



March 21, 2008

DAVID L. SOLOMON  
VICE PRESIDENT, NEW YORK METRO AREA OPERATIONS

ALEXANDER E. LAZAROFF  
CHIEF POSTAL INSPECTOR

SUBJECT: Audit Report – Postal Service Emergency Preparedness Plans for the New York Metro Area (Report Number SA-AR-08-005)

This report presents the results of our self-initiated audit of the U.S. Postal Service emergency preparedness (EP) plans for the New York Metro Area (Project Number 07YG061SA002). Our objective was to determine whether Postal Service EP plans were completed in accordance with federal and Postal Service guidance and addressed risk vulnerabilities. We conducted this audit because EP is a critical area for the Postal Service. See [Appendix A](#) for additional information about this audit.

Overall, we concluded that Postal Service EP plans were not always completed in accordance with federal and Postal Service guidance and did not fully address risk vulnerabilities.

### **Integrated Emergency Management Plan (IEMP) Templates**

IEMP templates did not address federal and Postal Service guidance for emergency plans. This occurred because Postal Service management did not establish sufficient requirements in the IEMP templates to ensure applicable federal and Postal Service guidance was addressed. As a result, responsible EP officials may not be fully prepared for disasters and employees, customers, the mail, and critical assets may be exposed to increased risk. See [Appendix B](#) for our detailed analysis of this issue.

We recommend the Chief Postal Inspector:

1. Establish sufficient requirements in the Integrated Emergency Management Plan templates to address federal and Postal Service guidance. Specifically, the Integrated Emergency Management Plan templates should address Postal Service responsibilities under the National Response Plan (NRP), area and headquarters level functions during emergencies, federal exercise and drill plan requirements, and consolidated annexes.

## Management's Comments

Management agreed with our finding and recommendation and stated they are revising the IEMP to address federal and Postal Service guidance. The revised final IEMP is scheduled for dissemination and implementation by June 30, 2008. Management's comments, in their entirety, are included in [Appendix F](#).

## Evaluation of Management's Comments

The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to the recommendation, and the corrective actions should resolve the issue identified in the finding.

## Completion and Approval of IEMPs

District and facility IEMPs were not properly completed and approved as required by Postal Service guidance. This occurred because Postal Service management did not establish sufficient internal controls to ensure that responsible personnel completed these tasks. When IEMPs are not completed and approved in accordance with federal and Postal Service guidance, Postal Service employees, customers, the mail, and critical assets are exposed to increased risk. See Appendix B for our detailed analysis of this issue.

We recommend the Chief Postal Inspector:

2. Establish a formal policy to identify Postal Service facilities that require an Integrated Emergency Management Plan.

## Management's Comments

Management agreed with our finding and recommendation and stated they have drafted a management instruction identifying the types of facilities that will require an IEMP. The final management instruction is scheduled for dissemination and implementation by June 30, 2008.

## Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendation, and the corrective actions should resolve the issue identified in the finding.

We recommend the Chief Postal Inspector:

3. Establish requirements for mandatory emergency preparedness training, including periodic refresher training for personnel responsible for emergency preparedness at the area, district, and facility level.

## **Management's Comments**

Management partially agreed with the finding and stated that mandatory emergency preparedness training was established during the rollout of the Biohazard Detection System. Additionally, management stated that the Postal Service has participated in national and local drills and training exercises that are multi-disciplinary and multi-jurisdictional. Management agreed with the recommendation and stated they are revising the IEMP to identify additional requirements for training, testing, and exercises. The revised final IEMP is scheduled for dissemination and implementation by June 30, 2008.

## **Evaluation of Management's Comments**

The OIG considers management's comments responsive to the recommendation, and the corrective actions should resolve the issue identified in the finding. We acknowledge that management required employees to receive training during the rollout of the Biohazard Detection System, and the Postal Service has participated in national and local drills and training exercises. However, our interviews with 29 personnel responsible for EP indicated that 26 did not complete the minimum suggested training requirements established by the Postal Service and the Federal Emergency Management Agency. Additional mandatory training is required to ensure all personnel responsible for EP can perform their responsibilities effectively. We believe the additional training management intends to require in the revised IEMP should help ensure the Postal Service is prepared to respond to the various emergencies that threaten employees, customers, postal assets, and the mail.

