

August 3, 2006

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SUBJECT: Audit Report – Postal Service Emergency Preparedness for Hurricanes Katrina and Rita (Report Number SA-AR-06-007)

This report presents the results of our audit of the U.S. Postal Service Emergency Preparedness (EP) for Hurricanes Katrina and Rita (Project Number (06YG011SA002). Our overall objective was to assess the Postal Service's implementation of EP plans and programs before and in the immediate aftermath of Hurricanes Katrina and Rita.

The Postal Service responded to Hurricanes Katrina and Rita rapidly and successfully under difficult and unprecedented circumstances. As a result, the Postal Service safeguarded employees, continued to deliver the mail in the Gulf Coast region, and protected the sanctity of the mail and the nation's mail system. While the Postal Service took noteworthy actions in responding to the hurricanes, opportunities exist to enhance EP planning and responses in the event of a future natural disaster.

We recommended the vice president, Emergency Preparedness, in coordination with the Southeast Area vice president and Southwest Area acting vice president: (1) revise the Integrated Emergency Management Plan (IEMP) to sufficiently address area and headquarters level functions, including coordination with the federal government during responses that require Postal Service involvement in the National Response Plan; (2) ensure field operations personnel complete, approve, validate, and implement IEMPs that incorporate stand-alone plans for hurricanes and lessons learned; (3) develop an alternative incident management system to assist the Postal Service in managing emergencies throughout each stage of EP; and (4) establish performance measures for all hazards to achieve emergency management goals that effectively enhance the Postal Service's EP and incorporate them into the core goals for headquarters, area, and field level emergency managers. We also recommended the vice president, Emergency Preparedness identify and develop mandatory EP training at each level of the Postal Service for hazards as necessary, based on risks and vulnerabilities.

Management agreed with all recommendations. Management's comments and planned corrective actions are responsive and satisfy the intent of the recommendations, and should correct the issues identified in the findings. Management's comments and our evaluation of these comments are included in the report.

We appreciate the cooperation and courtesies provided by your staff during the audit. If you have any questions or need additional information, please contact Sandra Bruce, director, Oversight of Investigative Activities, or me at (703) 248-2300.

E-Signed by Mary Demory 🕐 ERIFY authenticity with Approvel

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Attachments

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EXECUTIVE SUMMARY

Introduction	This report addresses the U.S. Postal Service's emergency preparedness (EP) regarding Hurricanes Katrina and Rita. Our overall objective was to assess the Postal Service's implementation of EP plans and programs during Hurricanes Katrina and Rita.
Results in Brief	The Postal Service responded to Hurricanes Katrina and Rita rapidly and successfully under difficult and unprecedented circumstances. As a result, the Postal Service safeguarded employees, continued to deliver the mail in the Gulf Coast region, and protected the sanctity of the mail and the nation's mail system. While the Postal Service took noteworthy actions in responding to the hurricanes, opportunities exist to enhance EP planning and responses in the event of a future natural disaster.
Summary of Recommendations	We recommended the vice president, Emergency Preparedness, in coordination with the Southeast Area vice president and Southwest Area acting vice president: (1) revise the Integrated Emergency Management Plan (IEMP) to sufficiently address area and headquarters level functions, including coordination with the federal government during responses that require Postal Service involvement in the National Response Plan; (2) ensure field operations personnel complete, approve, validate, and implement IEMPs that incorporate stand-alone plans for hurricanes and lessons learned; (3) develop an alternative incident management system to assist the Postal Service in managing emergencies throughout each stage of EP; and (4) establish performance measures for all hazards to achieve emergency management goals that effectively enhance the Postal Service's EP and incorporate them into the core goals for headquarters, area, and field level emergency managers. We also recommended the vice president, Emergency Preparedness identify and develop mandatory EP training at each level of the Postal Service for hazards as necessary, based on risks and vulnerabilities.
Summary of Management's Comments	Management agreed with all recommendations, stating that they are working to align internal emergency management policy under an Emergency Operations Plan that will conform to the National Response Plan; and have issued a memorandum instructing the field to complete an

	IEMP review for their area of responsibility, which was due by June 30, 2006. They also indicated they have begun a rollout of basic training in the incident command system for field emergency management teams (EMT) and have begun using the Microsoft Sharepoint software application. Also, the Postal Inspection Service, in partnership with other headquarters stakeholders, is developing an incident management software program as a tool for EP. Finally, the Office of Emergency Preparedness has provided the field with two substantive core goals for EP managers; and has initiated pilot and refresher training in the incident command system for EMT in coordination with the Southeast, Southwest, and Capital Metro Areas. Management's comments, in their entirety, are included in Appendix F.
Overall Evaluation of Management's Comments	Management's comments and planned corrective actions are responsive to the recommendations, and should correct the issues identified in the findings. We requested an update on the status of the second recommendation and the requirement for the field to complete an IEMP review for their area of responsibility by June 30, 2006. According to management, 537 locations have updated their IEMPs as of July 20, 2006. We plan to continue monitoring Postal Service activities in this area, including progress and attainment of milestones. As such, we plan to conduct follow-up reviews as necessary.

INTRODUCTION

Background

<u>Hurricanes Katrina and Rita</u>. On August 29, 2005, Hurricane Katrina affected an expansive area across the Gulf Coast region, including Alabama, Louisiana, and Mississippi. Hurricane Katrina developed sustained winds of 145 miles per hour with winds extending 120 miles from its center.¹ New Orleans continued to sustain damage after the storm's impact because much of New Orleans is below sea level and the levees designed to protect against floods could not contain Hurricane Katrina's 15-foot storm surge.



Satellite Image of Hurricane Katrina—Photograph 1

Levees failed in four locations along three canals, flooding New Orleans and creating a catastrophic event. As a Category 3 storm, Hurricane Katrina was an unprecedented event which is projected to cost the U.S. government up to \$200 billion. Less than a month after Hurricane Katrina made landfall, on September 24, 2005, Hurricane Rita hit the Texas-Louisiana border as a Category 3 storm, flooding parts of Louisiana again.

¹ According to the National Oceanic and Atmospheric Administration (NOAA).



Flooding in New Orleans —Photograph 2²

<u>Congressional Interest</u>. Anticipating inquiries from members of Congress, the President's Council on Integrity and Efficiency tasked the inspectors general community with assuring appropriate oversight of financial and procurement processes and operations regarding Hurricane Katrina activities.

