



Emergency Management

Internal Audit

February 2017

Bernalillo County Internal Audit Emergency Management

Executive Summary

SUMMARY OF PROCEDURES

REDW performed internal audit procedures at Emergency Management Department over emergency planning and follow-up processes for compliance with regulations, as well as training and maintenance of emergency listings. We tested the process to authorize and initiate an emergency response. Our internal audit also evaluated compliance with grant requirements.

We performed the following procedures:

- Obtained an understanding of Emergency Management processes and requirements through discussion with personnel and reading internal policies.
- Evaluated the Office of Homeland Security and Emergency Management Administrative Manual to ensure policies and procedures were created to facilitate compliance with Federal, State and County requirements.
- Tested a selection of requirements from the Office of Homeland Security and Emergency Management Administrative Manual to determine if compliance was met.
- Evaluated the emergency plans to determine if there were any areas where additional plans may be beneficial.
- Tested a selection of emergency plans created by the County to determine if the plan was properly maintained, updated timely, and included appropriate individuals who would execute the plan in the event of an emergency.
- Evaluated the annual work plan to determine if required number of simulations were performed throughout the year, appropriate documentation was maintained, and follow-up procedures were performed.
- Tested all Emergency Management Department employees and a selection of County departments for the National Incident Management System (NIMS) training requirements.
- Evaluated the authorization and initiation process for declaring emergencies within the County, and test a selected emergency in order to determine if action steps were effectively followed.
- Tested a selection of grants that were active between January 1, 2016 and December 31, 2016, in order to determine if compliance requirements were met.

SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS

During the course of the audit we identified many areas which appeared to be functioning properly. These areas included effective authorization and initiation of emergency response procedures, as well as effective and timely follow-up and plan evaluation procedures after an emergency or simulation event. Additionally, Emergency Management was proactive in updating the Emergency Operations Plan, and had already completed more than the required plan annex reviews at the time of our testing. Although other departments did not consistently fulfil their training requirements, the Emergency Management personnel were all properly trained, with many of them receiving training above and beyond the Federal, State and grant compliance requirements.

As a result of our testing, the following significant moderate risk observations were identified:

- 1) ***Training requirements were not tracked*** - There was not a consistent process in place to track required training for all County employees outside of the Emergency Management Department.
- 2) ***County policies were not updated timely*** - The Administrative Manual and the NIMS Compliance Manual had not been updated since 2014 and 2005, respectively. Some requirements specified in the policies were either no longer applicable, or needed to be updated to appropriately reflect current requirements.

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Further detail of our purpose, objectives, scope, and procedures are included in the internal audit report.

We received excellent cooperation and assistance from the Emergency Management Department during the course of our interviews and testing. We sincerely appreciate the courtesy extended to our personnel.

REDW LLC

Albuquerque, New Mexico
April 13, 2017

Bernalillo County Internal Audit Emergency Management

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Bernalillo County Internal Audit Emergency Management

Report

INTRODUCTION

We performed the internal audit services described below solely to assist the Bernalillo County Emergency Management Department in evaluating the processes for planning, training, preparation and response related to County emergencies and disasters. Additionally, we evaluated Emergency Management's compliance with selected Federal, State, and County regulations including the creation and maintenance of key emergency plans. Our services were conducted in accordance with the Consulting Standards issued by the American Institute of Certified Public Accountants Generally Accepted Government Auditing Standards, and the terms of our Professional Services Contract agreement for internal audit services. Since our procedures were applied to samples of processes, it is possible that significant issues related to the areas tested may not have been identified.

Although we have included management's responses in our report, we do not take responsibility for the sufficiency of these responses or the effective implementation of any corrective action.

An entrance conference was held on February 21, 2017, and fieldwork began February 22, 2017. An exit conference was held on April 5, 2017.

PURPOSE AND OBJECTIVES

Emergency Management is responsible for the creation, maintenance and execution of emergency plans for County emergencies and disasters. Emergency Management creates plans in accordance with Federal and State regulations, as well as additional plans for County and grant specific requirements. Emergency Management tracks training of the County employees to ensure the appropriate individuals are prepared to implement the emergency plans in the event of an emergency. Our internal audit evaluated processes for compliance with specified regulations and internal policies at Emergency Management.

