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United States Department of State

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September 2022

Audit of Department of State Emergency Action Plans at Selected Domestic Facilities

SECURITY AND INTELLIGENCE DIVISION

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HIGHLIGHTS

Office of Inspector General
United States Department of State

AUD-SI-22-36

What OIG Audited

The Department of State's (Department) Domestic Emergency Management Program assists domestic facilities in developing a facility emergency action plan (FEAP), which guides occupants in carrying out evacuation or shelter-in-place procedures designed to prevent or minimize injury, loss of life, and property damage. The Office of Emergency Management (OEM) administers the Department's Domestic Emergency Management Program.

The Office of Inspector General (OIG) conducted this audit to determine whether the Department is prepared to respond to and recover from foreseeable emergencies at selected domestic facilities. To perform the audit, OIG conducted audit fieldwork at six domestic facilities. OIG tested the accuracy and executability of the six facilities' FEAPs, personnel's awareness of details in their FEAPs, and their participation in emergency training and drills. OIG also reviewed 63 FEAPs to assess whether they met federal and Department requirements and 98 FEAPs to determine whether each was certified annually.

What OIG Recommends

OIG offered 20 recommendations to address the deficiencies identified in this report. On the basis of the Department's response to a draft of this report, OIG considers 1 recommendation closed and 19 recommendations resolved, pending further action. A synopsis of the Department's responses to the recommendations offered and OIG's reply follow each recommendation in the Audit Results section of this report. Responses from the Bureau of Administration and the Bureau of Diplomatic Security to a draft of this report are included in their entirety in Appendices B and C, respectively.

September 2022
OFFICE OF AUDITS

SECURITY AND INTELLIGENCE DIVISION

Audit of Department of State Emergency Action Plans at Selected Domestic Facilities

What OIG Found

The Department was principally prepared to respond to and recover from emergencies at the six selected domestic facilities reviewed for this audit, located in California, Texas, Kentucky, Florida, and Washington. Specifically, OIG found that the majority of Department personnel interviewed at these facilities knew the procedures to follow during an evacuation and a shelter-in-place emergency. In addition, OIG found that four of six facilities had conducted required fire drills. However, only 35 percent of the individuals interviewed were sufficiently familiar with procedures to follow for an active shooter situation. OIG also found that FEAPs were not always certified in a timely manner and did not always contain complete, accurate, and executable information. For example, none of the FEAPs for the six selected facilities had accurate information regarding the Occupant Emergency Organization, four did not have executable procedures for individuals requiring assistance, and three did not contain complete information on the number of Department personnel by bureau and floor.

One reason for the deficiencies identified was that information on available training was not always effectively communicated to personnel. Furthermore, officials responsible for emergency planning at the domestic facilities stated they were not aware of some requirements. Specifically, the FEAP template and instructions developed by OEM did not address all federal and Department requirements and were unclear regarding requirements for personnel who require assistance during emergencies. OIG also found that OEM did not sufficiently oversee the FEAP process. Furthermore, OEM requires FEAPs for all facilities that house Department personnel, even if the Department is not the primary occupant agency. The FEAP effort at those facilities duplicates the work performed by other federal agencies and OEM should determine whether continuing to require FEAPs for all facilities is a good use of limited resources. OIG concludes that when these deficiencies are fully addressed, domestic Department personnel will be better prepared to execute all emergency procedures that are meant to prevent injury, loss of life, and property damage.

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OBJECTIVE

The Office of Inspector General (OIG) conducted this audit to determine whether the Department of State (Department) is prepared to respond to and recover from foreseeable emergencies at selected domestic facilities.

BACKGROUND

Domestic Emergency Management Program

The Department is required to maintain an emergency management program that “encompasses preparedness, planning, training and exercises, and response support.”¹ The Department established the Office of Emergency Management (OEM), within the Bureau of Administration, in October 2003 to consolidate the Department’s emergency management functions into a single entity. According to the Foreign Affairs Manual (FAM), OEM is responsible for administering the Department’s Domestic Emergency Management Program,² which helps ensure that the Department is prepared to respond to and recover from emergencies that impact its ability to accomplish its domestic mission.³ OEM’s Policy and Planning Division (PPD) manages the Department’s compliance with the program, “with a focus on protecting life and property.”⁴

Facility Emergency Action Plan Requirements

Federal regulations require that every federal facility have an occupant emergency plan,⁵ which is a set of procedures developed to protect life and property.⁶ The facility emergency action plan (FEAP) is the Department’s version of an occupant emergency plan. According to the FAM, FEAPs guide occupants in carrying out evacuation or shelter-in-place procedures designed to prevent or minimize injury, loss of life, and property damage.⁷ PPD tracks two types of FEAPs—written and oral. Written FEAPs apply to facilities with:

- Eleven or more federal personnel when the Department is the primary occupant agency.

¹ 6 FAM 417.4, “Policy and Planning Programs.”

² 6 FAM 417, “Program Administration.”

³ 6 FAM 411(a), “Purpose.”

⁴ 6 FAM 417.4(a), “Policy and Planning Programs.”

⁵ 41 Code of Federal Regulations (C.F.R.) § 102-74.230, “Who is responsible for establishing an occupant emergency program?”

⁶ 41 C.F.R. § 102-71.20, “What definitions apply to GSA's real property policies?”

⁷ 6 FAM 418.1(3), “Domestic Emergency Action Plans.”

- Eleven or more Department personnel when the Department is not the primary occupant agency.⁸

The Department requires that written FEAPs include detailed information such as an outline of procedures and response actions to be taken during emergencies, a list of critical staff (e.g., floor wardens and assembly point coordinators), shelter-in-place locations, evacuation routes, designated assembly points, and accountability procedures.⁹ When the Department is the primary occupant agency in a facility, the Designated Official¹⁰ is responsible for developing, implementing, and maintaining the written FEAP, and this FEAP serves as the occupant emergency plan for the entire facility.¹¹ When the Department is not the primary occupant agency in a facility, the senior Department official is responsible for developing, implementing, and maintaining the written FEAP for only Department personnel.

Facilities with 10 or fewer Department personnel may choose to maintain an oral FEAP and communicate the plan to personnel orally.¹² Although termed “oral,” these FEAPs identify in writing the name of the facility’s senior Department official, the Facility Security Committee¹³ members, and information about the Department’s occupants on each floor of the facility.

Office of Emergency Management Responsibilities

According to the FAM, OEM is responsible for ensuring that each domestic facility develops and maintains a FEAP annually.¹⁴ PPD provides technical guidance, templates, and assistance for the development of FEAPs.¹⁵ PPD is responsible for tracking FEAPs (using a website that is accessible by Department personnel), coordinating annual FEAP recertification efforts, and reviewing and approving FEAPs.¹⁶ OEM is also responsible for ensuring that each facility exercises its FEAP annually,¹⁷ as federal regulations require that each occupant agency

⁸ The Bureau of Administration, Office of Emergency Management, Policy and Planning Division’s FEAP Standard Operating Procedures, December 2021, page 3.

⁹ Ibid.

¹⁰ 41 C.F.R. § 102-71.20, “What definitions apply to GSA’s real property policies?” The Designated Official is the highest ranking official of the primary occupant agency or a designee selected by mutual agreement of occupant agency officials.

¹¹ 41 C.F.R. § 102-74.230.

¹² The Bureau of Administration, Office of Emergency Management, Policy and Planning Division’s FEAP Standard Operating Procedures, June 2021, page 3.

¹³ According to the Interagency Security Committee’s Occupant Emergency Programs: An Interagency Security Committee Guide (March 2013), a Facility Security Committee is responsible for addressing facility-specific security issues and approving the implementation of security measures and practices. The committee consists of representatives of all federal tenants in the facility, the security organization, and the facility’s owning or leasing department or agency.

¹⁴ 1 FAM 212.3(r), “Office of Emergency Management (A/OEM).”

¹⁵ 1 FAM 212.3-1(e), “Policy and Planning Division (A/OEM/PPD).”

¹⁶ The Bureau of Administration, Office of Emergency Management, Policy and Planning Division’s FEAP Standard Operating Procedures, June 2021, page 4.

¹⁷ 1 FAM 212.3(r).

participate in at least one fire drill per year.¹⁸ Furthermore, OEM is responsible for ensuring that Department personnel are properly trained to respond to an emergency at domestic facilities and assist in recovering from such emergencies.¹⁹

In 2022, PPD started holding a quarterly “Designated Official 101” training webinar for Designated Officials, senior Department officials, and Occupant Emergency Coordinators²⁰ on the concepts, key players, and critical facility emergency management functions used to develop and implement a FEAP. Upon request, PPD also provides training to floor wardens and assembly point coordinators on FEAP functions and roles and responsibilities.²¹

AUDIT RESULTS

Finding A: The Department Is Principally Prepared To Respond to and Recover From Emergencies but Improvements Are Needed

OIG found that the Department was principally prepared to respond to and recover from emergencies at the selected domestic facilities reviewed for this audit. Specifically, OIG conducted site visits at six domestic facilities²² and found that the majority of Department personnel interviewed knew the procedures to follow during an evacuation and during a shelter-in-place emergency. In addition, OIG found that four of six facilities had conducted required fire drills. However, only 35 percent of the individuals interviewed were sufficiently familiar with procedures to follow for an active shooter situation. OIG also found that FEAPs were not always certified in a timely manner and did not always contain complete, accurate, and executable information. For example, none of the six FEAPs had accurate information regarding the Occupant Emergency Organization, four did not have executable procedures for individuals requiring assistance, and three did not contain complete information on the number of personnel by bureau and floor.

One reason for the deficiencies identified was that information on available training was not always effectively communicated to personnel. Another reason is that officials responsible for emergency planning at the domestic facilities stated that they were not aware of some of the procedural requirements that should be included in a FEAP. Specifically, the FEAP template and instructions developed by OEM did not address all federal and Department requirements and

¹⁸ 41 C.F.R. § 102-74.360(a), “What are the specific accident and fire prevention responsibilities of occupant agencies?”

¹⁹ 6 FAM 417.2(1), “Director, Office of Emergency Management (A/OEM).”

²⁰ The FEAP template instructions state that the Occupant Emergency Coordinator assists the Designated Official with preparing the FEAP, including recruiting and training Occupant Emergency Organization members, coordinating FEAP procedures with other tenants of the facility, and collaborating with OEM on FEAP development.

²¹ The Bureau of Administration, Office of Emergency Management, Policy and Planning Division’s FEAP Standard Operating Procedures, June 2021, page 26.

²² The six domestic facilities selected and reviewed for this audit were in California, Texas, Kentucky, Florida, and Washington. Appendix C provides details on how the facilities were selected.

were unclear regarding requirements for personnel who require assistance during emergencies. OIG also found that PPD did not sufficiently oversee the FEAP process.