As a result, the U.S. Postal Service Office of Inspector General (OIG) established a task force to review the Postal Service's Hurricane Katrina activities. The OIG has conducted several reviews of Postal Service activities associated with each of the hurricanes, including procurement, employee safety, change of address (COA) procedures, facilities, mail processing, and emergency preparedness (EP). See Appendix A for a list of OIG reports on Postal Service's Hurricanes Katrina and Rita response, recovery, and reconstruction efforts.

Emergency Preparedness. In November 2003, the Postal Service established the position of vice president, Emergency Preparedness, who is responsible for developing, implementing, and coordinating EP plans to protect Postal Service employees, customers, operations, and mail security during disasters and national emergencies. In January 2004, the Postal Service issued a memorandum to establish the Integrated Emergency Management Plan (IEMP) as the plan for the Postal Service

² Picture taken by OIG staff.

to use in mitigating, preparing for, responding to, and recovering from any natural disaster or man-made hazard. The IEMP standardizes the emergency management process and incorporates Postal Service incident-specific and planning efforts into a single, comprehensive document that serves as the core guide for emergency management.

The standardized IEMP template is designed to consolidate a facility's stand-alone plans (Emergency Action Plan [EAP], Continuity of Operations Plan [COOP], and emergency specific plans). It also establishes emergency management teams (EMT), defines team roles and responsibilities, and positions the Postal Service's emergency management activities for integration with the country's National Response Plan. The chart³ in Appendix B describes the framework of the IEMP, including the emergency management organization and the concept of operations, and shows the relationship between the EAP, COOP, and annexes to the plans for specific hazards.

The EAP provides evacuation-specific tasks and procedures for the installation. The COOP provides operational tasks and procedures for moving operations to an alternate facility. The EAP flowchart (Appendix C) and the COOP flowchart (Appendix D) depict how the EAP and COOP are integrated in the IEMP. Additionally, each annex is for a specific hazard (such as hurricanes and floods) and provides supplemental tasks for the EMT to complete. Districts and installations are required to tailor the standardized IEMP template to address specific processes and procedures and other information pertinent to a site.

The EP process includes establishing a high state of EP through better planning, process integration, and field support to serve national security interests, properly safeguard employees and customers, and protect the critical assets of the Postal Service.

³ Louisiana District IEMP, dated July 2005.

	Postal Emergency Management System (PEMS). PEMS is a national system intended to provide emergency plans to other stakeholders beyond the immediate local area. It provides Postal Service EMTs a mechanism to communicate, coordinate, and collaborate effectively during emergencies. It also enables a nationwide staff to create, track, and manage emergencies through all stages of an incident. During emergency incidents, personnel are provided with current and customized information so they can carry out their duties.
Objective, Scope, and Methodology	Our overall objective was to assess the Postal Service's implementation of EP plans and programs during Hurricane Katrina and in some instances ⁴ Hurricane Rita. To accomplish our objective, we:
	 Interviewed Postal Service officials from headquarters, areas, districts, and installations.
	 Reviewed applicable EP plans and Postal Service and federal policies.
	 Reviewed Postal Service information (such as training, assignments, and goals) pertaining to EP and the activities associated with Hurricane Katrina.
	 Observed Postal Service mail processing and delivery operations and attended lessons learned meetings.
	In addition, we reviewed data from the PEMS. However, we did not assess the reliability of the computer-generated data from PEMS. Based on our comparative analyses of data obtained from PEMS and discussions held with officials regarding their usage of PEMS, we consider the data to be sufficiently reliable to support the opinions and conclusions in this report.
	We conducted the review from September 2005 through August 2006 in accordance with generally accepted government auditing standards and included such tests of

⁴ *Mail Processing Operations in the Wake of Hurricane Katrina and Rita* (Report Number NO-MA-06-002, March 27, 2006).

	internal controls as we considered necessary under the circumstances. We discussed our conclusions and observations with management officials and included their comments where appropriate.	
Prior Audit Coverage	U.S. Government Accountability Office (GAO) Testimony, <i>Emergency Preparedness and Response, Some Issues and</i> <i>Challenges Associated with Major Emergency Incidents</i> (Product Number GAO-06-467T, February 23, 2006). The testimony addressed the challenge of establishing interoperable communications by defining the problem and establishing interoperability requirements. The Department of Homeland Security established three major policy initiatives to promote the further development of all-hazards EP capabilities of first responders. The initiatives were: (1) the National Response Plan (NRP), which outlines what is necessary to manage a nationally significant incident, focusing on the role of federal agencies; (2) the National Incident Management System (NIMS), which is a command and management process to be used by the NRP during an emergency event; and (3) the National Preparedness Goal, which identifies critical tasks and capabilities.	
	GAO concluded that assessing, developing, attaining, and sustaining needed EP, response, and recovery capabilities is a difficult task that requires sustained leadership and the coordinated efforts of first responder disciplines, levels of government, and nongovernmental entities. The task requires continuing commitment, leadership, clear priorities, hard choices, and objective assessments of current plans and capabilities.	
	White House Report, <i>The Federal Response to Hurricane Katrina: Lessons Learned</i> , February 2006. The 228-page report provided a review of the preparation for, and response to, Hurricane Katrina and the flooding of New Orleans. The report concluded that:	
	 Emergency management plans and processes created after September 11, 2001, did not sufficiently account for widespread or simultaneous catastrophes. 	
	 The current system for homeland security does not provide the necessary framework to manage the challenges posed by catastrophic 21st century threats. 	

 All levels of government need improvement in preparing for catastrophic events.

The report provided 125 recommendations for reform, of which 11 were to have been implemented before the hurricane season began on June 1, 2006. Examples of the 11 recommendations include: (1) identifying and developing rosters of federal, state, and local government personnel who are prepared to assist in disaster relief; (2) establishing rapidly deployable communications; (3) improving delivery of assistance to disaster victims by streamlining registration; (4) expediting eligibility decisions, tracking movement of displaced victims, and incorporating safeguards against fraud; and (5) enhancing ongoing reviews of state evacuation plans and incorporating planning for continuity of government.

GAO Testimony, *Hurricane Katrina, Providing Oversight of the Nation's Preparedness, Response, and Recovery and Activities* (Product Number GAO-05-1053T, September 28, 2005). The testimony summarized past GAO work that noted improvements needed in government programs relating to preparing for, responding to, and recovering from natural disasters such as Hurricane Katrina. Specifically, first responders were challenged by a lack of interoperable emergency communications. Also, agencies needed to improve their EPs to better plan, set goals, measure performance, provide training, conduct exercises, and incorporate lessons learned.

