel (e.g., logistics, procurement, OGC, and program leads) so all understand the demands and time-sensitive nature of Response operations and support FCOs on the ground to get urgent decisions made and implemented.

4.1.5. *Planning Capabilities*

Issue: JFOs are ill equipped to plan for lengthy Response and even longer Recovery without mid- and long-term planning capabilities for significant incidents.²² Without a long-term solution to this critical planning capability, planning will continue to be ad hoc and reactive. As a result, Response and Recovery will be less effective than necessary.

Prior to this event, the JFO's planning function has primarily focused on situation reporting and daily incident action planning. Situation Reports (SITREPs) were a summary of Recovery program assistance rather than the essential information for Situational Awareness to build a Common Operating Picture for catastrophic disasters or incidents. For incidents beyond the normal and those involving rapid Federal response, JFOs need planning for longer time frames (weeks and months) and for functional areas, such as fuel distribution.

This issue was paramount to the FCOs and Regional Response and Recovery Directors as FEMA's traditional planners have not had the planning expertise to meet this need. DOD planners were able to partially fill this need during phases of Katrina, but FEMA does not have such expertise.

Recommendations:

- As the DOD has significant planning capabilities and is being asked to support FEMA HQ with that expertise, DOD could be further tasked with a pre-scripted MAs to support JFOs for the 2006 Hurricane Season. Having designated planners—who can work within a Region, with States, and across the Federal agencies—to plan for various contingencies and necessary protective actions and support actions would promote a more seamless transition when disasters occur. Coupled with common operational picture and tactical planning templates, the planners could greatly enhance the efficiency and effectiveness of Response and Recovery operations.

²² This issue correlates to the need to understand response operations, incident action planning, and the complexity of a catastrophic disaster.

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- In the long term, institutionalize an enhanced JFO planning capability within DHS/FEMA by identifying the critical knowledge, skills, and abilities and building a cadre of these planners preferably internally, or from other parts of DHS (e.g., Coast Guard) or OFAs.

4.1.6. *Availability of Trained and Experienced Staff Agency-Wide*

Issue: There was a lack of experienced staff and trained people to fill positions because of limited pre-disaster hiring compounded by trained staff being diverted to fill positions for which they were not trained. (A related staffing issue: The use of Peace Corps volunteers and firefighters to supplement staffing shortfalls worked well in many locations when expectations were provided up front and accepted, and when they were adequately trained and directed. However, when expectations were not managed up front, the use of firefighters was not as effective.)

Recommendations:

- Develop a briefing (by Human Resources) regarding the various initiatives and their ConOps, to include deployment and staging, and discuss with the FCO cadre and program leads who will utilize them.
- Develop an effective team roster development/management methodology to replace the current ad hoc process, and develop a strategic rotation policy for long-duration JFO operations for catastrophic events.
- Move FCOs out of the Recovery Division as they are also involved in Response operations.

4.1.7. *Consistency of Policy Application*

Issue: Unclear policies that were not uniformly distributed and were subject to differing interpretations resulted in inconsistent application of policies across the Agency.

Recommendations:

- Make a conscientious effort, even if through technical assistance means, to gather pertinent feedback from applicants and provide clear and understandable policy guidance and develop materials to educate the public on what to expect.

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4.2. ESF 14 – LONG-TERM COMMUNITY RECOVERY

Most of the ESF 14 issues have to do with the fact that this ESF is new and untested. As might be expected with any new support function, the key issues pertained to training and staff experience, policies and procedures, planning, leadership, financial support, and the ESFs relationship to established functions and program areas. It also included issues related to NIMS, ICS, and the Stafford Act.

4.2.1. *Availability of Trained and Experienced ESF 14 Staff*

Issue: There was no dedicated cadre of experienced personnel for ESF 14, in part because the ESF is new and untested. There was a general lack of trained, experienced, and qualified personnel to fill positions in the ESF 14 function, partially because the mission, roles, and responsibilities of ESF 14 are ill defined relative to other FEMA programs and it was therefore difficult to determine the right skill sets for the mission. Beyond the issue of numbers and skill-mix, the lack of training and training materials available to the field staff prompted ad hoc training solutions that were inconsistent and resulted in inefficient and ineffective uses of resources and inadequate management of field staff. ESF 14 management also was strongly encouraged to hire local contractors, which delayed further the delivery of support to impacted communities.

Recommendations:

- Develop the job skill requirements for the function based upon the eventual refinement of the ESF 14 mission statement, policies, and procedures.
- Recruit, train, credential, and retain a dedicated cadre of qualified personnel to support ESF 14.
- Develop a staffing strategy that is scalable, gets people into the field at the right time, and provides consistency across impacted areas.
- Develop and deliver ESF 14 training to identified cadre and Federal, State, local government, non-governmental, and other partners and stakeholders. This training should be based upon a needs assessment that flows from the ESF 14 mission analysis now underway.

4.2.2. *Written Policy and Procedural Guidance*

Issue: The ESF 14 mission, roles, and responsibilities remain unclear to the many stakeholders. Although there is an ESF 14 Annex to the NRP, the supporting body of policy, plans, and procedures remains incomplete. Without this body of guidance, the means for execution in the field remains unclear. The main obstacle to implementation of this body of policy and procedures is a lack of understanding of the scope and breadth of the “long-term recovery mission” *vis-à-vis* traditional FEMA Recovery missions and

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in some cases, Response missions. Additionally, there is no clear chain of command either internal or external to the ESF 14 function in the JFO. One FCO remarked that he would dedicate less than two minutes a day to ESF 14 issues because its role was so ill defined. Consequently, there is no corresponding reporting protocol, information flow, SOPs, or associated role for ESF 14 in short- and long-term planning.

The absence of necessary policy and procedural guidance resulted in the questioning of ESF 14 authority, mission, roles, and responsibilities by senior leadership. Some progress has been made in the development of guidance since Katrina that may alleviate some of this ambiguity, but these documents have not yet been vetted among the partner organizations nor have they been made ready for implementation.

Recommendations:

- Establish clear roles and responsibilities for ESF 14; explicitly define expectations of Federal, State, local governmental, and non-governmental partners; explicitly define the mission, process, and products to be delivered through ESF 14, as well as the limitations of ESF 14.
- Develop a definitive ESF 14 organization and publish an organization chart with clear command and staff functions and the relationship of ESF 14 to the JFO organizational structure.
- Engage FEMA and partners in collaboratively rewriting the SOP to accommodate the information needs, vertically and horizontally, of all Federal, State, local, and volunteer partner agencies.
- Engage FEMA and partners in collaboratively rewriting the ConOps. The ConOps should include the piece of work developed by the ESF 14 working group at the After-Action Conference in April that defined and outlined three activities as stated in the NRP: assessment, technical assistance for planning, and implementation support.
- Distribute on a wider basis existing policy and procedural documents to all potential partners and stakeholders to develop a baseline of knowledge and understanding of the ESF 14 function.

4.2.3. Preparedness Planning and Coordination

Issue: FEMA is the lead agency assigned responsibility in the NRP for overall planning and coordination of the function's activities across Federal, State, and volunteer organizations. Inadequate coordination of preparedness activities among the key partner organizations during "peace time" hindered and delayed the delivery of services to impacted local communities. This was evident through incomplete written policy and procedural guidance and a lack of program/contact information provided to the staff in the field. Additionally, there was inadequate pre-incident convening, planning, and

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coordinating with partners to explore and document ways to leverage available resources through Federal assistance. The lack of preparedness caused duplication of effort, overlapping activities, or gaps in assistance relative to ESF 14 and other FEMA organizations and programs as well as other agency authorities.

Recommendations:

- Convene and coordinate with Federal, State, local, and non-governmental partners to do the following:
 - Explicitly define the roles and responsibilities of Federal, State, local, and non-governmental partners;
 - Formalize coordination mechanisms to identify programs and funding streams;
 - Develop an effective and efficient process to provide long-term community recovery assistance to impacted areas;
 - Rewrite the SOP to accommodate information needs vertically and horizontally of all Federal, State, and local partners, including voluntary agencies, business and industry, Congressional Budget Office (CBO), Federal Business Opportunity (FBO), etc.; and
 - Define staffing to function throughout all phases of SOPs, and obtain written commitments to dedicate sufficient staff to the function from the start (i.e., pre-event and assessment) to finish (i.e., implementation).
- Develop and provide clear guidance to State and local governments to explain ESF 14 purposes, authorities, and limitations, including expected levels and types of State involvement.
- Coordinate, vet, and distribute on a wider basis the existing policy and procedural documents to all potential partners and stakeholders to develop a baseline of knowledge and understanding of the function.

4.2.4. *ESF 14 Leadership*

Issue: The frequent changes in ESF 14 leadership in the field resulted in inconsistent execution of the function. This was evidenced by changing and/or inconsistent direction, lack of specific goals and objectives, frequent delays, failures to honor commitments, and credibility issues. In Louisiana in particular, the frequent changes in ESF 14 leadership greatly impeded the establishment of strong and consistent leadership and programs with the JFO, field staff, State, and local government representatives. The goal-setting and decision-making scheme was changed so frequently that it diminished the stability, credibility, and effectiveness of ESF 14. The frequent changes in leadership also caused

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confusion and burn-out in the field as well as inefficient use of resources. ESF 14 leaders in the field frequently felt that they did not have the support from their counterparts at the national level.

Recommendations:

- Clearly define the roles, responsibilities, and scope of the ESF 14 lead in the field in FEMA doctrine and documents. Ensure that the FCO and other key JFO staff understand the ESF 14 leader's role and authority.
- Provide support from FEMA Headquarters to the ESF 14 leadership in the field. Develop a "leadership policy memo" expressing explicit support for the function to senior leadership within FEMA and other agencies/partner organizations.
- Develop a staffing strategy that provides for continuity and consistency in leadership for the support function.

4.2.5. Financial Support

Issue: The lack of clarity about a clear source of funding for implementation of the ESF 14 projects by FEMA and OFAs significantly diminished its effectiveness. Because the mission lacked clear funding support, it was perceived only as a coordination function, without the ability to execute FEMA or other Federal agency programs in any meaningful way.

Recommendation:

- Develop clear guidance concerning the funding of ESF 14 projects and clarify expectations among the partner agencies regarding financial and institutional support for ESF 14 initiatives.

4.2.6. Authority Under the Stafford Act and NRP

Issue: The authority to execute ESF 14 missions, as outlined in the NRP, under the Stafford Act was challenged by FEMA and other Federal agency decision makers. This resulted in confusion, frustration, and disruptions in service delivery. Some felt that the Stafford Act does not explicitly address long-term community recovery as an eligible cost.

Recommendations:

- Perform a legal review to determine which of the activities that are described for ESF 14 in the NRP are authorized by the Stafford Act. Based on the results of this review, recommend changes to the NRP and/or the Stafford Act to make them consistent with each other.

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- Consider proposing legislative changes to the Stafford Act for activities that are not currently authorized by the Stafford Act but are deemed necessary and desirable for providing Federal long-term community recovery assistance. The following are examples of areas that should be considered for change:
 - Provisions for catastrophic and/or long-term impact incidents;
 - Definition of long-term community recovery and associated activities;
 - Assessment, technical assistance, and long-term community recovery plans;
 - Clear definition of when support starts and when it ends;
 - Identification of limitations and expectations as they relate to State and local support as well as OFAs and non-governmental partners; and
 - Definition of the authority of ESF 14 activities in the NRP, and where Federal, State, and local authority apply.
- Provide training on the Stafford Act to FEMA; FEMA ESF 14; OFAs; State, Tribal, and local governments; and voluntary agency (VOLAG) partners.

