



United States Government Accountability Office
Washington, DC 20548

March 22, 2013

The Honorable Bennie G. Thompson
Ranking Member
Committee on Homeland Security
House of Representatives

Subject: *FEMA Reservists: Training Could Benefit from Examination of Practices at Other Agencies*

Dear Mr. Thompson:

Hurricane Sandy made landfall on October 29, 2012, in New Jersey, leaving extensive flooding, loss of life, and property damage across the eastern United States in its wake. Within 3 days of the hurricane's landfall, more than 2,300 Federal Emergency Management Agency (FEMA) personnel were working to support response operations, including search and rescue, power restoration, communications, and logistical support in states affected by the storm. Hurricane Sandy was one of 46 federal major disaster declarations in fiscal year 2012. From fiscal year 2007 through fiscal year 2012, there have been 422 federal major disaster declarations in which FEMA has obligated \$39 billion in major disaster assistance payments.¹

Within the Department of Homeland Security (DHS), FEMA is tasked with leading the nation in mitigating, responding to, and recovering from major disasters, both natural and man-made. To carry out its mission, FEMA relies heavily upon its Reservist Program, an on-call reserve workforce that is deployed when needed to assist disaster survivors. As of February 2013, there were 6,795 reservists, who constituted 36 percent of FEMA's disaster workforce. In April 2012, FEMA announced that it was transforming its reservist workforce, formerly known as Disaster Assistance Employees. Among other things, the transformation to the Reservist Program transitioned reservist assignments from a regionally based structure to a nationally managed program.

We have identified several challenges related to FEMA's reservist training practices. Specifically, in May 2012, we reported that FEMA's reservist training was not consistent with key attributes of effective training and development programs that could help to ensure that its training and development investments were targeted strategically. We recommended that FEMA establish a plan to ensure all reservists have opportunities to participate in training and are qualified and that FEMA develop a systematic process to track training costs.² FEMA officials agreed with the recommendations. In October 2012 the agency launched the FEMA Qualification System (FQS) and the Incident Qualification Certification System (IQCS) to track reservist training and qualifications.³ According to the officials, they anticipate that IQCS will

¹This includes obligations for Individual Assistance, Public Assistance, and Hazard Mitigation, only for major disaster declarations declared from fiscal years 2007 through 2012.

²GAO, *Disaster Assistance Workforce: FEMA Could Enhance Human Capital Management and Training*, [GAO-12-538](#) (Washington, D.C.: May 25, 2012).

³FQS establishes qualification and performance standards for FEMA's disaster workforce, including reservists. IQCS is the information system managed by the Bureau of Land Management (BLM), originally used to track training and

enable FEMA to better track training costs. In April 2012, we also reported that FEMA's training information system did not provide a comprehensive or accurate account of all training activities of FEMA employees, including reservists, and we recommended that FEMA develop systematic processes to collect and analyze training data.⁴ FEMA agreed with the recommendation and is increasing its capacity for analyzing training data through the development of a human capital data warehouse.

You asked us to assess FEMA's reservist workforce training. Our objective was to examine how FEMA's reservist workforce training compares with training of other similar agencies, and to what extent FEMA has examined these agencies' training programs to identify useful practices. In addition, the enclosure provides additional information on reservist program characteristics that may affect training. Specifically, the enclosure provides information on reserve program missions, organizational structure, hiring process and pay, and approaches to deployment at FEMA and the three similar agencies—Small Business Administration (SBA); Fire and Aviation Management (FAM), which is within the U.S. Department of Agriculture's Forest Service; and the U.S. Coast Guard, within DHS.