The GAO noted that it has issued a number of reports on evaluating Hurricane Katrina and plans to continue evaluating the nation's response to the hurricane. GAO also reported that Congress has passed legislation providing \$15 million for the Department of Homeland Security Inspector General to audit and investigate Hurricane Katrina response and recovery activities.

GAO Report, Agency Management of Contractors Responding to Hurricanes Katrina and Rita (Report Number GAO-06-461R, March 16, 2006). GAO reported that given the environment in which they were operating, agency acquisitions and contractor personnel worked hard to provide the goods and services needed. However, the response efforts demonstrated insufficient numbers and inadequate deployment of personnel to provide effective contractor oversight, and inadequate planning and preparation to anticipate the goods and services needed. Response efforts also did not clearly communicate responsibilities across agencies and jurisdictions. GAO did not issue any recommendations in the report; however, the agency will continue to monitor activities.

Noteworthy Actions and Responses to the Hurricanes	The Postal Service responded to Hurricanes Katrina and Rita rapidly and successfully under difficult and unprecedented circumstances. The Postal Service continued to deliver the mail in the Gulf Coast region and protected the sanctity of the mail and the nation's mail system. The following provides a summary of the noteworthy actions. The details are reported in separate OIG reports. (See Appendix A for a list of reports.)
	Safeguarded Employees. The Postal Service safeguarded employees by effectively notifying employees before Hurricane Katrina made landfall, instructing employees on actions to take regarding Hurricane Katrina, and evacuating facilities. Employees were instructed to use notification methods such as the national emergency hotline number, local emergency numbers, public media outlets, and interna safety talks. As a result, no injuries were reported prior to Hurricane Katrina's landfall for approximately 28,000 Postal Service employees in the Gulf Coast area. <u>Assessed and Reestablished Mail Processing Networks</u> . The Postal Service assessed damages to and reestablished mail processing networks. Subsequently, Postal Service officials established temporary mail processing and post
	<text></text>
	Temporary Postal Office at New Orleans P&DC—Photograph 3 ⁵

AUDIT RESULTS

⁵ Picture taken by OIG staff.

They also established special procedures for forwarding remittance⁶ mail to business customers. Additionally, Postal Service officials processed over one-half million COA forms for customers displaced by the hurricanes. Through these efforts, the Postal Service continued to process mail throughout the Gulf Coast region. Table 1 provides a summary of the major mail processing facilities damaged by Hurricane Katrina.

Issue	New Orleans P&DC ⁷	Gulfport P&DF	Mobile P&DC	North Houston P&DC
Facility				
Damage	Yes	Yes	Yes	No
Severity of				
Damage	Major ⁸	Moderate ⁹	Minor ¹⁰	None
Processing				
Operations				
Affected	Yes	Yes	Yes	Yes

Table 1.	Mail	Processing	Facilities
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Assessed Damages to Facilities and Other Related Equipment. Numerous Postal Service facilities in the affected areas suffered severe damage or complete destruction. The emergency construction funding for these facilities was estimated at \$126 million. Table 2 depicts the overall assessment for these facilities.

⁶ Remittance mail is the largest segment of First-Class Mail. It consists of bills, statements, and payments transported between businesses and customers.

P&DC – Processing and Distribution Center; P&DF – Processing and Distribution Facility.

⁸ Maior damage includes a facility that is required to close because of flooding, a storm surge, wind damage, or loss of power.

Moderate damage includes facilities closed temporarily (less than 10 days) because of flooding, a storm surge, wind damage, or loss of power.

Minor damage includes facilities closed temporarily (less than 4 days) due to wind damage or loss of power.

Condition	Number of Facilities	Costs (in Millions)
Damaged:		
Owned	64	\$42
Leased	111	11
Subtotal	175	53
Destroyed (Leased)	5	4
Total	180	\$57

Table 2. Estimated Emergency ConstructionFunding

Also included in the \$126 million were costs for repairing and replacing equipment, vehicles, supplies, and post office box units valued at about \$69 million. Postal Service facilities headquarters, the Southeast and Southwest Facilities Service Offices (FSO) and areas, the affected districts, and the Postal Inspection Service worked together to assess facility damage and remediation work.



Damaged Postal Service Facility—Photograph 4¹¹

<u>Assessed and Reestablished Transportation Logistics</u> <u>Network</u>. The Postal Service diverted mail from the affected region, established alternate logistical staging points,¹²

¹¹ Picture taken by OIG staff.

¹² Houston, Dallas, and Beaumont, Texas; and Baton Rouge, Louisiana.

shifted transportation, and established emergency transportation where needed. In the Southwest Area, Postal Service officials suspended or terminated 30 unneeded highway contract routes in affected areas, saving about \$2.5 million. Further, Postal Service officials in the Southeast Area recouped \$298,000 for interrupted service. Thus, about \$2.8 million was made available for other emergency transportation requirements.

<u>Used Existing Contracts for Emergency Purchases</u>. The Postal Service quickly responded to the hurricanes by using existing contracts and containing costs when new contracts were needed. Specifically, the Postal Service's supplier relations strategies team maintains a list of key suppliers to use in monitoring and improving relations between suppliers and the Postal Service. Five of six existing contracts that the Environmental and Maintenance, Repair and Operating Category Management Center used for emergency purchases in response to Hurricanes Katrina and Rita were with suppliers on the key suppliers list.

The effectiveness of emergency purchases can be attributed to (1) supply chain management initiatives that promoted efficient supplier relationships already in place at the time of the hurricanes, and (2) the timely issuance of the Postal Service electronic newsletter (October 24, 2005, Supply Management Infrastructure Customer Link) warning the supply management community of increased risks for contractor fraud, waste, and mismanagement during a natural disaster.

