



KING COUNTY AUDITOR'S OFFICE

January 11, 2019

Follow-up on Office of Emergency Management Audit

TO:

Metropolitan
King County
Councilmembers

FROM:

Kymber Waltnunson,
County Auditor




The Office of Emergency Management implemented four recommendations that clarify its authority, and made progress on the remaining nine recommendations focused on internal coordination and stakeholder communication.

Our audit, *Emergency Management: Insufficient Authority and Communication Hinder Emergency Preparedness and Response in King County*, was issued in June 2016. The implementation deadlines for the audit's 13 recommendations ranged from immediate to September 2017. In October 2017, the King County Executive transmitted legislation clarifying and reinforcing the roles and authorities of the Office of Emergency Management (OEM), approved by the King County Council in early 2018. In addition, as part of completing the Emergency Management Accreditation Program (EMAP) process through 2017, OEM updated its internal guidance on emergency activation and stakeholder communications. OEM fully completed four audit recommendations increasing OEM's authority within King County governance.

Continued focus on increasing preparedness through consistent interdepartmental engagement will build the county's resiliency. The emergency closure of the King County Courthouse on September 27, 2018, raised questions as to how broadly OEM's role is understood by county agencies. However, it also provided opportunities for OEM to demonstrate its proficiency in coordinating response communications for county agencies, and illustrates how OEM must leverage its increased authority to enhance the county's disaster readiness.

To complete the nine remaining recommendations, OEM must continue facilitating the preparedness activities of the strengthened Emergency Management Coordinating Committee, leading planning and stakeholder engagement. It also needs to document the County's progress toward internal readiness in annual reports and define the qualifications for the OEM director as the County's Emergency Manager. Ensuring consistent participation by county departments and regional stakeholders is critical to OEM's leadership role in preparedness and response coordination.

Of the 13 audit recommendations:

	4		9		0
DONE		PROGRESS		OPEN	
Fully implemented		Partially implemented		Remain unresolved	
Auditor will no longer monitor.		Auditor will continue to monitor.		Auditor will continue to monitor.	



King County

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

Recommendation 1

DONE 

The County Executive should recommend legislation to the County Council to formalize the role of the Emergency Management Coordination Committee, defining it as the emergency management coordinating body for King County, led by the Office of Emergency Management and requiring participation by the emergency manager or designee from each county department and separately-elected office.

STATUS UPDATE: Ordinance 18679, passed by the King County Council on March 12, 2018, codified the Emergency Management Coordination Committee (EMCC) in county code. The legislation designates the EMCC as the emergency preparedness coordinating body for King County government to advise OEM in enhancing the preparedness of King County employees and departments.

By formalizing the role of the EMCC as the coordinating body for county departments' emergency preparedness, OEM reports it now has the participation needed to lead broad county engagement in preparedness planning activities, including departmental continuity of operations plans (COOP) and updates to the King County Comprehensive Emergency Management Plan (CEMP). Although the legislation does not specifically require participation by all county functions, OEM staff reported that the legislation meets the intent of formalizing responsibilities along with flexibility to include additional participants as needed.

Recommendation 2

PROGRESS 

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: Neither of the two emergency management-related ordinances enacted in 2018 (Ordinances 18664 and 18679) directly address departmental requirements for COOPs, annual exercises and plan updates, or designations of emergency liaisons. OEM staff reported that, as part of the formalization of the EMCC's role, departments have identified emergency liaisons who actively participate in plan development through the EMCC and the EMCC's work focuses on maintaining and updating COOPs and engaging in preparedness exercises.

To complete this recommendation, OEM must identify, establish, and document specific expectations for county departments and separately-elected offices regarding their COOPs, updates, and preparedness exercises. OEM reported this is part of its EMCC facilitation role; however, departments and separately-elected offices must have clear, documented expectations

regarding the need for COOP plans and updates, periodic preparedness exercises, and a designated liaison responsible for them. For example, the legislative branch does not have a COOP which limited communication during the September 27, 2018 closure of the King County Courthouse. If not formalized in King County Code, these requirements can be addressed through an agreement with OEM, so long as OEM can assess and report as to each department's compliance with readiness requirements.

Recommendation 3

DONE 

As a key player in emergency response, the King County Sheriff's Office should work with the Office of Emergency Management (OEM) to develop a continuity of operations plan that meets requirements determined by OEM, and provide it to OEM by November 15, 2016.

STATUS UPDATE: The King County Sheriff's Office (KCSO) completed its COOP in November 2016. The KCSO COOP materials address the required emergency management standards for COOPs, and include a crosswalk of those standards with the appropriate sections in the KCSO General Orders Manual, Chapter 11, and relevant unit standard operating procedures. By completing the COOP, KCSO is better positioned to provide OEM with support in a major emergency, consistent with the County's CEMP.

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: OEM provided annual reports to the King County Council in September 2016 and 2017. While the format of the annual report changed from 2016 and 2017, both reports feature updates on departmental COOPs, OEM preparedness exercises and training, and other information. The information in the reports helps county leaders understand the state of the County's preparedness and OEM's direction in enhancing it.