Furthermore, PPD requires FEAPs for all facilities with Department officials, even if the Department is not the primary occupant agency. The FEAP effort at those facilities duplicates the work performed by other federal agencies. PPD should determine whether continuing to require FEAPs for all facilities is a good use of limited resources.

Although OIG determined that Department personnel were generally aware of emergency procedures and therefore principally prepared to respond to emergencies, more must be done to fully comply with requirements that are intended to prevent injury, loss of life, and property damage.²³ For example, preparing for an active shooter scenario and including procedures that account for personnel following an evacuation are particularly important. In addition, when facilities do not fully prepare executable plans for individuals who require special assistance, the execution of an emergency evacuation order or shelter-in-place procedures for those individuals could be jeopardized. OIG therefore concludes that when these deficiencies are addressed, domestic Department personnel will be better prepared to execute all required emergency procedures.

Personnel at Selected Domestic Facilities Were Generally Aware of Emergency Procedures

OIG found that personnel at the six selected facilities reviewed for this audit were generally aware of details of their respective FEAPs. OIG interviewed 60 randomly selected individuals (10 at each of the 6 selected facilities)²⁴ and found that 58 (97 percent) knew the procedures to follow during an evacuation and 48 (80 percent) knew the procedures to follow for a shelter-in-place emergency. However, although OEM has conducted active shooter training at these facilities in the past, only 21 (35 percent) of 60 individuals were fully aware of the procedures to follow in an active shooter situation. The written FEAP template cites “run, hide, or fight” as the immediate actions that should be taken in response to an active shooter. Furthermore, 39 (65 percent) of 60 individuals interviewed were not aware of the availability of general emergency preparedness training.

According to federal regulations, an employer must review the emergency action plan with

Spotlight on Success: One Facility Implemented Partial Evacuation Sessions

OIG found that one facility implemented partial evacuation sessions after an actual fire incident in 2019 because the facility wanted to be better prepared for future emergencies. During these sessions, an official walks new personnel through the evacuation procedures, including gathering at the assembly point area. Other personnel can also join the sessions if they would like a refresher on evacuation procedures. These small-group evacuation sessions allowed personnel to continue exercising the FEAP during the COVID-19 pandemic because a full fire drill with other facility occupants did not have to be coordinated.

²³ 6 FAM 418.1(3).

²⁴ Appendix C provides details on the selection methodology.

each employee when the plan is changed.^{25,26} The written FEAP template instructions state, “The [Designated Official] should hold a FEAP Orientation training to inform all facility occupants of the building’s FEAP once it has been approved/recertified.” Orientation topics include the types of emergency responses, a review of the Occupant Emergency Organization members and responsibilities, how occupants can expect to be notified of an emergency, assembly points and shelter-in-place locations and routes, and where personnel can access the FEAP. However, the orientation guidance does not include guidance on informing personnel about available training or other resources to reinforce emergency procedures. To address the identified deficiency, OIG is offering the following recommendation.

Recommendation 1: OIG recommends that the Bureau of Administration revise the orientation guidance in the written facility emergency action plan (FEAP) template instructions to include guidance on informing personnel about the availability of training resources for general emergency preparedness and for specific scenarios, such as active shooter incidents.

Management Response: The Office of Emergency Management (OEM) partially concurred with this recommendation, stating that the FEAP, which is available to all Department employees, includes information on active shooter response actions as well as links to additional materials and trainings. Furthermore, in 2022, OEM provided Designated Officials, senior Department officials, Occupant Emergency Coordinators, and bureau executive directors with information outlining all emergency preparedness resources that OEM offers. OEM has also included information regarding available training on its website and within the Designated Official 101 and Occupant Emergency Organization trainings. Furthermore, it plans to include additional training information in its FEAP guidance documentation as part of a FEAP program update.

OIG Reply: On the basis of OEM’s partial concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM has revised the orientation guidance in the written FEAP template instructions to include guidance on informing personnel about the availability of training resources for general emergency preparedness and for specific scenarios, such as active shooter incidents.

²⁵ 29 C.F.R. § 1910.38(f)(3), “Emergency action plans.”

²⁶ At the six facilities visited, 51 of 60 (85 percent) individuals interviewed stated that they are informed when the FEAP is changed.

OIG also found that four of six selected facilities performed required fire drills during 2021.²⁷ Federal regulations require that each occupant agency participate in at least one fire drill per year.²⁸ According to officials at two locations, the facilities had not conducted a fire drill since 2019 due to the COVID-19 pandemic. At one facility, which is commercially leased,²⁹ the Department official responsible for the FEAP stated that the primary occupant agency was not present in the facility during the pandemic; therefore, it had not scheduled a fire drill for the facility's occupants. Unlike the primary occupant agency, Department personnel had been present at the facility since the summer of 2020. The second facility, which is owned by the Department, elected not to conduct a fire drill in 2020 or 2021 as the Department's Office of Facility Management made fire drills optional in 2020 and 2021 and personnel were primarily teleworking. The Department is planning to conduct fire drills in fall 2022. If Department personnel are not provided the opportunity to participate in an annual fire drill, they may not be able to effectively implement the evacuation procedures documented in their FEAP. OIG is therefore offering the following recommendations.

Recommendation 2: OIG recommends that the Bureau of Administration (a) direct Department of State domestic facilities that did not conduct a fire drill in either 2020 or 2021 to conduct the required fire drill in 2022 and (b) verify their compliance.

Management Response: The Office of Emergency Management (OEM) concurred with this recommendation, stating that the Bureau of Administration's Assistant Secretary sent a letter to all Designated Officials and senior Department officials in April 2022 requiring that they conduct a fire drill before the end of 2022. OEM is tracking the fire drills to verify completion.

OIG Reply: On the basis of OEM's concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that the Bureau of Administration has directed domestic facilities to conduct a fire drill in 2022 and verified their compliance.

Recommendation 3: OIG recommends that the Bureau of Administration revise the written facility emergency action plan (FEAP) template to include language promoting

²⁷ The Bureau of Administration, Deputy Assistant Secretary for Operations, Office of Facility Management Services, Domestic Environmental and Safety Division, manages a fire protection program for domestic Department-owned and delegated facilities (facilities owned by the General Services Administration, but the primary care and maintenance of the facility has been delegated to the Department). Drills at commercially leased facilities are coordinated between the lessor and the primary tenant agency. The Domestic Environmental and Safety Division tracks annual fire drills for Department-owned and delegated facilities.

²⁸ 41 C.F.R. § 102-74.360(a), "What are the specific accident and fire prevention responsibilities of occupant agencies?"

²⁹ Another facility, which is commercially leased, did not conduct a fire drill in 2020 due to the COVID-19 pandemic and received a fire drill waiver from the city's Fire Marshal in 2021. However, after receiving approval from building management, the Designated Official conducted a fire drill in December 2021 for Department personnel only.

the implementation of the best practice identified during this audit that involves small group emergency procedure training sessions. Specifically, this involves implementing partial evacuation sessions during which an official walks personnel through the evacuation procedures.

Management Response: The Office of Emergency Management (OEM) concurred with this recommendation, stating that best practices will be included in new reference materials as part of a FEAP program update. OEM stated that, in the interim, it has posted examples and ideas of drills on the ePrepare site.

OIG Reply: On the basis of OEM's concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM has revised the written FEAP template to include language promoting the implementation of the best practice identified during this audit that involves small group emergency procedure training sessions.

FEAPs Were Not Always Certified in a Timely Manner

Agencies are required to review their emergency plans annually.³⁰ PPD's FEAP Standard Operating Procedures requires that a FEAP "be certified [1] year from its last date of certification." The FEAP Standard Operating Procedures also states that the PPD FEAP Coordinator is responsible for identifying FEAPs approaching their recertification date and emailing the facility's point of contact stating that the FEAP "is up for recertification by the end of [MONTH]." Once a facility has updated its FEAP, the PPD FEAP Coordinator is to review it for accuracy and then return the FEAP to the Designated Official or senior Department official for certification. The official either sends an email stating, "As the Designated Official for [facility], I certify this FEAP," or they sign the FEAP certification page and return it to PPD.³¹ OIG reviewed 98 written and oral FEAPs and found that 78 (80 percent) were not certified 1 year from the last date of certification. Certification delays for the 78 FEAPs ranged from 1 day to 1,140 days,³² with the median being 31.5 days. Due to the language in PPD's FEAP Standard Operating Procedures regarding the "end of the month," OIG performed an additional calculation using that standard and found that 61 (62 percent) of 98 FEAPs were not certified by the end of the month in which certification was required. To address this deficiency, OIG is offering the following recommendation.

³⁰ 41 C.F.R. § 102-74.240, "What are Federal agencies' occupant emergency responsibilities?"

³¹ The Bureau of Administration, Office of Emergency Management, Policy and Planning Division's FEAP Standard Operating Procedures, June 2021, pages 3, 5-7.

³² The FEAP for the Harry S. Truman Building, the Department's headquarters, expired on August 2, 2018, and was recertified on September 16, 2021. OEM officials stated that the delay was due to waiting for "new leadership."

Recommendation 4: OIG recommends that the Bureau of Administration revise its standard operating procedures to comply with the federal requirement that agencies review plans annually.

Management Response: The Office of Emergency Management (OEM) concurred with this recommendation, stating that it updated its standard operating procedures to better align with language from the federal requirement. As part of a facility emergency action plan program update, OEM plans to make the annual review and certification requirements clearer.

OIG Reply: On the basis of OEM's concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM has revised its standard operating procedures regarding reviewing plans annually.

OEM uses the annual certification of FEAPs as a performance measure. OEM is responsible for maintaining the certification of FEAPs at 90 percent or higher per fiscal quarter. For FY 2021, OEM reported that it had reviewed and approved the following:

- Quarter 1: 14 FEAPs (90 percent compliant)
- Quarter 2: 16 FEAPs (91 percent compliant)
- Quarter 3: 16 FEAPs (percent not reported)
- Quarter 4: 38 FEAPs (percent not reported)
- Cumulative Results to Date: "As of September 30, 2021, 96 of 102 [FEAPs] reviewed and approved."

OIG added the results for each quarter and found that they totaled 84 FEAPs, rather than 96 as reported; therefore, the resulting compliance rate was 82 percent, which was less than the 90 percent target. According to a PPD official, a PPD Team Lead calculates the data for this reporting. OIG was unable to determine why the data submitted was inaccurate because the Team Lead who submitted the data is no longer with the Department. To address this deficiency, OIG is offering the following recommendation.

Recommendation 5: OIG recommends that the Bureau of Administration develop and implement a quality control process to ensure the accuracy of reported facility emergency action plan (FEAP) certification data.