To compare reservist training at FEMA with training at similar agencies—that is, agencies with a disaster mission—we selected three agencies by evaluating the comparability of 10 potential organizations with FEMA. We identified these 10 organizations based on a judgmental selection of agencies with disaster-related programs or missions, including those with an international focus, military function, public health mission, role in Katrina, or a relationship with FEMA in developing its qualification system. We evaluated the organizations and selected SBA, the Forest Service, and the Coast Guard for our review because each has a domestic mission and a reservist program that includes temporary or part-time employees (similar to FEMA's program).⁵ Within FEMA and the three selected reservist programs, we compared segments of these programs that were related to disaster response or recovery and composed of employees who have temporary appointments and who work on an intermittent (on-call) or seasonal basis. We consider these types of employees reservists for the purposes of this report. We selected FEMA Reservists, but did not consider in our comparison permanent full-time FEMA staff with collateral, disaster-related duties in the field; FEMA's Cadre of On-Call Response/Recovery Employees (CORE) because they are hired on a temporary, full-time basis for 2- and 4- year terms; or the National Civilian Community Corps-FEMA Corps program, as Corps Members serve full-time for 10-month terms with an option to renew for an additional 10-month term. We selected the following employee categories at the comparison agencies because they maintain a contingent of reservists as defined above: the Coast Guard Selected Reserve; SBA surge and surge plus staff, including term intermittent and Schedule A staff;⁶ and Forest Service temporary seasonal employees and administratively determined (AD) employees.⁷

certifications for wildland firefighters. BLM created a specific version of IQCS for FEMA to track reservist training and qualifications. These systems are intended to better track reservist training needs and costs, but other factors determine whether reservists have an opportunity to receive training, such as course availability.

⁴GAO, *Federal Emergency Management Agency: Workforce Planning and Training Could Be Enhanced by Incorporating Strategic Management Principles*, [GAO-12-487](#) (Washington, D.C.: Apr. 26, 2012).

⁵Other organizations considered were the Army Corps of Engineers, Centers for Disease Control and Prevention, Department of State (Civilian Corps), National Guard, Red Cross, U.S. Agency for International Development, and the World Health Organization.

⁶Term intermittent staff are on SBA's payroll and are to be called upon to respond to disaster activity when the core group, such as permanent, full-time equivalent employees on a seasonal schedule (known as cadre employees), and term seasonal staff, have been exhausted. Schedule A staff are employees hired without competing for employment, when term intermittent staff have been exhausted.

⁷Reserve program segments not considered in our comparison because the employees were not temporary or part-time and employed on an intermittent or on-call basis included: the Coast Guard individual ready and stand-by reserve and Forest Service permanent seasonal employees. SBA term seasonal employees were not considered in

At FEMA and at each of the selected agencies, we reviewed reserve program documentation, such as training-related manuals, legislation related to each program, hiring and deployment guidance, and fiscal year 2012 budget documents, where available. We also interviewed agency officials responsible for overseeing the training programs to compare reservist training requirements, funding sources, and delivery mechanisms, and to identify information described in the enclosure, including reserve program missions, hiring, and deployment processes. In addition, to identify the extent to which FEMA examined other agencies' practices, we reviewed a contractor's draft evaluation of FEMA's reserve program and interviewed FEMA officials responsible for overseeing the program.⁸ We compared this information to our prior work on effective training programs, which included practices such as learning from other organizations as a core characteristic of a strategic training process.⁹

We conducted this performance audit from May 2012 through March 2013 in accordance with generally accepted government auditing standards. 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Results in Brief

We compared FEMA's training of reservists with the training provided to reservists at the SBA, the Forest Service, and the Coast Guard—agencies with a disaster mission—and found similarities and differences; and, moreover, FEMA had not examined other agencies' training programs to identify useful practices.¹⁰ All four training programs shared some similar attributes with regard to training requirements, funding sources, training delivery, and training evaluation. For example, FEMA and two of the comparison agencies have a credentialing program used to document reservist qualifications. Differences included the timing of when training is delivered and the use of job aids to reinforce reservists' understanding of material covered in training courses. Regarding timing, SBA, the Forest Service, and the Coast Guard each train their reservists in advance of deploying these individuals to a disaster. However, factors such as the way in which FEMA funds its disaster program have limited the agency's ability to train its reservists in advance of deployments to disasters. FEMA plans to begin allowing up to 2 weeks of reservist training outside of deployments under the new reservist program during fiscal year 2013. Differences we identified in training practices indicate that an examination of other agencies' reserve training programs could be beneficial. For example, FEMA may benefit from examining the Coast Guard's use of job aids, which reinforce reservist training course material after course work is completed. As part of our work identifying key attributes of successful training programs, we have previously identified developing partnerships and learning from others as a core characteristic of a strategic training process.¹¹ FEMA officials stated that while they had not looked to other agencies' training programs, training practices at other agencies

the comparison because they are employed on a full-time seasonal work schedule and their employment is expected to last at least 6 months.