4.2.7. *Utilization of NIMS and ICS*

Issue: The utility of NIMS and ICS for implementing LTCR planning was not clear to many, causing ICS structures to be underutilized or ignored. A lack of knowledge and training regarding NIMS and ICS also contributed to the questioning and/or underutilization of NIMS and ICS. NIMS and ICS are considered by many to address short-term incident management as opposed to longer-term Recovery programs; therefore, ICS concepts as they might apply to ESF 14 were generally ignored. This left ESF 14 out of the loop on incident action planning, priority setting, and other key aspects of JFO operations. At least one FCO believed that ESF 14 belonged in the Planning Section rather than in the Operations Section.

Recommendations:

- Assess the appropriate application of ICS and NIMS to long-term recovery activities.
- Define the optimum location for ESF 14 within the JFO under the ICS architecture and including “command and control” field relationships.
- Provide training to ESF 14 staff and Federal, State, local governmental, NGOs, and OFAs regarding NIMS and ICS to ensure that staff understand how to operate under ICS.

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4.2.8. *Clarity of Activities and Relationship to IA, PA, and Mitigation*

Issue: Ambiguity between ESF 14 activities and FEMA Mitigation, IA, and PA Programs required extensive coordination in the field to avoid gaps and duplications in program execution, especially where disaster housing was involved. Under the NRP, ESF 14 includes “Long-term Community Recovery and Mitigation.” Furthermore, the NRP states that “mitigation assessment and program implementation” are designated activities under ESF 14. Although FEMA has chosen to partition Mitigation from Long-term Community Recovery in its organization’s execution of the mission, there is still overlap in the description of the scope of the ESF.

To be able to reach agreement on common initiatives, most meetings coordinated by FEMA ESF 14 required the presence of Mitigation, IA, and PA representatives in addition to ESF 14. This gave the impression that FEMA did not have a unified position within the Agency regarding ESF 14 issues, as they had to be coordinated in open forum with other agencies present. Additionally, FEMA expected other agencies to have a representative present that could make decisions and speak officially for that agency while FEMA could not do the same.

Recommendations:

- Determine FEMA’s roles and responsibilities in ESF 14 through collaboration with the respective FEMA program areas and empower the ESF 14 lead to speak for the total FEMA role in the function.
- Collaborate with the other Federal partners to re-establish how FEMA will execute its role in accordance with other ESF 14 support agencies.
- Develop and deliver training packages to FEMA ESF 14; representatives of FEMA IA, PA, and Mitigation; and other partners and stakeholders on all FEMA programs and functions.

4.2.9. *Long-term Community Assessment Tool*

Issue: The Long-term Community Recovery Assessment Tool was designed to identify post-disaster community impacts, capabilities, and needs, and provide recommendations regarding Federal operational and staffing support to states. The Tool was used with limited success in Mississippi and Louisiana, but because it is designed to function at the local level and for small-scale incidents, the tool was intrinsically inadequate to meet the magnitude and wide-ranging needs for this catastrophic incident. The following are examples of how the Tool could not address the needs of a disaster of this magnitude and why the validity and reliability of the results generated by the assessment tool were called into question:

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- No DOT data was generated, but most of the transportation routes were significantly damaged or completely destroyed;
- There were inordinate spikes in economic impacts (as the tool gave a significant amount of weight to the number of days the businesses were out of commission);
- Lower than actual housing impacts were revealed (in part due to there being no measure for the number of evacuees in a community); and
- Output was limited and too general.

Poor quality and unreliable results were attributable to improper use of the tool due the absence of training, misuse of baseline assessment data, and the use of incomplete or outmoded input data. Additionally, there were no attempts to test the outcomes generated by the tool against “ground truth.” The baseline guidance generated by the Tool was challenged due to external factors. For example, the political environment undermined the validity of the Tool by causing an over-commitment of service delivery (i.e., adding communities to the tool that were not identified by the tool).

Recommendations:

- Fully evaluate the requirement for a Long-term Community Recovery Assessment Tool to determine its value in assessing impacted communities.
- Consider expanding or modifying the capability of the tool to include catastrophic incidents.
- Enhance the validity and the reliability of the tool by improving input data quality used to generate baseline assessments through coordinating with State and local entities to collect, review, and validate data.
- Enhance the capability of the tool to rapidly assess impacts by adding a more in-depth empirical data-assessment component that can rapidly assess impacted communities (e.g., satellite capacity used in conjunction with GIS to determine assessment of needs, housing, and transportation).

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4.3. PUBLIC ASSISTANCE (PA)

For the most part, PA issues pertain to the catastrophic nature of this event (e.g., policies and available staff not scalable to an event this size) and debris. Additional issues are related to training, the Stafford Act, and the \$1 Million queue.

Catastrophic Events

Current PA policies were written for the “average” or “garden-variety” disaster and do not contain contingencies to address catastrophic events of this magnitude. All policies pertaining to debris monitoring and removal, documentation requirements, funding levels, and staffing procedures should be reviewed and modified to ensure that provisions are made for catastrophic events, potentially including legislative modifications to the Stafford Act. The following specific issues arose from the application of current policy to this catastrophic event.

4.3.1. *Current Debris Policies and Implementation Scalability*

Issue: Time was wasted on issues that were insignificant in scale, such as appropriate truck volumes for debris management, to the neglect of issues that were critical in a catastrophic disaster such as Hurricane Katrina. Under the current program, it was perceived that PA possibly paid more in monitoring costs than it saved in missed debris. PA needs to consider provisions to monitor in a more cost-effective way (e.g., by measuring weight instead of cubic yards).

For example, justification was required for the removal of one limb versus another. In a small storm with a limited number of limbs, this level of justification does not cause much of a delay, but in the case of a large-scale event, it is extremely time consuming, unnecessary, and impedes the recovery dramatically. Additionally, a property owner’s signature was required before debris on their property could be removed. With homeowners spread throughout the country, obtaining signatures became a monumental task. Policies should be considered that allow for removal of debris without these signatures, but only in instances of public health and safety hazards.

Recommendations:

- Develop a scalable methodology to monitor debris operations effectively, efficiently, and at a reasonable cost.
- Review debris removal requirements in light of the issues that arose during this catastrophic event, and modify these requirements as necessary to expedite debris removal during events of this magnitude. Ensure that in expediting debris removal, human and environmental health and safety concerns are not ignored. Some of the policies that need to be reviewed and modified for catastrophic events include, but are not limited to, environmental testing, private property and waterway debris removal, disposal, and monitoring.

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- Clarify the guidance regarding debris removal on private property, gated communities, and private roads to overcome confusion and streamline the removal process, including clarification of what constitutes imminent and substantial danger to allow private debris removal.

4.3.2. *Documentation Requirements*

Issue: Local applicants had difficulty providing the required PA documentation because they did not understand the requirements, the requisite documentation no longer existed, or there was no staff available to retrieve the documentation. In some cases, applicants were unaware of assistance programs or unfamiliar with application requirements. In other cases, municipal staff were unavailable, either because they were missing (e.g., relocated outside the area) or simply too busy to complete applications. Other communities lost municipal buildings where records were kept, and thus were unable to furnish the required certifications or documentation (e.g., Mississippi lost roughly 750 government buildings). The result was that the application process was delayed, as communities tried to recover lost or missing documentation.

Recommendations:

- Prior to the Kickoff meeting, coordinate with State and other partners regarding the best way to deal with applicants' inability to provide the necessary information and documentation due to the magnitude of destruction.
- Consider relaxing the documentation requirements for the first 30 days (or more) following a catastrophic disaster. Many local governments will likely not be functional enough to provide the standard required documentation and will likely need the funding immediately to restore basic functions and services.
- Review documentation requirements and ensure their necessity. Consider modifying (i.e., reducing) documentation requirements for catastrophic events.

4.3.3. *Coverage of Expenses During Catastrophic Events*

Issue: Many of the current PA policies do not address the unique costs or impacts associated with catastrophic events. For example, localities that hosted evacuees had increased human-services costs yet were still ineligible for PA funds.

Additionally, PA is authorized to pay only overtime costs for local governments for performing eligible emergency work. Due to the catastrophic nature of this event, communities lacked revenues to cover even the first 40 hours, resulting in a double economic impact to those families. Similarly, communities are not always able to cover the needs for medical personnel and services that are not currently reimbursable by PA.

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Recommendations:

- Review the unique situations that arise during catastrophic disasters and modify PA policies (and work to obtain legislative modifications to the Stafford Act as necessary) to address the costs associated with these unique circumstances, including (but not limited to) payment for base wages for force account staff who perform eligible emergency work, temporary hires for medical personnel (which would aid in recruitment and retention of temporary employees), and provision of medical services.

4.3.4. *Availability of Qualified Personnel*

Issue: With limited experienced staff and multiple simultaneous disasters, it was difficult to deploy experienced staff among multiple disasters in an equitable manner. The DAE Cadre that existed in 2005 was appropriate for small recovery operations but was not sufficient to handle large disasters in multiple states. In some cases, it took months to obtain sufficient field staff to meet operational requirements adequately.

This deficiency is thought to be in part due to the long lag time to fill vacancies and the DAE freeze, leaving the agency with limited experienced, seasoned staff to mentor and lead the work. Further, disparity in pay for TACs and DAEs, failure to have trained personnel ready (see Section 4.3.10 for additional issues and recommendations regarding training), and the fact that Regions have only one PA specialist per State adversely impacted the adequacy of PA staffing. Additionally, the policy of 30-day staff rotations was detrimental to consistency, continuity, and performance improvement.

Recommendations:

- Establish qualifications for different positions based upon training and experience and identify individuals in relevant tiers as a tool to ensure even distribution and deployment. Revise the Automated Deployment Database (ADD) to accommodate this information and promote more efficient assignments in terms of the use of human resources.
- Consider a rotation period longer than 30 days, and develop a standard transition process for re-deployment to a second disaster or back to the Regions, including the overlap of replacement staff to ensure continuity.
- Train and hire local permanent staff to overcome the problems associated with timed rotations.
- Encourage more States to become self-managed to alleviate the Federal workload.

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Debris

In addition to the debris magnitude issue with catastrophic events as discussed above, there are several debris issues that need to be addressed regardless of the magnitude of the event. Many policies were applied in an inconsistent manner, including those pertaining to debris testing, removal, disposal requirements and debris-removal contractor concerns, and a lack State and local of pre-disaster debris-management plans.

4.3.5. *Application of Debris Testing, Removal, and Disposal Requirements*

Issue: Debris management suffered from inconsistencies in communication, coordination, and implementation particularly pertaining to testing, removal, and disposal requirements for hazardous debris. Changes in the way that debris management policy was interpreted resulted in a great deal of confusion regarding debris removal from waterways, as different agencies provided debris-management staff inconsistent direction on debris handling and disposal.

For example, the U.S. Environmental Protection Agency (EPA) required extra inspections and sampling of certain debris to determine whether it contained asbestos, lead (from paint or other sources), or other hazardous materials to determine proper disposal methods. These additional testing requirements were seen by many outside of EPA as unnecessary because either the reason for the testing was not explained or the testing requirements were inconsistently applied.