SCOPE AND PROCEDURES PERFORMED

In order to gain an understanding of the processes and laws/regulations, we interviewed the following personnel:

- Richard Clark, Emergency Manager
- Gary Surad, Deputy Emergency Manager (Communications/COOP)
- Thomas Walmsley, Deputy Emergency Manager (Planning/Training/Exercise Officer)
- John Stephens, Accountant

In order to gain an understanding of the processes we read relevant portions of:

- Office of Homeland Security and Emergency Management Administrative Manual (Administrative Manual) as of July 1, 2014
- National Incident Management System (NIMS) Training Program September 13, 2005
- Bernalillo County NIMS Compliance Manual
- Administrative Instruction for Emergency Preparedness and Response as of July 1, 2014
- 2010 Emergency Operations Plan (EOP)
- 2015 Hazard Mitigation Plan
- 2016 City Readiness Initiative Plan
- 2014 Threat and Hazard Identification Risk Assessment (THIRA)
- 2016 Shelter Plan
- 2016 Continuity of Operations Plan
- 2013 Homeland Security Exercise and Evaluation Program (HSEEP)
- 2015 NM Department of Homeland Security and Emergency Management Training and Exercise Program Manual

We performed the following testwork:

Compliance with Regulations: Obtained County policies and procedures, as well as Federal, State and Local emergency management and planning regulations. We read the Emergency Management's policies and procedures to ensure they were in line with Federal and State regulations. We selected five requirements from the Administrative Manual and tested to determine if the requirements were met timely. For the plans selected, we tested to determine if they were reviewed, updated and maintained in accordance with the Administrative Manual.

Emergency Plans Maintenance: Obtained a listing of all County emergency plans and selected a sample of five from a total of 10 plans, we tested to determine if the plan was:

- Appropriately documented and easily accessible,
- Updated in accordance with Emergency Management policies,
- Included an appropriate contact list of individuals/departments responsible for administering the plan in the event of an emergency.

Additionally, we performed research and discussed potential plans that could be in place, to determine if there are any other plans that may be beneficial to the County.

Emergency Simulations: Obtained the County's annual work plan for 2016 and determined if it included a listing of simulations to be performed, and if the required simulations were performed in accordance with the Administrative Manual. We selected three of four simulations performed, and tested to determine if:

- The exercise Notification Form was completed,
- Adequate documentation existed to evidence the simulation was performed,
- Results of the simulation were documented,
- An After Action Report and Improvement Plan was completed and submitted to the New Mexico Department of Homeland Security Emergency Management.

Required Training: Obtained a list of Emergency Management Department employees and tested that they received the required training according to the Administrative Manual, NIMS, and grant requirements. Additionally, we selected a sample of 10 departments and tested that 80% of those employees had documentation on file to support that they completed the required training in accordance with the Administrative Manual.

Authorization and Initiation of an Emergency: We analyzed documentation for the one emergency during 2016 to test if the initiation/authorization process was followed. Additionally, we tested to determine if system access to send County-wide alerts was limited to the appropriate individuals.

Grant Compliance: Obtained a listing of active grants from January 1, 2016 through December 31, 2016, and selected a sample of four of the eight grants. For each grant selected, we performed limited testing of the grant compliance requirements, such as reporting, reimbursement, property and equipment management, procurement, recordkeeping, performance and special conditions were met.

Inter-Department Communications: Performed inquiries with key personnel over inter-department communication. Inquiries included reporting requirement and key deadlines that rely on information from other departments, as well as access to that information.

OBSERVATIONS, RECOMMENDATIONS AND MANAGEMENT RESPONSES

During the course of the audit we identified many areas which appeared to be functioning properly. These areas included effective authorization and initiation of emergency response procedures, as well as effective and timely follow-up and plan evaluation procedures after an emergency or simulation event. Additionally, Emergency Management was proactive in updating the Emergency Operations Plan, and had already completed more than the required plan annex reviews at the time of our testing. Although other departments did not consistently fulfil their training requirements, the Emergency Management personnel were all properly trained, with many of them receiving training above and beyond the Federal, State and grant compliance requirements.

