



KING COUNTY AUDITOR'S OFFICE

DECEMBER 1, 2020

Follow-up on Office of Emergency Management Audit

The Office of Emergency Management completed recommendations that enhance the professionalism of King County's emergency management function, but risks to its authority and stakeholder awareness of its role remain. The Office of Emergency Management (OEM), has a varied role. It builds the County's resiliency to disasters through collaborative planning and preparation with regional and internal stakeholders and also coordinates the response to those disasters through the Emergency Operations Center (EOC). High-quality emergency management functions have the influence to build emergency preparedness during periods of calm and the expertise to align operations in crisis. The three audit recommendations OEM completed since the last audit follow up (January 2019) elevate its professionalism: the OEM director, hired in 2019, is a certified emergency manager (CEM), and changes in EOC practices and improved engagement between OEM and key county departments have improved its capabilities in responding to regional disasters. These actions directly enhance the County's ability to help save lives when disaster strikes.

Completing the remaining recommendations will strengthen OEM's ability to advance emergency preparedness and response—particularly in King County departments and agencies. Improving the County's internal preparedness means proactively influencing senior county managers—department heads and separately-elected agency leaders—to invest in emergency readiness. To that end, OEM provided examples of consistent access to and coordination with senior county leaders. OEM, however, functionally remains at the division level, and the evidence of these relationships is informal.

The ongoing COVID-19 pandemic—and OEM's role in the County's response—raises questions about whether OEM has the authority it needs. In our audit report, we noted that layers of command between emergency management professionals and executives can diminish effectiveness. In the current pandemic emergency, the OEM director, a trained emergency management professional and the designated county emergency manager, is not the incident commander. While being assigned the incident commander may not be required, this may have negatively impacted elements of the County's pandemic response. For example, there was initial confusion among directives from OEM, Public Health, and the King County Executive's Office. OEM has also not effectively used the Emergency Management Coordinating Committee (EMCC) to disseminate emergency response guidance, such as how agencies should order protective equipment and supplies. The impacts of these decisions are not yet clear, but they suggest that OEM may not have the leadership authority to effectively coordinate the County's emergency response to the COVID-19 pandemic.

In addition, the County also still lacks baseline expectations for agency preparedness: deadlines for completing and updating continuity of operations plans (COOPs) and participating in training exercises. And, communication about the status of department and agency preparedness and OEM's leadership roles, while improved, is incomplete. Formally planning OEM's access to county leaders, and careful



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review of the remaining recommendations when preparing OEM’s annual report, would help OEM capture how its achievements are meeting its preparedness goals.

Of the 13 audit recommendations:

	7 DONE		6 PROGRESS		0 OPEN
Fully implemented Auditor will no longer monitor.		Partially implemented Auditor will continue to monitor.		Remain unresolved Auditor will continue to monitor.	

Please see below for details on the implementation status of these recommendations.

Recommendation 1	On January 11, 2019	DONE	
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Recommendation 2	PROGRESS	
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The County Executive should develop and propose to the County Council specific emergency preparedness-related requirements for King County Code and/or Executive Orders for all county departments and separately-elected offices, related to:

- a. development of continuity of operations plans**
- b. annual plan reviews, exercises and updates**
- c. designation of a departmental emergency liaison (with emergency management as an express function in its job description) as the employee responsible for leading compliance with continuity of operations plan requirements and coordination between the department and the Office of Emergency Management and other county functions.**

STATUS UPDATE: At the time of the audit (June 14, 2016), the audit findings included two gaps directly relevant to county departments and agencies: no formal requirements for departments and agencies to participate in coordination of county emergency preparedness, and, similarly, no formal requirements for them regarding emergency planning. The first gap was the basis of Recommendation 1, addressed by Ordinance 18679. The ordinance, passed by the King County Council on March 12, 2018, formalized the EMCC as the coordinating body for county department and agency emergency preparedness, with representatives from each county department and agency.

Through the EMCC, OEM has advanced participation in departmental and agency coordination (part c of this recommendation). For example, OEM reports EMCC participation by county

departments and agencies in its annual reports, and documents contributions by the EMCC to countywide preparedness—such as the King County’s Regional Hazard Mitigation Plan (RHMP) update and the King County Guidelines for Workforce Management in an Emergency (Guidelines).

