STATE OF NEW HAMPSHIRE DEPARTMENT OF SAFETY DIVISION OF HOMELAND SECURITY AND EMERGENCY MANAGEMENT

PERFORMANCE AUDIT REPORT AUGUST 2016



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To The Fiscal Committee Of The General Court:

We conducted a performance audit of the Department of Safety's Division of Homeland Security and Emergency Management (HSEM) to address the recommendation made to you by the joint Legislative Performance Audit and Oversight Committee. We conducted this audit in accordance with generally accepted government auditing standards. Those standards require we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions. The evidence we obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

The purpose of the audit was to determine how effectively HSEM coordinated and supported the State's and local governments' emergency management efforts in State fiscal years 2014 through 2016.

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August 2016

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ABBREVIATIONS

AAR After-Action Report CY Calendar Year

COG Continuity Of Government DOS Department Of Safety

EMAP Emergency Management Accreditation Program EMPG Emergency Management Performance Grant

EPZ Emergency Planning Zone

FEMA Federal Emergency Management Agency

HSEM Division Of Homeland Security And Emergency Management

IAC Information And Analysis Center ICS Incident Command System

JIC Joint Information Center
PIO Public Information Officer

RIMC Radiological Instrument And Measurement Calibration

SEOC State Emergency Operations Center SEOP State Emergency Operations Plan

SFY State Fiscal Year

SOC Security Operations Center

EXECUTIVE SUMMARY

The Department of Safety (DOS) Division of Homeland Security and Emergency Management (HSEM) was effective in coordinating and supporting the State and local government emergency management efforts. HSEM had strong approval from municipal Emergency Management Directors and other stakeholders. Ninety-two percent of the municipal Emergency Management Directors responding to our survey reported being satisfied or very satisfied with assistance provided to them by HSEM; none of the Directors reported being dissatisfied. Likewise, 87 percent of Emergency Management stakeholders responding to our survey, such as other State agencies and private entities involved in disaster management, reported the overall service provided by HSEM was good or very good. However, we found HSEM needs to improve its planning and operations to fully meet accreditation standards and comply with State requirements.

State, county, and local governments can seek to have their emergency management programs accredited by the independent, non-profit *Emergency Management Accreditation Program* (EMAP). EMAP standards represented best practices in the emergency management and homeland security field. While HSEM was not required to be accredited, we applied those standards as benchmarks to assess HSEM's policies, procedures, and plans and found the HSEM did not fully comply with all EMAP accreditation standards.

Although HSEM updated and maintained many essential plans, it lacked a continuity of government plan to help ensure essential government functions remain operational after a disaster. HSEM inconsistently completed after-action reports and did not track if corrective actions were taken. We found HSEM was in the process of developing an EMAP-compliant training program but needed to formally assess training needs and improve documentation. Additionally, plans to test the State's primary alternate Emergency Operations Center were scheduled, but never executed.

We found the DOS did not comply with certain State laws. Since 2004, statute required the DOS to adopt administrative rules to implement an Incident Command System for events requiring response from multiple agencies within State and local government. This was previously identified in our November 2014 *Statewide Radio Interoperability* performance audit report. We also found certain policies and procedures that did not fully comply with requirements for the Information and Analysis Center. We identified a need for administrative rules for the fee assessment process levied on nuclear power plants and the need to comply with statutory reporting requirements regarding those funds.

During the audit period, HSEM management sought to make the State's emergency management program compliant with accreditation standards while also adhering to federal requirements in order to maintain federal funding for the State's emergency management efforts. In our Other Issues And Concerns section, we discuss a number of improvements to HSEM's documentation and operations which, if implemented, could improve conformity to accreditation standards.

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RECOMMENDATION SUMMARY

Observation Number	Page	Legislative Action Required?	Recommendations	Agency Response
1	13	No	Develop a continuity of government plan and procedures, and continue working with the Governor's office, Legislature, Judicial Branch, and State agencies to ensure continuation of State leadership and services in the event of a disaster.	Concur
2	15	No	Generate an after-action report (AAR) after each exercise; develop and implement a consistent written policy and procedure on authoring AARs; and track, assign, monitor, and improve State operations based on all identified corrective actions from an AAR.	Concur
3	17	No	Develop an Emergency Management Accreditation Program compliant training program.	Concur
4	19	No	Fully test primary alternate facility.	Concur
5	21	No	Adopt administrative rules for a statewide Incident Command System.	Concur
6	22	No	Use a random sample in future audits of data input quality and data access, and develop written procedures for implementing its authority to take personnel actions as they relate to the Information and Analysis Center.	Concur
7	24	No	Adopt rules for the nuclear plant assessment fee process.	Concur
8	25	No	Complete all required reports regarding the Nuclear Planning and Response Fund.	Concur

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BACKGROUND

The State's emergency management mission has evolved since 1951. In that year, the State created the Civil Defense Agency with the objective of preparing New Hampshire in the event of nuclear attack during the Cold War. During the 1980s, the focus shifted to emergency planning with the construction of the Seabrook Station nuclear power plant, and legislation developing the Nuclear Planning and Emergency Response Program. This change coincided with the Civil Defense Agency transitioning into the Office of Emergency Management. After the September 11, 2001 terrorist attacks, the State responded by moving emergency management responsibilities under the purview of the Division of Fire Safety and Emergency Management within the Department of Safety (DOS). In 2006, the Division of Homeland Security and Emergency Management (HSEM) was created along with a director position to oversee the new DOS division. This change assigned the dual mission of preparing for and responding to disasters and terrorist attacks into one division.

HSEM was involved in all five phases of emergency management:

- prevention efforts to stop an act of terrorism;
- protecting people and assets against threats and hazards;
- mitigation efforts to reduce the loss of life and property in future disasters;
- response efforts to protect property and provide for basic human needs after a catastrophic incident; and
- recovery efforts to restore, strengthen, and revitalize communities after an incident.

To achieve these mission objectives, HSEM coordinated the State's resources, planning, and support efforts. As a coordinating agency, HSEM relied on a large network of federal, state, and local governments as well as private organizations to effectively work together. At the local level, 234 New Hampshire communities had local emergency management directors. Local governments were often the first to respond and manage an adverse event. As the scale of the adverse event grew, the communities relied on HSEM to assist them or assume command of the situation if local communities were overwhelmed.

The State's support network primarily consisted of 46 organizations which included federal and State agencies and private entities. HSEM responded and planned for hazards by organizing its efforts into the following 15 emergency support functions:

- transportation;
- communications and alerting;
- public works and engineering;
- firefighting;
- emergency management;
- mass care, housing, and human services;
- resource support;
- health and medical;

- search and rescue;
- hazardous materials;
- agriculture, natural, and cultural resources;
- energy;
- public safety and law enforcement;
- volunteer and donations management; and
- public information.

Our survey of local, State, federal, and private entities involved in emergency management activities were satisfied with the services, coordination, and support provided by HSEM as shown in Appendices C and D.

Organizational Structure

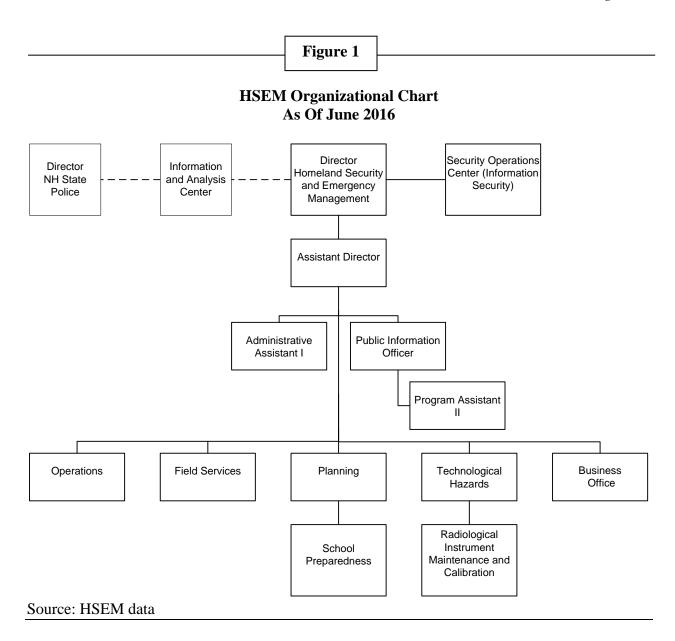
As of June 2016, HSEM was organized in the following sections: Administration and Security Operations Center, Business, Planning, Operations, Technological Hazards, Field Services, and the Information and Analysis Center. HSEM had 44 positions during State fiscal years (SFY) 2014 through 2016. Figure 1 depicts the organizational structure of HSEM.

Administration And Security Operations Center

The Director and Assistant Director were responsible for the overall Division leadership and direction. Statute required the HSEM Director to report to both the Governor and the DOS Commissioner. Additionally, both the Information Security Officer and the Public Information Officer (PIO) supported HSEM Administration. The Information Security Officer operated the Security Operations Center, which was in a conceptual phase during the audit period, but was expected to monitor cyber threats and mitigate damage. The PIO informed and educated the general public before, during, and after an emergency. Although the PIO was administratively staffed within HSEM, this position supported the entire DOS.

Business

The Business Section was responsible for performing the accounting functions within HSEM, which largely included accounts payable and payroll processing. Additionally, the financial and accounting aspects of grant management within HSEM were performed by the Business Section.



Planning

The Planning Section was responsible for planning activities, drafting State plans and its associated trainings, and grant administration. Major plans included:

• <u>State Emergency Operations Plan (SEOP)</u>: This plan established the framework by which the State government and its partners will respond and assist during an emergency. The SEOP assigned roles and responsibilities in order to coordinate a multi-jurisdictional response to an event or disaster. The SEOP was the foundational plan and included several annexes for additional planning needs (e.g., the Radiological Emergency Response Plan).