As another example, in Louisiana, sediment was considered debris and therefore required disposal. Many different agencies and organizations (e.g., EPA, FEMA, USACE, and nonprofits) were conducting tests on the sediment and obtaining varying results on the level of contamination. This resulted in the same types of sediment being disposed of in different ways, and possibly some sediment being disposed of as hazardous waste when it was not, and conversely, contaminated sediment not being disposed of properly.

Additionally, there were inconsistencies in direction and coordination in the way debris removal on private property was addressed. For example, FEMA issued a disaster-specific policy for private-property debris removal that deemed two Alabama counties eligible for private property debris removal, but FEMA field officials seemed to be making their own eligibility judgments about properties in these two counties. A streamlined approach to private-property debris removal is feasible, but there is not a policy directive or a legal basis to help local governments make those decisions.

Because guidance was not developed ahead of time, FEMA HQ was forced to make decisions “on the fly” and, once made, these decisions were not clearly conveyed to the Regions in a timely fashion. Because each Region may not implement the program in exactly the same way, a change in personnel (especially from a different Region) resulted in a different interpretation of policy and guidance. Even at the field level, Project Officers and Public Assistance Coordinators were applying rules differently.

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Recommendations:

- Improve interagency policies to define roles, responsibilities, and expectations more clearly for debris testing, removal, and disposal for all Federal, State, and local governments.
- Confer with field staff and States before issuing disaster-specific guidance from FEMA HQ. This will ensure that the guidance is practical and does not conflict with State policy and procedures.
- Meet with other agencies—e.g., USACE, United States Coast Guard (USCG), EPA, Natural Resources Conservation Service (NRCS), Council on Environmental Quality (CEQ), NOAA, U.S. Fish and Wildlife Service (USFWS), DOT—prior to and during disasters to discuss policy and procedures, including what standards need to apply for environmental testing of debris and disposal, to ensure consistent implementation across programs and agencies, and to establish who is responsible for specific types of debris, testing, etc. Specifically, work in coordination with NRCS to revise, update, and clarify waterway debris-removal guidance, especially what is and is not eligible.
- Complete and distribute upcoming guidance on hand-loaded trucks, stump removal, and contracting (see Section 4.3.6 for additional issues and recommendations regarding contractors).

4.3.6. *Debris-Removal Contractor Selection*

Issue: Differing State and local criteria for “reasonable” costs and selection of who will complete debris removal make it difficult to determine a standard to ensure decisions are consistent and equitable across locales. In some cases, PA staff noted that local governments were awarding contracts to private contractors whose rates were much higher than estimates from USACE, for example. In other cases, communities found the opposite (i.e., USACE’s rates were higher than those of private contractors). Even when using private contractors, a wide range of estimates for similar work was provided, making it extremely difficult to judge whether costs were reasonable. Timeliness of debris removal was another variable to the decision of with whom to contract.

In some cases, counties that were allowed to select their own contractors were able to begin debris removal sooner. When counties were allowed to choose their own contractor, they were allowed to use performance criteria over price, which encouraged favoritism in awarding contracts. As a result, there were varying levels of cleanup in different areas depending on who conducted the debris removal.

Inappropriate contracting requirements, including an insufficient daily performance rate and a 30-day opportunity to resolve poor performance, contributed to problems associated with debris-removal contractors. Additionally, the monitoring process did not

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allow staff to ensure that contractors were removing only eligible debris and were not claiming more debris than they actually removed.

Recommendations:

- Work with FEMA Policy, OGC, and the Office of Management and Budget (OMB) to develop more specific guidance detailing how to deal with variable State and local criteria by developing standard criteria for reasonableness and what to do when estimates are not reasonable.
- Develop a range of costs by Region for various debris activities as a yardstick to ensure that bids are reasonable.
- Promote multiple awardees to encourage competition and, thus, offer incentives to improve performance.

4.3.7. Pre-Disaster Debris-Management Plans

Issue: The lack of pre-disaster debris-management plans resulted in delays and confusion and, in some cases, ineffective use of contractors. A comprehensive debris-management plan is essential for any disaster, but particularly a catastrophic one. Failure to plan where debris would be disposed of prior to the event was a major complication, causing delays in debris disposal. There can be long-term effects if no plan is in place prior to an event. For example, the New Orleans landfill accepted debris exceeding five times its permit limit by accepting 100 tons of debris because there was no other site planned.

A pre-disaster plan would have provided guidance on contamination levels and would have dictated debris segregation and proper disposal, thereby eliminating or reducing the contamination issues that arose due to the lack of pre-planning. The plan also should have included provisions for wetland protection, historic preservation, and termite control to avoid developing guidance and policies for these issues “on the fly.” More effective and efficient solutions that were protective of health and the environment could have been developed in advance.

Recommendations:

- Use the lessons learned from the lack of pre-planning for a catastrophic disaster such as Katrina to motivate communities (i.e., potential PA funding applicants) to develop pre-disaster debris-management plans. Provide technical assistance to these communities in preparing these plans, including potential language and quality-control requirements for communities to use in contracts with local debris-removal specialists to ensure quality contractor performance. Additionally, States and local communities should pre-negotiate debris-removal contracts to improve start up and cost-efficiency.

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- Prepare two FEMA PA teams that are dedicated to debris removal (i.e., similar to the USACE Planning and Response Teams for debris removal). They should conduct advance-preparedness training and assist in debris-management plans with local applicants. The planning team also should prepare advance standby contracts that can be activated immediately once a disaster occurs to expedite debris removal, testing, and disposal.

Additional Issues

In addition to the catastrophic event and debris issues discussed above, several additional issues should be addressed to improve PA performance during all disasters, including delays in review and funding of projects exceeding \$1million, Stafford Act Section 403 and its uses, and lack of sustained training.

4.3.8. Review and Funding of Projects Exceeding \$1 Million

Issue: Law requires DHS to notify Congress three days before projects exceeding \$1 million are obligated. The notification process resulted in inexplicable delays for some projects and grievances by State and local governments whose projects were delayed. The perceived cause of the delays appears to be, at least to some extent, a result of DHS's lack of familiarity with PA eligibility requirements and PA's lack of understanding of DHS's review criteria. OMB notification relates to informing States' Congressional Offices to allow them time to develop and distribute a press release regarding the funding. Reviewers at DHS and OMB are apparently not aware of the financial consequences for the jurisdiction or the political ramifications of delays if made public. Additionally, the threshold amount for this review has not been changed for years.

Recommendations:

- Meet with OMB and DHS reviewers to educate them on PA eligibility requirements and determine the essential information necessary for their review, and then incorporate this necessary information into the review documents to implement a consistent, timely review process.
- Prepare alternatives to streamline the process including generic press releases, an "if no action" default approval (e.g., five business days), a review waiver for catastrophic disasters (as was done for 9/11), and a methodology for prioritizing requests.
- After discussing the magnitude and nature of the problem, seek legislation to raise the review requirement threshold amount to \$5 million.

4.3.9. Stafford Act Section 403 and Its Uses

Issue: Issues arose about Stafford Act Section 403 and its uses. For example, some States were unclear about what kinds of emergency work or overtime costs could be

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funded under Section 403. Furthermore, confusion arose regarding an appropriate method to transition people whose emergency sheltering costs were covered under Section 403 to Section 408-funded housing.

Recommendation:

- This issue is detailed further and recommendations provided in the IA portion of this report.

4.3.10. *Sustained and Consistent Training*

Issue: The lack of sustained and consistent training resulted in less effective PA staff, inconsistencies on project work, and complaints by applicants. The PA program is sufficiently complex that even project officers who have completed all the available training do not understand all the nuances of the program. As a result, different project officers apply the PA program differently in similar circumstances, leading to inconsistency.

Exacerbating this problem was the presence of inconsistent qualifications and certifications across the FEMA Regions, which created discrepancies in staff competency. Staff originating from different Regions with the same job title did not have the same experience, training, or skills to do the job expected of them. Additionally, the trained TACs and DAEs were immediately deployed, leaving a lack of trained staff for subsequent deployment. As a result many inexperienced or insufficiently trained staff were sent to the field and provided incorrect or incomplete information to applicants.

Recommendations:

- Provide a budget for year-round PA training.
- Pre-qualify individuals to ensure they have adequate professional experience. For those lacking in experience, provide more than the standard two-week PA training.
- Send training teams to the field to make maximum use of staff time while people await assignments or badges and where training can be targeted on the disaster-specific needs.
- Establish a mentoring program for Project Officers by experienced Public Assistance Coordinators which could include “shadowing.”
- Modify performance reviews and job evaluations to include field and classroom performance assessments and more specific evaluation and questioning.

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- Develop a consistent position description for each type of position across the FEMA PA staff, and establish standard training requirements for PA staff with agreed-upon task books.

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4.4. INDIVIDUAL ASSISTANCE (IA)

IA has undergone many changes over the past several years in response to disasters, management, legislation, funding, technology, media, elected officials, and changing public expectations. Perhaps the most apt summary statement of the effect of these changes to emerge from the interviews is that “the IA program has evolved into a patchwork of services.” Much of the time, those services complement each other and serve victims well. Occasionally, however, those services conflict and cause unintended adverse consequences ranging from difficulty delivering services to the public, Federal officials’ confusion in understanding services, problems concerning the role of contractors, duplication of benefits, and inequities in benefits delivered to clients. After-action review participants suggested that FEMA “step back and look at the big picture” as part of its effort to prepare for the 2006 season.

Housing

4.4.1. *Housing Program Philosophy*

Issue: The implementation of a standard housing program philosophy can cause unintended consequences and gaps in catastrophic or multi-state disasters. Personnel react to situations and implement standard procedures that are consistent with program philosophy and procedures, but are not logical in a disaster of that scope. Providing housing to victims in disaster areas where there are no groceries, mail, police, etc. is an example of failure to react to a catastrophic situation. In “garden-variety” disasters, this type of infrastructure is much more likely to be restored earlier and preserved infrastructure is likely to be much closer geographically. In a catastrophic response, staff often does not have time to think through all the implications of actions, or time to confer with each other and their managers on all the issues and questions they face. As one official put it, “We’re doing more ‘doing’ than ‘thinking’” when reacting to situations and patching together solutions.

The Temporary Housing (TH) program received an unfavorable review from questionnaire respondents. Of those respondents expressing an opinion²³, 63% indicated that the “traditional [housing assistance] portion of the IA program” was “ineffective” or “somewhat ineffective,” 82% indicated that the traditional Travel Trailer and Mobile Home (TT/MH) programs were “somewhat ineffective” or “ineffective,” and 75% indicated that “alternative housing” was “somewhat ineffective” or “ineffective.” Restructuring is clearly required to ensure that the provision of the TH program is effective in large-scale disasters.

Recommendations: Review the overall housing strategy to identify why FEMA does what it does, and whether it should do anything differently depending on the scope and type of the disaster. The objective of this review would be to evaluate and reaffirm or

²³ Note that approximately 25% of those responding to the questionnaire answered the questions relevant to housing.