Management Response: The Office of Emergency Management (OEM) concurred with this recommendation, stating that it implemented a quality control process so that the team lead will confirm the accuracy of the certification and send the data to leadership for concurrence prior to reporting it. In addition, OEM is seeking to automate the process of calculating quarterly FEAP data.

OIG Reply: On the basis of OEM’s concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM has implemented a quality control process to ensure the accuracy of reported FEAP certification data.

Some Domestic Facility FEAPs Contained Incomplete Information

OIG reviewed 63 written FEAPs that were certified in FY 2021 to determine whether they complied with selected federal³³ and Department³⁴ requirements for an emergency action plan. OIG found that 57 (90 percent) of 63 written FEAPs did not comply with one or more requirements. The greatest deficiency identified, at 59 percent, was not having procedures for accounting for personnel following an evacuation. Table 1 summarizes the number of FEAPs that did not meet each requirement reviewed.

Table 1: FEAP Deficiencies

Requirements		Number of FEAPs That Did Not Meet Requirement (%)
Federal^a	Procedures for reporting a fire or other emergency	0 (0)
	Procedures for emergency evacuation	12 (19)
	Exit route assignments	24 (38)
	Procedures to account for all personnel after an evacuation	37 (59)
	Procedures for personnel performing rescue or medical duties	0 (0)
	Name or job title of points of contact for the plan	0 (0)
Department^c	Name, title, and contact information of the Designated Official or senior Department official	0 (0)
	Identification of floor wardens/searchers	26 (36)
	Identification of assembly point coordinators	9 (14) ^b
	Confirmation that floor wardens and assembly point coordinators are separate individuals	21 (33) ^d
	Assembly point map	3 (5)
	Shelter-in-place map	13 (21)
	Identification of Facility Manager and Building Engineer	0 (0)

³³ The written FEAP template includes five of six applicable federal requirements from 29 C.F.R. § 1910.38(c), “Minimum elements of an emergency action plan.” The written FEAP template requires the facility to have an exit route assignment but does not require the route assignment to be included in the FEAP.

³⁴ The Bureau of Administration, Office of Emergency Management, Policy and Planning Division’s FEAP Standard Operating Procedures, June 2021, pages 6-7. The selected items represent the requirements that PPD’s FEAP Standard Operating Procedures state “attention should be given to” when PPD reviews a written FEAP for “accuracy.” OIG also determined whether the FEAP had been certified by the required official.

Requirements	Number of FEAPs That Did Not Meet Requirement (%)
Certification by the Designated Official or senior Department official	14 (22) ^e

^a 29 C.F.R. § 1910.38(c), “Minimum elements of an emergency action plan.”

^b Of the nine FEAPs, one did not identify any assembly point coordinators and eight did not have enough coordinators for the number of assembly areas.

^c The Bureau of Administration, Office of Emergency Management, Policy and Planning Division’s FEAP Standard Operating Procedures, June 2021.

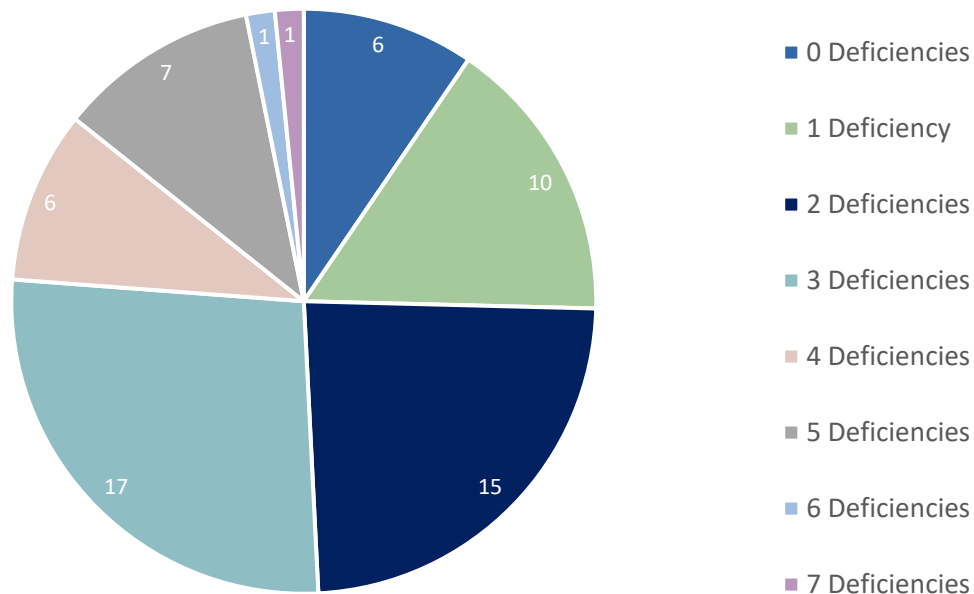
^d Four FEAPs did not identify any floor wardens, so OIG could not determine if those FEAPs met this requirement.

^e Of the 14 FEAPs, 6 were signed by an official other than the Designated Official. For the remaining 8 FEAPs, OIG could not make a determination because certification information was not included in the FEAP.

Source: Generated by OIG based on its testing of requirements from 29 C.F.R. § 1910.38(c), “Emergency action plans;” the Bureau of Administration, Office of Emergency Management, Policy and Planning Division’s FEAP Standard Operating Procedures, June 2021; OEM’s FEAP template instructions; and Occupational Safety and Health Administration guidance, “How to plan for workplace emergencies and evacuations-OSHA 3088.”

Figure 1 details how many of the 63 FEAPs had a certain number of deficiencies, ranging from zero to seven.

Figure 1: FEAPs Grouped by Number of Deficiencies



Source: Generated by OIG based on its analysis of the deficiencies associated with the 63 FEAPs described in Table 1 of this report.

According to PPD’s FEAP Standard Operating Procedures, the FEAP for State Annex-04B (i.e., the building where PPD is located) “is the guiding document and template for all other . . .

FEAPs.”³⁵ However, OIG found that State Annex-04B’s 2021 FEAP was missing the certification by the Designated Official,³⁶ a shelter-in-place map,³⁷ and exit route assignments.

During site visits to six domestic facilities, OIG performed additional FEAP testing. For example, PPD’s instructions for completing the written FEAP template state that the FEAP must contain “information about the occupants on each floor and bureau to get a clear picture of the occupant profile. . . . This information is critical for accountability when engaging in emergency actions.” OIG found that FEAPs at three (50 percent) of six facilities did not contain complete information concerning the number of personnel by bureau and floor in the facility:

- One facility’s FEAP identified five individuals as “Department of State” rather than by bureau. The facility’s Occupant Emergency Coordinator stated that she was not aware of the requirement to identify the bureau. Instead, she used “Department of State” to differentiate between direct-hire employees and contractors.
- A second facility’s FEAP did not include the number of personnel by floor. The facility’s senior Department official stated that, because the number of personnel changes frequently, including that information in the FEAP would mean it would be incorrect almost immediately. The FEAP also lacked any information about the floor occupied by the Bureau of Diplomatic Security (DS), including exit routes and Occupant Emergency Organization members, because DS does not participate in the FEAP process. A DS official stated that, since occupying the facility in 2011, DS has maintained standard operating procedures for emergencies that instruct DS personnel to follow the facility’s occupant emergency plan, which is maintained by the Department of Labor, instead of the FEAP.
- The third facility’s FEAP also did not include any information about the floors occupied by two Department entities: DS and the Bureau of Consular Affairs, Passport Services, South Central Region office. The senior Department official stated that DS does not participate in the FEAP process. With respect to Passport Services, the South Central Region office historically maintained a separate emergency action plan and did not participate in the FEAP process. However, during OIG’s site visit, the Regional Director stated that they will stop maintaining a separate emergency action plan and participate in the FEAP process. OIG is therefore not making a recommendation specific to Passport Services.

Officials in DS’s Office of the Executive Director stated that DS offices are instructed to follow the processes established by OEM. The DS official stated that DS encouraged its staff at domestic facilities to participate in the facilities’ emergency planning and reenforced OEM’s leadership role in the process. However, DS does not provide written guidance to personnel at

³⁵ Ibid., page 18.

³⁶ State Annex-04B’s 2021 FEAP that was posted on OEM’s website did not include the Designated Official’s certification, but when requested by OIG, PPD officials were able to provide a signed certification.

³⁷ Although State Annex-04B’s 2021 FEAP includes a hyperlink to a shelter-in-place map, clicking the hyperlink results in a “page not found” error.

facilities where DS is not the lead agency. The DS official stated that they plan to create an intranet page that includes guidance to DS personnel at facilities where DS is not the lead agency to seek out the facility's Designated Official, the Deputy Designated Official, and the Occupant Emergency Coordinator to gain information on the FEAP and to participate in emergency drills and exercises. A PPD official stated that it is the responsibility of the Designated Official or the senior Department official to ensure that all bureaus and offices are included in the FEAP. To help ensure clarity on this topic, OIG is offering the following recommendation.

Recommendation 6: OIG recommends that the Bureau of Diplomatic Security (DS) issue guidance to its domestic bureau offices stating that, when they are not the primary bureau in a facility, they must participate in the primary bureau's facility emergency action plan (FEAP) development process.

Management Response: DS concurred with this recommendation, stating that it established an emergency management website that provides direct access to FEAPs for facilities that have a DS presence as well as links to various websites related to emergency management and response. According to DS, the main page of the website states, "We recommend that staff who are at facilities where DS is not the lead agency to reach out to the Designated Official (DO), the Deputy Designated Official (DDO), or the Occupant Emergency Coordinator (OEC) for their facility for information on emergency plans and procedures at their facility." Furthermore, DS requested that the website include the following language: "Additionally, DS staff should participate in the Facility's Security Committee meetings and the senior DS official must participate in the facility's emergency action plan development process."

OIG Reply: On the basis of DS's concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that DS has issued guidance to its domestic bureau offices stating that, when they are not the primary bureau in a facility, they must participate in the primary bureau's facility emergency action plan development process.

Some Domestic Facility FEAPs Contained Inaccurate Information

OIG found that some FEAPs contained inaccurate information. For example, the written FEAP template includes a section to identify the members of the Occupant Emergency Organization, including the individual's name, title, agency, telephone numbers (office and work cellular), and email address. According to the FEAP template instructions, officials responsible for the FEAP must update points of contact information for each member quarterly.³⁸ OIG found that the six facilities' FEAPs included inaccurate information on the Occupant Emergency Organization. Specifically, four FEAPs listed individuals who were no longer members of the Occupant

³⁸ The official responsible for updating the FEAP, whether it is the Designated Official, Deputy Designated Official, or Occupant Emergency Coordinator, can do so by accessing OEM's FEAP website.