- <u>Hazard Mitigation Plan</u>: This plan included a risk assessment of potential hazards New Hampshire may encounter and a plan to mitigate the impact of those disasters.
- <u>Continuity of Operations Plan</u>: This plan established the guidance to ensure mission essential functions continued within HSEM in the event of a loss of facilities, workforce, or equipment failure.

In addition to drafting State plans, the Planning Section was responsible for assisting communities with their planning activities. The Planning Section created the template for communities to develop their own Local and School Emergency Operations Plans. Additionally, local communities were responsible for their own Hazard Mitigation Plans. Hazard Mitigation Plans were approved by the Federal Emergency Management Agency (FEMA), but during the audit period HSEM was in the process of becoming authorized by the FEMA to approve local plans.

Over the past few years, the Planning Section had grown its School Preparedness Program. This program conducted security assessments of school facilities, reviewed and assisted in developing the statutorily required School Emergency Operation Plans, and provided training exercises to test emergency plans. Between May 2014 and February 2016, 257 school assessments were reportedly completed out of 627 New Hampshire public and private schools.

The Planning Section had primary purview for HSEM federal grants management. Major grants included the Emergency Management Performance Grant (EMPG), Presidentially Declared Disaster Grants, and several hazard mitigation grants.

- <u>EMPG</u>: These funds were split between funding operations within HSEM and local communities. Local communities received a 50 percent matching grant to improve emergency preparedness, in areas such as, funding emergency planning or emergency equipment (e.g., generators, radios, and emergency notification systems). During the audit period, HSEM developed program guidance to prioritize the emergency needs to be funded by the EMPG. Additionally, in calendar year (CY) 2015, HSEM reviewed its handling of EMPGs using a continuous improvement initiative and reportedly reduced its grant applications processing from 100 days to 30 days.
- <u>Presidential Disaster Declarations</u>: These funds provided federal assistance to communities experiencing damage to after a disaster. For the State to receive assistance, public infrastructure damage must exceed \$1,856,223. Additionally, each county had its own threshold ranging from \$117,676 to \$1,426,567 based on a per capita dollar rate. During the audit period, these grants were audited annually in the *State of New Hampshire Single Audit of Federal Financial Assistance Programs*.
- Mitigation Grants: The State Mitigation Officer managed these federal funds supporting local communities in implementing cost effective mitigation projects to reduce the effects of natural disasters. For example, one of these grants might fund improving a culvert to prevent a road from being washed out during a future flooding event. Programs included

the Pre-Disaster Mitigation program, Flood Mitigation Assistance program, Repetitive Flood Claims program, and Severe Repetitive Loss program.

Operations

The Operations Section was responsible for supporting the State Emergency Operations Center (SEOC) and training stakeholders who interacted with the SEOC. Other responsibilities included inventory, fleet, and facility management. The Operations Section also housed training responsibilities under the Training and Exercise Coordinator, and database management responsibilities under the WebEOC Coordinator.

HSEM's incident management system was WebEOC, a commercial off-the-shelf software program. It was one of the primary means of communications for the SEOC, and provided command-level personnel and community leaders one common operating picture of public safety operations, sensitive information, and infrastructure problems and disruptions; assisting them to make informed and effective decisions in response, recovery, and mitigation efforts. WebEOC was used to share information between the SEOC and federal, State, and local public safety entities, as well as critical infrastructure partners.

Table 1 demonstrates the number and duration of SEOC activation events during CY 2013 to 2015. Since CY 2013, the SEOC has seen an increase in activations. SEOC activation was a discretionary decision made by the Governor and the HSEM Director. Major activations during the audit period included several snow storms during January and February 2015, power outages due to a winter storm in November 2014, and a flooding event in June and July 2013.

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SEOC Activation Events And Duration, CYs 2013–2015

Activation Measurement	2013	2014	2015
Total Number of Events	8	21	15
Planned Events	5	10	6
Unplanned Events	3	11	9
Total Duration of Events (Estimated Hours) ¹	247	239	302

Note: ¹One event did not include a duration. Source: LBA analysis of unaudited HSEM data.

Technological Hazards

The Technological Hazards Section was primarily responsible for maintaining the Radiological Emergency Response Plans for the Seabrook Station and Vermont Yankee nuclear power plants. These two plans were highly regulated, reviewed, and tested by the FEMA and the Nuclear Regulatory Commission. However, the Vermont Yankee nuclear power plant was in the process of being decommissioned and required less planning and exercises. In the event of a nuclear incident, HSEM needed to be prepared to evacuate and support communities within a ten-mile radius of the affected nuclear facility.

The Technological Hazards Section included the Radiological Instrument and Measurement Calibration (RIMC) Shop. The RIMC Shop was responsible for calibrating and maintaining approximately 40,000 pieces of radiological detection equipment for the State Police, Regional Hazardous Materials teams, and local communities. The RIMC Shop received an annual license and inspection from the Radiological Health Program within the New Hampshire Department of Health and Human Services.

Field Services

The Field Services Section assisted 234 local communities in emergency management planning, training, conducting exercises, and applying for grant funding. The State was divided into six regions with a field representative assigned as a liaison to each. The field representatives provided customer service to identify and address the emergency management needs of the communities they served. Field representatives informed communities of grant funding opportunities and all programs offered by other HSEM sections. Grant funding typically required a community to have a local emergency operations plan or hazard mitigation plan, which field representatives assisted with developing.

Information And Analysis Center

The Information and Analysis Center (IAC) was responsible for gathering information on natural and human-caused threats to the State, its people, and environment. It did this by:

- gathering, monitoring, and analyzing information from a variety of sources;
- evaluating critical infrastructure and key resource assets, and assisting the HSEM Director and the State Police Director in better protecting these assets;
- gathering available information from federal, State, and local sources and providing situational awareness, disaster intelligence, and early warning of possible terrorist activities or events:
- tracking criminal activity in the State and providing information to the Attorney General and law enforcement to assist with deploying resources, aiding crime investigations and assisting to minimize possible conflicts in situations where two or more agencies are investigating the same suspect or case;
- participating in planning for and monitoring various special events that may involve threats to public safety and assisting the DOS Commissioner, HSEM Director, and political subdivisions to anticipate threats and adequately protect against them; and
- monitoring and analyzing information from a variety of open and classified sources, and providing information which serves the State's homeland security, public safety, and emergency management needs.

The IAC was co-managed by the State Police Director and the HSEM Director, and overseen by the DOS Assistant Commissioner. The intelligence subcommittee of the Advisory Council on Emergency Preparedness and Security served as an advisory committee to the IAC.

Revenue And Expenditures

Table 2 displays HSEM's revenues and expenditures for SFYs 2014 and 2015. During these years, HSEM activities were primarily funded using federal, private, and agency revenue sources. The federal revenue included funding for HSEM operations, but a larger portion were funds passed through HSEM to provide disaster mitigation and public assistance grants to communities. The amount of federal revenue and grant expenditures fluctuates between years based on the number and severity of disasters. The private revenues were annual assessments of the Seabrook Station and Vermont Yankee nuclear power plants for planning, training, and equipment expenses associated with a nuclear incident. This funding was distributed between all of the State and local stakeholders involved in nuclear response planning. Agency income revenue was received through DOS fees associated with releasing information, such as motor vehicle records, and fines associated with safety violations, which were applied towards operational expenses. For the SFYs 2016 and 2017 budget, DOS agency income was replaced with renewable energy funds and State general funds.

Table 2

HSEM Revenues And Expenditures, SFYs 2014–2015

Class	2014	2015
Federal Revenue	\$12,854,108	\$8,912,074
Private Revenue	3,111,476	3,635,359
Agency Income	1,174,130	1,240,483
Revolving Fund	150,029	0
Total Revenue	\$17,289,743	\$13,787,916
Personnel & Benefits	\$2,979,742	\$3,487,801
Inter-Governmental	546,346	538,779
Technology	312,635	333,070
Facility	276,023	287,984
Administrative	877,755	849,603
Current Expenses	154,278	220,435
Equipment	109,019	67,598
Travel	73,438	80,470
Grants	11,960,318	7,925,461
Total Expenditures	\$17,289,554	\$13,791,201

Source: LBA analysis of Statements of Appropriations.

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EMERGENCY MANAGEMENT STANDARDS

According to the Colorado Division of Homeland Security and Emergency Management, the *Emergency Management Standard* published by the *Emergency Management Accreditation Program* (EMAP):

can be used as benchmarks for evaluation of programmatic elements, including laws and authorities, training, exercising, planning, crisis communications, public education and information, telecommunications and warning, hazard identification and risk assessment, mitigation, finance and administration, logistics and resource management, incident management, mutual aid, operations and procedures, facilities, and prevention and security.

While compliance with the EMAP standards was not mandatory for the Division of Homeland Security and Emergency Management (HSEM), the EMAP standards represented the best practices of the homeland security and emergency management profession.

We used the EMAP standards to identify areas of HSEM operations that did not meet those benchmarks. We found four areas that could be better aligned with the EMAP standards. Accredited emergency management programs should have four operational plans: an emergency operations plan, a continuity of operations plan, a continuity of government (COG) plan, and a recovery plan. We found HSEM needs to work with key stakeholders within State government and develop a COG plan. HSEM did not fully implement or develop exercise and training policies, programs, and practices. For example, the policy to write after-action reports (AAR) following exercises or events was found to be internally inconsistent and sporadically implemented. The training program for State and local emergency management officials was partially developed without HSEM conducting a formal training needs assessment or developing a comprehensive training tracking system. Finally, we identified the need to test the primary alternate site when the Incident Planning and Operations Center was rendered unusable.

