



UNITED STATES GOVERNMENT

LIBRARY OF CONGRESS

Memorandum

Office of the Inspector General

TO: Kenneth E. Lopez
Director, Office of Security and
Emergency Preparedness

September 30, 2008

FROM: Karl W. Schornagel
Inspector General

A handwritten signature in black ink, appearing to read "Karl W. Schornagel".

SUBJECT: Follow-Up Audit Report No. 2008-PA-104, *Emergency Preparedness Program*

During August 2008, we conducted a follow-up of Audit Report No. 2005-PA-104, *Emergency Preparedness Program*, dated March 6, 2007. The follow-up was designed to evaluate management's progress on implementing the report's recommendations. Our methodology included inquiring of management about the actions taken to implement the report's recommendations and analyzing supporting documentation.

We are pleased to report that the Office of Security and Emergency Preparedness (OSEP) has implemented most of our recommendations, leaving only one recommendation outstanding.

The following is a summary of what we found:

Recommendations that have been implemented/closed

Recommendation I: Develop a Regulation Defining and Designating Authority for the Emergency Preparedness Program

Follow Up Results:

Because authority and responsibilities were not clearly defined for the Emergency Preparedness Program (EPP), the effectiveness of OSEP and the Emergency Management Team (EMT) could be impaired in the event of an emergency. In our report, we recommended that OSEP develop an LCR designating authority for the Emergency Preparedness Program, defining program requirements for preparedness, response, and recovery, and directing Library service units in planning and emergency management. OSEP agreed with our recommendation.

Our follow-up found that OSEP updated and reissued LCR 211-3 on April 20, 2008 which defines the authority and responsibilities for the EPP. Our review of the revised LCR 211-3 determined that OSEP has fully implemented the recommendation.

Recommendation II: Coordinate the Development of a Single Comprehensive Emergency Management Document

Follow Up Results:

An emergency situation is managed most efficiently using one comprehensive document; however, the Library's emergency plans were contained in many different documents. In our report, we recommended that OSEP coordinate the development of a single comprehensive, emergency management document that details all aspects of the EPP. Initially OSEP agreed, but subsequently concluded that security sensitive data and law enforcement activities should not be included in one single plan.

Based on its revised approach, OSEP updated the 2003 Comprehensive Emergency Plan with security measures prescribed by the Department of Homeland Security and other applicable laws and regulations. Our review of the revised Comprehensive Emergency Plan found that all the necessary elements were now included.

Recommendation IV: Simplify and Make Greater Use of the Emergency Team Structure

Follow Up Results:

Our evaluation of the Library's Emergency Preparedness Decision Matrix originally determined that the Library official in charge of the Emergency Management Team may not be involved in decisions related to all emergency events affecting the Library. The result could be confusion in directing the Library's response to an emergency.

We recommended simplifying the matrix by reducing its three categories to two: Emergency Operations Center (EOC) level events and limited response events. To reduce the possibility of command confusion, we recommended that OSEP develop a command and control structure for emergency operations and document its line of communication in the Library's comprehensive emergency management plan. The plan should define the process for activating the EOC and EMT, and how the EMT provides directions and communicates with the Librarian and the EOC's primary backup sites.

OSEP responded that the three category matrix was adequate and reflected how the United States Capitol Police (USCP) is involved in managing emergency incidents affecting the Library. Therefore, OSEP decided to retain the three category matrix.

Additionally, OSEP maintained that the command and control structure was in place and its line of communication was identified in the plan. This included the process for activating the EOC and EMT, and guidance for EMT directions and communications with the Librarian and primary EOC backup sites. Based on further consultation with OSEP, we concluded that this recommendation should be closed.

Recommendation V: Develop Procedures to Achieve More Effective Controls over Office Emergency Coordinators

Follow Up Results:

OSEP does not have supervisory authority over Office Emergency Coordinators (OEC), therefore we recommended that OSEP pursue the authority to evaluate an OEC's emergency preparedness performance. We also recommended that OSEP develop procedures to require and track OEC training.

OSEP disagreed with our recommendation for pursuing authority to evaluate an OEC's emergency preparedness performance, stating that employees receiving performance evaluations from two supervisory elements is without precedent and raises the potential for employee relations issues. However, OSEP is now providing comprehensive training several times during the year that defines an OEC's role and responsibilities during an emergency.