We also recommend the Vice President, New York Metro Area Operations, in consultation with the Chief Postal Inspector:

4. Establish and implement emergency preparedness performance measures and incorporate them into performance plans for facility heads.

## **Management's Comments**

Management agreed with the finding and recommendation. Management stated the revised IEMP template will establish a performance measure for installations and districts that require the installation head to approve the IEMP annually. The response further indicated that the installation emergency manager and planning section chief (or designated alternate) are responsible for updating the IEMP annually or as circumstances dictate, and that the district homeland security coordinator is responsible for comprehensive review of the IEMP annually. Management stated the IEMP is validated at least quarterly based on the findings of an after action report associated with lessons learned from an event or exercise.

In follow-up correspondence, management also stated that it is often infeasible to incorporate this as a performance measure for facility heads in pay for performance. The Office of National Preparedness (ONP) has instead built performance measures into each of their systems and will give incentive awards based on exceeding performance measures. Management has developed drafts of their National Preparedness Award System and Performance Measures Assessment Scorecards and plans to implement them by October 1, 2008.

### **Evaluation of Management's Comments**

The OIG considers management's comments responsive to the recommendation, and the corrective actions should resolve the issue identified in the finding.

We also recommend the Vice President, New York Metro Area Operations, in consultation with the Chief Postal Inspector, establish and implement additional internal controls to ensure emergency plans are properly completed and approved. Specifically, we recommend management:

5. Establish an area Emergency Management Coordinating Committee to provide oversight and assistance to district and facility Emergency Management Teams in establishing, implementing, and reviewing Emergency Management Plans.

### **Management's Comments**

Management partially agreed with the recommendation. Management stated that the establishment of the Emergency Management Coordinating Committee (EMCC) is clearly delineated in the *Administrative Support Manual*. The functionality of the committee may not have been clear, but the oversight and assistance to district and facility emergency management teams (EMT) remain part of the foundation of the area operating staff. Risks to and vulnerabilities in the area are periodically addressed and discussed through venues other than a formal committee.

Management stated they have since established a formal emergency coordinating committee that will function in accordance with Postal Service policy. However, management did not provide the date that the emergency coordinating committee was established.

### **Evaluation of Management's Comments**

The OIG considers management's comments responsive to the recommendation, and the corrective actions should resolve the issue identified in the finding.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Andrea L. Deadwyler, Director, Inspection Service and Facilities, or me at (703) 248-2100.

E-Signed by Darrell E. Benjamin,   
VERIFY authenticity with ApproveIt

Darrell E. Benjamin, Jr.  
Deputy Assistant Inspector General  
for Support Operations

cc: Zane M. Hill  
John H. Bridges III  
Michele L. Culp  
Katherine S. Banks

## APPENDIX A: ADDITIONAL INFORMATION

### BACKGROUND

The U.S. Postal Service, an independent establishment of the executive branch of the U.S. government, operates like a business and generates about \$70 billion in revenue annually.<sup>1</sup> The Postal Service is responsible for the development of plans for actions necessary to maintain itself as a viable part of the federal government during emergencies.

The Postal Inspection Service is responsible for protecting the mail, Postal Service assets, and millions of customers. As the emergency coordinator for the Postal Service, the Chief Postal Inspector is responsible for coordinating emergency planning and civil preparedness programs and providing training and guidance to responsible EP personnel.

Consolidation of Postal Service Homeland Security Responsibilities. In March 2007, the Chief Postal Inspector announced that in a continuing effort to eliminate redundancies and reduce costs, all homeland security responsibilities were consolidated under the Postal Inspection Service. These responsibilities included EP and aviation security. These groups realigned to form the ONP within the Postal Inspection Service. ONP's key responsibilities include incident management, infrastructure protection, aviation mail security, public health preparedness, and performance measures.

ONP is responsible for developing Postal Service EP policy and guidance, including the IEMP templates. Its mission is to maintain a high state of national preparedness across the Postal Service enterprise through a comprehensive and coordinated approach to planning, integration, and support.

Integrated Emergency Management Plan. In January 2004, the Postal Service established the IEMP as the comprehensive plan for mitigating, preparing for, responding to, and recovering from any natural or man-made disaster. The goal of the IEMP is to improve coordination of planning and response activities among functional areas, minimize duplication of planning efforts, and establish a standardized emergency management process.