Observation No. 1

Develop A Continuity Of Government Plan

HSEM did not have a COG plan. The *State Emergency Operations Plan* (SEOP) briefly described the concept of COG planning, including the Governor's line of succession; however, this was only one aspect of a COG plan. In addition to lines of succession, a COG plan should identify and ensure continued essential government functions, records, systems, facilities, and authority. According to the National Governors Association Center for Best Practices, a COG plan helps ensure "continuity of leadership and direction to:

- provide public safety,
- reduce disruption to essential government functions, and
- minimize property loss and damages."

For example, in the event the State House became inoperative, the COG plan might describe how the State would proceed in maintaining a functional constitutionally compliant government.

Statute authorized the HSEM Director to oversee State-level planning and required State agencies to cooperate with the Director. However, a comprehensive COG plan also required the input of other branches of government. HSEM reported conducting preliminary meetings with the Governor's staff and legislative staff to discuss developing a COG plan. Without a COG plan and procedures, the State was unprepared to ensure the functional leadership, continued essential government services, or a constitutionally compliant government in the event of a significant adverse event. Additionally, the lack of a COG plan prevented HSEM from being compliant with multiple standards under the EMAP if it sought to become accredited.

Recommendation:

We recommend HSEM management develop a COG plan and procedures. It should keep working with top governmental officials within the Governor's office, Legislature, Judicial Branch, and State agencies to ensure continuation of State leadership and services in the event of a disaster.

Auditee Response:

We concur.

A clear, well defined Continuity of Government (COG) plan will ensure the continuity of essential functions of government under all circumstances that may disrupt normal operations.

A COG plan is an overarching plan that requires a number of foundational plans to be in place and exercised to ensure its effectiveness. Through considerable effort, the required foundational plans have been developed or rewritten during the last three years and are 100 percent up to date. Those foundational plans are a prerequisite step to creating a COG plan. We are extremely proud of this accomplishment.

With the foundational plans in place, HSEM began the process of developing a State of New Hampshire COG plan more than a year ago. This process included, but was not limited to both working with all state agencies on their Continuity of Operations Plans (i.e., the foundational plans discussed earlier) and holding meetings with staff in the Speaker's Office, Senate President's Office and the Governor's Office. Due to limited resources and the scope of this project, we will need to secure the assistance of a consultant to ensure completion of the plan in an efficient and effective manner. To this end, we are currently in the process of developing an RFP.

The development of a comprehensive COG plan will be an expensive undertaking with costs expected to exceed \$50,000. Provided we can secure grant funding, the expected completion date of the project will be March of 2017. To ensure the ability to fully implement the plan should it be necessary, it is our recommendation that upon completion of the plan, we hold a workshop and tabletop exercise with a projected completion date in Summer of 2017.

Observation No. 2

Improve After-Action Report Policies And Practices

HSEM inconsistently utilized and implemented AARs to improve its emergency management program. AARs help to evaluate and identify strengths and areas for improvement after an event or exercise has occurred. Once areas for improvement are identified, a plan is developed to address capability gaps within an emergency management program. This should include detailed corrective actions which may address plans, procedures, organization, management, resources, and training. All corrective actions should be assigned, given target dates for completion, tracked, and reported to increase emergency management preparedness.

Exercises AARs

HSEM did not track corrective actions nor did they consistently complete AARs following exercise events. Only four AARs existed out of ten exercises conducted during calendar years (CY) 2014 and 2015. Out of those four exercises, only one draft AAR was authored by HSEM. Although the draft AAR authored by HSEM identified 23 corrective actions, they were never assigned, given target dates for completion, or tracked.

HSEM policy required an AAR to be completed following each exercise and comply with the *Homeland Security Exercise and Evaluation Program* principles. By not following its policy, HSEM exercise program did not effectively ensure insights obtained from conducting exercises were addressed. For example, the one draft AAR authored by HSEM found the State did not sufficiently identify all of the infrastructure or social service assets needed for a large-scale recovery effort. While this was useful knowledge obtained from this exercise event, HSEM did not ensure this weakness was formally addressed.

Emergency Events AARs

HSEM did not author any AARs in response to real incidents during the audit period. During CY 2014 and 2015, the State Emergency Operations Center (SEOC) was reportedly activated for 26 real events. For six of those 26 events, the SEOC reportedly remained activated for more than 24 hours, including one multiple-day activation due to massive power outages during the 2014 Thanksgiving Day storm.

HSEM management reported the decision to write AARs was an informal policy dependent on the duration of the event. While the informal policy was communicated from HSEM management, the Planning Section within HSEM developed an internal reference guide which required an AAR to be authored after every SEOC activation. Both formal and informal policies were inconsistent and not fully implemented.

Without consistently utilizing AARs and improvement plans, HSEM had limited ability to address vulnerabilities discovered during an event and ensure gaps in capabilities were

addressed. Additionally, AARs from real events or exercises can be utilized to revise the State plans or inform the exercise planning process.

Recommendations:

We recommend HSEM management:

- comply with policy and generate an AAR after each exercise;
- develop and implement a consistent written policy and procedure on authoring AARs after emergency events; and
- track, assign, monitor, and improve State operations based on all identified corrective actions from an AAR.

Auditee Response:

We concur.

During the past three years, HSEM has facilitated a significant increase in the number of drills and exercises held by State and local partners. This considerable increase in the number of drills and exercises has required a corresponding increase in resources from our division. As such and in discussion with our State and local partners, we prioritized the use of our limited training resources to increase training opportunities for our stakeholders and elected to forgo formal after action reports. Our decision to sacrifice formal after action reports for an increased number of exercises has been embraced by our local communities as evidenced by the 86 percent of respondents that rated our training program as 'Good' or 'Very Good' (See Appendix D, Q9).

Better meeting the immediate needs of our stakeholders to exercise their plans and increase preparedness has provided a higher level of customer service and diminishes the value of the exercises very little because after action reports are time consuming to produce and are only valuable if produced and presented immediately following a drill or exercise. An after-action report that is produced well after the exercise, as our resource constraints would require, has little or no value to our customers.

However, exercises are not conducted without the benefit of a critique provided in the form of a 'hotwash'. Hotwashes are not considered formal AARs, but do provide feedback and allow for corrective actions. A hotwash was conducted following each and every exercise, drill or EOC activation. A review of the customer survey results indicates that the practice of using hotwashes has not diminished the value of our training services with local stakeholders.

We will continue our current practice and look to address the resources needed to fully address the AAR issue in the 18/19 budget process.

Observation No. 3

Improve Training Program

During the audit period, HSEM was developing the Emergency Management Academy to formalize and further develop its training program within the EMAP standards. As of June 2016, HSEM had developed a course list, created an enrollment process, and had advertised classes. However, full implementation of the academy, including course curriculum and course evaluation, was not projected to be fully completed until December 2017. In addition to not fully implementing a formalized training program, HSEM had no structured training identification and tracking procedures.

Training Needs Identification

EMAP standards required an emergency management training program to identify the programmatic emergency management training needs and the needs of emergency management personnel. Although HSEM developed a training and exercise program plan, HSEM lacked a formal needs assessment to identify training requirements. Part of the training identification process included identifying personnel required to be trained on the State's incident management system, matching individual trainings with specific job responsibilities, and addressing specialized training. However, HSEM did not consistently develop this level of detail in their training program procedures.

Training Program Tracking

EMAP required an emergency management program to ensure mandatory training requirements were met and deficiencies found were addressed with training. However, HSEM did not maintain a system to track individual attendance against a training program requirement or goal. Additionally, training records did not comply with EMAP standards requiring the length of each course or the instructor's name and qualifications be included in the record.

Without consistently identifying the program's training needs, staff training needs, or tracking training progress, HSEM was unable to verify emergency management personnel were sufficiently trained according to goals and requirements. HSEM's training program relied on using existing systems within the New Hampshire Fire Academy. Therefore, implementing an EMAP compliant training program required modifications to an existing system and structure external to HSEM.

Recommendations:

We recommend the Department of Safety (DOS) management develop an EMAP compliant training program by:

• continuing to develop the Emergency Management Academy to formalize a structured emergency management program;

- conducting a formal training needs assessment and identifying the training needs of the program and individuals within an emergency management role;
- developing a tracking system which records individual training progress towards identified training requirements and goals; and
- including course length and information regarding instructor's name and qualification on training records.

Auditee Response:

We concur.

EMAP standard 4.13, "Training", states:

An accredited Emergency Management Program has a formal, documented training program composed of training needs assessment, curriculum, course evaluations, and records of training. The training needs assessment shall address all personnel with responsibilities in the Emergency Management Program, including key public officials.

NH HSEM has had a robust training and exercise program supporting state and local emergency management (EM) for the past three years and has implemented improvement strategies based on constant participant feedback and evaluations, along with self-analysis as to the effectiveness and relevancy of content and convenience of location and delivery format (i.e., in-person and online content).

HSEM developed and utilized a Training and Exercise Plan (TEP) to deliver training and exercises (T&E) in an informed method within a two-year period. This TEP is produced through a process that includes stakeholder input collected from a variety of sources. Among these, the Training and Exercise Plan Workshop (TEPW) provides first-hand input from state and local agencies from a myriad of emergency management and response disciplines. The feedback collected while developing the TEP and that collected as part of the TEPW informs the development of training and exercises to better meet community needs.

Based on customer feedback, HSEM has taken on a new initiative to build and deliver the first-ever New Hampshire Emergency Management Academy (EM Academy), a four-tiered program intended to deliver National Incident Management System (NIMS), Incident Command (IC), Emergency Operations Center (EOC), exercise formation and evaluation, and a number of other critical EM skills to practitioners at every level (e.g., from volunteer Community Emergency Response Team (CERT) members, to elected officials, to professional emergency responders, and to emergency management directors (EMDs)). The program is still within its first year and already has 91 participants, about two-thirds of which are external participants with the remaining third being HSEM staff. Providing the NIMS training is essential as it is a requirement to receive federal EM funding.