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revise guidance and policy, as appropriate, pertaining to whether and in what ways the traditional housing program serves disaster victims. Also related to this idea is a broader recommendation to review and assess how IA programs, guidance, and policies work together to accomplish the Recovery mission. The following are specific recommendations to achieve more effective TH provisions in different types of disasters:

- Document IA-proposed Stafford Act changes so that ideas are “on the shelf” and ready to go if and when they are needed.
- Consider a streamlined intake application for catastrophic disasters, and assess the intake application form to determine if it requests unnecessary information, thereby causing processing and eligibility delays.
- Conduct a cost analysis of the feasibility of re-establishing a stockpile of travel trailers and mobile homes.
- Establish, through the Steering Committee, policies for mobile home/travel trailer exclusive use, critical industry, and essential workers.
- Consider eliminating current Individuals and Households Program (IHP) assistance categories and providing assistance in the form of lump-sum cash.
- Continue efforts to change the \$26,200 IHP cap; \$5,200 does not do much for minor repair vs. the cost of placing a family in a mobile home.
- Review the State matching requirements for IA programs in catastrophic disasters.
- Consider seeking authority to fund other agencies that have authority but not the funding to provide assistance, such as HUD for repairing public housing units for victims
- Research compliance provision requirements of the Americans with Disabilities Act (ADA), Fair Housing Act, Architectural Barriers Act, and Uniform Federal Accessibility Standards (UFAS). Revise or develop housing policy to do what is required and what is right, while utilizing appropriate flexibility based on accurate knowledge of the law, not myth or misinformation.

4.4.2. *FEMA-State Housing Memoranda of Understanding (MOU)*

Issue: Due to the catastrophic nature of this event, the State’s capacity to implement its own recovery operations was exceeded. These responsibilities were subsequently shifted to FEMA, but there was (and continues to be) no uniform housing guidance or agreement to help FEMA and States manage housing under catastrophic conditions. The lack of guidance or an agreement often meant that extra time and money were spent assessing sites that were later rejected by local officials and site selection and development were

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delayed. Additionally, extra time and effort were spent during the disaster negotiating roles and responsibilities, which if established prior to the disaster, this time could have been better spent (e.g., selecting sites and placing MH/TT). Finally, States often requested FEMA reimbursement for services that were not generally a Federal responsibility, including trash collection and law enforcement at housing sites.

Recommendations: Develop FEMA-State MOUs to ensure the effective delivery of housing services, as well as the appropriate Federal and State management of the housing programs. Boilerplate language could be developed to facilitate the negotiation of agreements between FEMA and the States. Each MOU should reference the broader FEMA-State agreement. The following MOU terms and conditions could also be included in the MOUs:

- Local officials would identify housing sites first, and once site identification was complete, site inspections would be conducted by FEMA.
- Local governments would pay for local services (e.g., trash collection, law enforcement) at sites where local residents are housed, and FEMA would share the costs at sites where evacuees from other areas are sheltered.
- FEMA would construct sites to national standards, not to local codes.

4.4.3. *Housing Area Command (HAC)*

Issue: From its inception the role and authority associated with the HAC were unclear, resulting in confusion. The HAC was a new program component, which resulted in new and different communication and decision-making procedures. It was intended to provide an early assessment of housing resources during the Response phase and begin early communication and coordination to meet those needs. Once JFOs were operating, the HAC was to transfer its coordination function to them and disband. Instead, the HAC stayed open and attempted to expand its communication and coordination role into operations and decision-making. Housing officials were not clear on the HAC's role or how it fit into the ICS and chain of command. The multi-state Recovery effort exacerbated communication and decision-making problems associated with the HAC. The "Area Command" aspect of the HAC did not function properly because States were unwilling to accept either "Area" solutions or the HAC's "Command" designation. As a result, field staff did not have the authority to make necessary decisions. This resulted in service delays and duplication, as well as contradictory communication and instructions.

Recommendation:

- If a HAC is established, stage it outside the impacted area, limit its function to coordination and not operations, and clarify its roles and responsibilities and the communication/decision-making processes associated with it.

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- If a PFO is appointed for a given disaster, a temporary housing expert should be placed on the PFO staff.
- Whether within the HAC or outside of it, establish a joint housing solution team at the JFO composed of FEMA and core housing partners (e.g., HUD, USACE, States, and others) to eliminate stove-piped communication, integrate operations, reconcile priorities, establish one process for haul and install, and implement a consistent approach to site development.

4.4.4. *Income and Insurance Verification*

Issue: Barriers to sharing employment, income, insurance, housing, and other information—particularly for the purpose of income verification—caused delays in the delivery of some benefits.

Recommendations:

- Facilitate applicant-related communication between IA and PA, and between FEMA and States, HUD, and other key housing partners (e.g., IRS), through a database of key applicant data and information. Share information among partners for income verification, State employment, and insurance verification. Work with FEMA counsel to clarify, comply with, and understand legal barriers.
- Review the screening process between the Small Business Administration (SBA) and IA programs to determine if steps can be eliminated for very low-income applicants.

4.4.5. *Eviction*

Issue: Landlord-tenant statutes were applied to 408 sheltering. Each State has its own eviction laws, which are often inconsistent with FEMA program policies. For example, FEMA leases require 15-day notices for evictions, but States frequently have different requirements. In the past two years, it has become difficult, time-consuming, and damaging to FEMA's image to evict people from MH/TT who are not eligible under Section 408.

Recommendation:

- Treat 408 sheltering as a loan or grant of Federal property. The provision of MH/TT should not be legally construed as a landlord/tenant agreement. Current practices should be reviewed with FEMA counsel, and policy or guidance should be revised as needed. Also, consider addressing changes in FEMA-State agreements and in the new FEMA-State IA MOU (see Section 4.4.2).

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4.4.6. *Elected Officials*

Issue: The demand for a visible FEMA presence compounded by misinformation or misunderstandings about the role and function of DRCs and housing programs and strategy, produced pressure from elected officials, resulting in the improper or ineffective use of resources. Often, great amounts of time and effort were spent educating local officials, disaster victims, and the media about Recovery operations, during Recovery. This push for a DRC in “my” area can pull away scarce staff resources—particularly senior staff qualified to handle these issues—from other Recovery responsibilities. Housing issues are not usually the prime focus of DRCs. DRCs normally serve those best who have already registered with FEMA by providing some answers on eligibility, as well as referrals to other State, local, and voluntary agency resources. In a catastrophic disaster, uncertainty about housing may raise the unrealistic expectation that a DRC will solve the problem.

Recommendations:

- Educate Federal, State, and local legislative delegations prior to an incident about FEMA’s and their own housing roles and responsibilities to reduce pressure, which can result in improper or ineffective use of resources, particularly at DRCs. Be more proactive in outreach and communication to the media and victims before and during disasters to manage expectations.
- Ensure that officials understand that the timing of set-up is critical to optimization of a DRC’s effectiveness and that they should not necessarily be set up on demand.
- Establish a catastrophic housing plan and tie housing SOPs pertaining to the criteria for DRCs to the plan, as one way to manage pressure to establish DRCs in numerous locations.

Human Services

4.4.7. *Human Services Branch*

Issue: Formation of the new Human Services Branch and confusion about its organizational structure led to inconsistent implementation of procedures and confusion regarding roles, responsibilities, and the chain of command, both in the field and at FEMA HQ.

Recommendation:

- Clarify the Human Services Branch organizational structure, and revise/realign IA operations, communication, and processes to work effectively within the Branch. Additionally, ensure that all relevant parties understand the structure.

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- Prior to the start of the 2006 hurricane season specify and communicate housing protocols and authorities, outline Branch roles and responsibilities, and clarify roles, responsibilities, and authorities at AFOs.
- Define staffing requirements to ensure levels are operable and hiring is initiated as needed.
- Develop an interagency housing SOP in accordance with the Human Services Branch structure and processes, and offer interagency training for the SOP, including a module for senior Federal officials, possibly using an online course as a delivery mechanism.
- Hold an annual interagency disaster housing conference, which may contain a training component.
- Resume the use of the Applicant Services Representative.
- Add specialties under the Specialist title on the Human Services Branch organizational chart.
- Release task books and reconstitute HS-21 to fit with new job titles (e.g., what does it take to do this job, and what kind of background/experience does one need?).

4.4.8. *Coordination with States and External Agencies*

Issue: Insufficient coordination between FEMA and external agencies led to the duplication of work and gaps in the continuity of operations. For example, there was no single, identifiable party ultimately responsible for ESF 6 coordination prior to landfall. Limitations on information sharing, due to the Privacy Act, also led to duplication of efforts such as wrap-around services between FEMA and the States.

The need for consolidated information about available resources (e.g., buildings, land, mobile homes, HUD houses) and determining who (e.g., FEMA, HUD, OFAs, or States) would provide services at sites exacerbated coordination challenges and led to numerous disconnected multi-agency conversations (e.g., multi-coordination teams, HAC, and the Recovery management cell) that produced different expectations at the field and command levels. When personnel at both HQ and field levels were trying to solve the field-level problems, decisions from HQ were carried out even if information was incomplete or incorrect. In some cases, Federal personnel relocated as evacuees were transported out of areas, leaving States without a Federal POC.

Inconsistencies with regard to staff being able to collect information on unemployment insurance and issuance of food stamps at some sites but not others, and a general lack of certainty about what the policies were regarding these programs.

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Recommendation:

- Define the roles and responsibilities of each field and Headquarters element. Hold regular, year-round calls with States and partners in addition to Regional Interagency Steering Committees (RISC) meetings—regarding IA and PA issues within a Region—including during disasters.
- Inform partners about FEMA’s expected organizational structure (for NIMS compliance) for the 2006 season.
- During events, continue ESF 6 coordination meetings, and post information on the Internet about who is providing what essential services to what sites, for how long, and under what overall organizational structure.
- Make informational calls to States informing them of issues that have arisen and decisions and policies that have been made in one state that could affect a neighboring state.
- Communicate early with regard to what the JFO structure will look like and its state designees.
- Communicate early with OFAs to determine their needs in DRCs (e.g., connectivity) for inclusion in minimal requirements of the DRC toolbox.
- Ask human services partners to reside physically at the JFO and DRCs to facilitate information sharing, and obtain agreement from Federal partners that this is a desirable solution.
- To facilitate the electronic flagging and use of release information, (i.e., 9069 Form) obtain legal interpretations on whether the Privacy Act permits FEMA to share information with certain entities based on their alignment with Recovery goals or the management response plan and whether the Act permits states to obtain signatures of victims, on behalf of FEMA, on information release forms prior to an incident. Inform State and voluntary agencies on what information FEMA is allowed to provide.
- Facilitate family reunification and further assistance to victims by easing constraints on information sharing during disasters, for example by generating a list of the types of information that FEMA is asked to release.
- Obtain legal guidance to determine the validity of voice and electronic signatures for releasing information, clarify the prohibition against releasing specific information, and clarify the consequences of using a broader interpretation of the Privacy Act.

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4.4.9. *Legal, Regulatory, and Policy Requirements*

Issue: IA program requirements or constraints as stipulated by law, regulation, or policy, impeded service delivery to victims. For example, the definition of eligibility meant that the 10% of New Orleans residents who lived in multiple household living situations were ineligible for assistance. As another example, rental assistance grants were based on short-term dislocations (i.e., 1 to 3 months), and although everyone knew that Katrina dislocations would be much longer, victims would not make long-term plans because of uncertainty surrounding the period of assistance. Additionally, the States' capacity to process unemployment claims was limited, causing delays for victims.

Recommendation:

- Modify or formulate policies for providing aid to permanently displaced populations, including temporary housing for longer periods of time.
- Work with victims, from the beginning, to help them make long-term plans, and advise them on appropriate uses of incremental financial assistance in the context of their cap and long-term plans.
- Arrange for FEMA to disburse funds to the Department of Labor that can then disburse those funds to States helping impacted States.
- Ensure States understand eligibility definitions.
- Make ineligibles a priority for voluntary agency assistance.