As a result of our testing, REDW identified the following observations:

1) Training requirements were not tracked

The County is required to maintain 80% compliance level with the NIMS training for employees based on requirements included in the Administrative Manual. There was not a consistent process in place to track required training for all County employees outside of the Emergency Management department. Our testing determined that six of the ten departments selected for testing were in not in compliance with the training requirements:

- Five of the 10 departments tested did not provide evidence that the training was completed, therefore we were unable to determine if the employees had been trained and the required percentage was met.
- One of the five departments that provided an employee listing with completed training failed to meet the minimum of 80% percent NIMS compliance as stated in the Administrative Manual.

Additionally, elected officials and County employees outside of Emergency Management who were promoted to levels which would require more intense training were not tracked to ensure that training was completed.

Potential Risk: Moderate - If County employees are not properly trained, the County plans and emergency procedures may not be followed in the event of a true emergency or disaster. Since the Emergency Management department employees are properly trained this reduces the risk to the County.

Recommendation: Emergency Management is currently working on the creation of a more consistent process for tracking and monitoring training across the County. This new system will centralize the storage of training certificates, which will allow the County to easily demonstrate NIMS compliance. Emergency Management should consider working with Human Resources to implement training procedures as a part of on-boarding, promotion and transfer processes. Additionally, Emergency Management should evaluate all training required at higher levels within the County and determine if there are trainings that should be performed for those individuals (e.g. Elected officials should take ICS-402: Overview of Executives/Senior Officials which is designed to provide an orientation to the Incident Command System for Executives and Senior Officials).

Management's Response:

- a. Emergency Management will continue to work with HR Training to ensure that all current employees go into MYBLC under the Self-Reporting Tab and create individual entries for the required ICS courses (ICS 100, 200, and 700) and upload their certificates for the required courses.
 - Task Completion Date: 31 December 2017
 - Responsible Party: Thomas Walmsley, Deputy Emergency Manager, and Yvonne Gonzales, HR Training Coordinator

- b. Emergency Management will update the county's NMIS training requirement documentation that correctly reflects additional training that is required by mid-level managers, upper-level managers, department heads, deputy county managers, the county manager and elected officials. This requirement documentation will be signed by the county manager and distributed to all departments within the county.
 - Task Completion Date: 31 December 2017
 - Responsible Party: Richard Clark, Emergency Manager, and Julie Morgas Baca, County Manager
- c. Emergency Management with the assistance of the department directors, deputy county managers and county manager will ensure that once the training requirement documentation is updated, any additionally identified training courses will be reported in MYBLC under Self-Reported Training and the associated certificates are loaded for those courses.
 - Task Completion Date: 31 December 2017
 - Responsible Party: Emergency Manager, Department Directors, Deputy County Manager and County Manager

2) County policies were not updated timely

Emergency Management maintains the Administrative Manual and the NIMS Compliance Manual, which help to ensure the County is in compliance with Federal, State and Local requirements. These policies had not been updated since 2014 and 2005, respectively. Our evaluation of the policies determined that requirements specified in the Administrative Manual were either no longer applicable, or needed to be updated to appropriately reflect current requirements (e.g. training requirements included trainings that were no longer available, and a Long-Term Recovery Plan was never created). The NIMS Compliance Manual included training requirements for specific employee levels, which appeared to be out of date.

Potential Risk: Moderate - Because the Administrative Manual and NIMS have not been updated there is possibility they do not reflect current needs, requirements and updated courses.

Recommendation: Emergency Management should create a process to update these procedures as changes occur. This process should include how often these policies must be reviewed and updated to ensure that they meet the County's current needs and include updated Federal, State and Local requirements.

Management's Response:

Emergency Management will update the Administrative Manual (Administrative Instructions) to ensure the county is in compliance with all applicable Federal, State and Local requirements and will update the NIMS Compliance Manual to list all of the training course requirements for each level of employee to include current course titles and numbers. Additionally, a plan review matrix will be created to aid the emergency management office with developing timelines for the review all of the office's manuals and plans to ensure each is updated in regular intervals with current ordinances and training requirements.

- Completion Date: 31 December 2017
- Responsible Party: Richard Clark, Emergency Manager, Ken Martinez, County Attorney, DCMs

3) *Grant compliance requirements were not performed*

Each grant lists specific requirements that the County must comply with. These requirements include, but are not limited to, reporting, reimbursement, property and equipment management, procurement, recordkeeping, performance and special conditions. Our testing determined that:

- Two of four grants tested did not have required documentation to show 80% compliance with the NIMS training requirement.
- Three of four grants tested did not complete quarterly progress reports as stated in the grant agreement.