Participation in training is tracked in a variety of databases, whether at the federal or state level. Training provided by HSEM, such as that provided through the EM Academy, is tracked

and the transcripts stored by the NH Fire Academy. Reports are generated and information regularly provided on federal accountability formats such as the quarterly EMPG Reports.

Radiological Emergency Preparedness (REP) Training Programs are defined by curriculum, content, appropriate audience, etc. and recorded for review in an Annual Letter of Certification.

Although we do not have a formal training needs assessment as suggested by the EMAP accreditation process, the extensive training opportunities that HSEM provides are based on an informal needs assessment, customer feedback and requests as well as quarterly EMD meetings and one-on-one EMD meetings. To fully comply with EMAP accreditation requirements, an RFP is being developed to hire a contractor who will conduct a complete training needs assessment. A draft of the RFP will be approved by the ACEPS training subcommittee. Once complete, the NH Fire Academy and HSEM will work with the ACEPS training subcommittee to develop a long-term plan to address and identify gaps.

Observation No. 4

Test Alternate Facility

HSEM identified both primary and secondary alternate facilities in the event the Incident Planning and Operations Center was rendered unusable. EMAP standards required programs establish and test procedures for activation, operation, and deactivation of alternate facilities. Testing the primary backup facility for HSEM emergency operations had been scheduled, but not executed, reportedly due to a lack of time and resources. Without testing its primary alternate location, management had no assurance HSEM could operate efficiently and effectively during an emergency requiring its evacuation from the Incident Planning and Operations Center.

Recommendation:

We recommend HSEM management fully test its primary alternate facility to ensure it can successfully function at that location.

Auditee Response:

We concur.

The State Emergency Operations Center was designed for resiliency, including the ability to operate 'off the grid' by using its own power and water supplies. Therefore, it is unlikely that the EOC would be rendered unserviceable. However, we must be prepared should this unlikely event occur. HSEM has a Continuity of Operations Plan that identifies two alternate locations should the State's Emergency Operations Center need to be relocated. As such, a signed MOA with the NH National Guard (NHNG) (signed July 2, 2014) allows for the relocation of the EOC to the NHNG facility in Concord. Further, should an incident occur that is widespread enough to require EOC operations to move out of Concord, we have an agreement with Seabrook Station to use their Incident Field Office (IFO) command center, located in Newington.

Emergency I	Management	Standards
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We have exercised the equipment at both locations and had staff work out of the IFO facility in Newington during FEMA graded exercises. In 2015, we were scheduled to hold a training event out of the NHNG facility in Concord, however, a real world event preempted the scheduled event.

Although we concur that full exercises should be conducted at both facilities, we are confident that the testing we have completed will allow us to make either facility operational if needed.

HSEM and the NHNG have agreed to conduct a 'mini-COOP' exercise for which HSEM representatives from several sections will be located at the primary alternate facility during the week of July 18-22. In addition, a second 'mini-COOP' exercise for which members of HSEM staff will move to the same site is scheduled for August 5, 2016, as part of the Granite Guard/DHHS Strategic National Stockpile (SNS) exercise taking place that week. During both exercises, HSEM staff will set up in the allocated training room at the primary alternate facility. The facility contains a more-than-ample supply of computers, projection equipment, and other equipment to support HSEM staff. During the exercises, HSEM staff will connect to WebEOC and other web-based resources, such as the National Weather Service-Gray, Maine, a key partner in providing emergency management notifications and decision making.

COMPLIANCE

Compliance with law and rule is a fundamental element of effective management control and aids agencies in achieving their objectives. Rules prescribe or interpret agency policy, procedure, or practice requirements binding on the public and employees of other State agencies. Rules allow agencies to develop procedures, filling in the details between statute and the practices needed to achieve its statutory purpose. Rules also provide greater certainty and regularity in agency action. Properly adopted rules have the force and effect of law. Incomplete or improper promulgation can lead to ad hoc rulemaking, and requirements not properly included in rules may be unenforceable. In this section we discuss several matters pertaining to administrative rules and compliance with State statute.

Observation No. 5

Adopt Rules For Incident Command System

The Department of Safety (DOS) did not adopt required administrative rules implementing the statewide Incident Command System (ICS). The Division of Homeland Security and Emergency Management (HSEM) adopted the National Interagency Incident Management System as its ICS and incorporated it into its State Emergency Operations Plan.

Since 2004, statute required the DOS to adopt administrative rules to implement an ICS for incidents requiring response from multiple agencies within State and local government. Administrative rules facilitate intergovernmental collaboration as they have the force of law. Administrative rules communicate agency policies, procedures, and practices binding on persons outside the agency. Rules provide greater certainty and regularity in agencies interacting with others, and the rule-making process provides public and Legislative oversight over agency actions.

The ICS is a standardized all-hazards incident management approach that can be employed during single agency responses or large-scale events involving multiple agencies and disciplines. As a command and control system, the ICS provides a flexible and coordinated response, ensures reliable interoperable communications across disciplines, provides common procedures, and allows efficient resource integration from different agencies. Properly employed, a statewide, all-responder ICS can help ensure communications are effective and operations are planned and executed according to clear objectives, which is critical to help eliminate on-scene confusion, and ensure effective and efficient operations involving multiple responders.

This matter was previously discussed in our November 2014 *Statewide Radio Interoperability* performance audit report. At that time, the DOS concurred with our recommendation to adopt rules.

Com	pliance	
Com	puunce	

Recommendation:

We recommend DOS management comply with State law and adopt administrative rules for a statewide ICS to be used in responding to any natural or man-made cause that requires emergency management by multiple agencies or departments.

Auditee Response:

We concur.

RSA 21-P: 52 requires a statewide Incident Command System (ICS) based on the National Interagency Incident Management System and authorizes the Commissioner of Safety to adopt rules pursuant to RSA 541-A to implement the statewide incident command system:

The statewide incident command system shall be used in responding to any natural or man-made cause that requires emergency management by multiple agencies or departments within state and local government (See RSA 21-P:52).

The Commissioner of Safety has adopted the ICS via Saf-C 3900 in the Code of Administrative Rules. The Commissioner has tasked the DOS legal staff with rulemaking to ensure that it is clear that the administrative rules are fully compliant and apply to any natural or human-caused incidents that require emergency management by multiple agencies or departments.

Although the current administrative rules are not as clear as we would like, the National Incident Command System (NICS) is currently universally accepted and used for most incidents that require multiple agencies or departments. In the past three years, the NH Police Academy, NH Fire Academy and HSEM have greatly increased the level of training to state and local partners to ensure effective and efficient incident management. In addition, HSEM requires all employees of the Division to receive ICS training appropriate for the position they hold. This policy is enforced and applies to everyone in the agency, from the Director to the unpaid interns. ICS training, including training in unified command, has been a focal point for the DOS who has partnered with the NH Association of Chiefs of Police and the NH Association of Fire Chiefs. In actuality, training is the most important piece in operationalizing a command system and more important than an administrative rule.

Observation No. 6

Ensure Compliance With Information And Analysis Center Statute

Certain policies and procedures of the DOS's Information and Analysis Center (IAC), codirected by the Divisions of State Police and Homeland Security and Emergency Management, did not fully comply with two statutory requirements. Our analysis, which included reviewing policies and procedures, and interviews with personnel, found:

 RSA 651-F:8 required an annual audit of data access, which required "a random sampling of data input quality and the type and reason for data access." However, random sampling of data input quality and the type and reason for access was not included in the audit. The employee who conducted the review in 2015 reported using his experience in deciding what records to look at and checked to see if there was an audit trail, but did not look at the audit trail in detail. Without a random sample of data input quality and the type and reason for access, the Legislature may not be fully assured the intelligence database contains accurate data, or the records were accessed for legitimate reasons.

• RSA 651-F:6, IV required the IAC to "adopt procedures for implementing its authority to screen, reject for employment, transfer, or remove personnel authorized to have direct access to the system." Although DOS policy 08-002 required the IAC to adopt procedures to reject for employment, transfer, or remove personnel authorized to have direct access to the system, no such procedures were found in the IAC's Operations Manual or DOS administrative rules. Without adopting procedures for implementing the IAC's authority to reject for employment, transfer, or remove personnel authorized to have direct access to the system, the IAC may not have a sufficient process to systematically identify personnel who should not obtain or maintain access to sensitive information.

Recommendations:

We recommend DOS management use a random sample of data input quality and data access in future audits, and develop written procedures for implementing its authority to take personnel actions as they relate to the IAC.

Auditee Response:

We concur.

Since the inception of the Information and Analysis Center, the review of data access was conducted as one part of an internal Performance Evaluation of the IAC conducted by an employee with a top secret security clearance, who assisted with the drafting of RSA 651-F. The employee sought to ensure that the IAC was only collecting, using, and retaining personal data and intelligence information on individuals or organizations where there was a clear criminal or terrorist predicate and the information directly related to terroristic or criminal activity, with the concept of reasonable suspicion as the guideline; that prior to entering such information it received high-level supervisory review; and once in the database, it was only shared on a caseby-case basis with properly vetted agencies having jurisdiction and for legitimate criminal investigatory or counter-terrorism purposes. An overriding concern has always been that intelligence data not be maintained about the political, religious, or social views, associations, or activities of any individual, group or organization unless it related directly to criminal or terrorist conduct or activity and was supported by reasonable suspicion. With this in mind, the person performing the evaluation searched for specific names of individuals and organizations in the state who had achieved some notoriety for anti-government bias or controversial political or social views that might make them candidates for improper tracking by a government agency. The staff member also checked to see that database inquiries were subject to an audit trail.

Upon review of the specific language of RSA 651-F: 8 and the comments of the auditors, we believe while the manner in which the "random sampling of data input quality" was conducted when the IAC was in its infancy probably sufficed due to the relatively small size of the database at that time, but with the passage of years and growth of the database, a more rigorous inspection is required from now on, designed with the assistance of subject matter experts on database design and operation. We will consult with the Department of Information Technology and devise and put in place a new and more rigorous review process that includes minimum sample sizes and quality standards to measure against.