The IEMP integrates the Emergency Action Plan (EAP),<sup>2</sup> Continuity of Operations Plan (COOP),<sup>3</sup> and annexes for specific hazards (such as hurricanes, floods, and wildfires) into one plan. It also establishes EMTs and defines team roles and responsibilities. Districts and facilities are required to tailor standardized district and facility IEMP templates to address specific processes and procedures and other information pertinent

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<sup>1</sup> *United States Postal Service Annual Report 2006.*

<sup>2</sup> The EAP provides evacuation-specific tasks and procedures for the facility.

<sup>3</sup> The COOP provides operational tasks and procedures for moving operations to an alternate facility.

to their site. District and facility managers are required to update their IEMPs at least once a year.

Homeland Security Presidential Directive (HSPD) 5. HSPD-5, *Management of Domestic Incidents*, dated February 28, 2003, directs the Secretary of Homeland Security to develop and administer a single, comprehensive National Incident Management System (NIMS) and use the NIMS to develop and administer a NRP. NIMS provides a consistent nationwide template to enable federal, state, local, and tribal governments and private-sector and nongovernmental organizations to work together effectively and efficiently to prepare for, prevent, respond to, and recover from domestic incidents.

National Response Plan.<sup>4</sup> The NRP, dated December 2004, is the federal government's unified, all-discipline, all-hazard plan that aligns federal coordination structures, capabilities, and resources for domestic incident management. The NRP identifies the Postal Service as a support agency for seven emergency support functions (ESF),<sup>5</sup> including transportation and mass care housing and human services.

## **OBJECTIVE, SCOPE, AND METHODOLOGY**

Our objective was to determine whether Postal Service EP plans were completed in accordance with federal and Postal Service guidance and addressed risk vulnerabilities.

To accomplish our objective, we interviewed Postal Service and Postal Inspection Service officials, including officials from the ONP, facility heads, and district and facility EMTs. We reviewed applicable EP policies and procedures and assessed related internal controls. We also assessed mitigation and preparedness activities for EMTs.

We conducted audit fieldwork at Postal Service Headquarters, seven judgmentally<sup>6</sup> selected Postal Service critical facilities,<sup>7</sup> and four districts (see [Appendix C](#)) located in the New York Metro Area. We also reviewed training records from the National Training Database and official Emergency Management Institute transcripts to determine whether key personnel responsible for EP completed the minimum suggested training requirements established by the Postal Service and the Federal Emergency Management Agency (FEMA). Although we did not test the accuracy of computer-generated data, we discussed the training records with applicable personnel and consider the data sufficiently reliable to support the opinions and conclusions in this report.

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<sup>4</sup> In September 2007, the Department of Homeland Security (DHS) issued a draft National Response Framework which, when approved, will supersede the NRP.

<sup>5</sup> ESFs describe how the Postal Service should coordinate processes and requirements to ensure efficient and effective incident management during national emergencies.

<sup>6</sup> We selected facilities based on mail volumes, number of employees, and facility type.

<sup>7</sup> Critical facilities are facilities the Postal Inspection Service considers essential for the delivery of vital postal services.

We conducted this performance audit from June 2007 through March 2008 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management officials on November 28 and December 11, 2007, and included their comments where appropriate.

## PRIOR AUDIT COVERAGE

In the past 3 years, the OIG issued nine reports regarding Postal Service EP plans. Six of the nine related to our review of the Postal Service's response to Hurricanes Katrina and Rita. In these reviews, we found that while the Postal Service took noteworthy actions in responding to the hurricanes, opportunities existed to enhance EP planning and response. Management generally agreed with our recommendations to enhance EP planning and response.

In addition, the Government Accountability Office (GAO) issued three testimonies on federal EP planning and one report on Postal Service EP planning. In its report, the GAO provided and Postal Service management generally agreed with three recommendations regarding training and guidance for suspicious mail. Also, the White House issued a report on lessons learned from Hurricane Katrina and federal EP planning.

