

GAO

Report to the Chairman, Committee on
Government Reform, House of
Representatives

September 2004

HOMELAND SECURITY

Effective Regional Coordination Can Enhance Emergency Preparedness



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Highlights of [GAO-04-1009](#), a report to Chairman, Committee on Government Reform, House of Representatives

Why GAO Did This Study

As requested, GAO reviewed coordination practices in various metropolitan areas to find regional programs with lessons learned that could be applied in the National Capital Region (NCR) and elsewhere. We addressed the following questions:

- (1) In selected metropolitan areas, what factors enhance regional coordination?
- (2) What features of federal programs enhance regional emergency preparedness coordination?
- (3) How does regional coordination for emergency preparedness in the NCR incorporate features from other areas and federal programs?

For detailed analysis, we selected Dallas, Los Angeles, New York, Philadelphia, San Francisco, and Tampa-St. Petersburg—considered by DHS to be high-threat urban areas because of their population and critical infrastructure, among other factors. We also analyzed regional coordination in the planning and implementation of transportation and environmental programs because of their history of requiring such collaboration.

DHS and the District of Columbia's Deputy Mayor/City Administrator generally agreed with our report regarding the characteristics of regional coordination and that the NCR's Urban Area Security Initiative governance structure was relatively advanced.

www.gao.gov/cgi-bin/getrpt?GAO-04-1009.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Patricia A. Dalton at (202) 512-6806 or daltonp@gao.gov.

HOMELAND SECURITY

Effective Regional Coordination Can Enhance Emergency Preparedness

What GAO Found

GAO's analysis of federal program documents and plans, and interviews with federal, state, and local officials in six metropolitan areas revealed several factors that characterize effective regional coordination of federally supported efforts. Regional coordination efforts are enhanced by the presence of a collaborative regional organization that includes representation from many different jurisdictions and different disciplines. Also, when regional civic and political traditions foster interjurisdictional coordination, flexibility in the membership and geographic area of the regional organization can enhance collaborative activities. In addition, a comprehensive strategic plan with measurable goals and objectives helps focus resources and efforts to address problems. Finally, funding regional organizations provides incentives for their collaborative planning activities.

The federal government can provide support for regional coordination. In particular, through its grant design and requirements, it encourages structures and practices associated with effective regional efforts. For example, federal transportation law requires the existence of metropolitan planning organizations (MPO) before transportation funds can be awarded. Some programs have recognized the importance of flexibility by allowing local jurisdictions to organize themselves in ways consistent with their regional environment. For example, the DHS' Urban Area Security Initiative (UASI) grant program allowed three San Francisco Bay programs to pool some of their grant resources to establish a regionwide UASI effort. Moreover, some federal grants require regional organizations to prepare plans that guide funding decisions. Transportation law, for example, requires MPOs to prepare transportation improvement plans as a condition for awards. Finally, federal financial support can facilitate coordination activities. Several programs, including the MPO program, provide such support.

The characteristics of effective regional coordination we identified are applicable to the NCR's efforts to coordinate emergency preparedness. If implemented as planned and as observed in its early stage, the NCR's UASI program would include a collaborative regional organization. However, as we reported in May 2004, the NCR did not include a full array of homeland security grants in its planning. The NCR's UASI program plans to address those issues by identifying non-UASI funding sources and collecting information about the funding allocations, expenditures, and purposes, as well as data on spending by NCR jurisdiction. DHS and UASI officials believe these data will enable program managers to avoid duplication of expenditures and to better utilize program funds.

Regional approaches are changing quickly, and the nation is still in the early stages of building regional institutions across the country to deal with homeland security issues. Those important developments warrant continued congressional monitoring and oversight.

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Abbreviations

CAOs	Chief Administrative Officers' Committee
D.C.	District of Columbia
DHS	U.S. Department of Homeland Security
DOT	U.S. Department of Transportation
EPA	U.S. Environmental Protection Agency
EPC	Emergency Preparedness Council
GAO	Government Accountability Office
MPO	Metropolitan Planning Organization
MWCOG	Metropolitan Washington Council of Governments
NAPA	National Academy of Public Administration
NCR	National Capital Region
NCTCOG	North Central Texas Council of Governments
ONCRC	DHS' Office of National Capital Region Coordination
SPG	Senior Policy Group
TBEP	Tampa Bay Estuary Program
TEW	Terrorism Early Warning Group
TRANSCOM	Transportation Operations Coordinating Committee
UASI	Urban Areas Security Initiative

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United States Government Accountability Office
Washington, D.C. 20548

September 15, 2004

The Honorable Tom Davis
Chairman
Committee on Government Reform
House of Representatives

Dear Mr. Chairman:

Particularly since the events of September 11, 2001, regional approaches have been recognized as a key way to address the threat of terrorism. In many urban areas, the threat of terror is regionwide, and resources for responding to that threat are distributed among many jurisdictions. Therefore, the most effective responses are coordinated and planned across the region, rather than being jurisdiction-specific. The complexity of multijurisdictional urban areas—such as the National Capital Region (NCR), composed of Washington, D.C., and numerous surrounding jurisdictions in Maryland and Virginia—with a range of potential terrorism targets, presents significant challenges to coordinating the development of effective homeland security programs.¹

Following the initial allocation of billions of dollars to first responders after September 11, 2001, the need to address the threat of terrorism from a regional perspective began to be a focus of federal policy. The Department of Homeland Security's (DHS) Urban Area Security Initiative (UASI) allocated hundreds of millions of dollars to urban areas that were considered to be at a high risk for a terror attack. In fiscal year 2003, DHS granted seven high-threat metropolitan regions² UASI funding to address the unique needs of emergency preparedness and response in large urban areas. Each of these areas covered multiple city/county jurisdictions, and two (New York City and the NCR) covered more than one state. In May 2003 DHS announced an additional total of \$500 million to augment the

¹ Section 882 of the Homeland Security Act of 2002 (Pub. L. No. 107-296 (Nov. 25, 2002)) incorporates the definition of the NCR from 10 U.S.C. 2674(f)(2) as the geographic area consisting of the District of Columbia; Montgomery and Prince George's Counties in Maryland; Arlington, Fairfax, Loudoun, and Prince William Counties and the City of Alexandria in Virginia; and all cities and other units of government within those jurisdictions.

² In addition to the NCR, the Chicago, Houston, Los Angeles, New York, San Francisco, and Seattle areas were designated as high-risk urban areas during the first round of UASI funding in fiscal year 2003.

original UASI areas' funding and provide funding for 23 more areas. Fiscal year 2004 funding was announced November 2003 to continue the thirty 2003 UASI programs and to fund an additional 20 areas.

In May 2004, we reported on the management by NCR jurisdictions and the DHS' Office of National Capital Region Coordination (ONCRC) of approximately \$340 million in first responder grants during fiscal years 2002 and 2003.³ We found that managers of first response agencies—police and fire, for example—as well as federal and state emergency preparedness agencies did not have national preparedness standards to assess existing first responder capabilities, gaps in those capabilities, and progress made in achieving performance goals. Similarly, those agencies had no regionwide, comprehensive, strategic plan for establishing first responder preparedness goals, needs, and priorities. Finally, the agencies had no consolidated, readily available source of information on (1) the amount of first responder grants available to each jurisdiction, (2) budget plans or criteria used to determine spending priorities, and (3) data on funds expended from the various sources. Without these components, the federal grants were difficult to manage in a way that enabled first response agencies to pursue and monitor goals and objectives.

As you requested, we followed up our NCR work with this review of coordination practices in various other metropolitan areas around the nation, with an emphasis on identifying characteristics of successful regional coordination that could be applied in the NCR and elsewhere. We agreed to address the following questions:

1. In selected metropolitan areas, what factors enhance regional coordination?
2. What features of federal programs enhance regional emergency preparedness coordination?
3. How does regional coordination for emergency preparedness in the NCR incorporate features from other metropolitan areas and federal programs?

³ GAO, *Homeland Security: Management of First Responder Grants in the National Capital Region Reflects the Need for Coordinated Planning and Performance Goals*, GAO-04-433 (Washington, D.C.: May 28, 2004).

We selected six metropolitan areas in which to examine regional coordination: Dallas-Fort Worth, Los Angeles, New York City, Philadelphia, the San Francisco Bay Area, and Tampa-St. Petersburg. We selected these locations based on such factors as their vulnerability to terror events indicated by the presence of potential targets, such as critical infrastructure and important federal and commercial facilities. We also selected metropolitan areas with a large number of regional jurisdictions that indicated a level of complexity in approaching emergency preparedness from a regional perspective. Within each area, we examined certain federal programs—such as metropolitan planning organizations (MPO), regional estuary preservation efforts, and UASI, which require regional coordination. We included in our analysis nonemergency preparedness programs, such as transportation planning (involving MPOs) that have existed for decades and have developed their own regional organizations and planning practices. Examining such programs can provide insights into how to structure regional homeland security efforts, which are relatively new, in the aftermath of the September 11, 2001, terror attacks.