The failure to include specific written procedures for screening, rejecting for employment, transfer or removal from direct access to the database system was apparently an oversight when the IAC's Operations Manual was drafted and approved. Importantly, the procedure of rescinding access to the database system was conducted when necessary. In consultation with the Department's legal counsel and human resources section, we will draft such procedures to reflect this practice and to ensure that such procedures are followed. With the Commissioner's approval, such procedures will be added to the Operations Manual.

Observation No. 7

Adopt Rules For Nuclear Plant Assessment Fee

No administrative rules existed governing the nuclear plant fee assessment process.

Nuclear Plant Assessment Fee

State laws authorized the DOS Commissioner to assess a fee on a nuclear power plant to pay for the cost of preparing, maintaining, and operating nuclear emergency response plans by State agencies and emergency planning zone (EPZ) municipalities. This included the costs for equipment and materials needed to implement the plans. The DOS collected nuclear power plants' payments and deposited them into a restricted revenue account for nuclear planning and response activities.

Every year, EPZ municipalities submitted their emergency response budget to the HSEM Director for review, who was required to make them available for public comment. In addition, the Director also received and reviewed the appropriateness of the budget requests of State agencies with a role in implementing emergency preparedness plans. The Director totaled these municipal and agency budgets and submitted the combined budget to the Commissioner. Nuclear power plants were required to be consulted prior to the Commissioner billing them. The Commissioner was statutorily authorized to determine the proportions of costs to each power plant based on what the Commissioner determined was fair and equitable.

Administrative Rule Requirement

State laws required each State agency to adopt administrative rules related to its organization, operations and practices, and formal and informal procedures. By definition, administrative rules communicate agency policies, procedures, and practices binding on persons outside the agency.

Rules provide greater certainty and regularity in agencies interacting with others and the rule-making process provides public and Legislative oversight over agency actions.

Without rules, agencies' actions may seem arbitrary and unfair. For example, starting in State fiscal year (SFY) 2015, the DOS instituted a flat rate fee of \$8,500 for every EPZ municipality to cover minor costs related to emergency preparedness. According to the HSEM Director and the one local EPZ emergency management director we spoke with, the EPZ towns were satisfied with the flat rate fee. However, we question whether instituting a flat rate fee binding on all EPZ municipalities was valid without having been established in rule. In addition, rules for the nuclear plant fee should also establish the entire assessment process, including:

- timing for the DOS assessment,
- timing for the EPZ municipalities' and State agencies' budget submissions,
- timing for both the HSEM Director and DOS Commissioner budget reviews,
- details for the public comment process and timing on EPZ municipalities' budgets,
- details for input the nuclear plants should have on forming the annual emergency response budget, and
- details regarding the DOS Commissioner's criteria and determination for fair and equitable assessments.

Recommendation:

We recommend the DOS Commissioner adopt rules for the nuclear plant assessment fee process.

Auditee Response:

We concur.

The Nuclear Plant Assessment Fee, which was passed by the Legislature in 1981, predates the Administrative Rulemaking Act, which came into effect in 1994. RSA 541-A: 41, Effect of Prior Law, states that "Conflicts between this chapter and prior or existing statutes shall be resolved by following the stricter requirements." Therefore, arguably the process of fee setting could constitute a rule. The Department will draft a set of rules and submit them to the Joint Legislative Committee on Administrative Rules.

Observation No. 8

Improve Nuclear Planning And Response Fund Reporting

Out of three statutory reporting requirements, the DOS partially completed two reports and did not produce a third report regarding the Nuclear Planning and Response Fund.

Compliance	
Compliance	

Partially Completed Reports

Statute required the DOS Commissioner to assess a fee to pay for State agencies' and municipalities' costs of preparing, maintaining, and operating emergency response plans associated with nuclear plants, as well as purchasing equipment and materials to implement them. The DOS collected \$3.6 million in SFY 2015, which were deposited into the State Treasury as restricted revenue to be used exclusively for the nuclear planning and response program. However, the DOS only reported approximately \$1.3 million to the Department of Administrative Services for its statewide dedicated funds report. The remaining \$2.3 million was used for supporting HSEM nuclear planning and response activities.

State law specifically required the DOS to produce a separate report on the Nuclear Planning and Response Fund to include a list of activities, fund recipients, amount distributed, and the source of funds for key State leaders. The DOS did not report funds used to support HSEM nuclear planning and response activities. While the DOS submitted these two reports, neither report included funds distributed to HSEM. Both reports were understated for SFY 2015 by at least \$2.3 million. Therefore, external stakeholders and designated recipients of these reports did not have accurate information.

DOS staff reported not knowing the original methodology for developing the reports. Since the money received for the Nuclear Planning and Response Fund was divided among four budget accounts, DOS staff inferred the methodology did not include the two budget accounts only partially used for nuclear planning and response activities.

Missing Report

Within 60 days after the end of the SFY, the DOS Commissioner was statutorily required to report back to the nuclear power plants on how the assessed fees were used during the prior fiscal year. According to HSEM officials, the DOS had no record of producing this report since 2010. HSEM reported turnover within the DOS Business Office may have been the reason this report was not completed.

Recommendation:

We recommend DOS management comply with statute and fully complete all required reports regarding the Nuclear Planning and Response Fund to ensure all dedicated funds are reported and nuclear power plants are notified on how assessed fees were spent.

Auditee Response:

We concur.

We concur that \$2.3 million used for supporting nuclear planning and response activities was not reported. A prior interpretation of the statute concluded that the funds to HSEM were part of a mixed funding stream and not specifically reportable as restricted revenue. Our reports were properly generated based upon that prior interpretation. After reviewing the requirements, we

concur that the reports should include all funds received and will apply a new methodology to that end.

We concur that the statute requires the DOS to report to the nuclear power plants how the assessed fees were used during the previous year. DOS failed to report this information due to staff turnover at the Department's Business Office. Immediately following the discovery of this oversight, we contacted the nuclear power plants to inform them we would correctly report the usage of fees. Plant representatives clearly indicated that they have been receiving this information to their satisfaction during the past three years. The representative for Seabrook Station stated, "We are very happy with the information we have received over the past three years. We are getting more detailed information now then we were when the reports were being filed." However, we understand the statutory reporting requirements and will ensure full compliance in the future.

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OTHER ISSUES AND CONCERNS

In this section, we present issues we consider noteworthy, but did not develop into formal observations. The Department of Safety (DOS), Division of Homeland Security and Emergency Management (HSEM) and the Legislature may wish to consider whether these issues and concerns deserve further study or action.

Continue Implementing Industry Standards

Emergency management programs were accredited through the *Emergency Management Accreditation Program* (EMAP) based on their compliance with standards. Accreditation through the independent, non-profit EMAP was voluntary. EMAP standards represented best practices in the emergency management and homeland security profession. The standards addressed the following emergency management program areas:

- program administration and coordination;
- administration and finance;
- laws and authorities;
- hazard identification, risk assessment, and consequence analysis;
- hazard mitigation;
- prevention;
- operational planning;
- incident management;
- resource management and logistics;
- mutual aid;
- communications and warning;
- operations and procedures;
- facilities;
- training;
- exercises, evaluations, and corrective actions; and
- crisis communications, public education, and information.

While HSEM management expressed interest in seeking accreditation and revised some policies to meet EMAP standards, they acknowledged the State program did not meet all the requirements. Whether HSEM seeks accreditation or not, the State emergency management system would likely be strengthened by continuing to align its program with EMAP standards. Nevertheless, accreditation would provide the added benefit of the program being reviewed by other emergency management professionals. We suggest HSEM continue to incorporate EMAP standards into its program and consider seeking accreditation with the backing of the DOS and the Legislature.

Enhance Communication Planning

According to the State Emergency Operations Plan (SEOP) listing of State agency authorities, the HSEM was in control of emergency communications. While HSEM had formal and informal plans for communicating with program stakeholders, emergency personnel, key decision makers, and warning the public, those plans may be insufficient to meet EMAP accreditation standards. We suggest HSEM ensure its communication planning documents address:

- specific hazards and requirements of the potential operating environments,
- secondary means of communication in case of failure with the primary system,
- the need to establish a schedule of tests, and
- system interoperability.

Improve Public Information Program

Expand Scope Of Joint Information Center Procedures

HSEM maintained a public information program which performed many of the activities expected of an emergency management program. For example, HSEM continuously educated the public on hazards, threats, and risks. However, the overall program lacked documented plans and procedures to implement the public information program.

HSEM had public information-related procedures for when the Joint Information Center (JIC) was activated. These were found in the appendix of the *JIC Plan* and included:

- a public information plan to respond to public inquiries and rumors,
- protocols to interface with public officials and important stakeholders, and
- policies to coordinate clear information for release.

Since the *JIC Plan* procedures only applied when the JIC was activated, HSEM was without procedures for situations when the JIC was not activated. We suggest HSEM consider expanding the scope of its *JIC Plan* procedures to cover its entire emergency management program.

Special Needs Population

HSEM reported having a capability gap when communicating with special needs populations; for example, communicating emergency preparedness information to those with hearing or sight impairments. HSEM reported the Federal Emergency Management Agency (FEMA) provided translation services during an emergency declaration. However, HSEM lacked capabilities and procedures to utilize alternative formats and methods to communicate with these populations during non-emergency situations. We suggest HSEM continue efforts to partner with non-profit agencies in order to develop this capability.

Track Strategic Plan

The State's *Homeland Security Strategy*, which was approved by FEMA, included seven priority goals which were further defined into dozens of different objectives and implementation steps. The *Homeland Security Strategy* required an evaluation plan be developed and progress tracked towards implementation. HSEM did not track the progress on the implementation steps, nor did they consistently assign these tasks. Therefore, HSEM was unable to report the status of strategic objectives, or what State priorities had been addressed. Although many of the objectives within the *Homeland Security Strategy* were set to be achieved during State fiscal year 2017, we suggest HSEM evaluate the interim status of implementation steps, and if necessary, adjust resources or expected completion dates accordingly.