Report Title	Report Number	Final Report Date
<b>OIG Reports</b>		
<i>Handling of a Suspicious Powder Incident at the Wichita Falls Mail Processing Center</i>	SA-AR-07-005	July 11, 2007
<i>Handling of a Potentially Explosive Ordnance at the Dallas Bulk Mail Center</i>	SA-AR-07-001	March 29, 2007
<i>Postal Service Emergency Preparedness for Hurricanes Katrina and Rita</i>	SA-AR-06-007	August 3, 2006
<i>Hurricane Katrina – The Effectiveness of the Postal Service Transportation and Logistics Network</i>	NL-AR-06-006	June 29, 2006
<i>Postal Inspection Service Emergency Preparedness for Hurricane Katrina</i>	SA-AR-06-005	June 5, 2006
<i>National Change of Address – Emergency Preparedness</i>	IS-AR-06-005	March 30, 2006
<i>Mail Processing Operations in the Wake of Hurricanes Katrina and Rita</i>	NO-MA-06-002	March 27, 2006
<i>Postal Service Actions to Safeguard Employees from Hurricane Katrina</i>	HM-AR-06-002	February 15, 2006
<i>Postal Inspection Service's Emergency Preparedness</i>	SA-AR-05-001	January 5, 2005

Report Title	Report Number	Final Report Date
<b>GAO and White House Reports</b>		
<i>Homeland Security: Preparing for and Responding to Disasters</i>	GAO-07-395T	March 9, 2007
<i>Emergency Preparedness and Response: Some Issues and Challenges Associated with Major Emergency Incidents</i>	GAO-06-467T	February 23, 2006
<i>Hurricane Katrina: Providing Oversight of the Nation's Preparedness, Response, Recovery and Activities</i>	GAO-05-1053T	September 28, 2005
<i>Guidance on Suspicious Mail Needs Further Refinement</i>	GAO-05-716	July 2005
<i>White House Report – The Federal Response to Hurricane Katrina: Lessons Learned</i>	None	February 2006

## APPENDIX B: DETAILED ANALYSIS

### Integrated Emergency Management Plan Templates

IEMP templates did not address federal and Postal Service guidance for emergency plans. For example, the templates did not:

- Address NRP requirements for the Postal Service's responsibilities to provide ESFs in the event of a national emergency. The Postal Service requires the IEMP to be the comprehensive plan for the Postal Service to prepare for and respond to national emergencies.
- Integrate area and headquarters level functions during emergencies, and did not include roles and responsibilities for area and headquarters EP officials. The Postal Service requires area and headquarters personnel responsible for EP to coordinate their planning and response activities in the IEMP.
- Require exercise and drill plans covering multiple years and including full-scale exercises involving multi-disciplinary and multi-jurisdictional participants, in accordance with DHS guidance.<sup>8</sup>
- Consolidate incident-specific annexes into broader categories to increase the Postal Service's capability to respond rapidly and effectively to a variety of incidents. The IEMP template contains 27 incident-specific annexes, many of which could apply to a single incident. For example, during a severe storm, the following annexes could apply: floods and flash floods, high winds, power outages, and serious injuries or fatalities. However, DHS established seven annexes to address similar risks and vulnerabilities in the NRP, in contrast to the Postal Service's 27 annexes. See [Appendix D](#) for a list of Postal Service annexes.

In our review of EP plans, we determined that Postal Service management did not establish sufficient requirements in the IEMP templates to ensure applicable federal and Postal Service guidance was addressed.

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<sup>8</sup> According to guidance in the NIMS and the *Homeland Security Exercise and Evaluation Program Manual*, dated February 2007, emergency plans should cover multiple years and include full-scale exercises involving multi-disciplinary and multi-jurisdictional participants.

## District and Facility IEMP Completion and Approval

IEMPs were not properly completed and approved as required by Postal Service guidance. For example:

- One facility did not have an IEMP at all and two did not have signed and approved final IEMPs.
- None of the approved facility IEMPs provided guidance for the movement of employees in their COOPs.<sup>9</sup>
- None of the approved district and facility IEMPs contained safe zone maps or appropriate guidance for Annex 2B (Floods and Flash Floods). Although personnel identified annexes applicable to their facilities, they did not always complete each annex as required.