We met with and obtained documentation from mayors' offices, city and/or county offices of emergency management, state emergency management offices, regional planning councils, or MPOs; other regional bodies, offices, and task forces; and program directors for selected programs that require coordination. We also contacted officials of the responsible federal agencies, including DHS, the Department of Transportation (DOT), and the Environmental Protection Agency (EPA). We reviewed relevant reports, studies, and guidelines on homeland security and emergency preparedness.

We conducted our review from July 2003 to September 2004 in accordance with generally accepted government auditing standards. See appendix I for more details on our scope and methodology.

Results in Brief

Regionally coordinated and planned programs have existed in such fields as transportation and environmental planning for decades. For example, the metropolitan transportation planning model came into being in response to federal transportation planning requirements in the 1960s. In contrast, homeland security is a relatively new public policy field, emerging in prominence after the terror attacks of September 11, 2001. According to our work in six metropolitan areas, several factors characterize effective regional coordination in those regions.

-
- Regional organizations that include representation from many different jurisdictions and diverse stakeholders serve as structured forums for these parties to discuss public policy problems and agree on possible solutions. These organizations exist in metropolitan regions for a variety of purposes—for example, to coordinate transportation planning or clean water initiatives. Decisions made collaboratively are likely to have broader support than those that are unilateral. For example, federal transportation law requires metropolitan planning organizations (MPO) with multijurisdictional representation to work together to agree on a regional transportation plan and allows the use of federal funding for such planning. For example, in the NCR, the Metropolitan Washington Council of Governments (MWCOC) promotes collaborative transportation decision making by requiring the majority of the area's multijurisdictional board to support a regional transportation improvement plan. Agreements on such projects as road improvements associated with rebuilding the Woodrow Wilson Bridge were approved by the MWCOC Transportation Planning Board and included in the transportation plan for federal funding.
 - Where regional collaboration is encouraged by the leadership and political traditions of state, regional, and local entities, flexibility for regional organizations to establish their membership requirements and collaborative processes is important. Such flexibility helps regional organizations function effectively in the existing political and civic environment by allowing them to expand the scope of the collaborative activities; under these circumstances, overly prescriptive requirements could impede effective coordination. For example, emergency preparedness officials in the San Francisco Bay area told us that first responder agencies in that area have a longstanding tradition of interjurisdictional coordination. However, in our view, in cases where state and local traditions do not engender interjurisdictional collaboration, more prescriptive requirements regarding regional group members, decision-making processes, and planning can establish minimum thresholds for those activities and may provide an incentive for regional coordination.
 - Strategic plans developed by regional organizations can be effective tools to focus resources and efforts to address problems. Effective plans often contain such features as goals and objectives that are measurable and quantifiable. These goals and objectives allow problems and planned steps to be defined specifically and progress to be measured. For example, according to Tampa Bay Estuary Program

officials, the involvement of federal, state, and local government partners, environmentalists, and the private sector in proposing and implementing solutions to cleaning up Tampa Bay ensures agreement on technically sound plans that are based on measurable goals and objectives. An agreement involving state and local agencies, as well as industry, committed these parties to specific actions to achieve those goals, including an overall goal of restoring sea grasses to the conditions of about 50 years ago. By specifying goals and objectives, plans can also give planners and decision makers a structure for allocating funding to those goals and objectives. Moreover, the application of standards, where existent, can focus the strategic planning process by allowing planners to measure the current status (baseline) of performance, express measurable goals, and identify any gaps between the baseline and goals.⁴

The federal government can provide support for regional coordination. In particular, through its grant design and requirements, the government encourages structures and practices associated with effective regional efforts.

- Some federal programs support the existence of regional organizations that reach collaborative decisions, and several federal programs require the grantee to establish such an organization before it can receive federal funds. For example, under federal transportation law, all transportation improvement plans must be prepared by MPOs prior to the allocation of highway and transit funds. To avoid one party or type of party being overrepresented in the regional group or wielding too much power, some federal programs define acceptable requirements for the group and the associated planning processes.
- Some federal grants allow local jurisdictions the flexibility to organize themselves in ways consistent with their regional environment. For example, in fiscal year 2003, the Dallas UASI region as defined by DHS included the City of Dallas and its contiguous counties, but not Tarrant County, Texas. Many regional, state, and city officials felt that Tarrant County should be included in the UASI planning. To address this issue, the state of Texas provided funding to Tarrant County from the 20

⁴ Preparedness standards include functional standards for equipment, such as personal protection suits; performance standards, such as the number of persons per hour that could be decontaminated after a chemical attack; and best practice benchmarks, if applicable.

percent of UASI funding that was not passed through to the City of Dallas. On the other hand, if the regional environment is not friendly to collaboration, then federal grantor agencies can specify minimum requirements for a regional organization and procedures that elicit collaborative decisions.

- Some grants require a strategic plan as a precondition for receiving federal funds, but to be effective the plans should include measurable goals and objectives. In addition, clear standards help to guide the progress toward measurable objectives. For example, MPOs must show that metropolitan transportation plans and programs conform to the goals of the state (air quality) implementation plan for the region. Reducing transportation emissions in the metropolitan planning process is usually achieved by a combination of new construction, system improvements, and demand reduction measures.
- We also found that federal funding targeted at collaborative regional groups can encourage regional coordination. For example, federal transportation funds pay for the coordination activities of MPOs.

Our observations about regional coordination in the implementation of federal programs in metropolitan areas we visited are applicable to the efforts to coordinate homeland security efforts in the NCR. Based on planning documents obtained from officials of the NCR's regional UASI governance structure and observations of the early stages of the program,⁵ the region's UASI program would have some elements of successful regional coordination, if the plans were fully implemented. For example, the NCR is beginning to use regional working groups—the Emergency Preparedness Council and the Chief Administrative Officers Committee, among others—to bring stakeholders together to agree upon goals and to consider funding for regional emergency preparedness. However, at the time of our May 2004 report, the NCR had not applied this regional coordination structure and plans to the full array of federal homeland

⁵ According to current plans, the NCR's UASI governance structure includes the Emergency Preparedness Council (EPC) and Chief Administrative Officers (CAO) Committee, and the Senior Policy Group (SPG). The EPC contains representation from various first response disciplines, several regional jurisdictions, the private sector, and the nonprofit sector, among others. The CAOs represent the city and town managers and county executives of the 19 jurisdictions. The SPG represents the governors of Maryland and Virginia, the mayor of Washington, D.C., and the Department of Homeland Security and has final budget authority over UASI-related emergency preparedness projects for the NCR.

security grants, totaling about \$340 million. Moreover, the regional UASI plan would not be based on any preparedness standards. In commenting on a draft of this report and as discussed at a September 1, 2004, meeting of the UASI Senior Policy Group and Chief Administrative Officers, DHS noted that the governance structure is in place and being used to reach decisions for homeland security programs in the region, including a broadening of the UASI decision-making process to consider funding sources other than UASI. The governance structure is developing information, including a centralized database to be implemented fully by 2005, that would provide information on non-UASI emergency preparedness funds available, allocated, and expended; the reasons for their allocations; and to which jurisdictions they were distributed. Having these data would help the UASI governance structure avoid funding duplications and leverage UASI funds to extend preparedness efforts to the entire region.

In summary, the federal government can encourage regional coordination through its grant programs. Regional organization structures, flexibility to account for local conditions, and strategic planning are key characteristics of regional coordination. Given the important role that regional planning and governance can play in improving national preparedness, these developments warrant continuing congressional oversight.

We provided a draft of this report to DHS and officials of the NCR's UASI governance structure for their review and comment. According to DHS, the report contains information that will be valuable to communities across the country as DHS encourages regional coordination and capability building. DHS stated, however, that the governance structure is currently active in the NCR—not proposed or interim—and is acting to enhance emergency preparedness decision making and planning in the region. As appropriate, we added information in our report to reflect these refinements to the NCR's governance structure. The Deputy Mayor/City Administrator, Washington, D.C., also provided comments. Similar to DHS, he stated that the NCR's governance structure reflected the building of a great deal of the foundation for meeting the domestic preparedness challenges that affect the area. In addition, he said that the NCR is unique compared to the six metropolitan areas we chose for detailed analysis because only the NCR (1) involves two states and a governmental entity that combines state and local functions; (2) contains monuments and memorials that are the most visible symbols of our national strength and patriotism; and (3) is the seat of the federal government, creating a partnership between the national government and NCR state and local

governments. While we agree that the NCR is an important and unique urban area, the areas we chose for detailed analysis contain comparable features.

The Deputy Mayor/City Administrator also stated that the National Estuary Program incorporates clean water standards and scientific solutions to accomplish clean water. He stated that the federal homeland security strategies and plans are not based on proven standards and solutions. Hence, he concluded that the estuary program is not comparable with federal homeland security strategies and plans. We agree that the National Estuary Program is based on existing standards and solutions; indeed, our report notes that for the most part, standards are not yet extant for homeland security efforts. However, the application of standards in the planning and implementation of the National Estuary Program is the very reason we chose to explore and elaborate upon it. Our report notes that the preparation and implementation of plans that have goals and objectives that are actionable and measurable—frequently based on the application of standards—is a key factor in the success of regionally coordinated programs.