However, the County still lacks express requirements for development of COOPs and its reviews, exercises, and updates (parts a and b of this recommendation). During the last follow up (January 11, 2019), we pointed out that Ordinance 18679 did not include specific mandates for these items. In recent discussion, OEM leadership noted that EMCC’s work includes COOP updates and exercise opportunities, and that OEM partners with departments on these efforts. It also referenced the Guidelines, completed in October 2019, “As part of the King County emergency planning process led by the Office of Emergency Management, each department and agency is responsible for developing a Continuity of Operations Plan.” As positive as these collaborative efforts may be, they are not a directive that compels the participation of all county functions.¹

WHAT REMAINS: The purpose of this recommendation is to mandate a baseline requirement for all county departments and agencies to perform emergency planning on a defined, periodic basis. All county functions must be required to complete COOPs, and update and train on them annually. Although many do, without a clear standard directing them to do so, this body of work will remain, in essence, voluntary; indeed, some county agencies have not completed or updated COOPs for years.

Per discussion with OEM leadership, formalizing these requirements does not necessarily require a new county ordinance. Ordinance 18679 tasks the EMCC to “Assist in the review, development, and maintenance of department and agency continuity of operations plans,” (K.C.C. 2A.310.070 (C)(3)) and also to “Assist in the review, development, and maintenance of any other plans, programs, rules, and policies concerning emergency management, as requested by the Office of Emergency Management and consistent with state law.” (K.C.C. 2A.310.070 (C)(6)). Thus, although the ordinance did not include specific requirements for county departments and agencies as to COOPs, annual updates, and exercises, it does provide EMCC the authority to develop those requirements.

To complete this recommendation, OEM should identify, establish, and document specific expectations for county departments and separately-elected offices that require completion of COOPs, updates, and participation in preparedness exercises, consistent with parts a and b of this recommendation. These requirements can be addressed through proposed changes in county code, or formal adoption of standards by the EMCC that apply to all county departments and agencies.

Recommendation 3	On January 11, 2019	DONE	
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¹ Other county policy guidance contemplates COOPs as a general expectation for county functions, led by OEM. For example, Motion 15650, passed July 2020, tasks OEM—working with Public Health—to update emergency plans, including COOPs, to address the threat of pandemics by September 1, 2021.

Recommendation 4

PROGRESS



The Office of Emergency Management (OEM) should develop and present an annual report to the County Council and County Executive on the status of emergency management in King County prior to budget proposals, including the status of continuity of operations plan development, updates, training, and exercises across all county agencies, and any other elements OEM deems appropriate, especially those that can be quantitatively assessed over time, such as participation in trainings and exercises.

STATUS UPDATE: Since 2017, OEM has issued annual reports that feature detailed narratives of OEM's actions and achievements over the previous year. The reports include information on planning updates, training, and functional exercises. They also include quantitative information regarding EMCC participation by county departments and agencies, and the 2018 report included a chart of department and agency COOPs and updates as of that year. The most recent (2019) report features data measures of social media engagement. However, the quantitative data presented has been inconsistent year-to-year, with the exception of EMCC participation.

WHAT REMAINS: To complete this recommendation, OEM should identify and expand the amount of quantitative information presented in the annual report as part of the report template, providing information, year-to-year, on the specific elements in the recommendation: COOP development, plan updates, training, and exercises. Per discussion with OEM leadership, the report format may be revised for the next annual report but will include more quantitative data across these and other areas.

Recommendation 5

PROGRESS



The County Executive should develop, document, and implement a plan to provide the Office of Emergency Management (OEM) with the visibility, leadership, and relationships necessary to effectively and efficiently drive the county's emergency preparedness and response activities. The plan should include implementation timeframes and consideration of making OEM an executive-level department or incorporating it into the Office of the Executive if other strategies do not achieve the desired outcomes.

STATUS UPDATE: In the current pandemic emergency, OEM is not driving the County's response because it is not in the incident command position. The fact that OEM is playing a supportive instead of leadership role indicates that it is not yet able to use its expertise to the best advantage of the County. While the County has made progress in providing OEM access to the senior leadership team and the Executive directly, these arrangements are ad hoc and the elements of the reporting structure are not recorded. In addition, OEM still does not have the authority to compel agencies to take preparedness or response actions, hindering the County's ability to effectively prepare for and respond to emergencies.

WHAT REMAINS: As explained in the 2016 audit, reporting layers can present a structural barrier to the effectiveness of emergency management. As the audit states, "An effective emergency management organization should report directly to the county executive." This is not the case in King County. The recommendation uses the term "plan" in part because reporting relationships and roles can change informally but are more resilient when documented.

To complete this recommendation, the Executive should develop a plan that provides the OEM director—the county emergency manager—the access and authority needed to drive county emergency preparedness and response, and then document and implement the plan. If appropriate, the plan may memorialize those aspects of the present reporting and relationship structure that address OEM’s strategic needs; however, the plan must address the limits of OEM’s current organizational placement and include a strategy to address those limits—either by elevating OEM to an executive-level department, incorporating it into the King County Executive’s Office, or another approach providing OEM the authority to drive emergency preparedness and response.