To complete this recommendation, OEM should include more quantitative assessment information regarding its key activities and its engagement with internal and external stakeholders. For example, the report could track departmental COOP updates completed, or the number of participants and departments attending the Emergency Coordination Center (ECC) academy training, or identify the number of ECC activation events by the level of activation. By including thoughtful milestones and measures, consistent with OEM's strategic plan, and reporting them year-to-year, OEM will show the County's advancing preparedness maturity and help illustrate areas needing greater attention.

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: OEM staff reported that the OEM director, as the County Emergency Manager, is now included in the Executive's Operations Cabinet and participates on a level functionally equivalent to county department heads. In addition, OEM's EMAP accreditation included its updated Strategic Plan and Business Plan, which identify the OEM's leadership role relative to the EMCC and its intent to build stronger departmental relationships to advance county preparedness. However, these steps, while positive, do not include the timeframes or milestones to assess whether OEM has sufficient authority to drive emergency preparedness throughout the county. For example, communication problems in notifying staff affected by an emergency closure of the King County Courthouse raise questions as to whether OEM's role in crisis response is correctly—and broadly—understood.

To complete this recommendation, the Executive, with OEM's assistance, should create a plan identifying the implementation steps needed to ensure that the OEM director, as the County Emergency Manager, and OEM have sufficient authority to drive emergency preparedness and crisis response. This should include assessing where OEM should be in the County's organizational structure. Completing this plan is critical to ensuring that the county's emergency management professionals are both empowered to enhance county preparedness and able to perform their roles during times of crisis.

Recommendation 6

DONE 

The County Executive should amend the Comprehensive Emergency Management Plan to designate the director of the Office of Emergency Management as the County Emergency Manager and propose related revisions for County Code section 2.56.030 to the County Council.

STATUS UPDATE: Ordinance 18664, passed by the King County Council on February 26, 2018, amended county code to designate the OEM director as the County Emergency Manager. OEM also issued a technical update to the County's CEMP reflecting the change, and will ensure the new CEMP features language consistent with the change when it is completed in 2019. The change meets requirements in Washington state law regarding designation of local government emergency managers. By implementing these changes, OEM, through the OEM director, has the basic authority necessary to perform its preparedness and coordination roles under county code and the CEMP, making improvements in the County's coordinated response to disasters possible.

Recommendation 7

PROGRESS 

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, designating the OEM director as the County Emergency Manager, did not address the director's qualifications. As noted in the Executive's transmittal letter and the ordinance's staff report, a key intent behind the ordinance was to ensure that responsibility for emergency management be with the OEM director as "the official primarily devoted to emergency management issues;" in their role, the OEM director is entirely focused on emergency management activities. However, neither the code nor other documentation addresses the qualifications of the OEM director as a certified emergency manager.

To complete this recommendation, the Executive should create and define qualifications for the OEM director that specifically identify the professional experience necessary to perform the role, including professional emergency manager certification or appropriate alternative experience. Emergency management is a profession requiring a specific collection of skills and abilities that are critical to ensuring a high-level of institutional preparedness and coordinated crisis response. Identifying expected qualifications for the OEM director role, as the County Emergency Manager, is a foundational step in ensuring a strong emergency management function. The current recruitment and appointment process for the OEM director position provide a great opportunity to complete this recommendation.

Recommendation 8

DONE 

The Office of Emergency Management and the Human Resources Division of the Department of Executive Services should reclassify Office of Emergency Management employees performing ongoing program functions from term-limited temporary to career service employees.

STATUS UPDATE: The 2017-2018 budget converted five term-limited temporary (TLT) OEM employees to career service status. These employees perform central roles in OEM's planning, training, and education work, and their status as TLT employees was based on former grant funding. By reclassifying these employees, OEM addressed the disconnect between the funding sources supporting the employee's work and that work's importance to OEM's mission, in turn improving staff morale. By changing the status of these employees, OEM ensured that all of the emergency preparedness work vital to its mission is equally supported, along with the employees performing it.

Recommendation 9

PROGRESS 

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: OEM staff reported that the ECC was activated in 2016 and 2017 and OEM's 2016 and 2017 Annual Reports document specific instances of ECC activation. The 2017 report notes that the ECC was activated over two dozen times during the previous year. OEM has three levels of ECC activation; Level I activation is a full-scale activation, with King County department representatives and coordination at all levels of response. OEM staff reported that a Level I activation occurred in both years, but the annual reports do not identify the specific level of activation in the narrative.

To complete this recommendation, OEM should continue to activate the ECC at least once annually at Level I, including participation with King County departmental representatives, and provide documentation. Annual activation will help ensure that all King County departments are adequately prepared to provide support in a full-scale regional disaster.

Recommendation 10

PROGRESS



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: OEM staff reported strong participation on the EMCC by county departments and a high level of engagement with OEM's preparedness mission by the County Executive. They have developed a training template with active divisional participation. KCSO operations senior management attends as EMCC liaisons. However, OEM does not have a specific plan regarding the three groups in the recommendation beyond EMCC engagement. In addition, the Road Services Division is moving into the new Department of Local Services, potentially triggering changes in staff participants.