Background

Historically, the American governance system, divided into federal, state, and local jurisdictions, does not provide a natural vehicle for addressing public policy issues from a regional, multijurisdictional perspective. The autonomy of local jurisdictions and competing priorities within and among them can make regional coordination difficult. Efforts that seek to overcome these challenges to coordinate regionally must take into account the different operational structures and civic traditions of states and municipalities. For example, states differ in their relationship to local governments and their promotion of regional infrastructures. Local municipalities differ in their history of multijurisdiction cooperation. Some local jurisdictions have histories of mutual aid agreements and working together, while in other regions federal homeland security programs may be bringing partners together across jurisdictions to conduct planning efforts for the first time.

As used in this report, regional coordination refers to the use of governmental resources in a complementary way toward goals and objectives that are mutually agreed upon by various stakeholders in a region. Regional coordination can also help to overcome the fragmented nature of federal programs and grants available to state and local entities. Successful coordination occurs not only vertically among federal, state,

and local governments but also horizontally within regions. The effective alignment of resources for the security of communities could require planning across jurisdictional boundaries; neighboring jurisdictions may be affected by an emergency situation in many potential ways, from implementation of mutual aid agreements, to accepting evacuated residents, to traffic disruptions.

Our work has previously noted the concerns of state and local governments about fragmented federal grant programs with burdensome application processes that are complicated by the inconsistency across programs.⁶ State and local governments manage multiple funding sources for distinct but often similar purposes. For instance, GAO identified 25 emergency preparedness programs that provided funding to the NCR.⁷ The short history of regional coordination for homeland security is characterized by attempts of federal, state, and local governments to overcome a fragmented federal grant system and local jurisdictional barriers to assess needs, fill gaps, and plan for effective prevention and emergency response.

GAO has consistently called for the development of a truly national, rather than purely federal, strategy.⁸ For example, in testimony given in 2003, GAO highlighted multiple barriers to addressing one basic area of preparedness—interoperable communications systems—including the lack of effective, collaborative, interdisciplinary, and intergovernmental planning.⁹ Another GAO study of bioterrorism preparedness found that although progress had been made in local planning, regional planning involving multiple municipalities, counties, or jurisdictions in neighboring

⁶ GAO, *Combating Terrorism: Intergovernmental Cooperation in the Development of a National Strategy to Enhance State and Local Preparedness*, [GAO-02-550T](#) (Washington, D.C.: Apr. 2, 2002).

⁷ GAO, *Homeland Security: Management of First Responder Grants in the National Capital Region Reflects the Need for Coordinated Planning and Performance Goals*, [GAO-04-433](#) (Washington, D.C.: May 28, 2004).

⁸ See [GAO-02-550T](#) and GAO, *National Preparedness: Integration of Federal, State, Local, and Private Sector Efforts Is Critical to an Effective National Strategy for Homeland Security*, [GAO-02-621T](#) (Washington, D.C.: Apr. 11, 2002).

⁹ GAO, *Homeland Security: Challenges in Achieving Interoperable Communications for First Responders*, [GAO-04-231T](#) (Washington, D.C.: Nov. 6, 2003).

states lagged.¹⁰ In July 2002, the President issued the National Strategy for Homeland Security, which emphasized a shared responsibility for security involving close cooperation among all levels of government. To enhance emergency preparedness, the strategy called for systems that avoid duplication and increase coordination to better align public and private resources for homeland security.

With the creation of DHS and the development of the National Strategy, the federal government has developed several programs and provided financial assistance to improve state and local governments' ability to prevent and respond to the threat of terrorism. These grant programs demonstrate a variety of approaches. For example, all states are eligible for the State Homeland Security Grant Program to update and implement their state Homeland Security Strategy. The UASI provides support to metropolitan areas designated by DHS as high-threat areas. The funds are distributed based on a formula that considers critical infrastructure, population density, assessment of threats, and other factors.

DHS' UASI program combines the elements of threat-based assessment and funding with regional planning. UASI programs must create a working group with representation from the region that will be responsible for coordinating development and implementation of program elements. Before funding can be distributed, DHS also requires each UASI program to develop and submit a strategic plan that outlines the region's common goals, objectives, and steps for implementation. The strategy is intended to provide each program with direction for enhancing regional capability and capacity to prevent and reduce vulnerability. UASI funds can be used to purchase a range of goods and services to enhance the preparedness of first responders, including approved equipment, preparedness plans, exercises, and training.

Other federal programs that require regional coordination may be instructive for homeland security. In the area of transportation planning, the federal government has required states to establish MPOs to address regional transportation impact and needs. Established in response to federal planning requirements dating back to 1962, MPOs are multijurisdictional regional bodies composed of local elected officials and public agency representatives who review and approve transportation

¹⁰ GAO, *Bioterrorism: Preparedness Varied across State and Local Jurisdictions*, [GAO-03-373](#) (Washington, D.C.: Apr. 7, 2003).

investments in metropolitan areas as a condition for federal highway and transit funding. In the area of environmental planning, the Clean Water Act directs EPA to develop plans for attaining or maintaining water quality in an estuary system. Congress established EPA's National Estuary Program in 1987 to improve the quality of estuaries of national importance. To be selected for the National Estuary Program, estuaries must be nominated by state governors and demonstrate existing regional infrastructure with the capacity to fulfill the requirements of the Clean Water Act.

Collaborative Organizations and Strategic Planning Foster Regional Coordination

As corroborated by officials with whom we met, collaborative regional organizations that include a wide range of stakeholders from multiple jurisdictions and disciplines contribute to successful regional coordination for a variety of public programs. In addition, effective strategic planning that includes measurable objectives appropriately aligned with resources is necessary for fostering regional approaches that enhance emergency preparedness and achieve other public goals. The application of standards, where existent, to the planning process can help to define and measure a baseline status (e.g., a baseline of preparedness), a desired level of performance (e.g., preparedness levels that are to be achieved), and a gap between the baseline and desired level that would be the focus of a program's efforts.

Regional Organizations and Collaborative Decision-making Process Support Effective Coordination

When regional organizations are structured so that they include a wide range of stakeholders and promote collaborative decision making, they can advance regional coordination by creating a forum for those stakeholders to build rapport, solve problems regarding issues of mutual concern, and engage in information and resource sharing. Collaborative problem identification and problem solving promotes cooperation in planning efforts to address public problems. Collaborative decision making can encourage decisions that preclude one party from dominating decisions about problems, potential solutions, programmatic goals and objectives, and funding allocations; instead, such decisions are made with input from many. Emergency management, transportation, and estuary program officials reported that regional organizations enabled their regions to work together on a variety of emergency preparedness, environmental, and transportation issues. In the emergency preparedness area, the UASI working group in the NCR has achieved multijurisdictional agreement on regional plans that contain 21 specific efforts to be funded in equipment, training, exercises, and planning to improve the NCR's preparedness

regionwide, not just to benefit individual jurisdictions. Also in the NCR, the Metropolitan Washington Council of Governments promotes collaborative transportation decision making by requiring the majority of the area's multijurisdictional transportation planning board to support a transportation plan that specifies projects to be funded that are intended to address the region's traffic congestion and air quality problems—seen as being among the worst in the nation. The region's long-range transportation improvement plan contained agreements on such projects as road improvements associated with rebuilding the Woodrow Wilson Bridge. Similarly, the Tampa Bay Estuary Program has restored a net increase of about 850 acres of sea grasses on the Tampa Bay seabed since the program's inception, or about 6 percent of the 14,000 total acreage to be restored.

Collaborative decisions made by many stakeholders represented in regional organizations can formulate mutually agreed-upon responses to public policy problems. The collaborative experiences we observed in the Dallas-Fort Worth area provided examples of how regional organizations can aid in solving problems. For example, the Dallas-Fort Worth's Regional Emergency Managers Group has served as a forum for the region's emergency preparedness officials to analyze, plan for, and make decisions about various regional initiatives, such as improving interjurisdictional communications interoperability. Within this group, an associated subgroup explored technical issues related to communications interoperability. The Regional Emergency Managers Group evaluated technology options and is creating a regional purchasing plan to facilitate the purchase of interoperable communications equipment. Without interoperable radios and other communications equipment, police and fire departments in different jurisdictions cannot easily communicate when responding to an emergency.

Collaborative efforts through regional organizations can also result in the integration of plans and programs that are implemented by individual jurisdictions. In Dallas-Fort Worth, local first responder agencies built upon the established working relationships and their trust of the local council of governments to enhance regional coordination of homeland security. For example, the City of Dallas contracted with the North Central Texas Council of Governments (NCTCOG) to facilitate the development of the UASI strategy. In addition, most of the jurisdictional and private sector stakeholders had their own emergency preparedness plans that were not integrated. Acting upon a request from local officials, NCTCOG initiated a process to coordinate and integrate these various plans that reflected the

NCTCOG's reputation as an impartial and fair arbiter. The resulting plan identifies the roles of the various first responder agencies across jurisdictional boundaries, thereby increasing the police, fire, and emergency medical resources that can respond to an emergency.