This occurred because Postal Service management did not establish sufficient internal controls to ensure that responsible personnel completed these tasks. Specifically, management did not:

- Establish a formal policy to clarify which postal facilities require IEMPs. (See [Appendix E](#) for the status of IEMPs at the districts and facilities reviewed.) Although guidance in the district IEMP template states that district managers are responsible for obtaining IEMPs for Level 24<sup>10</sup> and above facilities, the guidance does not clearly identify facilities that require IEMPs.
- Establish requirements for mandatory training for responsible personnel to ensure that IEMPs are properly completed. Twenty-six of 29 personnel responsible for EP did not complete the minimum suggested training requirements established by the Postal Service and FEMA. According to GAO internal control standards, training should be aimed at developing and retaining employees' skill levels to meet organization needs.<sup>11</sup>
- Develop EP performance measures for facility heads to ensure that IEMPs are properly completed and approved. None of the facility heads we interviewed had EP performance measures. According to GAO internal control standards, establishing appropriate performance measures and indicators helps ensure that employees accomplish management's directives and organizational objectives.

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<sup>9</sup> The IEMP requires EP officials to identify transportation providers for the possible movement of employees to alternate sites.

<sup>10</sup> The facility level is determined by the EAS grade of the facility head. All the facilities we reviewed were critical facilities and were level 24 or higher.

<sup>11</sup> *Standards for Internal Controls in the Federal Government* (GAO/AIMD-00-21.3.1), dated November 1999.

- Establish an area Emergency Management Coordinating Committee to provide oversight and assistance to district and facility EMTs in establishing, implementing, and reviewing IEMPs in accordance with postal guidance.<sup>12</sup>

When Postal Service EP plans are not completed and approved according to federal and Postal Service guidance, employees, customers, the mail, and critical assets are exposed to increased risk.

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<sup>12</sup> *Administrative Support Manual 13* (dated July 1999 and updated with *Postal Bulletins* revisions through March 29, 2007) requires EMCCs for each area.

**APPENDIX C: NEW YORK METRO AREA DISTRICTS AND FACILITIES REVIEWED**

<b>NEW YORK METRO AREA</b>			
<b>DISTRICTS</b>			
	<b>NAME</b>	<b>CITY</b>	<b>STATE</b>
1	Long Island	Melville	NY
2	New York	New York	NY
3	Northern New Jersey	Kearny	NJ
4	Triboro	Flushing	NY
<b>FACILITIES</b>			
	<b>NAME</b>	<b>CITY</b>	<b>STATE</b>
1	Mid-Island Processing and Distribution Center (P&DC)	Melville	NY
2	Morgan P&DC	New York	NY
3	New Jersey Bulk Mail Center (BMC)	Jersey City	NJ
4	Brooklyn P&DC	Brooklyn	NY
5	JFK International Service Center (ISC)	Jamaica	NY
6	Staten Island Processing and Distribution Facility (P&DF)	Staten Island	NY
7	Queens P&DC	Flushing	NY

## APPENDIX D: POSTAL SERVICE IEMP ANNEXES

<b>POSTAL SERVICE ANNEXES</b>	
<b>ANNEX 1</b>	<b><i>HUMAN CAUSED EMERGENCIES</i></b>
<b>1A</b>	Biohazard Detection System
<b>1B</b>	Anthrax
<b>1C</b>	Bloodborne Pathogens
<b>1D</b>	Bombs and Bomb Threats
<b>1E</b>	Chemical Agents
<b>1F</b>	Civil Disorders
<b>1G</b>	National Emergency
<b>1H</b>	Radiological Emergencies
<b>1I</b>	Serious Injury or Fatality
<b>1J</b>	Theft, Burglaries, or Robberies
<b>1K</b>	Violence in the Workplace
<b>1L</b>	Severe Acute Respiratory Syndrome
<b>1M</b>	Toxic Industrial Chemical and Industrial Hazards from Off-site Sources
<b>ANNEX 2</b>	<b><i>NATURAL EMERGENCIES</i></b>
<b>2A</b>	Earthquakes
<b>2B</b>	Floods and Flash Floods
<b>2C</b>	High Winds and Tornadoes
<b>2D</b>	Hurricanes
<b>2E</b>	Landslides and Mudflows
<b>2F</b>	Thunderstorms and Lightning
<b>2G</b>	Volcanoes and Ashfall
<b>2H</b>	Wildfire
<b>2I</b>	Winter Storms and Driving
<b>ANNEX 3</b>	<b><i>TECHNOLOGICAL EMERGENCIES</i></b>
<b>3A</b>	Building Fire
<b>3B</b>	Communications Failure
<b>3C</b>	Explosion
<b>3D</b>	Hazardous Materials Spills and Leaks
<b>3E</b>	Power Outage

In contrast, the NRP contains seven annexes that address similar risks and vulnerabilities: Biological, Catastrophic, Cyber, Food and Agriculture, Mass Evacuation, Nuclear/Radiological, and Terrorism Law Enforcement and Investigations.