4.4.10. *Expedited Assistance (EA)*

Issue: Although it suffered from difficulties surrounding implementation, EA delivered by checks, direct bank deposits, and debit cards met very critical victim needs including food, clothing, shelter, medical, and transportation needs. These challenges ranged from the huge number of victims requiring assistance to inequities in how services were delivered, duplication of benefits, policy misunderstandings and misinterpretations, and uneven public communication.

EA policy was announced without proper communication to field staff. For instance, field staff were given talking points that did not provide all the necessary information. Delays in establishing policies and procedures meant delayed public communication, which in turn caused difficulty managing expectations. There were general misunderstandings about the purpose of the money among field staff and the public. The way EA was presented left clients with the impression that it was a free entitlement. This problem underscores training as well as communication issues.

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Confusion and hostilities arose in the shelters as Katrina victims received debit cards and, initially, Rita victims did not. Then the program was abruptly discontinued causing further inequities. There were many reports of victims who received EA while their neighbors did not. Of those questionnaire respondents with an opinion, only 38% felt the program was “effective” or “highly effective.” Victims need this assistance immediately, but the lack of consistent policy and implementation resulted in much confusion and ill will.

Recommendations:

- Improve communication from the field for decision-making about when EA should be initiated and discontinued, and more clearly communicate to the field when decisions regarding EA are made.
- Review and revise FEMA policy for triggering EA and its strategy for disbursing funds.
- Review and revise EA eligibility questions and clarify EA eligibility criteria.
- Train personnel at all levels about the EA program, particularly eligibility.
- Improve FEMA communication to the public about the purpose of EA funds.

4.4.11. *Special Needs*

Issue: Gaps in information and communication about special needs (e.g., special medications or food needs, handicapped, mentally ill, pregnant, elderly, sick) hindered services to some disaster victims. Gaps exist in the current planning for persons with special needs. For example, there is no plan pertaining to how to deal with medical needs such as oxygen tanks, medicines, toilets, showers, and other items.

Transportation was hampered by the lack of accommodations for special-needs populations. Additionally, there was no system in place to notify the receiving agency of special needs in advance of evacuees arriving at their destination. One manager in Texas spoke of a group of mentally-challenged young adults who “just showed up” from Louisiana.

Special needs associated with housing primarily pertained to access because many structures did not meet ADA standards. Again, most victims arrived with no advance information pertaining to their special needs. A data system to track such needs did not exist, and special needs were seldom documented on evacuees’ FEMA paper work. The lack of planning resulted in many unmet special needs. Additionally, major difficulties were encountered in simply getting victims to facilities to receive assistance such as debit cards.

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Recommendations: Traditionally, voluntary agencies take the lead in addressing special-needs populations. Special arrangements should be incorporated into FEMA's agreements with ARC, other voluntary agencies, and State and local governments regarding the need to incorporate these issues into their planning (e.g., authorize local pharmacies to fill one-week prescriptions until other means are found by patients). ESF 6 and ESF 8 should incorporate special needs in their planning and procedures, specifically:

- Review and revise policies regarding special-needs populations to close gaps in service.
- Deliberately plan for special needs pertaining to Mass Care and housing (e.g., MH and TT).
- Incorporate ADA and other requirements into FEMA policies and procedures pertaining to special-needs populations.
- Deliver supplies to shelters for special-needs populations—especially medical supplies.
- Incorporate a method to identify and track the special needs into Agency data and information collection procedures.
- Train Helpline operators to identify special needs and help applicants obtain needed services.
- Assign a special-needs field staff person to ensure that special needs will be addressed in the field.

Mass Care

4.4.12. *Meals Ready-to-Eat (MRE) Management*

Issue: The distribution of MREs was mismanaged causing long delays in supplies reaching shelters. Causes for the delays included miscommunication between ARC and other voluntary agencies regarding MRE orders, little (if any) tracking to identify where the MREs were stocked and whether and when they were en route to the shelters, no mechanisms in place to receive the food, and once food began arriving, there was no designated place to unload. Other issues included the lack of baby food in most of the shipments. Some States also apparently had stockpiles of food available, but FEMA did not request it. All of this confusion compounded to result in extreme delays in the delivery of MREs, causing much suffering on the part of the victims.

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Recommendations:

- Clarify the roles and responsibilities within ESF 6 regarding feeding and food distribution.
- Complete a thorough analysis of MRE stockpiles, the geographical distribution and delivery procedures, and the procedures for ordering and receiving supplies. Revise as necessary.
- Develop a tracking system of inventories and movement status to allow receiving locations to plan accordingly.

4.4.13. *Security Clearances*

Issue: Requirements for detailed background checks slowed FEMA's ability to obtain qualified personnel from NVOAD, other voluntary organizations, and contractors into FEMA facilities. This exacerbated other staffing problems such as staffing shortages and matching qualifications to staffing needs and rotations.

Recommendation:

- Explore options for conducting security clearances prior to hurricane season. Identify qualified personnel and conduct as many background checks as possible in advance.
- Evaluate the level of background check necessary for different positions, and prioritize who goes through the background check process first.
- Standardize the process for background checks and establish a procedure for interim security clearances.
- Integrate the background check process into FEMA's certification and training programs.
- Provide NGOs with FEMA security requirements prior to hurricane season and secure funding for FEMA-required NGO background checks.
- Identify a list of existing places authorized to conduct background checks, and provide this list to voluntary agencies prior to hurricane season.

4.4.14. *Voluntary Agencies and the role of Voluntary Agency Liaisons (VALs)*

Issue: A lack of understanding, coordination, and communication between DHS/FEMA and voluntary agencies regarding roles, expectations, and capabilities strained working relationships and hindered service delivery to disaster victims. There is a general lack of DHS/FEMA understanding about the voluntary agency roles and capabilities in disaster

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recovery. Additionally, weak State VOAD structures caused delays in communication and service delivery. The inability of existing donations management systems to handle non-affiliated, grass-roots donation efforts caused buildup of goods, underutilization of donated goods, and the need to discourage donations.

Recommendation: Enhance communication and understanding between DHS/FEMA and voluntary agencies to improve service delivery by conducting the following actions:

- Update the IS 288 curriculum and require all DHS/FEMA employees who may deal with voluntary agencies and donations to complete that training, and create a shortcut/link to the IS 288 course on computer desktops in the JFO or other locations where new personnel are stationed.
- Create training modules about the role of voluntary organizations and permissible engagement of faith-based and community organizations in light of legal requirements.
- Enhance the VAL position by providing incentives for states to designate state-level full-time VALs, re-establishing the VAL position at the FEMA training center, requiring inclusion of VALs in senior staff meetings at the JFOs, consistently applying qualification requirements for VALs, and/or creating fact sheets or FAQs regarding the role of VALs.

Cross-Cutting Issues

4.4.15. *ESF 6 Standard Operating Procedure (SOP)*

Issue: The adoption of the NRP and generation of an entirely new and expanded concept for ESF 6 that was a large change from past practice had wide-ranging adverse impacts at all operational levels. ESF 6 currently includes the traditional Mass Care feeding and sheltering role as it has in the past, as well as Housing and Human Services. This addition significantly enlarged ESF 6's scope and led to new requirements for management, control, and coordination for all three functions. Conflicting scopes and missions also created confusion. The ARC is regarded primarily as a Mass Care agency while FEMA is accountable for tasks pertaining to not only Mass Care, but Housing and Human Services as well.

The ESF 6 SOP is still in draft form and contains known gaps and holes. It is unclear where the roles of primary and coordinating agencies differ in mission execution. Partners failed to agree on whether the ESF 6 coordinator is simply a preparedness role or a position that also maintains operational significance; however, many respondents to the questionnaire felt strongly that FEMA should step up and create a robust role for itself as coordinator – 74% of those with an opinion characterized the effectiveness of “the coordination between FEMA and ARC at all levels” as “ineffective” or “somewhat ineffective.”

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The lack of a firm understanding of the role of the ESF 6 coordinator and confusion regarding the necessity of reporting to the Human Services Branch Chief in the NRCC contributed to the poor performance of ESF 6. Poor communication and coordination resulted in confusion, inefficient resource utilization, unmet expectations, and service delays. Roles were not clear and/or not agreed upon for primary and coordinating agencies. There was a lack of agreement on the organizational structure. Terminology was confusing (e.g., interim sheltering, transitional housing). Confusion over roles often meant that some tasks were done twice and many were not done at all. One respondent pointed out that voluntary agencies were having a difficult time understanding their proper role in the ESF 6 structure.

Recommendation: Evaluate the centralized coordination of all three functions, clarify policies, and agree to roles and responsibilities under ESF 6. The most critical task before the ESF 6 partners is the completion of the SOP to the greatest degree possible before the start of the 2006 Hurricane Season. To accomplish this objective, however, major policy issues must be addressed and final decisions made regarding roles and responsibilities that all partners can accept. Additionally, it is important that any solution must be achieved with the participation of FEMA and the ARC, as well as other partners, including SBA, USPS, and the Salvation Army. Communication during the SOP's development will lead to better relations and accountability during upcoming operations. The following are also recommended to address the above issue:

- Develop and deliver a comprehensive ESF 6 training program for primary and supporting agencies, including an agreed upon division of roles and responsibilities.
- Create and distribute a one-page fact sheet for ESF 6 representatives at the state level to clarify an interim operational SOP.
- The Mass Care working group should revise and update the ESF 6 SOP and obtain agreement from partners.
- Establish daily ESF 6 calls during a disaster.

4.4.16. *IA Technical Assistance Contract (TAC)*

Issue: Insufficient resources devoted to contract management, coupled with a general lack of familiarity and understanding of the IA-TAC, caused role confusion and confusion regarding allowable contract activities that resulted in service delays. To help manage the IA-TAC for FEMA, contract administrators were brought in from other agencies and, thus, lacked knowledge pertaining to how FEMA programs function. Additionally, there are insufficient SOPs for the utilization of IA-TACs and inadequate integration of contractors to support the Recovery mission.

Recommendation: Improve the efficiency of Contracting Officer Technical Representatives (COTRs) through increased knowledge of IA programs, as well as the effectiveness of contracting rules through the following:

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- Increase the communication and information exchange between the Project Officer (PO) and COTR.
- Utilize COTRs who have a working knowledge of FEMA programs and their unique demands, and recruit and add at least thirty new COTRs who are trained and knowledgeable regarding IA programs. The DHS online COTR certification program should be used to complete this training, which should be followed by actual field deployment, supervised by an experienced mentor. This function should be supported by locating Regional IA staff onsite.
- Train and educate senior officials on the purposes and uses of IA-TAC with specific instructions on how work is given to contractors through the proper channels and a working knowledge of what contractors can and cannot do in their support roles.
- Educate IA officials regarding general contract management with emphasis on the procedures as to how assignments are made as well as what can and cannot be done by contractors.
- Provide IA program training to the contractors themselves. Contractors should be informed of general expectations beyond the actual work elements, such when and how they should, if ever, deal with local officials and their interactions with the public, victims and media.
- Augment the resources available to IA by having well trained standby contractors.
- Procure advance standby contractors for Mobile Home operations (including all aspects of spec MHs) which incorporate the applicable ADA specifications, are as specific as possible, and include more provisions to support performance monitoring and accountability.
- Develop a database of housing services, mobile homes, travel trailers and their locations which can track the assignments of where and who is providing the assistance and includes receiving feedback from contractors as to their actual experiences for incorporation into existing systems.
- Further augment resources by giving a mission assignment to the US Army Corps of Engineers (USACE) to conduct quality assurance of site designs and other appropriate activities. Also consider what activities could be given in advance to HUD and other housing organizations through a mission assignment.