Regional organizations can also facilitate coordination by fostering information and resource sharing. For example, in response to problems coordinating the construction schedules on roads in the New York-New Jersey region, the Port Authority of New York and New Jersey created the Transportation Operations Coordinating Committee (TRANSCOM) in 1986—a coalition of 18 independent transportation and public safety agencies in Connecticut, New Jersey, and New York. TRANSCOM's significance was exhibited on September 11, 2001, when it facilitated efforts among member agencies such as the Port Authority, New Jersey State Police, New Jersey Transit, New Jersey Department of Transportation, and New Jersey Turnpike to reopen a major Manhattan bus terminal to transport thousands of people home.

DHS and state and local emergency management officials have cited the Los Angeles Terrorism Early Warning Group (TEW) as an example of an information-sharing network focused on the prevention of terrorist acts. Created in 1996 by the Los Angeles County Sheriff's Department, the primary focus of TEW is to provide a coordinated and focused response to acts of terrorism based on assessment and dissemination of intelligence information. The core team of TEW includes the Los Angeles Sheriff's Department, Los Angeles Police Department, City and County Fire Departments, Los Angeles County Department of Health Services, and the Federal Bureau of Investigation. Cooperating agencies include about 30 other agencies representing a number of disciplines, such as emergency management, transportation, and criminal justice. As a group, TEW monitors trends and assesses threats that could potentially result in terrorist attacks within Los Angeles County. Because of its ability to develop terror threat information from a variety of sources and disseminate it to first response officials throughout a large metropolitan region, DHS is encouraging states and local agencies to utilize their federal homeland security funding to replicate the Los Angeles TEW model within the framework of their UASI plans.

Where Consistent with Civic and Political Traditions, Flexible Approaches Can Enhance Regional Organizations

Metropolitan regions differ in their civic and political traditions. Some regions have leadership and/or long-running civic and political traditions that promote collaborative efforts. For example, according to national associations and emergency preparedness officials in the San Francisco and Los Angeles areas, fire and emergency services in California jurisdictions have longstanding traditions of coordinating and operating jointly, across city and county lines. This tradition is expressed through a strong mutual aid system. In other regions, however, tradition can work against regional collaboration. In one state we visited, metropolitan transportation planning was characterized by a practice of having one MPO for each county. Officials in the region we visited explained that local development patterns in the region traditionally isolated each county from the next, but in recent decades the counties' development had merged as new migrants moved into the area. As a result, the county-based planning structure may be outdated, because it is based on previously existent development patterns. In response to the lack of a regionwide MPO, the county-based MPOs have formed a regional MPO alliance that includes MPO chairs, representatives from the regional councils of government, and the state transportation department.

To function effectively, regional organizations must take into account the impact of political and civic traditions. In regions where leadership or cultural factors encourage collaborative efforts, regional organizations that are formed locally, instead of being imposed by federal and state government, are more likely to have identified a coherent regional area based upon natural boundaries, population, and established mutual aid relationships. Where appropriate and considering regional leadership or culture, federal or state programs can preserve the benefits of existing, locally formed regional organizations by allowing local jurisdictions to organize together. The following examples illustrate this point:

- Pennsylvania's Counterterrorism Planning, Preparedness and Response Act of 2002 (Act 227) legally established the state's nine regional counterterrorism task forces to coordinate the activities of county law enforcement agencies in addressing terror threats.¹¹ However, in most cases, Pennsylvania allowed counties to divide themselves into regions

¹¹ 2002 Pa. Laws 227. This act codified the task forces, which were administratively created in 1998.

based upon their natural mutual aid alliances, rather than imposing a new organizational boundary.

- In Texas, the Governor requested assistance from regional councils of governments to facilitate a variety of collaborative efforts to build regional emergency preparedness capacity across the state. Specifically, regional councils of governments were able to unite public and private stakeholders to develop, maintain, and coordinate regional emergency preparedness management plans and actions. While many cities, counties, and private sector stakeholders in Dallas-Fort Worth had extensive emergency preparedness plans, many of these plans were not integrated. The North Central Texas Council of Governments played a key role in facilitating emergency preparedness coordination and integrating preparedness plans through its efforts to coordinate and integrate the emergency preparedness initiatives of the metropolitan area. Those efforts culminated in the Regional Emergency Managers meeting—a forum through which emergency managers shared information, discussed best practices and technology, built rapport, and developed mutual aid agreements. At the time of our study, the group was continuing to meet on a quarterly basis and is developing a regional emergency plan and associated schedule for achieving emergency preparedness goals.

Regional leadership or traditions that are focused on achieving collaboration can advance regional coordination by expanding collaborative efforts throughout a region. In such cases, allowing regional organizations the flexibility to define their geographic areas or membership requirements can foster increased degrees of regional coordination. However, in our view, in cases where state and local traditions do not engender interjurisdictional collaboration, more prescriptive requirements regarding group membership, decision-making processes, and planning serve as minimum thresholds for those activities. In some cases, leaders bring together stakeholders to agree upon common objectives and to act to achieve them. Those leaders play an important role in fostering trust among partners and facilitating progress. According to a report by the National Academy of Public Administration (NAPA), leadership dedicated to stakeholder involvement is a critical characteristic of high-performing partnerships, second only to achieving results.¹²

¹² National Academy of Public Administration, *Powering the Future: High Performance Partnerships* (Washington, D.C.: April 2003).

Collaborative leadership contributed to the expansion and success of regional coordination efforts we studied in both emergency preparedness and transportation programs. For example, emergency managers in the San Francisco Bay Area developed the area's Regional UASI working group, recognized by DHS and the State of California as a good example of regional coordination. They brought the working group together to discuss emergency issues and develop solutions for the entire Bay Area, which includes three subregions with individual UASI programs—San Francisco, San Jose, and Oakland. While there was no requirement to work collaboratively across UASI programs, these emergency management leaders took the initiative to establish a regional approach to facilitate coordination throughout the area. They created a regionwide group that meets for planning, and they obtained funding to implement the UASI efforts by combining a portion of the individual UASI program's funds for use in the whole of the San Francisco Bay Area. The group has effectively developed a regionwide emergency preparedness strategic plan that includes eight goals, such as regional mutual aid exercises and communications interoperability.

Comprehensive Strategic Planning Based on Measurable Objectives and Resource Alignment Contributes to Regional Coordination

The deliberations of regional collaborative entities can result in mutually agreed upon problems and solutions. Moreover, strategic plans are a valuable tool to articulate goals, objectives, tasks, and measures. By adding specificity to more general discussions about problems and solutions, strategic plans can help to focus and operationalize efforts to deal with identified problems. In addition, standards, if existent, can be applied to help measure baseline performance levels (e.g., the existing level of preparedness), define measurable goals and objectives, and identify any gaps in performance. In other words, the application of standards can give measurability and benchmarking to strategic planning and performance monitoring.

Regional organizations' collaborative efforts can result in achieving mutual agreement, expressed in plans, among diverse stakeholders on priority problems and on specific steps to be taken to address them. Moreover, the goals and objectives in plans allow problems and planned steps to be defined specifically and progress to be measured. Two examples follow.

- In the case of the Tampa Bay Estuary Program (TBEP), a regional organization's collaborative efforts identified environmental problems, goals, and objectives that were expressed in a comprehensive strategic plan. Estuary program officials pointed to the program's focus on a

limited number of measurable and achievable restoration goals as key to its success, with respect to the strategic planning process. Such planning addressed how to restore and recover the Tampa Bay sea grass to conditions of 1950 via measurable and actionable goals, objectives, and tasks. By specifically defining what could be done in an action plan, TBEP involved a wide cross-section of stakeholders, including federal, state, and local government partners, local environmental groups, and the private sector. Using EPA's primer dated August 1989, "Saving Bays and Estuaries" as a guideline for developing missions and policies, the program's planning component involved a diverse and comprehensive set of stakeholders. For example, a technical advisory committee proposes technical solutions to the restoration effort; a nitrogen mitigation consortium involves local industry in proposing solutions; and a management board involves environmental agencies in providing advice to the Policy Board—chaired by the Florida Department of Environmental Protection and EPA—that approves all major decisions. Program officials credited the involvement of scientists and citizens from the Tampa Bay region as vital to the process of identifying and ranking the Bay's problems, as well as developing measurable goals and objectives that are included in its comprehensive restoration plan. Specifically, the strategic plan identifies the restoration of 14,000 acres of sea grasses and protection of the remaining sea grasses as a major goal and also establishes a nitrogen management strategy (action plan) to encourage sea grass recovery. The comprehensive strategic plan and nitrogen management strategy include specific and measurable goals by reducing nitrogen levels, identifying interim indicators (including water clarity and chlorophyll concentrations), as well as monitoring mechanisms to measure progress toward goals.

- In the Dallas-Fort Worth area, emergency management officials reported that the UASI requirement for a regional emergency preparedness plan initiated development of a comprehensive plan for emergency preparedness policy guidance and coordination. They noted that planning helped the region to prioritize goals and resulted in a systematic decision-making process to determine spending for the UASI funds. Other UASI areas, including Tampa Bay and Los Angeles, reported that the strategic planning process was a driving force in streamlining administration of the program.