<u>Protected the Postal Service</u>. The Postal Inspection Service responded to Hurricane Katrina rapidly and successfully under difficult and unprecedented circumstances and implemented actions consistent with the IEMP. Specifically, over 300 postal inspectors and postal police officers responded to safeguard Postal Service employees, provide security, and ensure that infrastructures were secure and operational.¹³ Further, Postal Inspection Service personnel escorted fuel and other recovery-related goods (such as lights and generators) into Alabama, Louisiana, and Mississippi. The Postal Inspection Service also initiated an

¹³ OIG investigators also assisted in performing many of these functions.

	educational campaign to prevent fraud schemes related to Hurricane Katrina relief efforts.
Experience Responding to Other Hurricanes	Postal Service officials said that although the IEMP framework was in place, they used their experience with other hurricanes and supplemental hurricane plans to respond to Hurricanes Katrina and Rita. Based on historical information, in a typical 3-year span, five hurricanes hit the U.S. mainland, of which two are major Category 3 to 5 hurricanes. According to NOAA, Florida, Louisiana, and Texas are the states most likely to be hit by a major hurricane. For example, in July 2005, Hurricane Dennis (a major hurricane) hit Alabama and Florida. A Postal Service official stated the lessons learned from Hurricanes earlier and update the employee hotline information more often.
	Also in 2004, the lesson learned from Hurricane Ivan was to allow each facility manager to decide how to best safeguard their employees. After each hurricane season and lessons learned, the Postal Service is required to revise emergency management plans to enhance future preparation and responses to hurricanes.
Stand-Alone Hurricane Plans	Postal Service officials created and used various stand- alone hurricane plans to assist in responding to Hurricanes Katrina and Rita. Officials said they relied primarily on these plans, along with their previous experience with hurricanes and components of the IEMP. Table 3 depicts the four hurricane plans.
	Table 3. Stand-Alone Hurricane Plans

Table 3. Stand-Alone Hurricane Plans

Plan	Date
Southeast Area Hurricane/Tropical Storm	June 2005
Procedures	
Alabama District Hurricane Plan and SOP ¹⁴	June 2005
Louisiana District Hurricane Guide	2005
Gulfport P&DC Hurricane Preparedness	None
Plan for "395" and "396"	

¹⁴ Standard Operating Procedures.

Based on our analyses of these plans, we determined the following:

- The Southeast Area Hurricane/Tropical Storm Procedures provide some of the framework and guidance by functional area for hurricane preparation responses found in the Hurricane Annex 2D. These procedures are divided into phases: phase 1 - hurricane watch 36 hours in advance, phase 2 - hurricane warning 24 hours in advance, phase 3 - imminent danger of hurricane impact, and phase 4 - after the emergency. The procedures in each phase provide roles and responsibilities for various functional positions, such as district manager and manager, operations programs support.
- The Alabama District Hurricane Plan and SOP provides some of the framework and guidance (by functional area) for hurricane preparation response found in the Hurricane Annex 2D. This document's four phases are: phase 1 - hurricane watch 48 hours in advance, phase 2 - hurricane warning 36 hours in advance, phase 3 - imminent danger of hurricane impact, and phase 4 - after the emergency. The procedures in each phase provide roles and responsibilities for various functional positions, such as district manager and district safety manager.
- The Louisiana District Hurricane Guide addresses responsibilities only for local post offices and installations. For example, the plan provides guidance for hurricane categories, postmasters' checklists (24 and 36 hours before the hurricane), postmasters' responsibilities, accountable paper evacuation, automated postal centers, damage assessments, storm condition report, repairs and recovery, and emergency contacts.
- The Gulfport P&DF Hurricane Preparedness Plan addresses responsibilities only for U.S. Postal Service South Area Offices 395 and 396. The plan provides information on hurricane categories; emergency facility contacts; duties of the manager, post office operations, south; external notifications; precautions to take 24 to 36 hours in advance of landfall; pre- and post-storm

checklists for postmasters; postmasters' authority and responsibilities; accountable paper evacuation; storm condition reporting; and repairs and recovery.

Although these plans were useful in responding to the hurricanes, they were not incorporated into the IEMP to provide a consistent framework for one integrated plan, as required by HSPD-5.¹⁵ However, responsible officials stated they planned to incorporate some of these plans into Hurricane Annex 2D of the IEMP.

¹⁵ Under *Homeland Security Presidential Directive 5 (HSPD-5)*, all federal departments and agencies, including the Postal Service and Postal Inspection Service, are required to adopt a comprehensive plan addressing all hazards.

Emergency Preparedness Planning	While the Postal Service took noteworthy actions in responding to the hurricanes, opportunities exist in the following areas to enhance EP planning and responses in the event of a future natural disaster by:	
	 Establishing headquarters and area EMTs in the IEMP. 	
	• Aligning the framework of the IEMP to the NRP.	
	 Completing and approving the IEMPs. 	
	 Using PEMS or an alternative incident management system to manage incidents more effectively. 	
	 Revising performance measures to address all hazards. 	
	 Establishing mandatory training for responsible personnel. 	
Framework of the Integrated Emergency Management Plan	As recognized by the Office of Emergency Preparedness (OEP), the levels of readiness necessary to respond to an unprecedented incident such as Hurricane Katrina far exceeded the framework of the IEMP. The Postal Service needs to align the IEMP to the NRP to provide the framework to respond to unprecedented incidents.	
	The IEMP is a standard template designed for implementation at districts and installations. However, IEMPs were not designed to address area and headquarters level functions during emergencies and did not include headquarters and area EMT roles and responsibilities. Additionally, district and installation IEMP templates did not address coordination with the federal government during responses requiring Postal Service involvement in the NRP.	
	We recognize that the Postal Service is assessing these issues and has developed an initial draft Emergency Operations Plan (EOP). The draft EOP provides an emergency management framework requiring coordination from headquarters to Postal Service installations. The EOP	

	supports an all-hazards approach based on the NIMS. ¹⁶ The EOP provides the conduit for the Postal Service to link into the NRP should an incident of national significance require Postal Service resources and assistance. We will review the Postal Service's final plan, upon its completion, during a future audit.
Integrated Emergency Management Plan Completion and Approval	Responsible personnel sometimes did not complete and approve IEMPs to ensure consistent responses to emergencies. Specifically, eight of the nine districts and installations we reviewed did not have completed and approved IEMPs before the hurricanes. Additionally, responsible personnel did not fully implement the IEMPs as designed. This occurred, in part, because responsible personnel were not always trained sufficiently in the IEMP.
	Also, the IEMP is in the early stages of its lifecycle, most of the initial emphasis is on deploying biohazard detection systems (BDS), and area and district EP manager positions were newly created. Furthermore, the Postal Service's National Performance Plan (NPP) did not include goals to enhance and achieve organizational EP outcomes. As a result, responsible personnel did not always assume their roles and responsibilities for responding to emergencies.
	This report provides detailed analyses of training and goals in the sections on EP training and EP performance measures.
	Completion . Completed IEMPs include the overall IEMP, the EAP, the COOP, and 27 annexes specific to natural or man-made disasters. At a minimum, for the hurricanes, the following emergency plans applied:

¹⁶ Consistent with the IEMP, HSPD-5 requires the Postal Service to incorporate the NIMS into all emergency plans and provide NIMS training to employees. The Department of Homeland Security has established a NIMS to unify federal, state, and local governments through processes, protocols, and procedures. This system is designed to help coordinate and standardize response actions to emergencies at all levels.