4.4.17. NIMS Integration Agency-wide

Issue: NIMS is perceived to be better suited to events (response) than to processes (recovery), and so has not yet been implemented effectively for IA programs. ICS is typically organized geographically and so does not necessarily serve the IA service

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delivery model, particularly in multi-state recovery efforts. As a result of these conditions, inconsistent ICS implementation caused confusion over roles, responsibilities, the chain of command, and basic information dissemination. One participant commented that there was no organized dissemination of information and that there was a great deal of confusion.

Recommendation: Align IA with NIMS in the best way to deliver recovery programs. IA should develop a policy that outlines how ICS can be implemented most effectively by defining requirements and answering the basic ICS questions.

- For each geographical director, co-locate an IA person who reports to the HS branch director, and whose function would be to support, facilitate, and coordinate with the geographical director on IA decisions.
- Policy should stipulate that all elements of Human Services will report to the Human Services Branch Director at the JFO Level.
- If requirements are identified to support field elements, Human Services personnel will act in a liaison capacity to the Human Services Branch Director.

4.4.18. *Public Communication*

Issue: Ineffective communication with the public created unrealistic service expectations, misunderstandings, and dissatisfaction, all of which led to repeated Helpline calls, appeals, and Congressional hearings. The questionnaire revealed that 54% of respondent felt the communications to the public were ineffective and 54% felt that the Community Relations for IA was ineffective. Participants noted that FEMA is not proactive enough in explaining what it does, how, and why. As a consequence, the public gets information from the media, which is not always accurate. It is also often the case that states communicate a different message than FEMA and other federal agencies. For example, states often communicate that they want people to return home quickly, and FEMA sends the message that immediate return is not possible or advisable. Participants also noted that phone representatives might inadvertently communicate incorrect information or raise false hopes.

Recommendation: Prior to and during events, improve communication with the public and media to create realistic service expectations and provide useful applicant information by revamping explanations and doing regular “peace time” outreach (brochures, newspaper inserts, and educational information), pre-season public service announcements (PSAs) explaining what FEMA does, what FEMA does not do, and who FEMA’s partners are in order to better contain expectations. States and OFAs should also be involved to coordinate messages. Materials should be tailored for regions, seasons, and types of events (e.g., hurricane, tornado, fire, snow, and others).

- Communicate via town hall meetings and use the Joint Information Center (JIC).

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- Public Information Officers (PIOs) need to explain IA programs better and should coordinate with IA on effective more messaging proposals for federal disaster assistance.
- Distribute revised material as part of the DRC 'Go Kit'.
- Distribute revised material at DRCs and at food/water/ice stations.
- Hang revised material on doorknobs in impacted areas.
- Provide a MA for the USPS to deliver material with mail.
- Merge *Recovery Times* into local newspaper's regular print page.
- Call local news and partner with them by giving them an informational interview or human interest story – benefits both sides – local news gets good story and FEMA can get the information out.
- Encourage states to establish a 211 telephone system (like those in Texas, LA, AZ) from which victims can get shelter information, where DRCs are, what the hours are, locations, and telephone numbers
- FEMA should be cautious and deliberate about decisions made and communications sent, particularly around service deadlines. Communication loses meaning, and FEMA loses credibility and trust, when information is issued and then retracted or corrected.

4.4.19. Scalability

Issue: IA policies and procedures designed for small-scale disasters are not all scalable to catastrophic events. FEMA does not have a true catastrophic plan with triggers, and the difficulty in scaling recovery activities results in unmet expectations for program performance. Staffing was a difficult area to scale, for example. FEMA could quickly set up DRCs but could not always staff them with trained personnel. Delivering expedited assistance was another example. Because EA is not a regular IA program, ad hoc processes were implemented to deliver assistance, resulting in disparate practices and confusion.

Recommendation: Review policies and procedures for scalability to catastrophic and multi-state disasters, and identify thresholds or triggers for when specified policies, procedures, or both, should be implemented differently due to the magnitude of the disaster.

- For the IA TAC contract, participants also recommended modeling this after the Registration Intake Readiness contract, contracting out for rapid hiring of surge staff

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for field operations and establishing MOUs with OFAs for responses to catastrophic events.

4.4.20. *New Use of 403 Authority*

Issue: The existing program structure, different permissible uses under 403 and 408 authorities, and the need to solve problems “on the fly” led to new uses of 403 authorities in combination with 408 services. Additional complicating factors were that inspections took too long, IA and PA records were kept in different ways, and projections were needed for multiple days and months but the projections often failed to correctly forecast resource needs. Participants identified numerous problems caused by, or exacerbated by, this situation, including confusion about which services were being provided or received, under what authority, for what purpose, as well as confusing over timing and transitioning from one program to another.

Inequity in services delivered also resulted due to inadequate or inconsistent policy and procedures. Some victims spent months in an apartment under 403 and did not have money deducted from their IHP cap, while others found their own place to stay and did have the money deducted from their caps. Also problematic was the inconsistent communication to disaster victims, landlords, state and local officials, particularly about when 403 services ended and 408 began²⁴ and was compounded by confusions over terminology (403 vs. sheltering). Additionally, eligibility determinations took too long. Victims were put in shelters under 403, and then moved to motels/hotels still under 403 because eligibilities had not been determined to move them to 408. Differences in state reimbursement practices and eviction requirements and the lack of definition pertaining to group site construction and occupancy agreements also created difficulties and duplication of efforts and benefits. Finally, the lack of coordination effort between PA and IA, and with voluntary agencies, and CLC was inefficient.

Recommendation: Since 403 and 408 authorities presently provide FEMA with much of the flexibility needed to provide continuity of housing, it is recommended that FEMA clarify those authorities and apply them, as needed, in cooperation with key housing partners. FEMA should seek the following authorities, through legislative change if necessary:

- Authority to use Section 403 for shelter in structures not ordinarily used, such as hotels, motels, and cruise ships.
- Authority to use Section 408 for long-term housing, similar to 403.
- Authority to take rental assistance out of the cap, thereby treating it as direct assistance, to relieve some equity issues.

To address problems stemming from data collection, storage, and retrieval:

²⁴ This was exacerbated by the fact that there is no policy on when an emergency sheltering phase is over.

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- Use a centralized location for taking questions and filling out IR.
- Facilitate communication between IA/PA, and between FEMA and states, HUD, and other key housing partners, through database of key applicant data and information.
- In recovery operations for catastrophic events, when hotels, cruise ships and other nontraditional forms of shelter might be provided, collect a minimum amount of information – e.g., driver’s license, social security number – not to determine eligibility, but simply to track basic victim information for a minimal authorization.
- Write down the forms and fields needed for tracking evacuees, and a process for collecting that information.
- Obtain landlord and renter records at the state level, such as who’s in the apartments etc.
- In collaboration with government and NGO partners, use data collected to track evacuee whereabouts during massive evacuations.

To address problems stemming from policy, procedure, and the management of programs:

- Form joint IA/PA housing teams at the JFO (to eliminate stovepipes) to ensure implementation of a single haul and install process, a consistent approach to site development, and a comprehensive housing program to manage and reconcile housing priorities.
- Ensure communication between IA and PA on a weekly basis regarding who is eligible this week to be dropped from 403 because they have switched to 408.
- Take current disaster specific guidance (DSG), refine it, and use it as an SOP guideline; look into FMR guidelines; have an SOP that outlines the information that needs to be collected, standard forms.
- Obtain guidance from FEMA on parties to the lease, and reporting, number of apartments, and the fair market rates (FMR).
- Have a trigger point for use of apartments under 403, and keep it on the table, to be used only in extreme events.
- Develop policy on cut-off dates for people in shelters and hotels.
- Require registration and an authorization code before people can go into a hotel or motel.

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- Obtain OGC confirmation that FEMA can send out eligibility info to applicants without violating the Privacy Act.
- Define group site construction and occupancy agreements.

4.4.21. *Staffing*

Issue: Inefficient staffing processes and policies led to overworked staff, the inability to provide quality services in a timely fashion, and underutilization of trained staff. In general, FEMA is experiencing a shortage of skilled staff as a result of slow hiring and cuts in the funding available for training. There is also a tension between the need to train people before going into the field and actually getting people into the field on a timely basis. This has systemically led to the wrong staff being in the wrong place doing the wrong job. There is no CONOPS in place to identify training needs, there are no plans or procedures in place to execute the CONOPS, and there is no way to match training to plans and procedures to staffing needs.

Additionally, the scale of hurricanes in the past two seasons has put FEMA in a position that it has never been in before, needing to make rotations but not having enough staff to rotate. Backup Regions do not have enough qualified staff to provide support as well as staffing their own operations, and knowledgeable and qualified people are overworked in the field as well as in HQ and Regional offices. The overall staffing situation results in burnout and a drain on DAE staff, creating a reliance on contractors to fill available positions.

Recommendations: Senior FEMA and DHS officials should make staffing an urgent priority to quickly address serious issues. In particular, FEMA should conduct a staffing needs analysis and develop a staffing plan for the upcoming hurricane season. Senior leadership should fill vacant positions before the next hurricane season.

- Offer the PFTs a long-term career incentive/option within FEMA.
- Current term appointments are between one and four years; offer a permanent position after four.
- Modify the Stafford Act to allow a higher cap for DAE training. Expand DAE pool of applicants. Use DAEs working on other disasters and redeploy
- Seek employees from agencies who are downsizing and whose employees are close to retiring
- Develop a needs-based CONOPS based on operational requirements to deal with the fundamental staffing issue of being able to match staffing to need. The CONOPS should be based on a needs assessment so that recovery policies and procedures would be based on operational requirements.

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- For large-scale or multiple events, Establish a mechanism or process to assess staffing needs, determine staff locations, and match need with resources. This could take the form of regional management cells that could analyze available staff and prioritize assignments, or cross-regional, pre-designated teams that are assigned to specific states, along with a steering committee that decided where these teams were needed.
- Develop a rotational policy, including prioritization of assignments between deployment and returning to Regions/home offices.
- Deployment of training staff to contract call centers should not be controlled by one NPSC. A better use of training resources should follow the Incident Command Structure. HQ should make the call, not any single NPSC
- Begin succession planning at GS-11/12 level to prepare for turnover across the next 5-10 years. A related recommendation was to build institutional knowledge by developing things such as “playbooks” to capture experience.
- To scale-up staffing quickly: Review functions and skills to see what skills can be hired locally and speed up the process of local hiring, open staffing calls to the NPSCs, use the national guard, work with Boards of Education to activate substitute teacher lists to obtain employees who have already been through background checks, and maintain a database of past volunteers and skills.

4.4.22. *Training*

Issue: Inadequate training led to mistakes, the necessity to rework things that had already been completed, and inferior IA service delivery. One participant observed that “it was like FEMA had never managed a disaster. There was little history known, and often even less of the existing programs and policies; they made them up as they went.” With training funds reduced in recent years, and with the magnitude of hurricanes in the 2004 and 2005 hurricane seasons, many participants identified training as the single biggest problem in Katrina recovery operations. Training was needed due the introduction of new structures and systems (FRP, ICS, HAC, Human Services Branch, and others). The NPSCs had to gear-up so quickly they could not properly train their staff, resulting in the provision of incorrect information to victims. Those who interview victims are the front line of the DRCs, and inadequate training and supervision resulted in incorrect information. Experienced staff was needed to train others and be in the field managing others. Participants observed the need for training all the way up to senior officials who needed to understand more about FEMA programs, implementation, and the agency’s relationship to government and non-governmental partners.