Another example of the role of strategic planning with well-defined goals and measurable objectives in encouraging regional coordination is the MPO's requirement to develop a realistic transportation plan that includes

short-term and long-term strategies. According to officials, such planning forces stakeholders to determine the relative importance of various transportation projects. Federal transportation law requires MPOs to plan for projects using a process that considers financial resources that are budgetarily constrained, thereby forcing stakeholders to resolve disputes and agree on common goals and realistic objectives at the outset. In the San Francisco Bay Area, the planning process led to transportation projects that served the region as a whole instead of disparate projects in different jurisdictions. For example, the regional MPO planned for an extension between two rail systems that enhanced regional access to the San Francisco Airport with the surrounding area, including San Jose and Oakland.

In addition, a strategic plan can be used in making decisions about funds and other resources. Funds and resources can be allocated based on the goals and objectives of the strategic plan. For example, the NCR's UASI plan aligned \$60 million to 21 lines of effort that were categorized in functional areas that included equipment, training, exercises, and planning. Those projects were linked to eight points contained in a multistate agreement. At the same time, to be truly effective strategic planning needs to be comprehensive by addressing most of the resources available to address a public policy problem. Failure to do so can result in overfunding some ongoing efforts, and underfunding or not funding other activities. For example, in our May 2004 report on the management of first responder grants in the NCR, we found that the UASI planning effort for the NCR would have been improved by considering not only the uses of \$60 million in UASI funds, but also the uses of \$280 million in funding from other first responder grants.¹³ While we found no evidence of duplicative purchases, consideration of the other \$280 million in funds within the framework of the UASI plan would have reduced opportunities for excessive expenditures in some areas, while gaps remained in other areas. More comprehensive planning could have better ensured that funding would have been focused on the highest priority emergency preparedness needs of the region. The NCR's UASI governance structure is now taking steps to implement more comprehensive planning.

¹³ [GAO-04-433](#).

Some Federal Programs Contain Incentives for Regional Coordination

Some federal programs contain features that encourage regional solutions by providing incentives for local jurisdictions to join together to obtain federal grant funding. A federal grant whose award is conditioned on the recipient working through a collaborative regional organization can encourage regional coordination. Grant programs can also require the regional groups to express their agreements regarding problems and solutions by preparing a strategic plan with measurable goals and objectives. Such plans can guide grant expenditures. Grant requirements that take into account local and regional conditions and histories of collaboration by providing appropriate flexibility can further enhance regional coordination. Finally, federal financial assistance for coordination activities can provide important support.

Some Federal Requirements Support Regional Organizations

Federal grantor agencies support the existence of regional organizations by requiring the grantee to establish such an organization before receiving federal funds. Importantly, such requirements can promote interjurisdictional cooperation in areas where civic and political traditions work against such cooperation. For example, federal transportation law requires an MPO to write metropolitan transportation improvement plans before federal highway and transit funds can be allocated.¹⁴ Moreover, UASI requires a regional working group representing first responder agencies and policymakers in a core city, core county, and other local jurisdictions to write a regional UASI plan.

In addition, a federal agency may define a collaborative decision-making process that fosters wide participation by a variety of stakeholders and tries to avoid one party or type of party being overrepresented in the regional group or wielding too much power within the group. In that regard, a federal program may define minimally acceptable requirements for such a group and the planning processes associated with it. For example, DHS' UASI assigns funding to predefined core cities and core counties. In addition, in one location that we visited, the working group was required to agree unanimously to the UASI regional strategic plan and budget, representing a high state of consensus. In another case, federal transportation law requires MPOs to be broad-based bodies that include representation from elected officials of various jurisdictions in the defined

¹⁴ 23 U.S.C. §134.

service area of the MPOs. In addition, MPOs must include the state transportation agencies and operators of publicly owned transit services.

Flexibility in Grant Requirements Accommodates Regional Variations

Federal grant designs can take into account the uniqueness of leadership and political traditions at the state, local, and regional levels by allowing local jurisdictions the flexibility to pursue working arrangements that can facilitate regional coordination. By allowing jurisdictions to identify the boundaries of the region, they can take advantage of regional leadership or political relationships that can bring additional stakeholders, resources, or ideas to the process. For example, in fiscal year 2003, the Dallas UASI region as defined by DHS included the City of Dallas and its contiguous counties—Collin, Dallas, Denton, Kaufman, and Rockwall. However, many regional, state, and city officials felt that Tarrant County also should be included in the UASI planning, since Tarrant County includes a large portion of the Dallas-Fort Worth population, including the entire city of Fort Worth. To address this issue, the state provided funding to Tarrant County from the 20 percent of UASI funding that was not passed through to the City of Dallas.

The Commonwealth of Pennsylvania also exhibited a commitment to regional collaboration when it overlaid the regional Philadelphia UASI area onto a preexisting regional task force. Member jurisdictions of that task force—five emergency management coordinators from the counties in the Southeastern Pennsylvania Regional Task Force—had been working together for 5 years. As a result, the UASI program in Philadelphia benefited from strong preexisting working relationships. The cordiality built up among the UASI task force members fostered relatively coequal funding and planning efforts that extended to suburban parties well beyond the core city and core county.

Other locations, however, may not have traditions or leadership that encourage interjurisdictional collaboration. For example, in some locations, we found power imbalances, as well as political traditions and histories of competition that challenged regional coordination. Such challenges, for example, have been manifested by one or two jurisdictions making decisions about how federal dollars would be spent and how much funding other jurisdictions would receive. In such cases, regional cooperation might be facilitated by designing grants that require representation and collaboration through regional organizations.

Federal Grant Requirements for Comprehensive Strategic Planning with Measurable Objectives and Resource Alignment Encourage Effective Regional Coordination

Some federal grant programs require strategic plans as a precondition for receiving federal grant dollars to encourage regional coordination, but for the plans to be effective they should include measurable objectives and corresponding resource alignment. In addition, the application of preparedness standards to define the baseline status and goals for regions can enhance strategic plans by adding an element of measurability and specificity to them.

Our previous study of a number of leading public sector organizations shows that strategic plans work most effectively when they contain goals and objectives that are measurable and actionable.¹⁵ The presence of measurable goals and objectives allows program managers to ascertain progress being made and required action—such as reallocating funding and/or making programmatic changes—needed to meet those goals and objectives. For example, in the Tampa Bay Estuary Program, a community of state, local government, nonprofit, and commercial stakeholders determined four key program goals, as well as mechanisms through which to achieve these goals prior to receiving funding. Upon obtaining the funding, the program’s management built upon the stakeholders’ support to proceed efficiently with the plan.

As previously noted, the existence and applicability of standards can enhance the ability of decision makers to define measurable programmatic goals and objectives and enable them to assess and demonstrate progress being made. DHS’ recently issued strategic plan makes reference to establishing, implementing, and evaluating capabilities through a system of national standards. In emergency planning, preparedness standards can serve to define the preparedness requirements of an area or jurisdiction, the current status of preparedness, and the gap that exists between the requirements and current status. Emergency preparedness officials told us that when developing their strategic plan, national standards would have been helpful to identify gaps and determine appropriate actions to address them.

Clear standards help to guide the progress toward measurable objectives. For example, MPOs must show that projects identified in transportation plans for federal funding do not worsen air quality conditions of the

¹⁵GAO, *Comptroller General's Forum: High-Performing Organizations: Metrics, Means, and Mechanisms for Achieving High Performance in the 21st Century Public Management Environment*, [GAO-04-343SP](#) (Washington, D.C.: Feb. 13, 2004).

nonattainment¹⁶ metropolitan area. Their analysis must demonstrate that the total emissions projected for a transportation plan or program are within the emission limits established by the State Implementation Plan.¹⁷ Reducing transportation emissions in the metropolitan planning process is usually achieved by a combination of new construction, system improvements, and demand reduction measures.

Federal Funding for the Costs of Coordination Supports Regional Efforts

Some federal grant programs provide regional organizations recurring funding for costs associated with regional coordination. The federal government sometimes facilitates regional collaboration by paying specifically for some of the costs of regional coordination. For example, the coordination activities of MPOs are paid in part with federal transportation funds.

Estuary program officials said annual EPA grants allow spending for administrative needs and are important for facilitating regional estuary efforts. They reported that federal EPA funding, even though a relatively small portion of their overall budgets, was important to program sustainability, because it is often the only funding available to cover the critical operations that enable the rest of the estuary program's activities to take place.

Federal grants also may facilitate regional coordination by enabling organizations to use federal grant dollars to leverage partner organizations to fund administrative costs. Officials with TRANSCOM in the New York-New Jersey region said that federal funding for technical infrastructure and maintenance costs enabled them to leverage funding from partner jurisdictions for administrative costs.

¹⁶ Nonattainment areas are those that do not meet or previously have not met air quality standards for ozone, carbon monoxide, particulate matter, or nitrogen dioxide.

¹⁷ States are required by the Clean Air Act to develop State Implementation Plans that demonstrate how the designated area will reduce emissions and meet air quality standards.