Plan	Appendix	Annex
IEMP		
EAP	A	
COOP	В	
National Emergency		1G
Floods and Flash Floods		2B
High Winds and Tornadoes		2C
Hurricanes		2D
Communications Failure		3B
Power Outages		3E

Table 4. Components of the IEMP

We recognize it is not practical for the Postal Service to provide comprehensive guidance in the IEMPs to document every procedure for responding to emergencies. However, at a minimum, providing uniform guidance as outlined in the IEMP should enhance the Postal Service's emergency responses to future incidents.

Approval. The Postal Service requires district and installation IEMPs to be approved at the district manager and installation manager level. With the exception of two IEMPs, none were signed or approved. See Appendix E for our analyses of district and installation IEMPs. Responsible personnel informed us they did not maintain hard copies of the signature page, and all but one of the electronic copies provided were not signed. A signed IEMP promotes uniformity during implementation and ensures that responsible personnel use the official version.

Additionally, the Postal Service does not require approval at the next level (that is, area officials do not approve district IEMPs and district officials do not approve installation IEMPs). We recognize this is not a requirement; however, requiring officials to approve the IEMP at the next level enhances awareness, accountability, and overall collaboration.

Postal Emergency District and installation personnel did not always use PEMS to manage emergencies as intended. As described in the section on IEMP completion and approval, personnel had not appropriately completed and included the IEMPs in

	PEMS. Personnel stated that they used PEMS only for limited purposes such as obtaining contact information, and not for managing emergencies. As a result, some plans and other information designed to assist with responding to emergencies were not maintained in PEMS.
	Further, according to Postal Service officials, PEMS was originally designed to provide local managers with rapid notification of emergencies such as a BDS positive alert. Therefore, its usefulness during emergencies was limited. For example, PEMS does not allow responsible personnel to enter information on area-level EMT roles during emergencies. As a result, area-level EMT members cannot access their roles and responsibilities through PEMS to assist them with responding to and managing emergencies.
	Unless responsible personnel use PEMS or develop an alternative incident management system, there is no assurance that they will effectively manage emergencies throughout each stage ¹⁷ of EP. Based on discussions with the vice president, Emergency Preparedness, the Postal Service will use PEMS as an alert and notification system and seek to identify an alternative emergency management system to more effectively manage emergencies.
Recommendation	We recommend the vice president , Emergency Preparedness, in coordination with the Southeast Area vice president and the Southwest Area acting vice president:
	 Revise the Integrated Emergency Management Plan to sufficiently address area and headquarters functions, to include coordination with the federal government during responses that require Postal Service involvement in the National Response Plan.
Management's Comments	Management agreed with recommendation 1 and stated that better coordination with federal partners in the National Response Plan is a desirable objective. Although the IEMP may not be the appropriate mechanism for achieving this coordination, management is working to align internal emergency management policy under an EOP that will conform to the National Response Plan.

¹⁷ EP stages include mitigation, preparedness, response, and recovery.

Recommendation	 We recommend the vice president , Emergency Preparedness, in coordination with the Southeast Area vice president and the Southwest Area acting vice president: 2. Ensure field operations personnel complete, approve, validate, and implement Integrated Emergency Management Plans that incorporate stand-alone plans for hurricanes and lessons learned.
Management's Comments	Management agreed with recommendation 2 and stated they have issued a memorandum instructing the field to complete an IEMP review for their area of responsibility by June 30, 2006. The memo also instructed the field to assess and update all checklists for each applicable IEMP hazard-specific annex, the field COOP, and load information into the PEMS.
Recommendation	 We recommend the vice president , Emergency Preparedness, in coordination with the Southeast Area vice president and the Southwest Area acting vice president: 3. Develop an alternative incident management system to assist the Postal Service with effectively managing emergencies throughout each stage of emergency preparedness.
Management's Comments	Management agreed with recommendation 3 and stated they have begun a rollout of basic training in the incident command system for field EMT. They have also begun using the Microsoft Sharepoint software application. This application is a team collaboration tool that includes real- time posting of messages and information, sharing of files and documents, useful links to other websites, and tasking features that can allow group members to assign tasks. Additionally, the Postal Inspection Service, in partnership with other headquarters stakeholders, is developing an incident management software program as a tool for EP.
Evaluation of Management's Comments	Management's comments and planned corrective actions are responsive to recommendations 1, 2, and 3, and should correct the issues identified in the findings. We requested

an update on the status of recommendation 2 and the requirement of the field to complete an IEMP review for their area of responsibility by June 30, 2006. According to management, 537 locations have updated their IEMPs as of July 20, 2006. We plan to continue monitoring Postal Service activities in this area, including progress and attainment of milestones. As such, we plan to conduct follow-up reviews as necessary.

Emergency Preparedness Performance Measures	Performance measures for all hazards were not included in the Postal Service's NPP to assess the achievement of emergency management goals and outcomes that effectively enhance the Postal Service's EP. According to Postal Service EP managers, they were not aware of any national EP performance measures. However, in fiscal year (FY) 2005, the OEP provided field operations with three substantive goals for district EP managers within the framework of the performance evaluation system. The goals required EP managers to:
	 Complete prescribed emergency management courses available through the Federal Emergency Management Agency.
	 Ensure EP documentation within their jurisdictions was complete and accurate.
	 Conduct outreach and develop relationships with emergency management entities at the state, county, and local levels.
	OEP officials also said they established baseline performance measures in NPPs in FY 2005 that addressed a single hazard: an aggressive deployment schedule for BDS. Thus, these performance measures did not address all the hazards established in components and annexes of the IEMP and required by HSPD-8. ¹⁸
	Furthermore, according to Postal Service officials, area and district EP managers are new positions within the Postal Service and are just starting their functional work. The EP function will require continuous headquarters leadership and training, and substantial support from field operations and area executives to meet the challenges of fulfilling their EP responsibilities in a traditionally operations-driven environment.