Recommendation: Invest in interagency recovery training for all personnel levels, including senior officials, in order to prevent mistakes, rework, and poor service delivery. Participants made numerous, specific training recommendations:

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ESF 6 SOP

- Develop and deliver a comprehensive ESF 6 training program for primary and supporting agencies, including an agreed upon division of roles and responsibilities.

Contracting

- Look at duties and responsibilities at functional level and utilize training programs/job aides/SME.
- Develop DVD training for contractors so they can use to train their own employees.
- Train senior managers on the IA programs so they can communicate and not over promise.

NIMS

- Develop and deliver NIMS and National Response Plan (NRP) training in the JFO. Knowledgeable HQ personnel can train all field staff on the general flow of things, including how to document, how to coordinate and communicate with other levels of the agency.

General

- Train a cadre of trainers who focus solely on training others.
- Track who was trained, and for what.
- Have a screening process or evaluation for individuals who have gone through training to determine who can excel and who needs to be trained further.
- Enhance and support COTR training and operations (e.g., use DHS online COTR certification, and mentor new COTRs in immediate field deployment). There should be more IA involvement in setting training proficiency
- Establish IA evaluation component for training.
- Use NPSC general training material as basis for training outside the NPSCs and make this material available over the Web.
- Train senior managers on the programs and what the mission is they are trying to lead.

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- Cross-train people in different areas (both PA and IA, for example).
- Create job aides for different roles.
- Raise training caps and train from general funds. FEMA can not wait for disaster-specific funding to train.
- Update HS21 and develop task books.
- Identify training needs to focus training for the cadre of 3,000 generalists.
- Reestablish training budget for DAE cadre to maintain readiness level.
- Utilize the Emergency Management Institute (EMI). Hire a full time-regional cadre/training manager and tie them to national cadre.
- Target training; be specific on the task staff is to be trained for. Scope down training to increase retention.

4.4.23. *Policy Review and Development*

Issue: FEMA's procedures for reviewing and developing policy – prior to and during disasters – exacerbate other problems and challenges delivering services to disaster victims.

Recommendations:

- Streamline and clarify the policy-making processes within the Recovery Division by insuring that all key policy makers have timely input
- Disseminate new and revised policies in a timely and comprehensive manner to all concerned individuals and agencies
- Pre-brief state and local partners on policy changes, and insure that they have access to pre-designated points of contact to answer questions and provide feedback.
- Sunset disaster-specific policies unless they are reviewed and adopted, as policy, by the Steering Committee.
- Establish a definitive, authoritative source (clearinghouse) for information regarding FEMA policies.

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- Review or establish policies for issues encountered in Katrina recovery operations, including pets, transportation of families back to their home areas, the use of generators, permanently displaced populations and the use of cruise ships as shelters.

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4.5. COMMUNITY RELATIONS (CR)

Many of the issues encountered by CR were due to the unique nature of this event. Katrina's magnitude and severity meant that there was a rush to put "boots on the ground." The inadequate training that resulted from this led to difficulties between surge and experience staffs, inappropriate conduct, and the lack of cultural awareness. Additionally, available plans did not address the large-scale deployment or communications and coordination challenges in the case of widespread destruction of infrastructure that occurred during this disaster.

Other CR issues were due to recurring program-implementation issues, not necessarily attributable to the magnitude and scale of Katrina and Rita. These issues included the lack of a designated CR cadre, lack of buy-in from responders, and a lack of coordination and designation of responsibilities between FEMA and External Affairs/PIOs.

4.5.1. *Pressure to put "Boots on the Ground"*

Issue: The push to have an immediate visible presence in the field was counterproductive. FEMA's desire to have as many people on the ground as quickly as possible is understandable given the images that were coming out of the Gulf Coast Region after the hurricane. However, the quick rush to put "boots on the ground" often came at the expense of sufficient training, appropriate tools, equipment and resources, and the relationship between seasoned and surge staff members. Moreover, there was a lack of a coordinated and integrated effort between HQ and the JFOs. This overall impact affected victims as some staff assigned to CR duties did not have answers to the questions being asked. On several occasions, surge staff could do little more than provide the FEMA 1-800 number. Citizens reported being frustrated with the lack of information and in many cases misinformation that surge staff were providing. This rapid deployment of resources contributed to a negative perception of FEMA's response.

Recommendations:

- Ensure that JFO/HQ staff understand the CR disaster-specific mission and activities, and assess and manage the surge deployment process. For example, if external pressure encourages FEMA to push deployment, coordinate with CR leadership.
- Develop a CR strategic plan that is disaster-specific to fulfill the mission. This plan should include the following critical disaster-specific requirements:
 - CR standards based on the size of the event—specifically, design processes and procedures that outline how CR will operate based on the size of the disaster and potential Generalists deployed to support CR (see Section 4.5.2 for an explanation of Generalists);
 - LOG requirements;

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- Human resource procedures and requirements;
 - Security rules and requirements, including the identification and badging processes;
 - Finance procedures and requirements—for example, credit card rules and how to purchase necessary equipment;
 - MA requirements, which should be based on prior MAs;
 - Procedures for sharing plans and activities with other Recovery partners (internal and external) —for example, ensuring Recovery partners understand CR mission-specific activities;
 - A plan for activation of staff to manage surge staffing;
 - Rules and regulations to effectively work with the Generalist pool—for example, outline the appropriate training for Generalists;
 - A process to deploy experienced staff to the field to lay a foundation for the Generalists—ensure experience is considered when deploying and assigning CR staff; and
 - A plan to coordinate staffing needs and skill sets between the field and HQ.
- Provide adequate training for field personnel (see Section 4.5.2 for additional training recommendations); and
 - Stagger the number of DAEs deployed to ensure an adequate number of qualified staff for multiple disasters.

4.5.2. *CR-Specific Training*

Issue: The need for a large number of CR staff in the field within a very short timeframe after Hurricane Katrina greatly taxed FEMA’s ability to adequately train surge staff prior to deployment, leading to frustration on the part of surge staff, experienced field officers, and affected residents. As a result, surge staff had inadequate tools and information necessary to help affected residents, experienced CR field officers were obligated to spend their time training inexperienced surge staff rather than working on their primary duties, and affected residents were given incorrect and conflicting information. Many conference participants commented that a smaller group of properly trained staff would have been more effective during Recovery efforts than the large group of untrained personnel that was actually deployed.

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A current plan under consideration involves creating a Generalist pool of surge staff that can be used by any recovery operations, including CR. If a Generalist pool is created, CR should craft and deliver clearly-defined training, prior to and during field activity, to prepare the Generalists to carry out the CR mission successfully.

Recommendations:

- Provide the appropriate Emergency Management Institute (EMI) training materials and subject matter experts (SMEs) to enable all incoming Generalist and surge staff to perform CR outreach activities. The training itself should, at a minimum, define and explain the CR outreach mission and include disaster basics (IS-292) and FEMA 101. Additionally, require all CR Generalist and Regional staff to attend this initial training and follow-up refresher courses, and ensure there is quality control for training (specifically, that the training is appropriate for the assigned work).
- Deploy the Mobile Training Unit (MTU) to help identify and address on-the-ground training gaps. Specifically, assess the skills, information, and guidance CR staff needs.
- Prior to training, conduct a skills assessment of the Generalist pool, develop a skill-assessment feedback form to aid in this assessment, and conduct preliminary screening (i.e., interview people) to identify special skills (e.g., multiple languages, engineering background) and special needs that might preclude people from deployment. A release process would need to be developed to address those who could not deploy. Incorporate this screening and assessment into a system that would help identify Generalists as future CR DAEs, thus ensuring that the qualified personnel are obtained by CR.
- Provide the following learning opportunities in addition to required training courses:
 - Encourage mentoring between experienced CR staff and new CR staff;
 - Develop an independent-study course entitled “Orientation to CR;” and
 - Develop a CR manual targeted for Generalists (i.e., Field Operation Guidance).
- Develop and provide CR-awareness program training to other internal and external partners (see Section 4.5.9 for additional recommendations for increasing partner awareness and understanding).

4.5.3. Relationships between Surge and Experienced Staff

Issue: The large influx of CR surge staff during the 2005 Hurricane Season led to coordination and workflow issues. Roles and responsibilities were often poorly defined and new surge staff and seasoned DAEs in the JFO had difficulty effectively working

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together. In several instances, field personnel thought they were getting experienced DAE staff but instead received relatively inexperienced surge staff. Many DAEs complained that they were forced to spend too much time teaching and training surge staff instead of focusing on the core mission. Additionally, in many cases surge staff members were paid a higher salary than seasoned DAEs, which bred resentment.

Recommendations:

- Clearly define roles and responsibilities for JFO members, and ensure that JFO leadership understands all roles and responsibilities. Clearly distinguish surge, Community Emergency Response Team (CERT), DAE, and firefighter personnel to avoid confusion of roles.
- Provide better training to surge staff and management training for managers (see Section 4.5.2 for additional training recommendations).
- Provide surge staff only when and in the numbers requested by the JFO, and have an exit strategy for surge staff once their specific roles are fulfilled.

4.5.4. *CR Personnel Conduct*

Issue: Because of the decision to quickly place boots on the ground, people were deployed before receiving clear standards of conduct (see Section 4.5.1 for additional issues and recommendations caused by quickly deploying large numbers of surge staff). This resulted in some field workers dressing inappropriately and exhibiting inappropriate behavior and language. FEMA headquarters received numerous complaints from fellow employees and citizens regarding inappropriate language and behavior. Additionally, some residents complained of a general callous attitude on the part of CR staff.

Recommendations:

- Develop standards for dress and behavior and provide these requirements to all FEMA staff. This information should be supplied during the recruitment process, in letters to all deploying staff prior to deployment, during orientation at Mobilization (MOB) centers and JFOs, in the FCO's administrative memo, by cadre managers in the field, on the FCO website, and in any other appropriate and effective manner to reach all field staff.
- Establish a labor-relations presence in the field for employees and establish Equal Employment Opportunity/Human Resources (EEO/HR) field teams.
- Train managers and supervisors to deal with performance and conduct issues (see Section 4.5.2 for additional training recommendations).

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4.5.5. *Cultural Awareness*

Issue: Lack of cultural awareness and understanding among FEMA field staff impeded recovery efforts and led to miscommunication and misunderstanding with local communities. Additionally, language barriers resulted in difficulties and delays in getting printed materials in other languages to affected communities.

Recommendations:

- Evaluate demographics and cultural competencies of the existing workforce (by Region) prior to the disaster and identify cultural competency requirements at the JFO (internal and external). Insufficiencies at the JFO could then more easily be addressed with those competencies previously identified in the Regions.
- Have HQ and Regions work together to identify recruitment sources, develop long-range recruitment plans, and provide recruitment sources for leaders.
- Make cultural competency training mandatory for all employees and develop specific training for leaders to aid them in leading by example.
- Meet with cultural communities during “peace time” to determine potential issues that might arise during a disaster and to aid in developing an area-specific cultural fact sheet that can be distributed to CR staff prior to being deployed during an emergency.
- Address cultural issues in the required State plans (perhaps develop a cultural competency section of the plan).