NCR Emergency Preparedness Effort Can Benefit from Comprehensive Planning and Application of Standards

Our observations about regional coordination in the implementation of federal programs in metropolitan areas we visited are applicable to the efforts to coordinate homeland security in the NCR. Importantly, DHS' UASI program allowed the District of Columbia, the State of Maryland, the Commonwealth of Virginia, and regional jurisdictions to exercise a high degree of flexibility in organizing the UASI governance structure. Based on our review early developments, the NCR's UASI program would exhibit key elements of successful regional coordination in UASI-related emergency preparedness efforts. As envisioned in the current UASI plans, the NCR's UASI program may be on the way to developing multilayered regional coordination structures for the UASI. For example, the NCR is beginning to use regional working groups—the Emergency Preparedness Council (EPC) and the Chief Administrative Officers Committee (CAO), among others—to bring stakeholders together to agree upon goals and to consider funding allocations for regional emergency preparedness. However, at the time of our May 2004 report, the NCR had not applied this regional coordination structure and plans to the full array of federal homeland security grants in the region, totaling about \$340 million.¹⁸ As discussed at a September 1, 2004, meeting of the UASI governance structure's Senior Policy Group (SPG) and CAOs committee, the UASI governance structure plans to implement comprehensive planning by identifying funding other than UASI and developing centralized information on the uses of those funds.

NCR UASI Program Could Demonstrate Some Elements of Successful Regional Coordination

Based on our work in six urban areas, effective regional collaboration is characterized by, among other things, the presence of a regional organization of many diverse stakeholders that identifies problems and possible solutions. The combined outcome of the collaborative interaction of those parties is a strategic plan that is made actionable by the presence of goals and objectives. As currently envisioned and as being implemented in the initial stages, the NCR's UASI governance structure appears to incorporate those features and thereby has the potential to identify, fund, and implement emergency preparedness regionwide, rather than having those decisions made either by one dominant jurisdiction or in a fragmented, jurisdiction-by-jurisdiction manner.

¹⁸ [GAO-04-433](#).

As the UASI program is currently planned and implemented in the early stages, the governance structure is bringing together various stakeholders to identify regional emergency preparedness projects to be funded with UASI funds, and to solicit and obtain funding priorities, other input, and concurrence from federal, state, and local governmental stakeholders (including first responders); the commercial sector; the not-for-profit sector; and the health community, among others. For example, the CAO committee uses several technical committees—e.g., police chiefs, fire chiefs, public information officers, and health care committees—to identify security gaps and make recommendations on how to close them. Those recommendations are to be reviewed by the CAO committee, which is comprised of the 19 CAOs (in effect, county executives and city and town managers) of the Metropolitan Washington Area Council of Government's (MWCOG) jurisdictions, and consolidated, where necessary. In addition, the CAOs would discuss preparedness expectations for the region, including strategic objectives and commitments to action by Maryland, Virginia, and the District of Columbia. The CAOs would obtain UASI proposals by asking NCR jurisdictions and technical committees to provide their top priorities. According to the CAO Committee's chairman, those priorities would be consolidated by the CAO committee and used to generate final, rank-ordered funding priorities for the fiscal year 2004 UASI funds.

Under current plans, the EPC, which serves as the UASI working group, would have the authority to approve all funding initiatives. The EPC represents the federal, state, and local levels of government, a variety of first responder disciplines, and the commercial and not-for-profit sectors, among others. It meets to discuss and approve the UASI funding recommendations that have been made by the CAO Committee.

The SPG—representing the Governors of Maryland and Virginia, the Mayor of Washington, D.C., and the DHS Office of National Capital Region Coordination (ONCRC)—has final budget authority over projects discussed, recommended, and approved by the CAOs and EPC. MWCOG staff and the CAO Committee's Chairman do not envision disagreements between the different elements of the UASI governance structure, because they share membership on the same committees.

Management of Most Emergency Preparedness Grants in the NCR Affected by Lack of Comprehensive Regional Planning and Preparedness Standards

In our report and testimony of May and June 2004, respectively, we concluded that the NCR efforts to implement an efficient and effective regional preparedness approach were hampered by not having a coordinated strategic plan for enhancing NCR preparedness. Moreover, the regional UASI plan would not be based on any performance standards. Specifically, the NCR's UASI plan could not be considered to be a comprehensive strategic preparedness plan because it excluded non-UASI funds totaling \$280 million in fiscal years 2002 and 2003. As we reported, at the time of our May 2004 report, there existed no reliable central source of data on funds available and expended and the purposes for which they were spent.¹⁹ Instead, those funds were allocated on a grant-by-grant basis within each jurisdiction largely based on requests from first responder and emergency management officials. To the extent there was consensus on regional goals and knowledge of regional capacities, funds could be allocated in a more coherent manner. Moreover, federal emergency preparedness grants were often spent by each jurisdiction without considering whether assets and resources purchased already existed in neighboring jurisdictions and could be shared. Decisions about those purchases generally were not based on knowledge of the current level of preparedness or requirements to reach a desired preparedness level. According to comments provided by DHS and as discussed at a September 1, 2004, meeting of the UASI governance structures SPG and CAOs Committee, the UASI governance structure now plans to address these issues by gathering information from Maryland, Virginia, and the District of Columbia on funding sources other than UASI, how the funds were allocated and for what purposes, and how they were distributed by jurisdiction. In that regard, the governance structure's working group is converting hard-copy data on funds available and expended to a centralized database that would be fully populated by 2005. This would help the UASI governance structure avoid duplication of funding and leverage UASI funds to extend preparedness efforts to the entire region. In addition, as stated in DHS' comments on our draft report and as discussed at the September 1, 2004, meeting of the SPG and CAOs Committee, a committee has been assigned to work on an analysis of regional preparedness gaps that would consider the local assets that could be applied to closing those gaps. Stakeholders at the meeting mentioned that such a gap analysis could be based on likely scenarios that would need to be addressed during an emergency.

¹⁹ [GAO-04-433](#).

The NCR's UASI plan sets broad strategic goals of preventing terror attacks, reducing the region's vulnerability to terror, and minimizing damages and recovery from any terror attacks that do occur. The plan endorses an eight-point agreement signed by Maryland, Virginia, and the District of Columbia to achieve those three strategic objectives by focusing action on (1) preventing terror; (2) promoting citizen involvement in preparedness; (3) working in partnership to implement a coordinated decision-making process; (4) implementing emergency protective measures; (5) promoting a public/private partnership to protect the infrastructure; (6) working to develop a Joint Information System for the media; (7) enhancing mutual aid agreements, including dealing with any liability issues; and (8) partnering to coordinate plans for terrorism and security-related training and exercises across the area.

Concluding Observations

Federal programs frequently rely on regionally coordinated approaches to deliver important services to program beneficiaries and clientele. This fact is especially important in the relatively young field of homeland security, because the urgency of addressing the terror threat calls for effectively and efficiently managing the use of federal homeland security grant dollars. Based on our work, we have concluded that regional approaches to manage federal homeland security dollars help to ensure that those funds are spent in a complementary, coordinated fashion that is targeted at known security gaps. Our work further shows that regional approaches to emergency preparedness and other fields are characterized by several broad features that the federal government can encourage, frequently through the design and requirements of its grants. These lessons can be applied in the NCR and elsewhere to improve the management of federal emergency preparedness grant dollars by enlisting the support of a variety of stakeholders in identifying and supporting solutions to preparedness requirements and targeting the use of scarce resources to address preparedness gaps.

The federal government can encourage effective coordination in its grant requirements in four ways:

- First, some federal grants require the existence and operation of a regional collaborative organization and establish a minimum threshold of regional collaboration by requiring a variety of stakeholders, resulting in widespread agreement on what problems should be addressed and what steps should be taken.

-
- Second, where favorable political and civic conditions exist, some federal grants have allowed regional organizations to exercise flexibility in how they operate—for example, in establishing their membership boundaries.
 - Third, some grants provide minimum thresholds for planning by requiring that regional organizations prepare regional strategic plans that contain goals and objectives that are specific and measurable. Strategic plans provide a focal point for establishing goals and aligning resources. The application of standards, where existent, adds a measure of precision and measurability to a plan’s goals and objectives.
 - Fourth, some grants fund the costs of regional organizations, thereby providing additional incentives for localities to collaborate interjurisdictionally.

Regional approaches for homeland security continue to evolve quickly, but the nation is still in the early stages of building institutions and processes to address emergency preparedness. Also, the federal government is still in the early stages of developing preparedness standards to guide local initiatives. Based on our work and given the important role that regional planning and governance can play in improving national preparedness, these developments warrant continued congressional monitoring and oversight. As local initiatives continue to evolve and federal guidance becomes more definitive, the use of regional structures and plans in guiding the allocation and use of all major federal homeland security assistance will likely become more important.

Agency Comments and Our Evaluation

We provided a draft of this report to DHS and officials of the NCR’s UASI governance structure for their review and comment. DHS commented that the report contains information that will be valuable to communities across the country as DHS encourages regional coordination and capability building. DHS also states that the UASI governance structure is currently active and is not proposed or interim. We agree that the governance structure is not proposed or interim, and we state in our report that the regional coordination activities of the NCR’s UASI governance structure have evolved to begin to display many of the characteristics of regional coordination. For example, our report reflects information regarding the establishment and evolution of structures associated with the UASI governance structure, including the Senior Policy Group, the Emergency Preparedness Council, and the Chief Administrative Officers Committee.