¹⁸ Under HSPD-8, all federal departments and agencies, including the Postal Service, are required to develop a national all-hazards preparedness goal that 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. The national preparedness goal will contain readiness metrics and elements, 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.

	OEP officials acknowledged that performance metrics for all hazards are a work in progress and will need continual refinement, clarification, and implementation by headquarters, area, and district leadership.
Recommendation	 We recommend the vice president, Emergency Preparedness, in coordination with the Southeast Area vice president and Southwest Area acting vice president: 4. Establish performance measures for all hazards to assess the achievement of emergency management goals that effectively enhance the Postal Service's emergency preparedness; and incorporate them into the core goals for headquarters, area, and field level emergency managers.
Management's Comments	Management agreed with recommendation 4 and stated the Office of Emergency Preparedness has provided the field with two substantive core goals for EP managers that address this recommendation within the framework of the Performance Evaluation System. The goals are to complete and validate plans and documentation, and to develop contacts and present Postal Service objectives to external emergency management groups and maintain a liaison.

Emergency Preparedness Training	Emergency response personnel had not received sufficient EP training at the time of the disaster, including training on the IEMP, PEMS, NIMS, and Incident Command System (ICS), to effectively and consistently respond to emergencies. This occurred in part because in FY 2005, BDS, which is Annex 1A in the IEMP, was the overriding priority for the Postal Service. OEP offered and provided BDS-related training in the IEMP, ICS, and PEMS to district and area EP managers and other personnel with emergency management responsibilities.					
	However, Postal Service officials said they were not sufficiently trained to effectively respond to Hurricane Katrina and stated the following:					
	 Members of the EMTs often did not assume their roles and responsibilities during emergencies. The Postal Service needs to provide appropriate orientation and familiarization to all EMT members to ensure they are ready to assume their roles and carry out their duties. 					
	 Postal Service officials did not always understand how the ICS should function. 					
	 Emergency operations center training was not provided sufficiently to eliminate some of the problems experienced during Hurricane Katrina. 					
	 In general, Southeast Area district managers were not involved in the IEMP training. This became apparent during the hurricanes when one of the district managers tried to take control and made several mistakes. When the district manager realized that core groups were in place, and a plan of action was implemented, operations moved more smoothly. 					
	 Southwest Area executives had not been trained in EP issues, and district managers had not been trained in NIMS when Hurricane Katrina made landfall. 					

	Sufficient EP training is necessary to ensure emergency personnel respond effectively and consistently to future incidents. When identifying sufficient EP training, the Postal Service should consider local and geographical risks and vulnerabilities.
Recommendation	We recommend the vice president, Emergency Preparedness:
	 Identify and develop mandatory emergency preparedness training at each level of the Postal Service for hazards, as necessary based on risks and vulnerabilities.
Management's Comments	Management agreed with recommendation 5 and stated the Office of Emergency Preparedness has initiated a pilot and refresher incident command system training for EMT in coordination with the Southeast, Southwest, and Capital Metro Areas. Headquarters teams are providing this training to reinforce the incident command system and to provide EMT members an overview of entry (IC-100) level training targeted for all EMT in the future. Management plans to roll out this training to the rest of the Postal Service starting FY 2007, targeting the hurricane districts first.
Evaluation of Management's Comments	Management's comments and planned corrective actions are responsive to the recommendation, and should correct the issues identified in the finding. EP should be enhanced as management continually identifies mandatory training at each level of the Postal Service.

APPENDIX A. LIST OF RELEVANT OFFICE OF INSPECTOR GENERAL REPORTS

Reports Issued in Final Related to Hurricane Katrina

- Postal Service Actions to Safeguard Employees from Hurricane Katrina (Report Number HM-AR-06-002, February 15, 2006). The OIG concluded that the Postal Service took appropriate actions as described in the IEMPs and supplemental hurricane plans related to effective notification to employees prior to Hurricane Katrina's landfall. Postal Service employees were safeguarded, and no injuries to employees were reported prior to Hurricane Katrina's landfall. The OIG made no recommendations.
- Postal Service's Emergency Purchasing in Response to Hurricanes Katrina and Rita (Report Number CA-MA-06-001, March 7, 2006). The OIG concluded that the Postal Service quickly responded to Hurricanes Katrina and Rita by using existing contracts and containing costs when new contracts were needed; therefore, the OIG made no recommendations. Postal Service management had no comments on the report.
- Mail Processing Operations in the Wake of Hurricanes Katrina and Rita (Report Number NO-MA-06-002, March 27, 2006). The audit concluded that the Postal Service successfully reestablished mail processing operations after the hurricanes by implementing emergency management plans to move the mail, assessing damage to the mail processing network, and quickly reestablishing mail processing operations in the Gulf Coast region. The report also identified several issues which could improve the Postal Service's response to future disasters. These issues included the need to provide an adequate communications structure, identify adequate contingency sites outside the hurricane zone, and secure adequate backup power supplies. Because these issues were not adequately addressed, mail processing recovery efforts were hampered, and some mail was delayed or not delivered.

The OIG recommended that Postal Service management revise, validate, and utilize a communications plan, assess existing mail processing contingency sites, and assess electrical requirements at mail processing facilities. Management agreed with the OIG's findings and recommendations and has initiatives in progress, completed, or planned addressing the issues in this report.

 National Change of Address – Emergency Preparedness (Report Number IS-AR-06-005, March 30, 2006). The OIG concluded that Postal Service management responded diligently to Hurricane Katrina by creating new procedures to redirect mail to affected customers under tight time constraints. However, the Postal Service could benefit from establishing and consolidating essential COA emergency procedures in a formalized policy, such as the IEMP for distribution throughout the Postal Service.

The OIG recommended Postal Service management: (1) identify COA emergency procedures established by the Postal Service during Hurricane Katrina that could be useful in responding to future national disasters; (2) establish a Postal Service-wide steering committee with the authority to declare an emergency for a specific location and ensure the Postal Service takes action to maintain continuity of service during emergencies; (3) incorporate the procedures identified in recommendations 1 and 2 into formal policy, such as the IEMP or other policies, to address Postal Service operations regarding COA emergency situations; and (4) disseminate these emergency procedures throughout the Postal Service so that managers in affected areas of an emergency will have authority to respond to emergency situations timely. Management agreed with recommendation 1 and has taken corrective actions. However, management disagreed with recommendations 2 through 4, generally offering alternative approaches to address the issues we raised.