Increase Review Of State Agency Procedures

SEOP identified State agencies responsible for having procedures to implement SEOP sections. HSEM reported reviewing which plans and procedures maintained by other State agencies when the SEOP was updated. This review included requesting agencies affirm if they had procedures and if any revisions were needed. However, HSEM review did not include collecting the written procedures or even specifically identifying them. State law gave the Director of HSEM authority to oversee and coordinate planning, response, and recovery effort of all State agencies to terrorist events, disasters, and wide-scale threats to public safety. We suggest HSEM increase assurance that procedures maintained outside HSEM are comprehensive and meet the needs of the State.

Enhance Gap Analysis

HSEM conducted a periodic gap analysis while completing the FEMA-required *Threat and Hazard Identification and Risk Assessment* process. However, the State did not consistently use quantitative data in measuring resource gaps or capabilities. Quantitative data provides for a more detailed approach in assessing preparedness and can facilitate the process of prioritizing resource needs. We suggest HSEM incorporate more quantitative data when conducting a gap analysis.

Improve Risk Assessment And Consequence Analysis

According to EMAP standards, an emergency management program needed to assess the risk and vulnerability of people, property, the environment, and its own operations; and conduct a consequence analysis to consider the impact hazards identified during the risk assessment might have on the public, responders, operations, property, the environment, the economy, and the public confidence. Although HSEM considered many of these factors when it conducted its risk assessment, we suggest HSEM should include the risk to its own operations during the risk assessment process. Additionally, HSEM should improve the consequence analysis by considering public confidence after an adverse event.

Assign Additional Responsibilities In State Plan

According to EMAP standards, the emergency operations plan of the emergency management program needed to identify and assign specific areas of responsibility for different functions. Nearly all 30 responsibilities required of HSEM were included in the SEOP. However, areas of responsibility such as mutual aid, monitoring, and private sector coordination were not included. We suggest HSEM should improve its SEOP by clearly assigning these responsibilities.

Develop Interim Milestones For Hazard Mitigation Plan

According the EMAP standards, the emergency management program's hazard mitigation plan shall establish interim and long-term goals and objectives to reduce risk to the hazards identified. Although the *State Hazard Mitigation Plan* obtained goals and objectives, the plan lacked interim goals and objective. We suggest HSEM develop interim goals and objectives when updating the *Plan*.

Fully Develop The Security Operations Center

During the audit period, HSEM and the Department of Information Technology were in the conceptual phase of developing the Security Operations Center (SOC) to defend the State against cyber-attacks. Although the SOC was operational, its further development was somewhat limited due to a pending decision by management on which department should have direct authority over the SOC. For example, HSEM reported a delay in filling the SOC administrator position due to organizational uncertainty. We suggest HSEM continue efforts to develop the SOC and work with the Department of Information Technology to develop clear roles, responsibilities, and authority.

STATE OF NEW HAMPSHIRE DIVISION OF HOMELAND SECURITY AND EMERGENCY MANAGEMENT

APPENDIX A OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives And Scope

In December 2015, the Fiscal Committee of the General Court adopted a joint Legislative Performance Audit and Oversight Committee recommendation to conduct a performance audit of the Department of Safety's (DOS) Division of Homeland Security and Emergency Management (HSEM). Our audit sought to answer the following question:

How effective was HSEM in coordinating and supporting the State's and local governments' emergency management efforts?

The audit had two primary objectives: 1) determine whether State and local stakeholders were satisfied with HSEM assistance during a disaster and supported with emergency management planning, training, and grant administration; and 2) determine whether HSEM written policies and procedures and activities conform to professional standards and State requirements. The audit period was State fiscal years 2014 through 2016.

Methodology

To gain an understanding of the homeland security and emergency management field, we obtained and reviewed the standards that encompass the requirements for accreditation by the *Emergency Management Accreditation Program* (EMAP) and reviewed audits and other publications from other states and the federal government.

To gain an understanding of HSEM, its management, the internal control environment, and legal requirements, we:

- reviewed relevant State statutes, administrative rules, policies, procedures, plans, and guidelines;
- reviewed DOS reports related to the Nuclear Planning and Response Fund;
- interviewed DOS and HSEM management personnel;
- examined HSEM's organizational structure; and
- reviewed internal and external audits and evaluations:

To evaluate HSEM policies, procedures, and practices, we requested HSEM to conduct a self-assessment of its operations compared to EMAP standards. We then evaluated HSEM's responses compared to the standards and judged whether they complied or not. In doing so, we recognized our assessment may not be the same as EMAP's review if HSEM sought EMAP accreditation.

To determine whether the Information and Analysis Center (IAC) complied with State laws, we visited the center and interviewed IAC management. We also evaluated the IAC's policies and procedures, and reviewed the IAC's statutorily required annual review.

To gain an understanding of how the State Emergency Operations Center operated, we observed exercises conducted by HSEM during February and April 2016. We also observed HSEM field representatives interact with local Emergency Management Directors in May 2016 to gain an understanding of their role in providing services to HSEM constituents.

To evaluate the nuclear plant assessment process, we reviewed State law and municipal emergency response budget requests, and documents maintained by DOS supporting the nuclear plant assessment fee.

To determine if grant management was adequate, we reviewed federal oversight and evaluation of the grant programs managed by HSEM.

Surveys

To assess client satisfaction with HSEM services, we sent surveys to individuals identified by the HSEM as municipal Emergency Management Directors throughout the State. We sent out 233 surveys and received 87 responses for a 37.3 percent response rate. Results of the survey can be found in Appendix C.

To assess stakeholder satisfaction, we sent surveys to individuals identified by HSEM and State plans as key stakeholders throughout the State. We sent out 59 surveys and received 48 responses for an 81.4 percent response rate. Survey results can be found in Appendix D.

Data Reliability

We concluded data would not be used to materially support findings, conclusions, or recommendations. Therefore, no data reliability assessment was necessary.

STATE OF NEW HAMPSHIRE DIVISION OF HOMELAND SECURITY AND EMERGENCY MANAGEMENT

APPENDIX B AGENCY RESPONSE TO AUDIT



State of New Hampshire Department of Safety John J. Barthelmes, Commissioner Kevin P. O'Brien, Assistant Commissioner Richard C. Bailey, Jr., Assistant Commissioner Homeland Security and Emergency Management Perry E. Plummer, Director

Jennifer L. Harper, Assistant Director



July 14, 2016

The Honorable Neal M. Kurk, Chairman Fiscal Committee of the General Court and Members of the Committee State House Concord, NH 03301

Re: Response to performance audit report by Office of the Legislative Budget Assistant –

August 2016 Performance Audit Report, "Division of Homeland Security and Emergency

Management Performance Audit Report"

Dear Chairman Kurk and Members of the Committee:

We thank the Committee for the opportunity to comment on the recent performance audit report issued by the Office of the Legislative Budget Assistant (LBA) for the Division of Homeland Security and Emergency Management (HSEM).

First and foremost, I share my sincerest thanks and appreciation to the LBA management and audit staff for their hard work pursuant to this audit. I especially want to thank both Jay Henry and Mark Manganiello for their dedication, flexibility and professionalism. They were both accommodating and sensitive to our current workload as they performed their duties and made great efforts to learn about our agency and critically analyze our operations. The extra time they spent attending exercises, meeting with staff, and researching the emergency management accreditation standards is a testament of their commitment to their job and the citizens of NH.

As you review this report, please note the approval rating from both local emergency management directors and state partners is something our staff is extremely proud of. The results of the auditors' impartial survey of all 234 towns and municipalities show that 92 percent of respondents were either 'satisfied' or 'very satisfied' with no respondents indicating that they were 'dissatisfied.' In addition, 87 percent of our state partners indicated the services we provide are 'good' or 'very good,' the two most positive choices in the survey, with no respondents indicating services were 'poor' or 'very poor.' These responses are a testament to the hard work and dedication of the HSEM staff.

Office: 110 Smokey Bear Boulevard, Concord, N.H. Mailing Address: 33 Hazen Drive, Concord, N.H. 03305 603-271-2231, 1-800-852-3792, Fax 603-223-3609 State of New-Hampshire TDD Access: Relay 1-800-735-2964

The Honorable Neal M. Kurk, Chairman Fiscal Committee of the General Court and Members of the Committee Page Two July 14, 2016

The audit was based on the Emergency Management Accreditation Program (EMAP) standards which we are striving to achieve. Three years ago, we began the informal process of accreditation preparation with the goal of becoming one of 30 accredited states during the 2018/2019 fiscal year. Though we look forward to achieving accreditation, it will be a long and arduous process to complete. It has been extremely helpful to have an independent review of our procedures and activities as we prepare for the formal accreditation process.

Once again, I thank Jay and Mark for assisting HSEM in being the best it can be in protecting the citizens of NH, a responsibility of the utmost importance.

Perry E. Plummer

STATE OF NEW HAMPSHIRE DIVISION OF HOMELAND SECURITY AND EMERGENCY MANAGEMENT

APPENDIX C MUNICIPAL EMERGENCY MANAGEMENT DIRECTOR SURVEY RESULTS

We sent surveys to individuals identified by the Division of Homeland Security and Emergency Management as municipal Emergency Management Directors throughout the State. We sent out 233 surveys and received 87 responses for a 37.3 percent response rate. We combined and simplified similar answers to open-ended questions and presented them in topic categories; multi-part responses are counted in multiple categories where applicable. Some totals in the following tables may not add up to 100 percent due to rounding or where respondents could respond multiple times to the same question.