DHS also remarked that, as discussed at a September 1, 2004, meeting of the UASI Senior Policy Group and Chief Administrative Officers Committee, the UASI governance structure will take steps to ensure that planned uses of federal emergency preparedness funds consider all funding sources, including non-UASI sources. Specifically, the UASI governance structure plans to gather information from Maryland, Virginia, and the District of Columbia on funding sources other than UASI, how the funds were allocated and for what purposes, and how they were distributed by jurisdiction. In that regard, the governance structure is converting hard-copy data on funds available and expended to a centralized database that would be fully populated by 2005. In response, we added information in our report to reflect these refinements to the NCR's governance structure.

The Deputy Mayor/City Administrator of Washington, D.C., also provided comments. Similar to DHS, he stated that the NCR's governance structure reflected the building of a great deal of the foundation for meeting the domestic preparedness challenges that affect the area. He also commented that the NCR is unique compared to the six metropolitan areas we chose for detailed analysis because only the NCR (1) involves two states and a governmental entity that combines state and local functions; (2) contains monuments and memorials that are the most visible symbols of our national strength and patriotism that, if attacked, would create a perception of vulnerability on the part of the federal government; and (3) is the seat of the federal government, creating a partnership between the national government and state and local governments. While we agree that the NCR is an important and unique urban area, the areas we chose for detailed analysis contain comparable features. For example, the New York City region contains three states and a very large city; that same region, as well as other areas we visited, also contains a significant federal presence and many buildings and icons that could be at risk for a terror event. Moreover, other regions we studied contained extensive partnerships between federal, state, and local governments.

The Deputy Mayor/City Administrator also stated that the National Estuary Program incorporates clean water standards and scientific solutions to accomplish clean water. He stated that the federal homeland security strategies and plans are not based on proven standards and solutions. Hence, he concluded that the National Estuary Program is not comparable with federal homeland security strategies and plans. We agree that the National Estuary Program is based on existing standards and solutions; indeed, our report notes that for the most part, standards are not yet extant for homeland security efforts. However, the application of standards in the

planning and implementation of the National Estuary Program is the very reason we chose to explore and elaborate upon it. Our report notes that the preparation and implementation of plans that have goals and objectives that are actionable and measurable—frequently based on the application of existing standards—is a key factor in the success of regionally coordinated programs. Indeed, our May 2004 report on the management of first responder grants in the NCR recommends that the Secretary, DHS, identify and address gaps in emergency preparedness and evaluate the effectiveness of expenditures in meeting those needs by adapting standards and preparedness guidelines based on likely scenarios for the NCR and conducting assessments based on them.²⁰

As agreed with your office, unless you release this report earlier, we will not distribute it until 30 days from the date of this letter. At that time, we will send copies to relevant congressional committees and subcommittees, to the Secretary of Homeland Security, and to other interested parties. We will also make copies available to others upon request. In addition, the report will be available at no charge on GAO's Web site at <http://www.gao.gov>.

If you or your staff has any questions about this report, please contact me at 202-512-6806. Key contributors to this report are listed in appendix IV.

Sincerely yours,



Patricia A. Dalton
Director, Strategic Issues

²⁰ [GAO-04-433](#).

Scope and Methodology

Our overall goal for this engagement was to identify features of regional collaboration in urban areas outside of the National Capital Region (NCR) that could be transferred to homeland security efforts in the NCR and elsewhere. In pursuit of that overall goal, we met with representatives and officials of the National Academy of Public Administration, the Association of Metropolitan Planning Organizations, the National Association of Regional Councils, the U.S. Department of Transportation, and the U.S. Environmental Protection Agency. We asked these parties to recommend specific urban areas that, in their view, had significant regional coordinative activities that we should examine. We also sought out areas that presented challenges for regional coordination through such features as having a multitude of jurisdictions within a region, an interstate geographic area, and geographic bifurcation characterized by the presence of a large body of water. We also obtained information regarding factors—such as the presence of significant federal and commercial facilities, national monuments, critical infrastructure (bridges, tunnels, airports, and seaports), population density, and ranking as a high-threat urban area per the Department of Homeland Security’s (DHS) Urban Area Security Initiative—that indicated a metropolitan area was at risk for a terror event.

Based on these various considerations and recommendations, we identified the Dallas-Fort Worth, Los Angeles, San Francisco Bay, New York, Philadelphia, and Tampa-St. Petersburg areas as sites meeting one or more of these criteria and selected them for a more detailed analysis of regional coordination across a variety of federal programs.

We also used information from these parties, along with a review our previous work in the area of intergovernmental relations, to identify federal programs with regional coordination features that could be useful for enhancing regional emergency preparedness coordination. Based on our assessment of this information, we selected for examination the transportation planning program that utilizes metropolitan planning organizations to prepare regional transportation improvement plans and related plans to guide the expenditure of federal highway and transit dollars. In the area of environmental protection, we selected estuary programs in which state agencies; local governments; or other public, nonprofit, or private agencies, research institutions, and individuals develop programs to protect and restore coastal resources through comprehensive planning and joint action. We also selected a homeland security program—the Urban Area Security Initiative—that apportions domestic preparedness funding for equipment, training, exercises, and

planning on the basis of a regional plan that is prepared by a regional working group.

To meet our first objective of identifying factors of successful regional coordination, we met with representatives of regional organizations and with federal, state, and local government officials in the areas selected. Regional organization representatives that we met with came from regional councils, councils of governments, metropolitan planning organizations, air quality districts, and estuary programs (where applicable). We also met with local and state officials responsible for homeland security and emergency preparedness, first responders, and other region-specific officials with responsibility for transportation, environmental, or homeland security planning. We asked these officials about characteristics of their organizations and regional political and civic factors that fostered regional coordination. We also obtained, analyzed, and followed up on such documentation as: stakeholder lists and the decision-making procedures of regional organizations, strategic planning documents, indicators of progress made against program goals and objectives, and plans for future enhancements of regional coordination.

In pursuit of the second objective of identifying features of federal programs that enhance regional emergency preparedness coordination, we met with local officials and officials from state emergency management agencies at all six case study locations. We also met with federal grantor agency officials from the Department of Transportation, the Environmental Protection Agency, and DHS's Office of State and Local Government Coordination and Preparedness. We obtained information and examined documentation (i.e., program guidance, grant requirements, and reporting requirements) about the federal guidelines and objectives for these programs. Based on those discussions and documentation examinations, we were also able to identify traits and characteristics that provided incentives to state, regional, and local governmental, commercial, and not-for-profit entities to collaborate in pursuit of public policy purposes.

To address our third objective of examining the state of emergency preparedness regional coordination in the NCR, we determined current NCR regional coordination practices by meeting with officials from the Metropolitan Washington Council of Government's Divisions of Transportation, Environment (Air Quality), and Homeland Security and Public Safety. We also met with officials from the DHS's Office of National Capital Region Coordination and the Chair of the NCR Chief Administrative Officers Committee, and we attended meetings of the NCR Emergency

Appendix I
Scope and Methodology

Preparedness Council as well as the Senior Policy Group and Chief Administrative Officers Committee. We relied on oral and documentary evidence from these officials as well as our previous review of the management of first responder grants in the NCR to understand the state of regional coordination in the NCR as of September 2004.

We conducted our review from July 2003 to September 2004 in accordance with generally accepted government auditing standards.

Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, DC 20528



Homeland
Security

September 10, 2004

Patricia A. Dalton
Director, Strategic Issues
U.S. General Accounting Office
Washington, DC 20548

Dear Ms. Dalton:

RE: Draft Report GAO-04-1009, Homeland Security: Effective Regional Coordination Can Enhance Emergency Preparedness (GAO Job Code 450263)

Thank you for the opportunity to review the subject draft report. The report contains information on the characteristics of effective regional coordination that will be valuable to many communities across the country as the Department continues to encourage regional coordination and capability building. The Department acknowledges that regional coordination efforts in the National Capital Region (NCR) already display many of the characteristics of effective regional coordination cited in the report. Additionally, the NCR is moving quickly towards putting into place all the aspects of effective regional coordination noted in the report including a comprehensive regional strategic plan.

It should be noted, however, that the regional coordination governance structure that is currently active in the NCR is not a proposed or interim structure as the report suggests. In fact, there has been a working regional governance structure since August 2002 when the Governors and the Mayor publicly committed to regional coordination and cooperation. The NCR Senior Policy Group (SPG) was constituted. This governance structure was further broadened in late 2003 and codified in 2004. The regional current governance structure for the NCR was adopted by the key regional stakeholders in February 2004 at the NCR Emergency Preparedness Council and has been fully implemented since that time. The structure is solidly in place and being used for reaching decisions regarding the ongoing homeland security programs in the region.

As the report discusses, the governance structure for the NCR is broad-based and inclusive of all jurisdictions and disciplines. It is also flexible, so that other groups can be added to the structure as the need is identified. One recent example of this flexibility is the inclusion of the Metro Chief Information Officers (CIOs) committee as a supporting committee for the Chief Administrative Officials (CAO). Now technical proposals that impact State and local information technology enterprises can be vetted through the Metro CIOs to ensure a coordinated solution is achieved. This is just one example of the flexibility that is built into the NCR regional coordination structure.