In light of OSEP's desire to avoid employee relations issues and our confirmation of its comprehensive OEC training, we have closed this recommendation.

Recommendation VI: Develop an Annual Training Plan and Provide More Emergency Response Training

In evaluating Library emergency preparedness, we determined that the Library's emergency training should be more organized and that courses addressing the needs of specific groups should be developed. We recommended that OSEP develop an annual training plan that provides a schedule of meetings, drills, tabletop exercises, and training courses. In developing the training plan, we also recommended that OSEP illustrate how the training would be evaluated.

OSEP agreed with the recommendation and developed an annual training plan that provides classes and instructions for several categories of Library's staff and tracks all training taken by employees. Our review of the annual training plan, rosters, and related training documentation concluded that the recommendation has been fully implemented.

Recommendation VII: Improve Communications and Training for Disabled Staff and Disability Monitors

Follow Up Results:

We originally found that the emergency-related needs of disabled staff required further attention. This included improving communications with and training for the disabled staff and the disability monitors. We recommended that OSEP improve communications and training for disabled staff and disability monitors with emphasis on informing them about the different types of evacuations disabled staff may experience.

OSEP agreed with the recommendation and has implemented several initiatives to improve communications with disabled staff and disability monitors. Also, with assistance from the Office of Workforce Diversity, OSEP has continued to work closely with disabled staff in an effort to improve assistance during an emergency. Our review found that OSEP has fully implemented our recommendation.

Recommendation VIII: Develop a Memorandum of Understanding with the Capitol Police

Follow Up Results:

At the time of our original audit the Library was not required to follow USCP direction in emergencies, therefore, the possibility existed that leadership during an emergency event could be unclear and could result in conflicting directions. To reduce the possibility for confusion and conflicting directions, we recommended that OSEP develop a Memorandum of Understanding (MOU) with the USCP to assure consistency and uniformity in their response to an emergency on Capitol Hill.

In response to our recommendation OSEP stated that its Office of Emergency Preparedness and its EMT were emphasizing improving coordination and communication with the USCP for emergency preparedness. Since our original report, progress has also been made on the merger between the USCP and the Library's police force with the USCP having authority to direct emergency operations under a MOU.

As a result, we now consider this recommendation closed.

Recommendation IX: Develop a Memorandum of Understanding with the Architect of the Capitol

Follow Up Results:

In our original report we indicated our concern that OSEP did not have the procedures and training to operate the building systems and equipment of the Library's three Capitol Hill buildings. Therefore, if during an emergency, Architect of the Capitol (AOC) staff were unavailable or incapacitated, OSEP and the EMT could not operate the Library's building systems and equipment.

We recommended that OSEP develop a MOU with AOC, that in the event of the absence of AOC staff during an emergency, provided for the procedures and training of Library personnel to operate the Library's building systems and equipment. OSEP originally concurred with our recommendation but subsequently concluded that the existing procedures for AOC's response in an emergency were adequate and that an MOU was unnecessary. Furthermore, OSEP indicated that AOC actively participates in all emergency planning and training exercises and maintains documentation defining its responsibilities at the Library during an emergency.

Due to these facts, we have closed this recommendation.

Recommendations that have not been fully implemented or closed.

Recommendation III: OSEP Should Develop or Obtain a Threat/Risk Assessment

Follow Up Results:

In our original review we found that complex threats were not considered in the Library's emergency response plans. An emergency plan should be based on the hazards and threats that may occur. We recommended that OSEP develop or obtain a current threat/risk assessment and use it as a basis for a comprehensive hazard mitigation plan. OSEP agreed with the recommendation.

In response to our recommendation, OSEP is conducting an analysis and has expanded it to include reviewing risk assessments of the collections by service units and to consider the impact of legislation requiring USCP to prepare recommendations for the management of security functions affecting the Library.

OSEP is currently soliciting assistance from all Library service/support units, including the Office of the Inspector General, to assess the effects of the future merger of the Library's police force with USCP. Therefore, OSEP has not been able to complete a

comprehensive threat/risk assessment for the Library. This recommendation remains unimplemented and our office will continue to review OSEP's progress on this issue.

We appreciate the cooperation and courtesies extended by the Office of Security and Emergency Preparedness during this follow up review.