To complete this recommendation, OEM should identify specific goals and action steps for engaging with the three groups above in coordinating emergency response in unincorporated and rural King County. During the audit, we heard that these groups act independently in supporting rural county residents during local crises; additional attention on coordinating for localized events, especially Level II activations of targeted scope, will help build OEM and departmental capabilities in responding to major disasters. The new Department of Local Services presents an opportunity for enhanced collaboration that OEM should consider partnering with in developing its plan.

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: OEM operations reportedly changed significantly as a result of the EMAP certification process. It clarified the requirements for each threshold of ECC activation (Levels I, II, and III) and incorporated them into the CEMP. OEM also developed training plans, based on the strategic plan, to enhance the skills of ECC duty officers and activation operations, including an

ECC academy that trains department staff on ECC operations and specific roles, including thresholds for ECC activation.

Unfortunately, challenges in communication with county employees during the September 27, 2018 emergency closure of the King County Courthouse due to a ruptured water main indicated that senior leaders may not understand the role of OEM's duty officer and/or OEM's crisis coordination capabilities. In turn, this raises questions as to whether OEM has clearly and broadly communicated them. Contacting the ECC duty officer must be a first step in any emerging county crisis.

To complete this recommendation, OEM should document processes to clearly identify and share the thresholds for ECC activation with county and regional stakeholders. Although some plans identified on the OEM website (like the CEMP) identify these thresholds, these references can be unclear. For example, the county's continuity of government plan is only available by request. To facilitate outreach, OEM should consider creating a webpage or other simplified reference for stakeholders. Doing so could prevent critical delay when departmental staff or other county officials do not know the process for requesting OEM coordination or ECC activation, or when other stakeholders, such as regional emergency operations centers (EOC), do not know the process for requesting mutual assistance.

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: OEM completed its revised vision and mission as part of its strategic planning process in concert with EMAP certification, and its EMAP program and business plan include specific actions related to its organizational goals. OEM staff explained that these elements are linked to the preparedness activities performed by the EMCC. OEM is also making changes to the participation structure of the regional Emergency Management Advisory Committee (EMAC) to better address goals for regional emergency management coordination.

To complete this recommendation, OEM should document each of the three sub-elements of the recommendation relative to performance measures in its annual reports and in the pending 2019 updates to the CEMP. For example, OEM facilitated an after-action meeting following the emergency courthouse closure; it could include reporting and follow-up on related recommendations as part of its leadership goals. Identifying and reporting King County preparedness measures per Recommendation 4, and enhanced coordination with the three groups in Recommendation 10, would also help complete this recommendation. By doing so, OEM would have a clearer understanding of its part in leading King County government preparedness efforts, along with its regional coordination and facilitation roles.

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: OEM shared its mission and elements of the roles in Recommendation 12 in its 2017 annual report. OEM staff noted that the development of the strategic plan and business plan in 2017 incorporate the actions related to its organizational goals, and that it communicates them to stakeholders through its liaison roles for EMAC and the EMCC. By doing so, OEM directly informs internal and external county stakeholders of its role and activities, and how it can assist. Because emergency management inherently depends on the strength of the relationships developed in coordinating response during a crisis, clear communication about expectations is critical to OEM's overall success.

As explained in the audit, a fundamental component of successful emergency management functions is having the cachet within the organization to drive preparedness and coordinate crisis response. Unfortunately, OEM's critical value does not yet appear to be fully appreciated across county leadership. For example, as already mentioned, OEM was not initially included in communications during the emergency courthouse closure. Later, OEM was not originally included in the after-action review of the closure—despite OEM's subject matter expertise. These examples demonstrate that OEM may need greater support in sharing its leadership role. Regardless, to complete this recommendation, OEM should continue to document and communicate its mission in its annual report, including specific goals and measures relative to its roles in King County government preparedness, unincorporated county disaster response, and regional coordination. Consistent reporting, along with documentation of continued liaison outreach, will demonstrate OEM's commitment to sharing its organizational expectations and progress with its partners, enhancing its credibility and leadership when it is needed most: during a major disaster.

Justin Anderson, Principal Management Auditor, conducted this review. Please contact Justin at 206-477-1046 if you have any questions about the issues discussed in this letter.

cc: Dow Constantine, King County Executive
 Casey Sixkiller, Chief Operating Officer, King County Executive Office
 Rachel Smith, Chief of Staff, King County Executive Office
 Caroline Whalen, County Administrative Officer, Department of Executive Services
 Danielle Lucero, Strategic Budget and Policy Manager, Department of Executive Services
 Jody Miller, Interim Director, King County Office of Emergency Management
 Barnaby Dow, Senior Program Manager, King County Office of Emergency Management
 Dwight Dively, Director, Office of Performance, Strategy & Budget
 Ken Guy, Division Director, Department of Executive Services, Finance & Business Operations Division
 Melani Pedroza, Clerk of the Council, Metropolitan King County Council
 Lakeidra Williams, Administrator 1, King County Executive Office