Potential Risk: Low - If Emergency Management does not maintain proper documentation demonstrating grant requirements were met, they could potentially lose important funding. The risk was determined to be low because the likelihood of losing funding due to these areas was minimal.

Recommendation: Management should create a checklist of all requirements stated in a grant agreement to verify all documentation is maintained to satisfy requirements. If an item is not considered applicable, verification should be obtained from the granting agency to support the absence of documentation.

Management's Response:

- a. Emergency Management will ensure that all grants awarded to OHSEM have required documentation included in the grant binder showing 80% compliance with the NIMS training requirement by all agencies that receive grant money as indicated in the sub-grant agreement.
 - Task Completion Date: 31 December 2017
 - Responsible Party: John Stephens, Accountant OHSEM, Thomas Walmsley, Deputy Emergency Manager
- b. Emergency Management will ensure it obtains a letter from the New Mexico Department of Homeland Security and Emergency Management regarding the quarterly progress reporting requirement as stated in the grant agreements giving us specific instructions on how this requirement should be met or that the requirement is not applicable.
 - Task Completion Date: 31 December 2017
 - Responsible Party: Richard Clark, Emergency Manager, John Stephens, Accountant, New Mexico Department of Homeland Security and Emergency Management.
- c. Through this audit process the Emergency Management staff has identified ways to better compile grant files so that all aspects of each grant's management from performance measures and reporting to financial and expenditure documentation is kept in one location to enable easier document review activities. Moving forward the office will ensure all grant files are complete with all applicable documentation arranged in a logical and consistent manner.
 - Task Completion Date: 31 December 2017
 - Responsible Party: John Stephens, Accountant

4) *Simulation notification form was not available*

Simulations are performed throughout the year to evaluate if emergency plans would be effective in the event of a County disaster or emergency. Grant requirements include submitting an Exercise Notification form to the NM Department of Homeland Security Emergency Management prior to the exercise being performed, to notify the State of an upcoming drill or exercise. One of three simulations selected for testing did not have an Exercise Notification Form completed.

Potential Risk: Low - If the simulation is not appropriately reported through the Exercise Notification Form, there may be confusion between other agencies who may be impacted. The risk was determined to be low, as the simulation was a discussion only exercise and there was no other agencies involved or risk to the community.

Recommendation: Emergency Management should ensure that an Exercise Notification Form is completed and submitted prior to each exercise/drill taking place.

Management’s Response:

Emergency Management will ensure an Exercise Notification form is submitted to the NM Department of Homeland Security Emergency Management prior to any required exercise being performed, in order to meet the grant requirements of the EMPG sub-grant and a copy of the notification is kept in the sub-grant binder.

- Task Completion Date: 31 January 2017
- Responsible Party: Thomas Walmsley, Deputy Emergency Manager

PROCESS IMPROVEMENT OPPORTUNITIES

In addition to the observations above, we identified the following process improvement opportunities:

1) *CodeRED and NIXLE Communication*

At the time of our audit, the emergency alert system CodeRED was utilized by approximately 50% of County employees. Additionally, the emergency alert system NIXLE was utilized by less than 1% of County residents. Emergency Management should identify ways to promote the CodeRED alert system and encourage employee participation. Promoting the system can be done through verbal communication, emails and posters. Additionally, consider increasing the exposure of NIXLE to County residents by making it easily accessible on County website, as well as through advertisement which can help increase awareness of the existence of the system.

2) *Additional Emergency Plans*

Based on a discussion with Emergency Management and a review of other Counties similar to Bernalillo County, we identified two areas where a formal plan may be useful for the County to create.

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This report is intended for the information and use of the Bernalillo County Emergency Management Department, the Audit Committee, members of Bernalillo County's Board and others within the organization.

We discussed and resolved other minor observations with management and received excellent cooperation and assistance from Emergency Management Department during the course of our interviews and testing. We sincerely appreciate the courtesy extended to our personnel.

REDW LLC

Albuquerque, New Mexico
April 13, 2017