Emergency Organization (with three of these including individuals who were no longer at the facility), and one FEAP did not list all Occupant Emergency Organization members. Additionally, two FEAPs listed incorrect telephone numbers for Occupant Emergency Organization members.

The written FEAP template also includes a section that asks whether “anyone in your facility self-identified as needing assistance during an Evacuation or Shelter-in-Place action?” The template also states that individuals who would like to self-identify as such should use Form DS-4126, Emergency Planning Assistance Request. However, the form is only necessary if the individual would like PPD to facilitate the development of an Individual Preparedness Plan for them.³⁹ The form is not needed to identify in the FEAP that an individual requires assistance. OIG found that one facility’s FEAP indicated that there was an individual who needed assistance during an evacuation or shelter-in-place event; however, the Designated Official stated that there were currently none because the identified individual only needed assistance temporarily.⁴⁰ The FEAP at a second facility did not identify any individuals who required assistance. However, the Deputy Designated Official identified two individuals requiring assistance. The Deputy Designated Official stated that the individuals were provided Form DS-4126 but chose not to complete it; therefore, he did not include them in the FEAP. An official at a third facility identified an individual who required assistance but who was not included in the FEAP. The Deputy Designated Official stated that the individual was not included in the FEAP because the responsible bureau did not notify him that the individual required assistance.

Some Domestic Facility FEAPs Contained Inexecutable Information

Federal agencies are required to “consider, in their emergency preparedness planning, the unique needs of agency employees with disabilities. . . .”⁴¹ The written FEAP template states:

Additional planning is especially important for individuals with either temporary or permanent mobility impairments, individuals with medical concerns, and those who may be hearing or vision impaired. The needs of these individuals must be considered and adequately addressed in all aspects of occupant emergency plan development, implementation, and practical application.

Guidance from the Interagency Security Committee states, “All plans should address the needs, processes, and equipment needs for all occupants who may require assistance due to a medical condition, injury, or existing disability during an emergency evacuation.”⁴²

³⁹ The Bureau of Administration, Office of Emergency Management, Policy and Planning Division’s FEAP Standard Operating Procedures, June 2021, page 28.

⁴⁰ The Designated Official has since updated the facility’s FEAP.

⁴¹ Executive Order 13347, Individuals with Disabilities in Emergency Preparedness, July 26, 2004.

⁴² Interagency Security Committee, Occupant Emergency Programs: An Interagency Security Committee Guide, March 2013.

OIG found that four (66 percent) of six facilities either did not include procedures in their FEAPs or included suboptimal procedures for individuals requiring assistance. One facility had procedures but did not include them in the FEAP. A different facility's FEAP identified two "wait and rescue" locations but did not detail procedures for the individuals who required assistance. The third facility's FEAP did not sufficiently address the needs of personnel with mobility issues. The FEAP stated, "In a fire-related evacuation, your designated attendant ("Buddy") will assist you out of the building." The individuals needing assistance informed OIG that they were to evacuate using a stairwell, which for at least one individual would be difficult. However, the procedure for individuals who require assistance as explained to OIG by the facility's management is that personnel who need assistance will wait at a freight elevator for first responders. The fourth facility did not have procedures for assisting an individual in a wheelchair. To address this deficiency, OIG is offering the following recommendation.

Recommendation 7: OIG recommends that the Bureau of Administration revise the written facility emergency action plan template and template instructions to require that facility emergency action plans (FEAP) address general procedures for individuals requiring assistance due to a medical condition, injury, or existing disability during an emergency.

Management Response: The Office of Emergency Management (OEM) partially concurred with this recommendation, stating that the responsibility to develop a support plan external to the FEAP is a requirement for Designated Officials and personnel supervisors in coordination with the Office of Accessibility and Accommodations. As part of a FEAP program update, OEM is working with the Office of Accessibility and Accommodations to determine the appropriate level and type of input needed in the FEAP instructions to meet the needs of individuals with access and functional needs. OEM is developing a new Domestic Emergency Planning System that should be operational in approximately 6 months.

OIG Reply: On the basis of OEM's partial concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM has revised the written FEAP template and instructions to require that FEAPs address general procedures for individuals requiring assistance due to a medical condition, injury, or existing disability during an emergency.

OIG also identified issues with shelter-in-place locations. Sheltering in place is an action personnel can take to protect themselves from exposure to threats from outdoors. It is a voluntary action unless mandated by law enforcement or public health officials.⁴³ OEM guidance recommends that shelter-in-place rooms "have adequate space for everyone to be able to sit."⁴⁴ Federal Emergency Management Agency guidance requires a minimum of 5

⁴³ Ibid.

⁴⁴ Department of State, Office of Emergency Management's Shelter-In-Place Guidance.

square feet per person for standing or seated occupants for tornado community safe rooms.⁴⁵ OIG found that two (33 percent) of six facilities' shelter-in-place locations were not large enough to accommodate all personnel.

One facility needed to accommodate approximately 320 individuals during normal operations. Although the FEAP listed three shelter-in-place locations, facility management officials stated that one location should not be used because it would not be safe during a tornado. The remaining two locations would only accommodate approximately 220 individuals. The second facility's shelter-in-place locations needed to accommodate 70 individuals. However, the primary location, a storage room, and two alternate locations, the strong room and the network room, were kept locked and were not accessible to most personnel. The Department official responsible for the FEAP stated that the facility initially kept the storage room unlocked, but, over time, it accumulated excess equipment and the door was locked. If facilities do not have sufficient or adequate space for shelter-in-place events, individuals may not be able to adequately protect themselves from exposure to outside threats. OIG is therefore offering the following recommendations.

Recommendation 8: OIG recommends that the Bureau of Administration, in coordination with the Kentucky Consular Center, evaluate possible shelter-in-place locations at the Kentucky Consular Center that can accommodate all personnel at the facility.

Management Response: The Office of Emergency Management (OEM) concurred with this recommendation, stating that it worked with the Kentucky Consular Center to update its shelter-in-place guidance.

OIG Reply: On the basis of OEM's concurrence with the recommendation and actions taken, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that the Bureau of Administration and the Kentucky Consular Center evaluated possible shelter-in-place locations that can accommodate all personnel at the facility.

Recommendation 9: OIG recommends that the Bureau of Administration, in coordination with the San Diego Passport Agency, evaluate possible shelter-in-place locations at the San Diego Passport Agency that are accessible to all personnel at the facility.

Management Response: The Office of Emergency Management (OEM) concurred with this recommendation, stating that it worked with the San Diego Passport Agency to update its shelter-in-place guidance.

⁴⁵ Safe Rooms for Tornadoes and Hurricanes, Guidance for Community and Residential Safe Rooms, FEMA P-361, Third Edition (March 2015), page B5-3.

OIG Reply: On the basis of OEM's concurrence with the recommendation and actions taken, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that the Bureau of Administration and the San Diego Passport Agency evaluated possible shelter-in-place locations that can accommodate all personnel at the facility.

Inadequate Guidance

The primary reason for the deficiencies identified given by the Designated Officials⁴⁶ and senior Department officials at the six facilities was that they were not aware of requirements. OIG reviewed the FEAP template and the template instructions and determined that PPD did not include some requirements in these documents. For example, they did not state that facilities could not assign the floor warden and assembly point coordinator duties to the same person. Furthermore, some requirements were presented as suggestions or were unclear. For example, the guidance stated that "facilities should have . . . emergency evacuation routes" rather than requiring the development of evacuation routes. Furthermore, Department officials responsible for the FEAPs at three facilities stated that information in FEAPs was incorrect because they believed that updates could only be made at the time of the annual recertification. The officials were not aware that Occupant Emergency Organization members' information should be updated quarterly or that the FEAP could and should be updated after certification. To address this deficiency, OIG is offering the following recommendations.

Recommendation 10: OIG recommends that the Bureau of Administration (a) reconcile the facility emergency action plan (FEAP) template and template instructions with all applicable federal and Department requirements, (b) identify all applicable differences, and (c) revise the FEAP template and template instructions accordingly.

Management Response: The Office of Emergency Management (OEM) concurred with this recommendation, stating that it completed an assessment of all applicable legal, federal, and Department requirements and will update data requirements for use. According to OEM, the new FEAP template was in draft as of August 2022.

OIG Reply: On the basis of OEM's concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM has reconciled the FEAP template and instructions with all applicable federal and Department requirements, identified the applicable differences, and revised the FEAP template and instructions accordingly.

Recommendation 11: OIG recommends that the Bureau of Administration revise the written facility emergency action plan (FEAP) template and template instructions to

⁴⁶ Three of the six facilities had a Designated Official because the Department is the primary occupant agency.

state that the facility emergency action plans should be updated to ensure accuracy whenever conditions or situations change.

Management Response: The Office of Emergency Management (OEM) concurred with this recommendation, stating that it updated the FEAP splash page to note that FEAPs can be updated anytime to ensure accuracy. OEM also plans to ensure that its new Domestic Emergency Planning System includes the ability to update the FEAP whenever conditions or situations change.

OIG Reply: On the basis of OEM's concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM has revised the written FEAP template and instructions to state that FEAPs should be updated to ensure accuracy whenever conditions or situations change.

In addition, Designated Officials at three facilities did not conduct semiannual meetings. OEM's "Training and Exercise" intranet site states that Designated Officials are responsible for "[c]onducting semiannual meeting[s] between [the Designated Official], all emergency response staff and, as appropriate, the building manager, the owner, commercial manager, and/or the leasing department or agency, to discuss results of training, staffing, exercises (and real-world events), and lessons learned." The Designated Officials did not conduct the meetings because they were not aware of the language at OEM's "Training and Exercise" intranet site. Specifically, two Designated Officials had not conducted any meetings and the third had not held a meeting since December 2019. Two of the Designated Officials questioned the need for semiannual meetings, with one stating that annual meetings would be sufficient. Meetings with all emergency response staff and other stakeholders to discuss the results of training, staffing, exercises, real-world events, and lessons learned can be useful tools to improve emergency preparedness. However, OEM should consider whether semiannual meetings are necessary. OIG is offering the following recommendation.

Recommendation 12: OIG recommends that the Bureau of Administration (a) determine the appropriate frequency of emergency response meetings that Designated Officials are required to conduct, (b) retain or revise the current frequency, and (c) revise the written facility emergency action plan template and template instructions to alert officials.

Management Response: The Office of Emergency Management (OEM) partially concurred with this recommendation, stating that there is no legal, federal, or Department mandate for emergency response meetings. Therefore, OEM removed the language on emergency response meetings from its intranet site.

OIG Reply: OIG accepts OEM's alternative course of action to address the issue identified in this report related to emergency response meetings. OIG confirmed that OEM removed the language related to meetings from the "Training and Exercise"

intranet site. On the basis of OEM's concurrence with the intent of the recommendation and actions taken, OIG considers this recommendation closed.