Recommendation 6	On January 11, 2019	DONE	
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Recommendation 7		DONE	
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The County Executive should require that the designated County Emergency Manager be a certified emergency manager or have comparably significant emergency management experience and sufficient capacity to dedicate a consistent and substantial percentage of work time to emergency management activities.

STATUS UPDATE: Ordinance 18664, passed by the King County Council on February 26, 2018, designated the OEM director as the county emergency manager. As noted in the last audit follow up, the ordinance did not address the director’s qualifications. During the hiring process for the current OEM director (February 2019), the job posting’s key expectations specifically sought candidates with CEM certification or equivalent education or experience; the OEM director is a CEM, renewing their designation most recently in June 2020.

IMPACT: As a profession, emergency management requires specific skills in building preparedness and coordination of emergency operations. Having an experienced emergency management professional with a CEM credential in the OEM director role enhances the County’s emergency management efforts and leverages its investments in OEM.

Recommendation 8	On January 11, 2019	DONE	
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Recommendation 9		DONE	
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The Office of Emergency Management should ensure full Emergency Coordination Center activation on at least an annual basis, whether for natural disaster, planned event, or full-scale exercise incorporating key partners.

STATUS UPDATE: In January 2020, OEM revised the EOC activation levels to simplify and clarify the amount of staff participation required. The new levels moved away from a numerical designation system (“Level 1,” “Level 2,” etc.) to a phased system advancing from “Steady-State,” to “Enhanced,” “Partial,” and “Full.” The highest degree of staff participation is during the Full activation level. OEM leadership explained that the EOC is almost always activated to Full in

response to specific events during the year. When emergency events do not result in a Full EOC activation, OEM also conducts a functional exercise mirroring a full-scale activation as requirement of its Emergency Management Accreditation Program (EMAP) certification. OEM included information on EOC activations and functional exercises in its 2019 annual report, including those reaching Full activation level.

IMPACT: Annual Full EOC activation helps ensure that key King County departments are adequately prepared to provide support in a full-scale regional disaster, and that OEM staff are seasoned in managing coordination among county and regional stakeholders. By both reaching full activation in response to events and planning for functional exercises at full activation, the County builds its knowledge base in effective emergency management response.

Recommendation 10

DONE



The Office of Emergency Management should continue to develop, document, and proactively implement a plan to develop relationships with leaders and staff in King County departments and divisions that regularly conduct emergency response, specifically, the King County Sheriff's Office, and the Road Services and Water and Land Resources Divisions.

STATUS UPDATE: At the time of the last follow up, OEM reported that it had improved participation by departments in the EMCC, but had no specific plans beyond EMCC. Since then, OEM has engaged with these departments in response to specific regional events, such as the February 2019 snowstorm, and in after-action reviews, strengthening the coordination among the EOC, the EOC duty officer, and the departments as potential emergencies arise. OEM also noted the collaborative work on updates to the county's Comprehensive Emergency Management Plan, and provided specific examples of enhanced collaboration between OEM and the County's Flood Warning Center (FWC); as part of Department of Natural Resources and Parks organizational changes, the FWC (which is in the Water and Land Resources Division) is moving into the Regional Communications and Emergency Coordination Center (RCECC)—where the EOC is located. Co-locating the FWC with the EOC highlights the improved relationship between OEM and these key county functions.

IMPACT: Better understanding of OEM's critical role in emergency communications and support improves coordination among county departments—leading to better outcomes for King County residents during emergencies. By improving relationships with key departments, OEM strengthens the resiliency of the county in future natural disasters.

Recommendation 11

PROGRESS



The Office of Emergency Management should continue its efforts to identify and clearly document the thresholds for emergency coordination center activation and elevation, and communicate them to stakeholders.

STATUS UPDATE: As noted above, OEM revised the EOC activation levels in January 2020. The new levels moved away from a numerical designation system ("Level 1," "Level 2," etc.) to a phased system advancing from "Steady-State," to "Enhanced," "Partial," and "Full." Along with the new activation levels, OEM made changes to the EOC to enhance readiness and increase support to the

EOC duty officer. OEM included the new activation levels in its annual report and has communicated them to stakeholders.

An essential purpose of the EOC is to ensure clear information is provided to those who need it in real time during regional crises—EOC activation levels scale the amount of support needed to ensure capacity for accurate communication. Even in minor events, the EOC duty officer can act to aid communication among stakeholders through access to tools such as KCInform and ALERT King County.