Q1. What town or city do you represent?	
	Count
answered question	84
skipped question	3

Q2. Have you interacted with the State Division of Homeland Security and Emergency Management since July 1, 2013?		
Answer Options	Count	Percent
Yes	85	98
No	2	2

answered question 87 skipped question 0

Q3. Overall, how satisfied are you with the assistance provided by the State Division of Homeland Security and Emergency Management?		
Answer Options	Count	Percent
Very satisfied	55	65
Satisfied	23	27
Neither satisfied nor dissatisfied	7	8
Dissatisfied	0	0
Very dissatisfied	0	0

answered question 85 skipped question 2

Q4. Please explain why you were dissatisfied with the assistance provided by the Division of Homeland Security and Emergency Management.	
Comments	Count

provided comment

0

Don't know

Other (please specify)

Q5. Do you feel the State Division of Homeland Security and Emergency Management is prepared to effectively help your community deal with disasters or other adverse events?		
Answer Options	Count	Percent
Yes	73	86
Somewhat	11	13
No	1	1

answered question 85 skipped question 2

Q6. Please explain why you feel the Division of Homeland Security and Emergency
Management is not prepared to effectively help your community deal with disasters or
other adverse events.

Comments	Count
Too much focus and effort on school security has left the majority of other	
programs without direction. Mitigation programs are lacking. Agency is staffed	
with many part time positions. Most work by the agency is focused around	
security issues and not general emergency management operations.	1

provided comment

0

0

0

0

Q7. Have you been contacted by representatives of the State Division of Homeland Security and Emergency Management?

and Emergency Management.		
Answer Options	Count	Percent
Yes	83	98
No	2	2

answered question 85 skipped question 2

Q8. Approximately how many times were you contacted by a representative of the State Division of Homeland Security and Emergency Management during calendar year 2015? (Please provide a numerical estimate)

Statistics	
	Average = 15 times
	Median = 10 times
	Minimum = 0 times
	Maximum = 92 times

Q9. How would you rate the frequency of those contacts?		
Answer Options	Count	Percent
Too frequent	1	1
Just right	75	90
Too infrequent	5	6
Don't know	2	2

answered question 83 skipped question 4

Q10. For what reasons has the State Division of Homeland Security and Emergency Management contacted your community? (Select all that apply) **Answer Options Count** Percent Hazard mitigation plans, grants, or projects 69 83 School security assessments, alerts, or training 57 69 **Emergency Management Preparedness Grants** 82 68 77 Local Emergency Operations Planning (LEOP) 64 Continuity of Operations Planning (COOP) 19 16 Emergency Operations Center (EOC) equipment 36 43 51 42 **Emergency Management Exercises** WebEOC training 57 69 Emergency management training 40 48 National Incident Management System (NIMS) or Incident Command System (ICS) 22 27 Public health/sheltering 19 23 Radiological Emergency Preparedness activities 24 29 Other (please specify) 15 18

answered question 83 skipped question 4

Q10. Text Responses, Other (please specify)	
Meetings	5
Weather events\updates	3
Activation of Emergency Operations Center	2
Rail accident management	1
Initial orientation and update plans	1
New representative for our town x3	1
Table top exercises	1
Incident surveys	1
Notifying of field representative changes	1

Q11. Was the information and technical assistance provided helpful to you as an Emergency Management Director?

Answer Options	Count	Percent
Yes	80	96
No	3	4

answered question 83 skipped question 4

Q12. What would make the information and technical assistance more helpful to you?		
Comments	Count	
During 2015 there was not a field rep for this area. So we were left out of the		
loop on a lot of things. The only thing I was contacted on was the school		
inspections and it was not helpful. It was actually done in a very disrespectful		
way as the person handling it was a fill in.	1	
Operating in a team format rather than individual levels of government doing		
their own thing. More collaborative decisions along emergency management		
programs would be appreciated.	1	

provided comment

2

Q13. Since July 2013, has your community experienced an actual disaster or other adverse event, or training for one which involved the State Division of Homeland Security and Emergency Management?

U 1		
Answer Options	Count	Percent
Yes	51	60
No	33	39
Don't know	1	1

answered question 85 skipped question 2

Q14. How satisfied were you with the level of responsiveness between your community and the State Division of Homeland Security and Emergency Management during your disaster or other adverse event, or training exercise?

Answer Options	Count	Percent
Very satisfied	32	63
Satisfied	15	29
Neither satisfied nor dissatisfied	4	8
Dissatisfied	0	0
Very dissatisfied	0	0

Q15. Please explain why you were dissatisfied with the responsiveness of the I	Division of
Homeland Security and Emergency Management.	
Comments	Count

Comments

provided comment

0

Q16. Overall, how would you rate the assistance provided by the State Division of Homeland Security and Emergency Management during your disaster or other adverse event or training exercise?

Answer Options	Count	Percent
Very good	32	63
Good	14	27
Acceptable	5	10
Poor	0	0
Very poor	0	0
Don't know	0	0

answered question 51 skipped question 36

Q17. Please explain why you rated the assistance provided by the Division of Homeland Security and Emergency Management during your disaster or other adverse event or training exercise as poor.

Comments	Response Count

provided comment

0

Q18. Have you received WebEOC training from the State Di	vision of Homeland Security
and Emergency Management?	

and Emergency Management		
Answer Options	Count	Percent
Yes	72	85
No	13	15

Q19. How satisfied were you with the WebEOC training?		
Answer Options	Count	Percent
Very satisfied	40	56
Satisfied	29	40
Neither satisfied nor dissatisfied	2	3
Dissatisfied	0	0
Very dissatisfied	1	1

answered question 72 skipped question 15

Q20. Please explain why you were dissatisfied with the WebEOC training.		
Comments	Count	
Training could be done virtually, does not need to be done in a classroom		
format. It becomes very difficult to get our staff to Concord or to schedule a		
specific time to get all of them together to take a training. Video or internet		
based training would be much more helpful.	1	

provided comment

1

Q21. Have you received training related to emergency operations or homeland security
other than WebEOC sponsored by the State Department of Homeland Security and
Emergency Management?

Answer Options	Count	Percent
Yes	64	75
No	21	25

answered question 85 skipped question 2

Q22. How satisfied were you with the training you received sponsored by the State Division of Homeland Security and Emergency Management?

Answer Options	Count	Percent
Very satisfied	32	50
Satisfied	28	44
Neither satisfied nor dissatisfied	3	5
Dissatisfied	1	2
Very dissatisfied	0	0

Q23. Please explain why you were dissatisfied with the training provided by the Division of
Homeland Security and Emergency Management, other than WebEOC training.

	0
Comments	Count
We've had a number of trainings with State level instructors that were not	
federal courses sponsored by FEMA. The ones with State level instructors (not	
HSEM staff) were conducted poorly with instructors that lacked experience on	
the topic.	1

1

Answer Options	Count	Percent
Yes	66	78
No	19	22
Don't know	0	0

answered question 85 skipped question 2

Q25. Did your community submit an application for any of the following grants? (Select all that apply)

that apply)		
Answer Options	Count	Percent
Emergency Management Performance Grants (EMPG)	47	75
Flood Mitigation Assistance	4	6
Hazard Mitigation Grant Program	26	41
Pre-Disaster Mitigation Grant	6	10
Other (please specify)(Do not include Homeland Security		
grants)	4	6

answered question 63 skipped question 24

Q25. Text Responses, Other (please specify)	
School security	2
Radiological Emergency Management Plan	1
AFG	1

provided comment

4

Q26. How satisfied were you with the grant application process? (Do not consider Homeland Security grants in your response)		
Answer Options	Count	Percent
Very satisfied	24	38
Satisfied	33	52
Neither satisfied nor dissatisfied	3	5
Dissatisfied	3	5
Very dissatisfied	1	2

answered question 64 skipped question 23

Q27. Please explain why you were dissatisfied with the grant application process.	
Comments	Count
Too complicated/bureaucratic	4
Mitigation grant process lacked technical assistance and was very cryptic in	
what was allowed by state level officials versus what was allowed by FEMA	
grant guidance.	1

provided comment

4

Q28. Has your community received any grant funding through the State Division of Homeland Security and Emergency Management since July 2013? (Do not consider Homeland Security grants in your response)

Answer Options	Count	Percent
Yes	50	77
No	11	17
Don't know	4	6

answered question 65 skipped question 22

Q29. After receiving a grant, how satisfied were you with the technical assistance given to you by the State Division of Homeland Security and Emergency Management? (Do not consider Homeland Security grants in your response)

Answer Options	Count	Percent
Very satisfied	28	56
Satisfied	19	38
Neither satisfied nor dissatisfied	2	4
Dissatisfied	1	2
Very Dissatisfied	0	0

Q30. Please explain why you were dissatisfied with grant technical assistance provided by the Division of Homeland Security and Emergency Management.	
Comment	Count
Process	1

Q31. In what ways could the Division of Homeland Security and Emergency Management		
improve its efforts or better serve your organization and the State?		
Comments	Count	
Good job/No changes are needed	21	
Grants are too bureaucratic.	5	
Field representatives need flexible schedules to attend meetings on nights and		
weekends	4	
Regional trainings/drills needed	4	
Need better grant guidance	3	
Improve communication	2	
Reduce field representative turnover	2	
When I had a question on any of the two grants we sought, they were always		
answered. I have always found them to be very helpful with the grant program.	1	
Personnel are well versed in process.	1	
Not sure. Communication, visits, and competency of those visiting have all		
improved in the last several years over the service level that was provided		
previously.	1	
It can be hard for small towns that do not have paid staff to deal with all that		
goes into emergency management.	1	
A more diverse representation from smaller communities on grant committees.		
Continued representation from HSEM at regional mutual aid meetings provides		
great representation from the state and a reminder of the state as a valuable		
resource.	1	
I would like to see training sessions available for new EMD's like Training 101		
to cover the basics, as there are many aspects to this position.	1	
they haven't	1	
I've only represented my community for 3 months and would like to reserve		
comment for now.	1	
I think the balance is about right. Just stabilize your staffing.	1	
Do more training in local communities, rather than in Concord.	1	
At times work as an advocate more for communities with the Federal		
Department of Homeland Security/FEMA.	1	
Develop an online forum to provide a means for EMDs to easily interact and		
collaborate on topics.	1	