OIG also noted that the written FEAP template instructs facilities to develop a procedure for self-identification of individuals requiring assistance that allows for preplanning and resource allocation prior to an emergency. However, one official stated that they thought that Form DS-4126 was the self-identification process. The form was provided to individuals who required assistance, but they chose not to complete it. The official did not realize that he needed to document individuals requiring assistance in the FEAP even if the individuals chose not to complete Form DS-4126. Furthermore, another official stated that if he indicates that there are individuals who require assistance when preparing the written FEAP, the system provides a hyperlink for Form DS-4126. However, he reported in February 2021, that the hyperlink did not work, and as of July 2022, the hyperlink in existing FEAPs, which is what facilities use to update their FEAPs, was still not functional. To address this deficiency, OIG is offering the following recommendations.

Recommendation 13: OIG recommends that the Bureau of Administration revise the written facility emergency action plan (FEAP) template to require facilities to develop self-identification procedures for individuals who need assistance during an evacuation or shelter-in-place event.

Management Response: The Office of Emergency Management (OEM) partially concurred with this recommendation, stating that it was working with the Office of Accessibility and Accommodations to better communicate to Designated Officials and senior Department officials the existing self-identification process using Form DS-4126 and to determine the appropriate input needed in the FEAP instructions to meet the needs of individuals with access and functional needs while complying with legal and personally identifiable information restrictions.

OIG Reply: On the basis of OEM's partial concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM has revised the written FEAP template to make it clear that Form DS-4126 is the self-identification process for individuals who need assistance during an evacuation or shelter-in-place event.

Recommendation 14: OIG recommends that the Bureau of Administration revise the written facility emergency action plan (FEAP) template and template instructions to state that facilities must indicate in the FEAP whether there are individuals who need assistance during an evacuation or shelter-in-place event regardless of whether the individuals complete Form DS-4126.

Management Response: The Office of Emergency Management (OEM) concurred with this recommendation, stating that it will include this information in an update of the FEAP program and the development of the Domestic Emergency Planning System.

OIG Reply: On the basis of OEM's concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM has revised the written FEAP template and instructions to state that facilities must indicate in the FEAP whether there are individuals who need assistance during an evacuation or shelter-in-place event.

Recommendation 15: OIG recommends that the Bureau of Administration replace the nonworking hyperlink for Form DS-4126, Emergency Planning Assistance Request, with an accessible hyperlink in the written facility emergency action plan (FEAP) template.

Management Response: The Office of Emergency Management (OEM) concurred with this recommendation, stating that it fixed the broken link on the FEAP splash page and within the FEAPs.

OIG Reply: On the basis of OEM's concurrence with the recommendation and actions taken, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that the hyperlink for Form DS-4126 is accessible in the written FEAP template.

Furthermore, the FEAP template instructions state that information on a facility's occupants is critical for accountability efforts; however, the instructions do not offer alternative methods for obtaining this information, such as using the Department's myProfile system.⁴⁷ The FEAP standard operating procedures recommend that the OEM FEAP Coordinator use the myProfile or Safety and Accountability For Everyone⁴⁸ systems, but the standard operating procedures are not shared with staff at the domestic facilities. To address this deficiency, OIG is offering the following recommendation.

Recommendation 16: OIG recommends that the Bureau of Administration revise the written facility emergency action plan (FEAP) template and template instructions to provide alternative methods for obtaining critical occupant information from all Department of State bureaus and offices present in a facility.

Management Response: The Office of Emergency Management (OEM) partially concurred with this recommendation, stating that occupant information is not a legal, federal, or domestic requirement for FEAPs. However, OEM stated that the Domestic Emergency Planning System will have the ability to automatically import occupant data from the Safety and Accountability For Everyone application. Furthermore, OEM will

⁴⁷ The myProfile system is a Department application that collects data, including work location, directly from personnel. The application prompts Department personnel to update their information every 90 days.

⁴⁸ Safety and Accountability For Everyone is the Department's enterprise-wide emergency notification system that is deployed to all domestic facilities and overseas posts. It allows senior Department officials to relay important information when an emergency impacts Department domestic personnel, facilities, and/or operations.

include a recommendation in a FEAP program update that additional information can be found on myProfile to verify the Safety and Accountability For Everyone data.

OIG Reply: On the basis of OEM’s partial concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM revised the written FEAP template and instructions to provide alternative methods for obtaining critical occupant information from all bureaus and offices present in a facility.

PPD Oversight of the FEAP Process

Another reason for the deficiencies identified is that PPD does not sufficiently review⁴⁹ FEAPs before approval.⁵⁰ For example, PPD’s FEAP Standard Operating Procedures states that “[a]ttention should be given” to only one of the minimum federal requirements—name or job title of individuals who may be contacted about the plan (e.g., the Designated Official, floor wardens, or assembly point coordinators). Conversely, the Standard Operating Procedures identifies several Department requirements for PPD focus. Furthermore, the FEAP Standard Operating Procedures states, “The [State Annex]-04B FEAP stands as an example FEAP for all other [Occupant Emergency Coordinators] to emulate and serves as a reference point.”⁵¹ Therefore, if PPD used the State Annex-04B FEAP as guidance when reviewing other FEAPs, given that OIG found that the FEAP did not meet all requirements, it would have resulted in PPD also approving FEAPs that did not meet requirements. To address this deficiency, OIG is offering the following recommendations.

Recommendation 17: OIG recommends that the Bureau of Administration revise the Facility Emergency Action Plan (FEAP) Standard Operating Procedures to include, at a minimum, federal requirements as the elements that should be specifically reviewed by the Office of Emergency Management, Policy and Planning Division, Facility Emergency Action Plan Coordinator.

Management Response: The Office of Emergency Management (OEM) concurred with this recommendation, stating that it updated its standard operating procedures to include specific instructions for the FEAP Coordinator to review federal requirements.

OIG Reply: On the basis of OEM’s concurrence with the recommendation and actions taken, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM has revised the FEAP standard operating procedures to include, at a minimum,

⁴⁹ 41 C.F.R. § 102-74.240(b), “Who is responsible for establishing an occupant emergency program?”

⁵⁰ The Bureau of Administration, Office of Emergency Management, Policy and Planning Division’s FEAP Standard Operating Procedures, June 2021, page 4.

⁵¹ Ibid.

federal requirements as the elements that should be specifically reviewed by the OEM FEAP Coordinator.

Recommendation 18: OIG recommends that the Bureau of Administration design and implement procedures to ensure that the Office of Emergency Management (OEM), Policy and Planning Division, Facility Emergency Action Plan (FEAP) Coordinator considers federal requirements when reviewing written facility emergency action plans.

Management Response: OEM concurred with this recommendation, stating that it has updated its standard operating procedures to include specific instructions to review federal requirements as part of the FEAP Coordinator's review.

OIG Reply: On the basis of OEM's concurrence with the recommendation and actions taken, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM has designed and implemented procedures to ensure that the FEAP Coordinator considers federal requirements when reviewing written FEAPs.

In addition, PPD guidance states that the FEAP review and certification process begins 2 months prior to a FEAP's expiration date. The PPD FEAP Coordinator should identify FEAPs that are approaching their recertification date and notify the facility's point of contact that the FEAP is up for recertification by the end of the applicable month. However, OIG found that PPD did not always follow its guidance of starting the process 2 months prior to certification. For the six selected facilities, OIG calculated that PPD contacted two facilities less than 2 weeks prior to the expiration date, two facilities less than 6 weeks prior to the expiration, one facility less than 7 weeks prior to expiration, and the last facility 6 weeks after the FEAP expiration date.⁵² A PPD official stated that the primary reason for late certifications is the Designated Officials' or senior Department officials' workload because emergency preparedness duties are auxiliary to their regular duties. Furthermore, PPD does not always send the reminder emails 2 months prior to certification because of competing priorities and increased workloads due to PPD staffing shortages. Another PPD official stated that in 2020 and 2021 some Designated Officials did not update or recertify plans due to the COVID-19 pandemic, limited staffing, and telework throughout the Department.⁵³ To address this deficiency, OIG is offering the following recommendation.

Recommendation 19: OIG recommends that the Bureau of Administration direct the Office of Emergency Management (OEM) to (a) contact facility emergency action plan (FEAP) points of contact at least 2 months prior to expiration of the FEAP as required by

⁵² PPD was unsuccessful in obtaining a response from the Designated Official prior to the individual's departure from the facility. PPD was successful in working with the new Designated Official, but this occurred 6 weeks after the FEAP expired.

⁵³ OIG recalculated the number of FEAPs that could have been certified in a timely manner if those facilities for which PPD could not provide 2020 and 2021 certification documentation had certified their FEAPs annually. OIG determined that 50 of 98 FEAPs (51 percent) would not have been certified in a timely manner.

its standard operating procedures and (b) implement a tracking process showing the date contacted and the expiration date of each FEAP.

Management Response: OEM concurred with this recommendation, stating that it sends reminders out at least 2 months in advance of the due date. OEM also developed an internal tracking system to ensure timely contact. OEM also stated that the Domestic Emergency Planning System will include an automated notification email 2 months prior to plan expiration.

OIG Reply: On the basis of OEM's concurrence with the recommendation and actions taken, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM implemented a tracking process showing the date contacted and the expiration date of each FEAP.

Reconsider Need for Department-Specific FEAPs

Given the FEAP deficiencies identified, and the staffing limitations described by Department officials, PPD should consider whether requiring FEAPs for all facilities that house Department personnel rather than only for those facilities where the Department is the primary occupant agency is a prudent use of its limited resources. OEM stated in response to a prior OIG report⁵⁴ that occupants in facilities where the Department is not the primary occupant agency fall "under the umbrella of the primary occupant agency's [occupant emergency plan], thus having access to the required emergency action information." If those occupants truly have access to the required emergency action information, OIG questions PPD's requirement for superfluous FEAPs. Focusing on reviewing and tracking only the FEAPs that act as occupant emergency plans could help increase timely certifications and the quality of PPD's FEAP reviews, thereby decreasing the number of deficiencies. OIG is therefore offering the following recommendation.

Recommendation 20: OIG recommends that the Bureau of Administration (a) conduct a review to determine whether requiring facility emergency action plans (FEAP) for facilities where the Department of State is not the primary occupant agency is necessary and, (b) if it is determined that these plans are not necessary, revise its internal guidance accordingly and notify domestic facilities about the policy change.

Management Response: The Office of Emergency Management (OEM) concurred with this recommendation, stating that it conducted an analysis of federal requirements for FEAPs and will no longer require that senior Department officials develop a separate FEAP when the Department is not the primary occupant agency. New requirements include integration with the appropriate federal agency's Designated Official and emergency organization.