At the time of the last audit follow up, an emergency closure of the King County Courthouse raised questions regarding the understanding of the role of the EOC and the duty officer in emerging crises. Some employees and patrons of the courthouse were not informed until after the building had closed, and the County’s communications tools were not used until roughly two hours after the closure decision had been reached. Including the duty officer in the initial outreach could have helped communicate the closure more rapidly to a broader group of county employees.

As part of this follow up, OEM provided examples of email reminders about the role of the duty officer and noted that there is a duty officer “tag” in all OEM email signature lines. OEM also shared anecdotal examples of encouraging engagement with the duty officer and using KCInform to outreach with county employees. OEM has not, however, updated its web content on the revised activation levels or with reference information regarding the duty officer for stakeholders.

WHAT REMAINS: As we stated in the last audit follow up, to complete this recommendation, OEM should consider creating a webpage or other simplified reference for stakeholders regarding EOC activation levels and the role and contact information of the EOC duty officer. Without this information, county leaders and other stakeholders who may generally know the role of the duty officer may not be able to find contact information, and those who do not know the process for EOC activation may be unable to find where to quickly learn about it. Clarifying the pathway for engaging the EOC in emerging communications needs would help ensure those communications happen as timely as possible.

Recommendation 12

PROGRESS



The Office of Emergency Management should build on its initial efforts to clarify its mission, vision, and goals. This process should clearly identify its leadership role in, and goals for:

- a. King County government preparedness**
- b. disaster response in unincorporated King County**
- c. regional emergency management coordination.**

STATUS UPDATE: At the time of the last follow up, OEM had completed revisions to its mission, vision, and goals in alignment with the EMAP certification process, and noted that it would link the elements in the recommendation to the EMCC’s preparedness activities (relevant to part a of the recommendation). More recently, OEM’s changes to EOC operations based on after-action analysis of Full activation events in unincorporated King County in 2019 are intended to improve response, consistent with part b of the recommendation. OEM also noted the Federal Emergency Management Agency’s (FEMA) approval of the county RHMP reflected OEM’s leadership in

regional emergency management coordination. These examples provide evidence of OEM’s ongoing work in each of the parts of the recommendation.

During the last follow up, we explained that to complete this recommendation OEM should identify goals relevant to each of the parts of the recommendation in its annual report, and then document its performance relative to the parts. OEM’s annual report template consists of four sections: Regional Emergency Services, Standards-Based Programs, Resilient and Inclusive Systems, and Quality Workforce. In each of these sections, OEM identifies the key actions achieved in each section over the preceding year; as they state in the annual report, the actions “provide specific examples of how we’ve achieved these outcomes” in those sections.

WHAT REMAINS: OEM is taking positive actions that demonstrate leadership in each of the parts of the recommendation. What is missing is connecting how those actions (or other potential performance measures) documented in its annual reports are addressing goals specific to the parts of the recommendation. OEM’s likely changes to the annual report format (see Recommendation 4, above) could address this gap. Regardless, to complete the recommendation, OEM should clearly crosswalk its goals—whether defined as goals, outcomes, or other strategies—with the three parts of the recommendation and specify the actions that specifically address those goals.

Recommendation 13

PROGRESS



The Office of Emergency Management should clearly document and communicate its mission and goals to partners and stakeholders within each of the leadership roles in Recommendation 12.

STATUS UPDATE: Similar to Recommendation 12, at the time of the last follow up, OEM staff noted that it shared its mission and goals in its 2017 annual report, and that it communicates those goals through its actions in leading the EMCC and the regional Emergency Management Advisory Committee (EMAC). More recent examples shared by OEM (in Recommendation 12, above) reflect OEM’s collaborative leadership in each of the parts of Recommendation 12.

At the time of the audit, however, we found that there was confusion among stakeholders about OEM’s role for each of the parts of Recommendation 12. For example, we heard conflicting information regarding OEM’s role in responding to disasters in unincorporated King County. And at the time of the last audit follow up, we noted confusion with OEM’s role in King County government preparedness. However, during this follow up, OEM provided examples of outreach by OEM staff communicating OEM’s mission to stakeholders, both regionally and within King County.

WHAT REMAINS: To complete this recommendation—in concert with Recommendation 12—OEM should document its mission and goals relative to its roles in King County government preparedness, disaster response in unincorporated King County, and regional emergency management coordination, specifically in its annual report. Consistent communication with stakeholders in all three areas will continue to build OEM’s capacity during major disasters.

Justin Anderson conducted this review. If you have any questions or would like more information, please contact the King County Auditor’s Office at KCAO@KingCounty.gov or 206-477-1033.