My community relies very heavily on HSEM. We are small, and basically all	
volunteer. HSEM has always been a trusted partner, and needs to continue.	
Increasing technical resources, especially in Radiological Emergency Response	
Planning capabilities and interactive training will strengthen the ability of	
communities such as ours to respond to situations.	1
More regular coordination with EMDs, more stakeholder buy in on State level	
programs, more focus on all-hazards emergency management instead of school	
security initiatives. In communities with non-existent emergency management	
programs, HSEM should take more of a lead in supporting the community. For	
those communities that have strong emergency management programs, they	
should work more to coordinate efforts and reduce duplication. Train the	
Trainers should be provided to those communities to ensure WebEOC training,	
school assessments, etc. can be done with local resources instead of	
overwhelming state staff that could work with communities that have no	
emergency management resources. Emergency Management Planning Grant	
funding should be distributed to the local level to fund more part time staffing at	
the local level to support more emergency management initiatives.	1
Make using WebEOC easier and no need to change password so often.	1
Continue to communicate training and grants offered.	1
Continued face to face assistance from field reps.	1
It's difficult with the state of the State budget I know. Perhaps more direct	
contact? There is good written communications from the Division out to us.	1
Outreach Continue the list serve for State and County updates. Continue the	
conference calls during events. Provide town officials with a better	
understanding of their role regarding HSEM.	1
Communication grants all our portable radios are getting old.	1
Keep forms on the website updated.	1
Just maintaining lines of communications.	1

Q32. Are there any additional comments you would like to make regarding the State Division of Homeland Security and Emergency Management or their services?	
Comments	Count
No	16
Customer service oriented	14
Excellent job/Keep up the good work	10
Very helpful	6
Field representative is great	5
Continue adequate funding	3
Field representative's territory is too big	2
Great State asset that benefits local communities.	1
Staffing changes	1
Train locally. More funding and grants.	1
They have always been there to assist my community when needed.	1

The change in the Emergency Management Planning Grant process has been	
positive and works well.	1
Our community is within the Seabrook EPZ, and is severely resource limited.	
Having a strong HSEM presence that we know is providing support to a	
community like ours is essential for the protection of our population in case of	
emergencies. This in not limited to RERP issues, we also need their support in	
case of disasters, Natural or man-made, in both mitigation planning and	
response. We are not unique in this situation, as many smaller communities in	
the State rely on this agency.	1
Department of Homeland is self evaluating in areas to improve all NH towns	
and cities.	1
Additional training for EMDs. There is minimal training for a small town EMD	
and when there are no clear roles and responsibilities dictated by the town, we	
should be able to rely on the State to assist with that education.	1
I would like to see more regional planning emphasis placed within the "north	
country". Our resources and limited and we should start to move towards	
regionalization of these resources. The State should act as the "manager" or	
coordinator, who would help the north country towns work towards a regional	
response.	1

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STATE OF NEW HAMPSHIRE DIVISION OF HOMELAND SECURITY AND EMERGENCY MANAGEMENT

APPENDIX D EMERGENCY MANAGEMENT STAKEHOLDER SURVEY RESULTS

We sent surveys to individuals identified by the Division of Homeland Security and Emergency Management (HSEM) and State plans as key stakeholders throughout the State. We sent out 59 surveys and received 48 responses for an 81.4 percent response rate. We combined and simplified similar answers to open-ended questions and presented them in topic categories; multi-part responses are counted in multiple categories where applicable. Some totals in the following tables may not add up to 100 percent due to rounding or where respondents could respond multiple times to the same question.

Q1. Please indicate which organization you are representing for this survey.	
	Count
answered question	48
skipped question	0

Q2. Have you interacted with the State Division of Homeland Security and Emergency Management since July 1, 2013?				
Answer Options Count Percent				
Yes	48	100		
No	0	0		

answered question 48 skipped question 0

Q3. What emergency management services or support has the State Division of Homeland Security and Emergency Management provided to your organization since July 1, 2013? (choose all that apply)

Answer Options	Count	Percent
Training	44	92
Planning	34	71
Exercises	37	77
Technical assistance	21	44
Coordination	37	77
Resource coordination	29	60
Developing and assessing capabilities	27	56
Other (please specify)	8	17

Q3. Text Responses, Other (please specify)	
Radiological support	2
Respondent has limited experience with HSEM	2
Emergency Operations Center involvement	1
Radio system support	1
Information Analysis Center support	1
Service feedback support	1
Public information support	1

8

Q4. Approximately how many times during calendar year 2015 did you participate in State Division of Homeland Security and Emergency Management activities, including training, exercises, or real events? (Please provide a numerical estimate)

,			
Answer Options	Total	Average	Count
Training/Exercise Events	233	5	45
Emergency Operations Center Activation (Real			
Events)	144	3	42
Monthly meetings	328	7	46

answered question 47 skipped question 1

Q5. Are your organization's responsibilities, expectations, and roles clearly defined when interacting with the State Division of Homeland Security and Emergency Management?

meetacing with the state bivision of moniciana security and binergency management.		
Answer Options	Count	Percent
Yes	36	75
Somewhat	11	23
No	1	2
Don't Know	0	0

answered question 48 skipped question 0

Q6. Other than the State Emergency Operation Plan, does your organization have either written plans, policies, standard operating procedures, or administrative rules specifically for emergency events?

Answer Options	Count	Percent
Yes	46	96
No	1	2
Don't Know	1	2

Q7. Do you feel the State Division of Homeland Security and Emergency Management is prepared to effectively assist your agency in dealing with any disaster or other adverse event?

Answer Options	Count	Percent
Yes	38	79
Somewhat	7	15
Don't Know	1	2
No (please specify)	2	4

answered question 48 skipped question 0

Q7. Text Responses, No (please specify)	
Communication systems are inadequate.	1
Not prepared for a wide scale animal specific disease outbreak	1

provided comment 2

Q8. Does the State Division of Homeland Security and Emergency Management solicit your input in order to improve the effectiveness of the State's emergency management effort?		
Answer Options	Count	Percent
Yes	45	94
No	3	6

Q9. In the matrix below, rate how well the State Division of Homeland Security and							
Emergency Management conducts the following activities.							
A O .4.	Don't	Very	D	A 4 . 1. 1 .	G 1	Very	Response
Answer Options	Know	Poor	Poor	Acceptable	Good	Good	Count
Planning	2	0	0	9	15	22	
	(4%)	(0%)	(0%)	(19%)	(31%)	(46%)	48
Training	1	1	0	5	22	19	
	(2%)	(2%)	(0%)	(10%)	(46%)	(40%)	48
Coordination of	2	0	1	8	17	20	
services and		_	1	_	-	_	40
resources	(4%)	(0%)	(2%)	(17%)	(35%)	(42%)	48
Communication	0	0	2	10	10	25	
with your	0	0	3	10	10	25	40
organization	(0%)	(0%)	(6%)	(21%)	(21%)	(52%)	48
Providing	0	1	1	2	1.5	20	
situational	0	1	1	2	15	29	40
awareness	(0%)	(2%)	(2%)	(4%)	(31%)	(60%)	48
Timely response	0	0	0	2	10	35	
to incidents	(0%)	(0%)	(0%)	(4%)	(21%)	(74%)	47
Developing and		1	2	7	1.4	10	
assessing state	6	1	2	7	14	18	40
capabilities	(13%)	(2%)	(4%)	(15%)	(29%)	(38%)	48
Preventing fraud,	21	0	0	2	1.1	10	
waste, and abuse	21	0	0	3	11	13	40
during an event	(44%)	(0%)	(0%)	(6%)	(23%)	(27%)	48
Conducting after	5	0	1	7	17	17	
action reports	(11%)	(0%)	(2%)	(15%)	(36%)	(36%)	47

answered question 48 skipped question 0

Q10. How would you describe the overall service provided to your organization by the State Division of Homeland Security and Emergency Management?		
Answer Options	Count	Percent
Very Good	28	58
Good	14	29
Acceptable	6	13
Poor	0	0
Very Poor	0	0
No Opinion	0	0

Q11. Please provide a reason for why you described the overall service provided by the	
State Division of Homeland Security and Emergency Management as poor.	
Comments	Count

0

Q12. In what ways could the State Division of Homeland Security and Emergency Management improve its efforts or better serve your organization and the State? Put "Don't Know" if applicable.

Don't Ishow in approaches	_
Comments	Count
Don't know	24
Improve coordination efforts	4
Increase exercises	3
Improve communication	3
Improve planning	3
Increase training	1
Include organization in radio interoperability workgroup(s) and provide current	
information on radio interoperability as it changes or is updated	1
HSEM is always improving and maintains positive relationships with	
stakeholders	1
Communicate rationale for decision making	1
Less politics	1
Direct and timely communication with agency management and emergency	
response coordinators	1
Organization has a great relationship with HSEM	1
Fewer acronyms (for the lay participants among us)	1
Follow HSEM policy and procedures	1
Share after action reports and lessons learned	1

provided comment

44

Q13. Are there any additional comments you would like to make regarding the State
Division of Homeland Security and Emergency Management and their services? Put
"None" if applicable.

Tione is appreciate.	
Comments	Count
None	29
Non-specific positive statement about HSEM or staff	13
Appreciation of HSEM integrating organization feedback into State plan	1
Backup communication systems are inadequate	1
HSEM needs to follow their "rules" before applying them to other Emergency	
Support Functions	1
Appreciate work on preparedness campaigns	1

provided comment

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