⁵⁴ OIG, *Management Assistance Report: Improvements Needed in Procedures for Emergency Action Planning at Selected Department of State Domestic Facilities* (AUD-SI-22-27, April 2022).

OIG Reply: On the basis of OEM's concurrence with the recommendation and actions taken, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that OEM has revised its internal guidance and notified domestic facilities about the policy change.

RECOMMENDATIONS

Recommendation 1: OIG recommends that the Bureau of Administration revise the orientation guidance in the written facility emergency action plan (FEAP) template instructions to include guidance on informing personnel about the availability of training resources for general emergency preparedness and for specific scenarios, such as active shooter incidents.

Recommendation 2: OIG recommends that the Bureau of Administration (a) direct Department of State domestic facilities that did not conduct a fire drill in either 2020 or 2021 to conduct the required fire drill in 2022 and (b) verify their compliance.

Recommendation 3: OIG recommends that the Bureau of Administration revise the written facility emergency action plan (FEAP) template to include language promoting the implementation of the best practice identified during this audit that involves small group emergency procedure training sessions. Specifically, this involves implementing partial evacuation sessions during which an official walks personnel through the evacuation procedures.

Recommendation 4: OIG recommends that the Bureau of Administration revise its standard operating procedures to comply with the federal requirement that agencies review plans annually.

Recommendation 5: OIG recommends that the Bureau of Administration develop and implement a quality control process to ensure the accuracy of reported facility emergency action plan (FEAP) certification data.

Recommendation 6: OIG recommends that the Bureau of Diplomatic Security (DS) issue guidance to its domestic bureau offices stating that, when they are not the primary bureau in a facility, they must participate in the primary bureau's facility emergency action plan (FEAP) development process.

Recommendation 7: OIG recommends that the Bureau of Administration revise the written facility emergency action plan template and template instructions to require that facility emergency action plans (FEAP) address general procedures for individuals requiring assistance due to a medical condition, injury, or existing disability during an emergency.

Recommendation 8: OIG recommends that the Bureau of Administration, in coordination with the Kentucky Consular Center, evaluate possible shelter-in-place locations at the Kentucky Consular Center that can accommodate all personnel at the facility.

Recommendation 9: OIG recommends that the Bureau of Administration, in coordination with the San Diego Passport Agency, evaluate possible shelter-in-place locations at the San Diego Passport Agency that are accessible to all personnel at the facility.

Recommendation 10: OIG recommends that the Bureau of Administration (a) reconcile the facility emergency action plan (FEAP) template and template instructions with all applicable

federal and Department requirements, (b) identify all applicable differences, and (c) revise the FEAP template and template instructions accordingly.

Recommendation 11: OIG recommends that the Bureau of Administration revise the written facility emergency action plan (FEAP) template and template instructions to state that the facility emergency action plans should be updated to ensure accuracy whenever conditions or situations change.

Recommendation 12: OIG recommends that the Bureau of Administration (a) determine the appropriate frequency of emergency response meetings that Designated Officials are required to conduct, (b) retain or revise the current frequency, and (c) revise the written facility emergency action plan template and template instructions to alert officials.

Recommendation 13: OIG recommends that the Bureau of Administration revise the written facility emergency action plan (FEAP) template to require facilities to develop self-identification procedures for individuals who need assistance during an evacuation or shelter-in-place event.

Recommendation 14: OIG recommends that the Bureau of Administration revise the written facility emergency action plan (FEAP) template and template instructions to state that facilities must indicate in the FEAP whether there are individuals who need assistance during an evacuation or shelter-in-place event regardless of whether the individuals complete Form DS-4126.

Recommendation 15: OIG recommends that the Bureau of Administration replace the nonworking hyperlink for Form DS-4126, Emergency Planning Assistance Request, with an accessible hyperlink in the written facility emergency action plan (FEAP) template.

Recommendation 16: OIG recommends that the Bureau of Administration revise the written facility emergency action plan (FEAP) template and template instructions to provide alternative methods for obtaining critical occupant information from all Department of State bureaus and offices present in a facility.

Recommendation 17: OIG recommends that the Bureau of Administration revise the Facility Emergency Action Plan (FEAP) Standard Operating Procedures to include, at a minimum, federal requirements as the elements that should be specifically reviewed by the Office of Emergency Management, Policy and Planning Division, Facility Emergency Action Plan Coordinator.

Recommendation 18: OIG recommends that the Bureau of Administration design and implement procedures to ensure that the Office of Emergency Management (OEM), Policy and Planning Division, Facility Emergency Action Plan (FEAP) Coordinator considers federal requirements when reviewing written facility emergency action plans.

Recommendation 19: OIG recommends that the Bureau of Administration direct the Office of Emergency Management (OEM) to (a) contact facility emergency action plan (FEAP) points of contact at least 2 months prior to expiration of the FEAP as required by its standard operating

procedures and (b) implement a tracking process showing the date contacted and the expiration date of each FEAP.

Recommendation 20: OIG recommends that the Bureau of Administration (a) conduct a review to determine whether requiring facility emergency action plans (FEAP) for facilities where the Department of State is not the primary occupant agency is necessary and, (b) if it is determined that these plans are not necessary, revise its internal guidance accordingly and notify domestic facilities about the policy change.

APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

The Office of Inspector General (OIG) conducted this audit to determine whether the Department of State (Department) is prepared to respond to and recover from foreseeable emergencies at selected domestic facilities.

OIG conducted this audit from October 2021 to May 2022 in the Washington, DC, metropolitan area and at six domestic facilities: the Kentucky Consular Center in Williamsburg, KY, the Florida Regional Center in Oakland Park, FL, the Fifth & Yesler facility in Seattle, WA, the Leland Federal Building in Houston, TX, the Phillip Burton Federal Building in San Francisco, CA, and the Columbia Place facility in San Diego, CA. OIG conducted this performance audit in accordance with generally accepted government auditing standards. These standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objective. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objective.

To obtain background information for this audit, OIG reviewed federal laws, regulations, and guidance related to domestic federal facilities, including Titles 29 and 41 of the Code of Federal Regulations, Executive orders related to emergency preparedness, Interagency Security Committee guides related to the security of personnel located in federal facilities, and General Service Administration standards for facility design. OIG also reviewed Department policies relating to emergency management, including the Foreign Affairs Manual, and Office of Emergency Management (OEM) guidance and standard operating procedures for developing and maintaining facility emergency action plans (FEAP). OIG also interviewed Department officials from OEM, the Office of Real Property Management, the Office of Facilities Management Services, and personnel at the six domestic facilities to gain an understanding of the Department's domestic emergency management program, the domestic facilities covered by the Department's program, and the FEAP development and maintenance processes.

To determine whether the FEAPs for the six selected facilities contained complete, accurate, and executable information, OIG verified contact information using the Department's Global Address List and the internet; interviewed Designated Officials, Deputy Designated Officials, senior Department officials, Occupant Emergency Coordinators, Occupant Emergency Organization members, Facility Security Committee members, and facility management personnel; and reviewed preventive maintenance and inspection documents on building systems pertaining to emergencies. In addition, OIG conducted walkthroughs of Department space to verify the executability of evacuation plans, exit routes, and shelter-in-place locations, and the posting of exit signs and evacuation routes.

To determine whether personnel were aware of the details included in the applicable FEAP and whether personnel had been trained and drilled to effectively respond to emergencies, OIG

interviewed 10 randomly selected individuals¹ at each of the six selected facilities. OIG also reviewed documents pertaining to fire drills, training slides, completion certificates, and after-action reports.

To determine whether FEAPs met selected federal and Department requirements, OIG tested 63 written FEAPs that were certified in FY 2021. OIG identified federal and Department requirements and reviewed each FEAP, including applicable attachments, to determine whether they complied with the requirements.

To determine whether FEAPs were certified annually, OIG reviewed 98 written and oral FEAPs. For each facility, OIG compared the date on the 2021 FEAP's certification page or certification email to the facility's previous FEAP and determined if the certification occurred within 1 year, as required.²

Data Reliability

OIG used property data extracted from the Office of Real Property Management's Integrated Real Property Management System³ on July 30, 2021, to determine the universe of the Department's domestic facilities. The Office of Real Property Management manages the master real estate plan for the Department's domestic real property. OIG verified the data included in the property report by comparing it with FEAP data extracted from OEM's FEAP website on August 2, 2021. This comparison identified five facilities that maintained a FEAP but were not included in the Office of Real Property Management's property report. According to an Office of Real Property Management official, these five facilities were not included for security purposes. The Sampling Methodology section of this report includes details as to how the property data was used by OIG. Based on the testing performed, OIG determined that the data quality is sufficiently reliable to achieve the objective of the audit.

Work Related to Internal Control

During the audit, OIG considered a number of factors, including the subject matter of the project, to determine whether internal control was significant to the audit objective. Based on its consideration, OIG determined that internal control was significant for this audit. OIG then considered the components of internal control and the underlying principles included in the *Standards for Internal Control in the Federal Government*⁴ to identify internal controls that

¹ If there were individuals working at the facility who required assistance during an emergency, the random selection was adjusted to include these individuals.

² Bureau of Administration, Office of Emergency Management, Policy and Planning Division's FEAP Standard Operating Procedures, June 2021, page 3; 41 Code of Federal Regulations § 102-74.240, "What are Federal agencies' occupant emergency responsibilities?"

³ The Integrated Real Property Management System is a windows-based application used to track property projects within the United States. The consolidated system records information concerning changes to property data, providing increased accountability.

⁴ Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

were significant to the audit objective. Considering internal control in the context of a comprehensive internal control framework can help auditors to determine whether underlying internal control deficiencies exist.

For this audit, OIG concluded that two of five internal control components from the *Standards for Internal Control in the Federal Government*, Control Activities and Information and Communication, were significant to the audit objective. The Control Activities component includes the actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system, which includes the entity's information system. The Information and Communication component relates to the quality information that management and personnel communicate and use to support the internal control system. OIG also concluded that four principles related to the selected components were significant to the audit objective as described in Table A.1.

Table A.1: Internal Control Components and Principles Identified as Significant

Components	Principles
Control Activities	Principle 10: Management should design control activities to achieve objectives and respond to risks.
	Principle 12: Management should implement control activities through policies.
Information and Communication	Principle 14: Management should internally communicate the necessary quality information to achieve the entity's objectives.
	Principle 15: Management should externally communicate the necessary quality information to achieve the entity's objectives.