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The Urban Areas Security Initiative (UASI) Program incorporates most or all of the elements identified in the report that characterize effective coordination, such as representation from different stakeholder groups and multiple jurisdictions; development of strategic plans; and formation of a regional organization for collaborative decision making. The NCR and the UASI work group have fulfilled these program requirements, and have established themselves as a viable operation for further enhancement of emergency preparedness.

The report indicates NCR has not included other homeland security funds that the respective jurisdictions have received when considering how to allocate its UASI funds. The UASI work group currently is gathering information from the States of Maryland and Virginia, and the District of Columbia on other funding sources and how funds have been allocated, for what purpose, and to which jurisdictions the funds have been distributed. Having this data available will help the UASI work group avoid duplication of funding, and leverage the UASI funds to extend the preparedness efforts of the respective jurisdictions, and thus the entire NCR.

A report finding suggests there is no reliable central source of data on funds available and expended and the purposes for which they were spent. This information is available at DHS/ODP through hard copy grant files. The Department is in the process of converting this information to a centralized database, which can provide queries upon request. This database will not be fully populated until early 2005, but DHS/ODP is able to provide this information upon request.

The report also identifies the importance of a comprehensive strategic plan with measurable goals and objectives to help focus resources and efforts to address problems. Over the past few months the CAOs have tasked the Disaster and Emergency Preparedness Committee (DEPC) to develop recommendations on performance standards that could or should be adopted by the region. These recommendations will form the larger over all strategy that will clearly identify preparedness priorities and the measurable performance standards.

Additionally, Homeland Security Presidential Directive (HSPD) 8 calls for the development of a national preparedness goal which will establish measurable readiness priorities and targets that appropriately balance the potential threat and magnitude of terrorist attacks, major disasters, and other emergencies with the resources required to prevent, respond to, and recover from them. It will also include readiness metrics and elements that support the national preparedness goal including standards for preparedness assessments and strategies, and a system for assessing the Nation's overall preparedness to respond to major events, especially those involving acts of terrorism. This guidance will inform the development of measurable goals and objectives at the State and local level. The Office of National Capital Region Coordination is committed to support the integration of the national guidance with State and local performance measures.

For all the progress made in the NCR to increase preparedness, the Department realizes, and your report supports the fact, that we need to continue on the path of improvement by

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developing preparedness standards, and clear performance goals. We have already built a great deal of the foundation for effective regional coordination as noted in the report and will continue to work toward improving that coordination.

Sincerely



Anna F. Dixon
Director, Departmental GAO/OIG
Liaison

Comments from the Deputy Mayor and City Administrator, District of Columbia

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Executive Office of the Mayor



Robert C. Bobb
Deputy Mayor and City Administrator

September 10, 2004

Patricia Dalton
Director, Strategic Issues
U.S. General Accounting Office
Washington, DC 20548

Dear Ms. Dalton:

As the State Administrative Agent (SAA) for the National Capital Region (NCR), I would like to thank you for forwarding the Draft GAO report, GAO-04-1009, entitled ***Homeland Security: Effective Regional Coordination Can Enhance Emergency Preparedness*** for review. This draft report was provided to the NCR to obtain advance review and comment for subjects it discusses. We understand that the report has not been fully reviewed within GAO and is, therefore subject to revision. In general, the report describes factors that enhance regional coordination in selected metropolitan areas, the features of federal programs that enhance regional emergency preparedness coordination, and how to incorporate regional coordination for emergency preparedness features from other metropolitan areas into the NCR.

The report selected six metropolitan areas to examine regional coordination. These six areas were chosen based on their vulnerability to terror events indicated by the presence of potential targets and the level of complexity as it relates to regional coordination. Based on the uniqueness of the NCR, it is difficult to compare the NCR with the six metropolitan areas identified. The following describes the differentiating factors associated with the NCR:

- The NCR is the only urban area to include two states and a government entity that serves city, county, state functions in combination (the District of Columbia). The NCR comprises eight major jurisdictions with a number of additional municipalities that reside within the boundaries of these eight jurisdictions. In line with regional homeland security coordination and the guidance set forth by the Office of Domestic Preparedness (ODP), the NCR adopted a comprehensive governance structure that includes elected leaders and Chief Administrative Officers (CAO's) from each jurisdiction as well as the State Homeland Security Advisors and Emergency Management Directors that comprise the Senior Policy Group (SPG).

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- The NCR's monuments and memorials are some of the most visible in the country and are symbols of national strength and patriotism. A terrorist threat to anyone of these monuments or memorials is likely to have a major negative psychological and emotional impact that would be felt throughout the country and the world. This would create a perception of vulnerability on the part of the Federal government.
- The NCR is also the seat of the Federal government. A partnership exists between the NCR state and local governments and the Federal government entities to coordinate homeland security efforts.

For these reasons, the NCR must be viewed as unique in comparison to other urban areas designated by the Department of Homeland Security.

The report recognizes the importance of regional organizations to serve as structured forums for diverse parties to discuss public policy problems and agree on possible solutions. The report specifically refers to the Metropolitan Washington Council of Governments (MWCOC) multi-jurisdiction transportation board as an example of such an organization and forum for collaborative decision making. As discussed in the Office of National Capital Region's response to the previous GAO report (GAO-04-433), the NCR recognizes the importance of such an entity through the formal NCR Review and Recommendation Process. This process ensures coordination of resources among all jurisdictions within the NCR and utilizes MWCOC public safety cluster committees (i.e., Law Enforcement, Fire Chief, Emergency Manager, etc...) to ensure coordination throughout the NCR within their particular area of expertise and provide the associated priorities and needs. This allows the NCR to leverage longstanding tradition of inter-jurisdictional coordination to provide recommendations through the regional process and accompanying governance structure. This regional collaborative process has been encouraged by the leadership of the NCR and has resulted in the NCR Chief Information Officers (CIO's) to formulate a MWCOC committee to discuss information technology issues and develop solutions as it pertains to homeland security.

The report also recognizes the importance of strategic plans developed by regional organizations can be effective tools to focus resources and efforts to address problems. Such plans often contain features as goals and objectives that are measurable and quantifiable. The report specifically refers to the Tampa Bay Estuary Program involving multiple entities from the private and public sectors (federal and state) to implement solutions to cleaning up Tampa Bay on technically sound plans that are based on measurable goals and objectives. The National Estuary program identifies federal standards that have been established for hazardous substances, through scientific data, that must be obtained within the water through specific sampling methods to determine if the Estuary is considered "clean". These standards are based on remedial technologies (solution) that currently exist for remediating a source as defined by the Environmental Protection Agency.

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The NCR recognizes the importance of technically sound plans that are based on measurable goals and objectives when federal standards exist to define the quantifiable standard to be met with existing remedies or solutions. Such quantifiable federal standards currently do not exist for defining a level of preparedness or established remedies or solutions to meet such standards. For the reasons stated above, GAO has incorrectly compared a well established, federal estuary program with baseline performance measures with homeland security strategies and plans that do not have well developed, scientifically tested, baseline performance measures.

That said, the NCR has in place a structure to enable good planning. To assist in future coordination efforts the SPG has developed a team to assist in administering state and regional grant funds, and coordination of programmatic planning and response issues. A detailed outline of these processes were described with the response to the draft GAO report, GAO-04-433 entitled: **Homeland Security: National Capital Region Grant Management Issues Reflect the Need for Coordinated Planning and Performance Standards**. The processes described allow for coordinated grants administration and strategic planning for enhancing the NCR's preparedness, performance standards, and a reliable, central source of data on funds available and the purpose for which they are spent.

The report further recognizes the importance of regional organizations that reach collaborative decisions prior to receiving grant funds. As the report points out, this avoids one party or type of party being over-represented in the regional group or wielding too much power. As stated on page 32 of the report, the NCR utilizes regional working groups for collaborative decision making, as stated above when referring to the public safety committees of MWCOG. This was also exemplified in the September 2, 2004 CAO/SPG meeting, which GAO representatives attended to view the NCR's collaborative decision-making process at work.

In line with regional homeland security coordination and the guidance set forth by ODP, the NCR adopted a comprehensive governance structure that includes the CAO's from each jurisdiction as well as SPG, which is comprised of the homeland security advisor and the director of the emergency management agency of Maryland, Virginia, and the District of Columbia. This governance process is required to ensure collaborative decision making throughout the NCR. The governance structure of the NCR is all encompassing to include not only the strategic decision makers and the senior leaders of the region but also the tactical decision makers, the Public Safety department heads, and their subordinate field experts.

For all the progress made in the NCR to increase preparedness, the NCR realizes, and your report supports the fact, that we need to continue to implement and enhance our collaborative decision-making process and continue to redefine our performance goals. We have already built a great deal of the foundation for meeting the challenges noted in the report and will continue to work toward meeting our goals.

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Your cooperation is appreciated. If you have additional questions, please call Steve Kral, Administrator for the Office of Homeland Security, at (202) 727-5934.

Sincerely,



Robert C. Bobb
Deputy Mayor / City Administrator

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GAO Contacts and Acknowledgments

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