4.5.6. *Plans for Large-scale Deployments*

Issue: CR deployment plans are not sufficient for large-scale deployments (e.g., Hurricane Katrina), resulting in confusion and ineffective use and deployment of CR staff. Hurricane Katrina was a much larger deployment than anything the CR program has previously experienced. CR placed more than 3,000 people in the field post-disaster. Previous large-scale deployments rarely if ever exceeded 300 personnel. These enormous increases severely taxed the systems designed to call-up, train, and deploy CR staff.

Staff at the Atlanta staging area were given conflicting information about when and where to deploy, and because of a lack of communication and coordination between the Atlanta staging area and the JFOs, Atlanta sent surge staff before being asked to in some cases, which overwhelmed the system(s) on the ground. Of those responding to the relevant question in the questionnaire, 45% indicated that the “timeliness of staffing hindered the effectiveness of the CR program.”

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Additionally, the separate CR center in Atlanta caused some confusion and delays as people were shuttled back and forth between Atlanta and the Florida staging area. Some people were told to report to both centers, which caused further confusion. CR needs to enhance existing plans to integrate issues and assumptions connected with large-scale deployments.

Recommendations:

- Develop a boilerplate CR Plan and communicate the requirements of the plan to CR managers, other disaster-response partners, and the FCO/SCO.
- Establish one central deployment center with a core CR component that centralizes medical support and issuance of materials.
- Create a strike team composed of seasoned CR management deployed ahead of time to staff the JFO, a MTU and to fill such positions as CR trainers, and a PIO and Congressional Affairs liaisons to communicate with local/national media and other interests.
- Ensure ADD is up-to-date to be able to deploy CR specialists to identified disaster site locations. To ensure CR specialists are assigned to the correct position, do not assign management roles/responsibilities until they are deployed to a disaster site.
- During large deployments, identify the total number of needed CR surge staff over a 30-day period. This information should be provided by each FEMA JFO in each State (in a multi-state operation) and then be provided to the management cell in the MOB center. Determine the maximum daily processing rate at the MOB to ensure that there are enough staff being called up to meet the expected demand.
- Deploy surge staff to the field in phases and only send the number of staff requested. Additionally, develop an exit strategy for people in the field (and/or) reassign them when the specific mission is accomplished.

4.5.7. *Availability of Appropriate Tools (e.g., laptops, cell phones)*

Issue: Due to the large-scale destruction of local and regional infrastructure, CR field personnel did not have sufficient tools (e.g., laptops, cell phones, and GIS equipment) or the capability to charge them, and thus could not communicate/coordinate with appropriate offices (e.g., JFO). One of the primary roles of CR field personnel is to act as the eyes and ears of the JFO (i.e., reporting back to the JFO on field conditions). The 2005 Hurricane Season destroyed and or adversely affected infrastructure in a huge area of the Gulf Coast Region. As a result, FEMA field personnel faced logistical challenges unlike any they encountered in the past. This, coupled with the fact that FEMA had more field personnel on the ground than ever before, led to significant challenges coordinating and communicating field activities.

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Recommendations:

- Provide seasoned DAEs with “Go Kits” that include a cell phone (to be activated at the same time their FEMA credit cards are activated), satellite phone, laptop with wireless card, and GIS equipment. The equipment should be kept with the DAEs and activated when they are called to service
- Encourage better use of and make it easier to use the mobile field offices where field personnel can go to charge equipment and send messages.

4.5.8. *Designated CR Cadre*

Issue: The lack of a designated CR cadre results in a less effective, efficient, and focused CR staff. The CR cadre currently only has one permanent full-time (PFT) employee; therefore, most CR staff have other non-CR duties. This makes it difficult for them to accomplish the CR mission as they juggle their other responsibilities and often must put the CR issues on hold to accomplish their other primary duties. A focused CR cadre with ample support and vision is critical to ensure that the CR mission is carried out successfully.

Recommendations:

- Centralize the CR mission and expand the headquarters’ staff by 5 PFTs. These new positions should be GS 12/13, and they should not impact current positions. Develop policies and procedures that establish and support a national, unified CR cadre. These policies and procedures should include requirements and guidance for training and credentialing CR staff.
- If the CR mission cannot be centralized, hire 10 PFT CR staff, one for each Region, and assist State and local governments to build and strengthen their CR staff capacity.

4.5.9. *Buy-In from Responders*

Issue: Internal partners (FCO, State, Operations, Planning, etc.) do not fully understand the CR mission, resulting in the improper or under-utilization of CR staff. Although these partners recognize CR as an asset, they do not understand the core functions and/or abilities of the CR staff. CR has not kept partners and stakeholders apprised of changes in the CR program, and there is a lack of clarity about the roles and responsibilities of the CR cadre. As a result CR personnel have been asked to perform duties and tasks outside the CR mission and are not fully utilized.

Recommendations:

- Upgrade and update existing CR SOPs, Field Operating Guides (FOGs), and other management and field training materials to explain the current and/or changing CR

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roles and responsibilities. Make this training mandatory by issuing a Regional Director policy requiring this training. This will include in-service training in Regional offices.

- Develop and institute a program that will continuously keep partners and stakeholders informed and up-to-date. This program should include information about the CR Steering Committee, a CR overview to be presented in the field, the CR video currently in production (*Helping Those Who Need it Most*), and additional videos, including the following topics and information:
 - Information about the CR work (i.e., timeline sessions);
 - An explanation of how/when people are deployed to the field (i.e., the Grid system);
 - Outline of how CR manages its resources; and
 - An explanation of the CR conference call and how CR works with field operations.
- Improve overall CR performance during field operations to increase credibility and reliability with other programs. This should include enhancing training, communication, and coordination with Recovery stakeholders, and improving CR cadre processes and procedures.

4.5.10. *Coordination and Designation of Responsibilities Between FEMA and External Affairs/PIO*

Issue: Significant bad publicity during the 2005 Hurricane Season highlighted the need for a coordinated effort and clear roles and responsibilities for communication and outreach efforts at FEMA. External Affairs/PIO and CR staff did not effectively coordinate their efforts during the Katrina disaster. It should not be exceedingly difficult to differentiate roles and responsibilities between the two groups as their primary objectives are quite different.

External affairs/PIO primarily deals with news and print media organizations and is concerned with overall public information and relations. CR's primary objective is to work with an affected community and provide information to that community as well as report back to the JFO on local conditions. It is imperative that local communities view CR as fair and impartial and above "spin." Both roles are critical for FEMA to succeed, and there must be a consistent message from both groups; therefore, communication and coordination between the two groups is essential. Currently, DHS and CR senior staff are meeting to discuss this issue.

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Recommendation:

- Establish clear roles and responsibilities for External Affairs/PIO and CR staff; explicitly define expectations, process, and products to be delivered by each group, as well as the limitations of each.

Appendix A

Acronyms and Abbreviations

ACRONYMS AND ABBREVIATIONS

ADA	Americans with Disabilities Act
ADD	Automated Deployment Database
AFO	Area Field Office
ARC	American Red Cross
ARF	Action Request Form
CBO	Congressional Budget Office
CEQ	Council on Environmental Quality
CERT	Community Emergency Response Team
CLC	Corporate Lodging Consultants
ConOps	Concept of Operations
COTR	Contracting Officer's Technical Representative
CR	Community Relations
DAE	Disaster Assistance Employee
DHOPS	Direct Housing Operations
DHS	Department of Homeland Security
DMAT	Disaster Medical Assistance Team
DMA2K	Disaster Mitigation Act of 2000
DOD	Department of Defense
DOT	Department of Transportation
DRC	Disaster Recovery Center
DSG	Disaster Specific Guidance
DUA	Disaster Unemployment Assistance
EA	Expedited Assistance
EEO/HR	Equal Employment Opportunity/Human Resources
EFT	Electronic Funds Transfer
EMAC	Emergency Management Assistance Compact
EMI	Emergency Management Institute
EOC	Emergency Operations Center
EPA	Environmental Protection Agency
ERT	Emergency Response Team
ERT-A	Emergency Response Team-Advanced
ERT-N	Emergency Response Team-National
ESF	Emergency Support Function
FBO	Federal Business Opportunity
FCO	Federal Coordinating Officer
FMR	Fair Market Rental

FOG	Field Operations Guide
FRP	Facilitated Relocation Program
GIS	Geographic Information System(s)
HAC	Housing Area Command
HPOP	Hotel Population Outreach Program
HQ	Headquarters
HS	Human Services Branch
HSOC	Homeland Security Operations Center
HUD	U.S. Department of Housing and Urban Development
IA	Individual Assistance
IAP	Incident Action Plan
IA-TACs	IA Technical Assistance Contractors
ICS	Incident Command System
IHP	Individuals and Household Program
IIMG	Interagency Incident Management Group
IMH	Incident Management Handbook
IPA	Intergovernmental Personnel Act
IRS	Internal Revenue Service
IST	Incident Support Team
JFO	Joint Field Office
KDHAP	Katrina Disasters Housing Assistance Program
LTCR	Long-term Community Recovery
MH/TT	Mobile Homes and Travel Trailers
MOA	Memoranda of Agreement
MOB center	Mobilization center
MOU	Memoranda of Understanding
MREs	Meals Ready to Eat
MTU	Mobile Training Unit
NDMS	National Disaster Medical System
NEMA	National Emergency Management Association

NEPA National Environmental Policy Act
 NERR National Emergency Resource Registry
 NGA National Governors Association
 NGO Non-Governmental Organization
 NHC National Hurricane Center
 NIMS National Incident Management System
 NOAA National Oceanic and Atmospheric Administration
 NOC National Operations Center
 NPSC National Processing Service Center
 NRCC National Response Coordination Center
 NRCS Natural Resources Conservation Service
 NRP National Response Plan
 NVOAD National Voluntary Organizations Active in Disaster
 NWS National Weather Service

OFA Other Federal Agencies
 OGC Office of General Counsel
 OMB Office of Management and Budget
 ONA Other Needs Assistance

PA Public Assistance
 PAO Public Assistance Officer
 PDA Preliminary Damage Assessment
 PFO Principal Federal Official
 PFT Permanent Full-Time
 PIO Public Information Officer
 PO Project Officer
 POC Point of Contact

RAC Regional Area Command
 RISC Regional Interagency Steering Committees
 RNAT Rapid Needs Assessment Team
 RRCC Regional Response Coordination Center

SBA Small Business Administration
 SCO State Coordinating Officer
 SFO State Field Office
 SITREP Situation Report
 SME Subject Matter Experts
 SOP Standard Operating Procedure

TA Transient Accommodations
TAC Technical Assistance Contractor
TD Tropical Depression
TH Temporary Housing program
THA Temporary Housing Assistance
THAP Transitional Housing Assistance Program
TT/MH Travel Trailer and Mobile Home

UFAS Uniform Federal Accessibility Standards
USACE U.S. Army Corps of Engineers
USCG United States Coast Guard
USDA U.S. Department of Agriculture
USFWS U.S. Fish and Wildlife Service
USPS U.S. Postal Service
US&R Urban Search and Rescue

VAL Voluntary Agency Liaisons
VMAT Veterinary Medical Assistance Team
VOAD Volunteer Organizations Active in Disaster
VOLAG Voluntary Agency (VOLAG).