Source: OIG-generated from an analysis of internal control components and principles from the Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

OIG interviewed Department officials, reviewed documents, and performed walkthroughs of the selected domestic facilities to confirm the completeness, accuracy, and executability of the FEAPs. OIG performed procedures to assess the design and implementation of key internal controls. Specifically, OIG:

- Reviewed 63 FEAPs that were certified in FY 2021 for compliance with federal and Department requirements.
- Analyzed 98 FEAPs for compliance with the federal requirement for an annual review.
- Conducted walkthroughs at six selected facilities following evacuation and shelter-in-place plans to determine the executability of plans.
- Reviewed documentation and interviewed personnel from the Department and external entities to determine the effectiveness of communication of FEAP data, including training staff on emergency response requirements.

Internal control deficiencies identified during the audit that are significant within the context of the audit objective are presented in the Audit Results section of this report.

Sampling Methodology

To determine the target universe for testing whether FEAPs complied with federal and Department requirements and had been certified in a timely manner, OIG obtained a list of 211 domestic facilities from the Department's Office of Real Property Management. This list included facilities that are Department-owned, government-owned, or commercially leased with personnel totals ranging from 0 (e.g., parking garages) to 5,909 (the Harry S Truman Building). OIG also reviewed a list of domestic facilities with FEAPs and identified five facilities that were not included in the Office of Real Property Management's list because the facilities were deemed operationally sensitive. Thus, OIG determined that the project universe is 216 domestic facilities.

To determine whether FEAPs complied with requirements, from the project universe of 216 facilities, OIG removed any facility that housed fewer than 10 individuals, resulting in a target universe of 104 facilities. From the target universe, OIG excluded facilities that did not have a written FEAP that was certified in FY 2021. OIG also excluded the five operationally sensitive facilities because the Designated Official or senior Department official at those facilities may choose not to disclose certain information in a FEAP. These adjustments resulted in 63 written FEAPs.

To determine whether FEAPs were certified in a timely manner, from the project universe of 216 facilities, OIG removed any facility that housed no personnel (e.g., parking garages), resulting in 131 facilities. OIG combined any facilities that shared one FEAP. For example, the Foreign Service Institute, which has several buildings, has one FEAP. OIG also excluded any location that had certified its first FEAP in 2021, no longer housed Department personnel, or was under construction. These adjustments resulted in a target universe of 98 FEAPs.

OIG selected six facilities for testing the completeness, accuracy, and executability of FEAPs as well as determining individuals' awareness of applicable FEAPs' details and whether personnel had been trained and drilled to effectively respond to emergencies. Starting with the target universe of 104 facilities, OIG considered two risk factors for facilities: (1) housing 50 or more individuals and (2) being located in states that have experienced emergencies in at least three of the following categories: civil unrest, active shooter incidents, tornadoes, and earthquakes. OIG focused on the states with the highest number of emergencies in the identified categories since 2000: California (64), Florida (38), Texas (35), Pennsylvania (27), New York (23) Kentucky (23), Illinois (19), Washington (18), and Colorado (17). From these 9 states, the target universe of facilities that housed 50 or more individuals was 19.

OIG used nonstatistical sampling to select six facilities by focusing on facilities that had a written FEAP certified in 2021. OIG also selected locations with different facility sizes⁵ and ownership status (i.e., government-owned, Department-owned, or commercially leased). Based

⁵ OIG considered those facilities that house fewer than 100 individuals to be small facilities, 100 to 199 individuals to be medium facilities, and 200 or more individuals to be large facilities.

on these factors, OIG selected six domestic facilities for testing. Table A.2 details the facilities selected and reviewed for this audit.

Table A.2: Facilities Selected for Testing by Facility Type and Size

Facility Type	Small	Medium	Large
Government-Owned	Phillip Burton Federal Building, San Francisco, CA		Leland Federal Building, Houston, TX
Department-Owned		Florida Regional Center, Oakland Park, FL	Kentucky Consular Center, Williamsburg, KY
Leased	401 W. A Street, San Diego, CA	5 th & Yesler Building, Seattle, WA	

Source: OIG-generated using facility data obtained from the Office of Real Property Management and OEM.

Prior Office of Inspector General Reports

During this audit, OIG reported in an April 2022 Management Assistance Report that, as of October 2021, some domestic facilities that required a FEAP did not have a FEAP.⁶ Specifically, 8 (6 percent) of 133 domestic facilities used by the Department did not have a FEAP. This deficiency occurred, in part, because OEM did not have formal, documented standard operating procedures to identify facilities that require a FEAP. OIG concluded that, because FEAPs provide guidance to a facility's occupants to prevent or minimize injury, loss of life, and property damage, Department personnel working at these eight facilities were at increased risk in the event of an emergency without the guidance provided by a FEAP. In addition, OIG reported that 4 (22 percent) of 18 facilities that should have had written FEAPs had oral FEAPs instead. One reason for this deficiency was that OEM's annual facility personnel count verification process did not trigger the need for the appropriate type of FEAP in accordance with OEM guidance. As a result, the four facilities did not have the required amount of documented information meant to guide Department personnel through specific actions and responses during emergencies. OEM took prompt action to address the nine recommendations offered and, as of June 2022, all recommendations had been implemented and closed.

⁶ OIG, *Management Assistance Report: Improvements Needed in Procedures for Emergency Action Planning at Selected Department of State Domestic Facilities* (AUD-SI-22-27, April 2022).

APPENDIX B: BUREAU OF ADMINISTRATION RESPONSE



United States Department of State

Washington, D.C. 20520

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August 26, 2022

MEMORANDUM

TO: OIG/AUD – Norman P. Brown

FROM: A/OEM – Troy M. Taylor

SUBJECT: OIG Draft Report: Audit of Department of State Emergency Action Plans at Selected Domestic Facilities

Thank you for the opportunity to provide a response to the subject report. The point of contact for this report is Andrea Giuliano (GiulianoAM@state.gov).

A/OEM response to OIG Recommendations

OIG Recommendation 1: “OIG recommends that the Bureau of Administration revise the orientation guidance in the written facility emergency action plan template instructions to include guidance on informing personnel about the availability of training resources for general emergency preparedness and for specific scenarios, such as active shooter incidents.”

Management Response (08/26/2022): A/OEM partially concurs. The Facility Emergency Action Plan hosts information on active shooter response actions within the plan as well as links to additional materials and trainings via A/OEM's ePrepare site. The FEAP is available to all Department employees via the SharePoint. Additionally, A/OEM disseminates active shooter awareness materials at various outreach events such as Active Shooter Town Halls and the annual Preparedness Fair, as well as to bureau executive directors. Early in 2022, A/OEM provided all Designated Officials (DOs), Senior Department Officials (SDOs), Occupant Emergency Coordinators (OECs), and bureau executive directors, via email, an A/OEM Preparedness Resources document providing a one-stop-shop

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outlining all emergency preparedness resources A/OEM offers including, but not limited to, trainings, exercises, and emergency planning support. Due to the challenges brought about by COVID-19 and the hybrid environment, many personnel had forgotten previous preparedness training and/or let currencies lapse due to other priorities. In April 2022, due to the return to the office with the shift in workforce posture to “all functions,” a letter was sent from the A Bureau Assistant Secretary to all DOs and SDOs regarding the requirement to take DO 101. A/OEM has also included information regarding available training on its el’prepare website, the FEAP splash page, and within the DO 101 and Occupant Emergency Organization (OEO) trainings. Additional training information will be included in FEAP guidance documentation as a part of the FEAP program update. The efforts will be sustained as A/OEM continues its outreach campaign for employee preparedness.

OIG Recommendation 2: “OIG recommends that the Bureau of Administration (a) direct Department of State domestic facilities that did not conduct a fire drill in either 2020 or 2021 to conduct the required fire drill in 2022 and (b) verify their compliance.”

Management Response (08/26/2022): A/OEM concurs. In April 2022, the A Bureau Assistant Secretary sent a letter to all DOs and SDOs requiring that they conduct a fire drill before the end of 2022. This is an A/OPR function that is underway. A/OEM is tracking to verify completion.

OIG Recommendation 3: “OIG recommends that the Bureau of Administration revise the written facility emergency action plan template to include language promoting the implementation of the best practice identified during this audit that

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involves small group emergency procedure training sessions. Specifically, this involves implementing partial evacuation sessions during which an official walks personnel through the evacuation procedures.”

Management Response (08/26/2022): A/OEM concurs. Best practices and examples of possible DO/SDO led facility drills will be included in new DO and SDO reference materials as a part of the FEAP program update. In the interim, A/OEM has posted examples/ideas of drills on the ePrepare site for DO and SDO use.

OIG Recommendation 4: “OIG recommends that the Bureau of Administration revise its standard operating procedures to comply with the federal requirement that agencies review plans annually.”

Management Response (08/26/2022): A/OEM concurs and has updated the language in the internal standard operating procedures to specify “annually” vice one calendar year from the last date of certification to better align with language from the federal requirement. As a part of the FEAP program update, A/OEM is making the annual review/certification requirements clearer.

OIG Recommendation 5: “OIG recommends that the Bureau of Administration develop and implement a quality control process to ensure the accuracy of reported facility emergency action plan certification data.”

Management Response (08/26/2022): A/OEM concurs. A quality control process has been implemented whereby the team lead confirms the accuracy of the certification and then sends the data to leadership for concurrence prior to reporting it. A/OEM is seeking to remove the potential for human error in the future by automating the process to calculate quarterly facility emergency action

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plan certification data as a part of the system requirements for the Domestic Emergency Planning System (DEPS), the domestic version of PEGASYS.

OIG Recommendation 7: “OIG recommends that the Bureau of Administration revise the written facility emergency action plan template and template instructions to require that facility emergency action plans address general procedures for individuals requiring assistance due to a medical condition, injury, or existing disability during an emergency.”

Management Response (08/26/2022): A/OEM partially concurs. A/OEM maintains that this responsibility to develop a support plan external to the FEAP is a requirement for DOs and personnel supervisors in coordination with GTM/OAA. As a part of the FEAP program update, A/OEM is already addressing this recommendation by working with GTM/OAA to determine the appropriate level and type of input needed in the FEAP instructions to meet the needs of individuals with access and functional needs while complying with legal and PII restrictions. Revising the current SharePoint FEAP template runs a high risk/probability of crashing the site due to unresolvable coding errors due to archaic coding language of the customized SharePoint site that is not compatible. Should this occur, we would have no FEAP capability until the Domestic Emergency Planning System (DEPS), the domestic version of PEGASYS, is operational in approximately six months.

OIG Recommendation 8: “OIG recommends that the Bureau of Administration, in coordination with the Kentucky Consular Center, evaluate possible shelter-in-place locations at the Kentucky Consular Center that can accommodate all personnel at the facility.”

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Management Response (08/26/2022): A/OEM concurs and has worked with the Kentucky Consular Center to update their shelter-in-place guidance - documentation available upon request.

OIG Recommendation 9: “OIG recommends that the Bureau of Administration, in coordination with the San Diego Passport Agency, evaluate possible shelter-in-place locations at the San Diego Passport Agency that are accessible to all personnel at the facility.”