 Review of Postal Service's Replacement and Repair of Facilities Affected by Hurricane Katrina (Report Number FA-MA-06-001, May 26, 2006). The OIG reported that Postal Service facilities quickly and successfully responded to Hurricane Katrina. Facilities headquarters and the Southeast and Southwest FSOs worked with the impacted areas and districts to resume operations as quickly as possible by assessing damage and finding alternatives. In addition, the FSOs suspended rent payments for leased facilities that were deemed unusable as a result of the hurricane. The report also identified several areas where the Postal Service could improve its response to future disasters. These areas included improving accessibility to facilities, following standardized lockdown procedures, developing procedures for prearranging mobile home and trailer haulers, improving communications, providing for appropriately sized generators, and securing multiple national cleanup contracts.

The OIG recommended and Postal Service management agreed to develop procedures to ensure that postal response personnel have emergency access to facilities, postmasters follow standard lockdown procedures, and prearrangements are made with mobile home/trailer haulers. In addition, we recommended Postal Service management distribute satellite phones to the FSOs or develop another alternative to improve communication, provide for acquiring appropriately sized generators, and establish national contracts to expedite cleanup efforts.

 Postal Inspection Service's Procurement Transactions Related to Hurricane Katrina Response, Recovery, and Reconstruct Efforts (Report Number SA-AR-06-004, May 30, 2006). The OIG concluded that overall, the U.S. Postal Service and the Postal Inspection Service had effective controls over procurement transactions related to Hurricane Katrina efforts. Procurement transactions were valid, authorized, and supported by the appropriate documentation; however, management could strengthen controls to ensure that International Merchant Purchase Authorization Card (IMPAC) cardholders review, sign, and date U.S. bank statements within 5 days of receipt as required.

The OIG recommended and management agreed that authorizing officials will ensure all IMPAC credit cardholders review, sign, and date U.S. bank statements within 5 days of receipt, as required.

 Postal Inspection Service Emergency Preparedness for Hurricane Katrina (Report Number SA-AR-06-005, June 5, 2006). The OIG concluded that the Postal Inspection Service responded to Hurricane Katrina rapidly and successfully under difficult and unprecedented circumstances and took actions consistent with the IEMPs. Over 300 postal inspectors and postal police officers responded immediately to safeguard Postal Service employees, provide security, and ensure that infrastructures were secure and operational.

Postal Inspection Service officials requested and obtained right-of-way authority from the FEMA to ensure that inspectors could carry out their mission. Postal Inspection Service personnel also escorted fuel and other recovery-related goods, such as lights and generators, into Alabama, Louisiana, and Mississippi. Further, the Postal Inspection Service initiated an educational campaign to prevent fraud schemes related to Hurricane Katrina relief efforts. These actions to implement the IEMP, update policies, and provide ICS training enhanced the Postal Inspection Service's EP and response to Hurricane Katrina. Therefore, the OIG did not make any recommendations. We discussed the report with Postal Inspection Service management and they opted not to provide comments.

 Hurricane Katrina – The Effectiveness of the Postal Service Transportation and Logistics Network (Report Number NL-AR-06-006, June 29, 2006). The OIG concluded that the Postal Service's anticipation of Hurricane Katrina and rapid response to the storm's impact on the Gulf Coast preserved Postal Service funds and other resources and facilitated the task of reconstituting the Postal Service network. The Postal Service implemented timely actions to suspend and terminate unneeded highway contract routes in the hurricane emergency zone, saving the Postal Service about \$2.8 million, and made those funds available for emergency transportation requirements. Additionally, despite the diligent efforts of Postal Service supply management and contracting officials to protect federal resources, the Postal Service may have incurred more than \$32.8 million in excess Hurricane Katrina related fuel costs, driven by Gulf Coast oil industry disruption, and resulting nationwide fuel price increases.

The OIG recommended and Postal Service management agreed to verify the termination of unneeded highway contract routes; coordinate with appropriate

federal authorities to better leverage Postal Service capacity during future national emergencies; and revise or validate IEMPs and other appropriate policies.

Pre-Hurricane Katrina Related Reports

- Emergency Preparedness Training (Report Number DA-OT-04-004, July 23, 2004). The review found that training sessions on comprehensive emergency management planning were helpful in disseminating headquarters policies and terminologies to all levels. The Postal Service continually provided guidance and policy. However, EP guidance was not always consistently communicated, and therefore not always followed by the EMTs. The OIG suggested that the OEP assess the field IEMPs and assist them in correcting any inconsistencies with policies and guidance.
- Audit of Postal Inspection Service's Emergency Preparedness (Report Number SA-AR-05-001, January 5, 2005). The OIG concluded that the Postal Inspection Service has many contingency plans (such as Bomb Response, National Security Emergencies Response, and Threat Warning System) and is now developing an IEMP specific to its law enforcement requirements, in response to *Homeland Security Presidential Directive 5*. Under this directive, all federal departments and agencies, including the Postal Service, are required to adopt comprehensive plans addressing all hazards. A comprehensive plan will help ensure consistent guidance and practices for managing and responding to emergencies across all Postal Inspection Service divisions. The OIG did not make any recommendations because the Postal Inspection Service was developing its IEMP.

APPENDIX B. INTEGRATED EMERGENCY MANAGEMENT PLAN FRAMEWORK



Source: Integrated Emergency Management Plan Template.

APPENDIX C. DISTRICT EMERGENCY ACTION PLAN FLOW CHART



DISTRICT EMERGENCY ACTION PLAN FLOW CHART

Source: Appendix A of the District Integrated Emergency Management Plan Template.

APPENDIX D. DISTRICT CONTINUITY OF OPERATIONS PLAN FLOW CHART



Source: **Management** *Plan Template.* Note: The installation COOP is depicted in the transportation and delivery operations flow charts.