**APPENDIX E: STATUS OF IEMPs**

<b>DISTRICTS</b>		
	<b>Name</b>	<b>IEMP Signed and Approved Annually</b>
1	Long Island	No
2	New York	Yes
3	Northern New Jersey	Yes
4	Triboro	Yes
<b>FACILITIES</b>		
	<b>Name</b>	<b>IEMP Signed and Approved Annually</b>
1	Brooklyn P&DC	Yes
2	JFK ISC	Yes
3	Mid-Island P&DC	No
4	Morgan P&DC	Yes
5	New Jersey BMC	No
6	Queens P&DC	Yes
7	Staten Island P&DF	Yes

## APPENDIX F: MANAGEMENT'S COMMENTS



UNITED STATES POSTAL INSPECTION SERVICE

OFFICE OF NATIONAL PREPAREDNESS

February 28, 2008

Johnson John  
Acting Director, Audit Operations  
1735 North Lynn Street  
Arlington, Virginia 22209-2020

We have reviewed the draft report entitled "Draft Audit Report – Postal Service Emergency Preparedness Plans for the New York Metro Area, Report Number SA-AR-08-DRAFT." Thank you for the opportunity to comment. We are in agreement with several of the conclusions reached in the report, concur with three of the five recommendations and partially agree with the remaining two recommendations as specifically noted in this response.

In fact, we have already taken steps to implement many of the recommendations. We appreciate that the report acknowledges the important role of the Chief Postal Inspector which strengthens the organization's infrastructure towards building resiliency. This role includes coordinating emergency planning with civil preparedness programs and providing training and guidance to responsible emergency preparedness personnel.

We agree that many of the recommendations in the report will serve to enhance and improve emergency preparedness plans. We do not believe the draft report adequately reflects the tireless efforts of many U.S. Postal Service (USPS) employees as well as the difficult challenges faced by the USPS to amend its priorities and philosophy related to homeland security since September 11, 2001.

As detailed below, we are in agreement with many of the recommendations to improve the USPS ability to execute Integrated Emergency Management Plan (IEMP) measures and emergency preparedness activities, where appropriate.

### Recommendation 1

Establish sufficient requirements in the Integrated Emergency Management Plan templates to address federal and Postal Service guidance. Specifically, the Integrated Emergency Management Plan templates should address Postal Service responsibilities under the National Response Plan (NRP), area and headquarters level functions during emergencies, federal exercise and drill plan requirements, and consolidated annexes.

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We agree with Recommendation 1.

Homeland Security Presidential Directive (HSPD) - 5, identified in the IEMP, was the basis for our existing IEMP, deployed in March 2004. Our existing IEMP was developed and implemented before the deployment of the existing National Incident Management System (NIMS) (2004) and National Response Plan (2006), which inhibited NRP reference guidance. The NRP evolved into the National Response Framework (NRF) by January 22, 2008, and the ideals were incorporated in our revised IEMP updates.

Revisions to the existing IEMP templates include the following:

- The previous 26 IEMP incident annexes were rolled up into 6 incident annexes aligned to the NRF.
- Installation Emergency Manager and Planning Section Chief (or designated alternative) at the installation or district is responsible for updating this plan annually or whenever circumstances dictate.
- The District Homeland Security Coordinator is responsible for confirming that these plans are up-to-date and approved by Installation Head annually.
- Roles and responsibilities are identified for Area and Headquarters emergency management representatives as they relate to support installations and Districts during emergencies.
- Roles and responsibilities for Area and Headquarters emergency management offices have been defined in the revised IEMP in each of six incident Annexes, where appropriate, and list roles and responsibilities associated with management of all-hazard incidents and events.

**A copy of the draft IEMP document was provided to OIG personnel during a conference on February 8, 2008. The revised final IEMP is scheduled for dissemination and implementation by June 30, 2008 (end of quarter 3).**

Recommendation 2:

Establish a formal policy to identify Postal Service facilities that require an Integrated Emergency Management Plan.