Management Response (08/26/2022): A/OEM concurs and has worked with the San Diego Passport Agency to update their shelter-in-place guidance - documentation available upon request.

OIG Recommendation 10: “OIG recommends that the Bureau of Administration (a) reconcile the facility emergency action plan (FEAP) template and template instructions with all applicable federal and Department requirements, (b) identify all applicable differences, and (c) revise the FEAP template and template instructions accordingly.”

Management Response (08/26/2022): A/OEM concurs and has completed an assessment of all applicable legal, federal, and Department requirements and is using this to confirm and update data requirements for use in the FEAP program update and the development of the Domestic Emergency Planning System (DEPS), the domestic version of PEGASYS. The new FEAP template is under construction and is currently in draft form for development and programming of DEPS. Revising the current SharePoint FEAP template runs a high risk/probability of crashing the site due to unresolvable coding errors due to archaic coding language of the customized SharePoint site that is not compatible. Should this occur, we

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would have no FEAP capability until the Domestic Emergency Planning System (DEPS), the domestic version of PEGASYS, is operational in approximately six months.

OIG Recommendation 11: “OIG recommends that the Bureau of Administration revise the written facility emergency action plan template and template instructions to state that the facility emergency action plans should be updated to ensure accuracy whenever conditions or situations change.”

Management Response (08/26/2022): A/OEM concurs and has added the following to the FEAP splash page - “FEAPs can be updated anytime during the year to ensure accuracy whenever conditions, situations, or personnel change.” Requirements development is ongoing for the Domestic Emergency Planning System (DEPS), the domestic version of PEGASYS, and the ability to update the FEAP whenever conditions or situations change is included in the development requirements.

OIG Recommendation 12: “OIG recommends that the Bureau of Administration (a) determine the appropriate frequency of emergency response meetings that Designated Officials are required to conduct, (b) retain or revise the current frequency, and (c) revise the written facility emergency action plan template and template instructions to alert officials.”

Management Response (08/26/2022): A/OEM partially concurs. There is no legal, federal, nor Department mandate for emergency response meetings. 29 CFR 1910.38f requires an employer to review the emergency action plan with each employee covered under the plan and 41 CFR 102-74.240b requires federal agencies to review plans and organizations annually and assist in training

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personnel. While it is important to note that the “Training and Exercise” intranet site is not a policy location for plans-related requirements, A/OEM has addressed this inconsistency and removed the verbiage from the intranet site. A/OEM addresses the annual requirements with DOs and SDOs during DO 101 training.

OIG Recommendation 13: “OIG recommends that the Bureau of Administration revise the written facility emergency action plan template to require facilities to develop self-identification procedures for individuals who need assistance during an evacuation or shelter-in-place event.”

Management Response (08/26/2022): A/OEM partially concurs. A/OEM is already working with GTM/OAA to amplify the current GTM/OAA self-identification process that has been available in the FEAP template using form DS4126 to DOs and SDOs, and to determine the appropriate level and type of input needed in the FEAP instructions to meet the needs of individuals with access and functional needs while complying with legal and PII restrictions. It is the DO’s/supervisor’s responsibility to work with the employee and GTM/OAA to develop a support plan, which is in addition to the self-identification process and separate from the FEAP.

OIG Recommendation 14: “OIG recommends that the Bureau of Administration revise the written facility emergency action plan (FEAP) template and template instructions to state that facilities must indicate in the FEAP whether there are individuals who need assistance during an evacuation or shelter-in-place event regardless of whether the individuals complete Form DS-4126.”

Management Response (08/26/2022): A/OEM concurs and is including this in the update of the FEAP program and the development of the Domestic Emergency

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Planning System (DEPS), the domestic version of PEGASYS. Revising the current SharePoint FEAP template to give an indicator in the FEAP if there is an individual needing assistance in an emergency runs a high risk/probability of crashing the site due to unresolvable coding errors due to archaic coding language that is not compatible. Should this occur, we would have no FEAP capability until DEPS is operational.

OIG Recommendation 15: “OIG recommends that the Bureau of Administration replace the nonworking hyperlink for Form DS-4126, Emergency Planning Assistance Request, with an accessible hyperlink in the written facility emergency action plan template.”

Management Response (08/26/2022): A/OEM concurs and has fixed this broken link on the FEAP splash page and within the FEAPs as this was not a coding issue within the FEAP SharePoint.

OIG Recommendation 16: “OIG recommends that the Bureau of Administration revise the written facility emergency action plan template and template instructions to provide alternative methods for obtaining critical occupant information from all Department of State bureaus and offices present in a facility.”

Management Response (08/26/2022): A/OEM partially concurs. This data is not a legal, federal, or domestic requirement for FEAPs. However, A/OEM has addressed this recommendation for the future and will be including occupant information in the Domestic Emergency Planning System (DEPS), the domestic version of PEGASYS, in support of DO planning efforts. A requirement of the new system is the ability to automatically import data from Safety and Accountability For Everyone (SAFE). Furthermore, A/OEM will include a

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recommendation in the FEAP program update that additional information can be found on myProfile to verify the SAFE data and support planning efforts. Revising the current SharePoint FEAP template runs a high risk/probability of crashing the site due to unresolvable coding errors. Should this occur, we would have no FEAP capability until DEPS is operational.

OIG Recommendation 17: “OIG recommends that the Bureau of Administration revise the Facility Emergency Action Plan Standard Operating Procedures to include, at a minimum, federal requirements as the elements that should be specifically reviewed by the Office of Emergency Management, Policy and Planning Division, Facility Emergency Action Plan Coordinator.”

Management Response (08/26/2022): A/OEM concurs and has updated the internal standard operating procedure to include the specific instructions to review the federal requirements from CFR 1910.38(c) as a part of for the FEAP coordinator’s review.

OIG Recommendation 18: “OIG recommends that the Bureau of Administration design and implement procedures to ensure that the Office of Emergency Management, Policy and Planning Division, Facility Emergency Action Plan Coordinator considers federal requirements when reviewing written facility emergency action plans.”

Management Response (08/26/2022): A/OEM concurs and has updated the internal standard operating procedure to include the specific instructions to review the federal requirements from CFR 1910.38(c) as a part of for the FEAP coordinator’s review.

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OIG Recommendation 19: “OIG recommends that the Bureau of Administration direct the Office of Emergency Management (OEM) to (a) contact facility emergency action plan points of contact at least 2 months prior to expiration of the facility emergency action plan as required by its standard operating procedures and (b) implement a tracking process showing the date contacted and the expiration date of each facility emergency action plan.”

Management Response (08/26/2022): A/OEM concurs and has implemented a tracking system to ensure timely contact. A/OEM sends reminders out at least two months in advance of the due date which, by practice, is the end of the month in which the plan expires. This requirement was substantively and negatively impacted by limited staffing during the OIG analysis timeframe. Current practices and staffing levels have allowed A/OEM to ensure this two-month requirement is being met and an internal tracker has been developed as a double check on the process. Requirements development for the Domestic Emergency Planning System (DEPS), the domestic version of PEGASYS, includes automation of a FEAP expiration notification email two months prior to plan expiration.

OIG Recommendation 20: “OIG recommends that the Bureau of Administration (a) conduct a review to determine whether requiring facility emergency action plans for facilities where the Department of State is not the primary occupant agency is necessary and, (b) if it is determined that these plans are not necessary, revise its internal guidance accordingly and notify domestic facilities about the policy change.”

Management Response (08/26/2022): A/OEM concurs. An analysis of federal requirements for FEAPs was conducted. A/OEM is changing the duties of the SDO to remove the requirement to develop a separate FEAP. New requirements

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include integration with the appropriate federal agency's DO and emergency organization to ensure Department equities and personnel are included in emergency.

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APPENDIX C: BUREAU OF DIPLOMATIC SECURITY RESPONSE



United States Department of State

Washington, D.C. 20520

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August 25, 2022

INFO MEMO TO ACTING INSPECTOR GENERAL SHAW – OIG

FROM: DS – Carlos F. Matus, Acting 

SUBJECT: Bureau of Diplomatic Security Response to the Office of Inspector General (OIG) Audit of Department of State Emergency Action Plans at Selected Domestic Facilities

Below is the Bureau of Diplomatic Security's response to recommendation #6 of the subject report.

Recommendation #6: OIG recommends that the Bureau of Diplomatic Security issue guidance to its domestic bureau offices stating that, when they are not the primary bureau in a facility, they must participate in the primary bureau's facility emergency action plan development process.

DS Response (08/25/2022): DS concurs with recommendation # 6. A DS/EX emergency management web site was recently established at (<https://usdos.sharepoint.com/sites/DS/DS/EX/SitePages/EMP.aspx>), the web site provides direct access to Facility Emergency Action Plans (FEAPs) for facilities that have a DS presence as well as links to various web sites related to emergency management and response, such as the Federal Emergency Management Agency, the Centers for Disease Control, and the National Weather Service. Additionally, the site has links to information sheets providing advice on dealing with various emergency situations, such as extreme weather, technological emergencies, and terrorist incidents

The main page of the web site states: "We recommend that staff who are at facilities where DS is not the lead agency to reach out to the Designated Official (DO), the Deputy Designated Official (DDO), or the Occupant Emergency Coordinator (OEC) for their facility for information on emergency plans and procedures at their facility." The DO, DDO, and OEC are listed in the FEAP for each facility.

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We also recommend that staff become familiar with emergency exits, evacuation plans, and rally points for their facility as well as participating in the emergency drills and exercises for their facility.

DS requested the web site wording be updated to: "We also recommend that staff become familiar with emergency exits, evacuation plans, and rally points for their facility as well as participate in the emergency drills and exercises for their facility. Additionally, DS staff should participate in the Facility's Security Committee meetings and the senior DS official must participate in the facility's emergency action plan development process."

We will be requesting that this also be added to the on-boarding process for new DS staff.

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Approved: DS – Carlos F. Matus [CFM]

Analyst: DS/MGT/PPD – Peggy Brown

Cleared: DS/DSS – KBauer (OK)
DS/EX – EDillenbeck (OK)
DS/EX/MGT – JMater (OK)
DS/MGT/PPD – RReisman (OK)
DS/MGT/PPD – DMurphy (OK)
DS/EX/EM – JHowson (OK)
M – MPaschke (OK)
M/SS – HJimenez (OK)
A – CSappenfield (OK)
A/OEM – MHarris (OK)

ABBREVIATIONS

C.F.R.	Code of Federal Regulations
DS	Bureau of Diplomatic Security
FAM	Foreign Affairs Manual
FEAP	facility emergency action plan
OEM	Office of Emergency Management
OIG	Office of Inspector General
PPD	Policy and Planning Division

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