APPENDIX E. ANALYSIS OF DISTRICT AND INSTALLATION INTEGRATED EMERGENCY MANAGEMENT PLANS

District:	Alabama	Louisiana	Mississippi
IEMP	Yes	Yes	Yes
Date	July 2004	July 2005	July 2005
Appendix A: EAP	Yes	Yes	Yes
Appendix B: COOP	Yes	Yes	Yes
Annex 1G: National Emergency	Yes	No	Yes
Annex 2B: Floods and Flash Floods	Yes	No	Yes
Annex 2C: High Winds and Tornadoes	Yes	No	Yes
Annex 2D: Hurricane Annex	Yes	No	Yes
Annex 3B: Communications Failure	Yes	No	Yes
Annex 3E: Power Outages	Yes	No	No
Signed	No	No	No
Signature Date	No	No	No

Installation:	Birmingham P&DC	Gulfport P&DC	Mobile P&DC	New Orleans P&DC	Shreveport P&DC	Baton Rouge P&DC
IEMP	Yes	Yes	Yes	Yes	Yes	Yes
Date	4-6-05	3-16-05	6-16-04 ¹⁹	No	7-29-05	8-2-05
Appendix A: EAP	Yes	Yes	Yes	Yes	Yes	Yes
Appendix B: COOP	Yes	Yes	Yes	Yes	Yes	Yes
Annex 1G: National Emergency	Yes	No	No	No	Yes	No
Annex 2B: Floods and Flash Floods	Yes	Yes	No	No	Yes	No
Annex 2C: High Winds and Tornadoes	Yes	Yes	No	No	Yes	No
Annex 2D: Hurricane Annex	Yes	Yes	No	No	Yes	No
Annex 3B: Communications Failure	Yes	No	No	No	Yes	No

¹⁹ This plan was updated December 7, 2005.

Postal Service Emergency Preparedness for Hurricanes Katrina and Rita

				New		Baton
	Birmingham	Gulfport	Mobile	Orleans	Shreveport	Rouge
Installation:	P&DC	P&DC	P&DC	P&DC	P&DC	P&DC
Annex 3E: Power	Yes	No	No	No	Yes	No
Outages						
Signed	No	No	Yes	No	Yes	No
Signature Date	No	No	6-16-04	No	7-29-05	No

APPENDIX F. MANAGEMENT'S COMMENTS

HENRY A. PANKEY Vice President, Emergency Preparedness



June 20, 2006

KIM H. STROUD, DIRECTOR, AUDIT REPORTING

SUBJECT: OIG Report Number (SA-AR-06-DRAFT) Postal Service Emergency Preparedness for Hurricanes Katrina and Rita

This is in response to your request for comments on the referenced report concerning the state of Postal Service preparedness for Hurricanes Katrina and Rita and follow-up actions by the Office of Emergency Preparedness.

Recommendation #1

Revise the Integrated Emergency Management Plan sufficiently to address area and headquarters functions to include coordination with the federal government during responses that require Postal Service involvement in the National Response Plan.

We agree in principle that better coordination with federal partners in the National Response Plan (NRP) is a desirable objective. The Integrated Emergency Management Plan (IEMP) may not be the appropriate mechanism for achieving this coordination. The IEMP was designed to provide guidance and a structure for establishing and coordinating the activities of local emergency management teams (EMT) using the incident command model. The all-hazards annexes in the IEMP provide basic templates and checklists that local EMTs can build upon and reference to manage local events. The Postal Service participates in the NRP as a supporting agency in various essential support functions (ESF) but it is not a lead agency in any particular ESF. Responsibility for coordinating and activating the ESFs are with the lead federal agencies as designated in the NRP.

There is an effort underway that is in line with the positive intent of your recommendation. We are working to align internal emergency management policy under an Emergency Operations Plan (EOP) that will conform to the NRP. Should the NRP be invoked and assets or services be requested of the Postal Service during an incident of national significance, OEP will coordinate accordingly.

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Recommendation #2

Ensure field operations personnel complete, approve, validate and implement Integrated Emergency Management Plans that incorporate stand-alone plans for hurricanes and lessons learned.

The Office of Emergency Preparedness agrees with this recommendation. Since responsibility for IEMP integrity and maintenance is a local responsibility, OEP has taken measures to establish policy and guidelines for IEMP assessment and review. On May 11, 2006 a field memorandum was issued by the Vice President, Emergency Preparedness to the Managers, Operations Support instructing the field to complete an IEMP review for their area of responsibility no later than June 30. This includes an assessment and update of all the checklists for each applicable IEMP hazard-specific annex, the field continuity of operations plans and an upload of updated information to the Postal Emergency Management System (PEMS).

Recommendation #3

Develop an alternative incident management system to assist the Postal Service with effectively managing emergencies throughout each stage.

The Office of Emergency Preparedness agrees with this recommendation and has started an initiative to rollout basic incident command system training to field emergency management teams starting with the Southwest, Southeast and Capital Metro Areas (Carolinas). OEP is also working with the three areas and has deployed headquarters resources to train Area and District coordinators in the

The Postal Inspection Service is also developing an incident management software program and we are in the early stage of assessing it as a tool for emergency preparedness. Incident Master is a software application that is being developed in partnership with other headquarters stakeholders.

Recommendation #4

Establish performance measures for all hazards to assess the achievement of emergency management goals that effectively enhance the Postal Service's emergency preparedness and incorporate them into the core goals for headquarters, area and field level emergency managers.

OEP has provided the field with two substantive core goals for EP Managers that address this recommendation within the framework of the Performance Evaluation System. These are to complete and validate plans and documentation, and to develop contacts and present USPS objectives to external emergency management groups and maintain a liaison. The EP field staffing was established as a direct reporting relationship to operations in the field. Although the core goals are established by headquarters, the responsibility for establishing an effective program remains with line management at the field level.

At the present time, the Office of Emergency Preparedness has consulted with our Information Technology portfolio managers and is limiting participation to an evaluation phase where rollout initially will be to a small group of subject matter experts that can support this effort and further develop the application as there is a need to expand.

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Recommendation #5

Identify and develop mandatory emergency preparedness training at each level of the Postal Service for hazards, as necessary based on risks and vulnerabilities.

OEP has initiated a pilot and refresher ICS training for EMTs in coordination with the Southeast, Southwest and Capital Metro Areas. Headquarters teams are providing this training to reinforce the incident command system and to provide EMT members an overview at the IC-100 level which is the entry level we are targeting for all EMTs in the future. We plan to roll this out to the rest of the country starting FY07 but we are targeting the hurricane districts first.

Overall, we agree with the recommendations of the Office of the Inspector General and sincerely appreciate the constructive comments.

Henry A. Pankey

cc: William J. Brown Ellis Burgoyne