We agree with Recommendation 2.

We have drafted a Management Instruction (MI) that will identify the types of facilities that will require an IEMP. **A copy of the draft MI was provided to OIG personnel during a conference on February 8, 2008. The final MI is scheduled for dissemination and implementation by June 30, 2008 (end of quarter 3).**

Recommendation 3:

Establish requirements for mandatory emergency preparedness training, including periodic refresher training for personnel responsible for emergency preparedness at the area, district and facility level.

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We partially agree with Recommendation 3.

***Mandatory emergency preparedness training had been established previously.*** Training requirements for Emergency Management Team (EMT) members were in place prior to this audit and included required exercises and drills since the rollout of the Biohazard Detection System (BDS). Over the past several years, the USPS has participated in National and local drills and training exercises that are multi-disciplinary and multi-jurisdictional.

The revised IEMP document confirms that USPS employees will participate in the following activities to ensure a viable program and maintain a constant state of readiness, in compliance with NRF and NIMS guidance. USPS will follow Homeland Security Exercise and Evaluation Program (HSEEP) guidance, which integrates NIMS concepts and principles into tests, training, and exercises (see below excerpt from IEMP draft). The revised final IEMP is scheduled for dissemination and implementation by June 30, 2008 (end of quarter 3).

**Training, Testing, and Exercise (TT&E) Plan**

TRAINING/EXERCISES	METHODS	AUDIENCE	FREQUENCY
Orientation, Case Study and Walkthroughs	Classroom Study Material	EMT, Essential Personnel	Semi-Annually (one day)
Specific Drills	Tabletop	EMT	Bi-Annually (one day)
Specialty	Functional Exercise	Specified Teams	Annually (one day)
Telecommunications Check	Functional Exercise	Installation Management, EMT	Quarterly
Full Scale	Exercise	All Employees and Local First Responders	Every 3 years (one day)

Recommendation 4

Establish and implement emergency preparedness performance measures and incorporate them into performance plans for facility heads.

We agree with Recommendation 4.

The revised IEMP Templates will establish a performance measure for the installation and District that require the Installation Head to approve the IEMP annually to ensure it is up-to-date. The Installation Emergency Manager and Planning Section Chief (or designated alternative) at the installation or District is responsible for updating the plan annually or as circumstances dictate. The District Homeland Security Coordinator is responsible for comprehensive review of the IEMP annually. The IEMP is validated at least quarterly based on the findings of an after action report (AAR) associated with lessons learned from an event or exercise.

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In addition to the revised IEMP measure, the Vice President, New York Metro Area Operations will issue a memorandum directing each facility head that currently has an IEMP to provide an annual certification that their respective IEMP is updated and approved, beginning FY 2008.

Recommendation 5

Establish an area Emergency Management Coordinating Committee to provide oversight and assistance to district and facility Emergency Management Teams in establishing, implementing and reviewing Emergency Management Plans.

We partially agree with Recommendation 5.

The establishment of the Emergency Management Coordinating Committee is clearly delineated in the Administrative Support Manual (ASM Section 28). The functionality of ECC's may not have been clear but the oversight and assistance to District and facility Emergency Management Teams remains part of the foundation of the area operating staff. Risk and vulnerability to the area are periodically addressed and discussed through venues other than a formal ECC.

The responsibilities of developing strategy and implementing policy as identified responsibilities in the ASM for the ECC will be formally implemented. Nationwide, on October 9, 2007 a memo was sent to field National Preparedness personnel and on January 25, 2008 a memo was sent to Inspectors in Charge outlining their responsibilities in relation to the Emergency Management Coordinating Committees. (Copies of these documents were provided to OIG personnel during a conference on February 8, 2008.)

The Vice President, New York Metro Area Operations has established a formalized Emergency Coordination Committee that will function in accordance with the ASM.

Again, we appreciate your review and opportunity to comment as we implement performance measures towards continual improvement. If you or your staff wishes to discuss any of these comments, I am available at your convenience.

The report contains no confidential business sensitive or law enforcement sensitive information that would preclude disclosure under the Freedom of Information Act.

Sincerely,



John Bridges  
Executive Director, National Preparedness