⁸The evaluation we reviewed was preliminary. However, our review of the evaluation was limited to determining whether FEMA had examined other agencies' practices and not in assessing the evaluation itself. Therefore, we determined the evaluation to be sufficiently reliable for our purposes.

⁹GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: Mar. 1, 2004).

¹⁰For the purposes of this report, when referring to the Forest Service reservists we are specifically referring to the Forest Service's firefighting reservists managed by FAM.

¹¹[GAO-04-546G](#).

that we highlighted in this report provide useful information for FEMA as it works to improve its reservist training efforts.

To enhance its training of reservists, we are recommending that FEMA examine the training practices of other agencies with disaster reservist workforces to identify potentially useful practices. DHS concurred with our recommendation and described plans to address it. DHS, SBA, and the Forest Service provided technical comments, which we incorporated as appropriate.

Background

SBA, the Forest Service, the Coast Guard, and FEMA each have reserve programs established to supplement full-time agency staff when responding to disasters. These additional resources have unique missions during response and recovery efforts, such as processing loans, extinguishing wildfires, securing ports, or assisting with temporary housing. Descriptions of these reservist programs are listed in table 1.

Table 1: Reserve Program Characteristics

Agency	Reserve program and description of staff	Number of reservists ^a
Small Business Administration	Term intermittent surge staff: Deployed to assist businesses, non-profits, and households affected by disasters, primarily with loans. Surge staff are on SBA's payroll and are to be called upon to respond to disaster activity when the core group, such as permanent, cadre, and term seasonal staff, have been exhausted. Surge staff compete for employment lasting for a period of more than 1 year and not to exceed 4 years. These staff are typically used when work is sporadic, unpredictable and cannot be regularly scheduled in advance or during a drastic increase in disaster activity.	1,730
	Surge plus staff: Term intermittent staff may be supplemented by surge plus reservists (Schedule A staff), who are employees hired without competing for employment, when surge staff have been exhausted.	1,319
Forest Service	Temporary employees: Deployed to fight wildfires. Limited to working 1,039 hours in a given position per year. They may be rehired each year if there is a need, but they are terminated at the end of the fire season or period of need.	3,725
	Administratively determined emergency workers: Deployed to fight wildfires. Hired for surge capacity in each geographical area. They are not guaranteed any quantity of hours deployed.	6,273
Coast Guard	Selected reserve: Deployed to supplement active duty personnel during disasters or routine maritime safety and security operations. ^b Required to perform 24 days of inactive duty training commonly known as drill weekends, and 12 days of annual training. The 24 days is normally on-the-job training (OJT), and the 12 days of annual training may be OJT or classroom training. For disasters, they can be ordered to active duty for no more than 60 days in any 4-month period, and no more than 120 days in any 2-year period.	8,105
FEMA	Reservists: Deployed to assist disaster survivors and their communities through functions such as directly supporting individuals and families with obtaining housing and other disaster benefits. FEMA is establishing a policy to deploy all reservists a minimum of once a year with the length of the deployment depending on operational needs. A deployment will be, on average, approximately 30 days in length, but may be longer.	6,795

Source: GAO analysis of reserve program documents and interviews with agency officials.

^aTotals listed for the number of reservists at each agency were provided as of the following dates: SBA (December 2012), Forest Service (February 2013), Coast Guard (October 2012), and FEMA (February 2013).

^bCoast Guard reservists are recalled, activated, mobilized, or ordered to active duty, according to Coast Guard officials. However, for our purposes in this report, we refer to reservists as "deployed" when they are on active duty, as this term is used when referring to the same scenario at the other agencies compared here.

FEMA's Reservist Training Shares Some Attributes with Selected Agencies' Training, but FEMA Has Not Examined Practices from Agencies' Training Programs

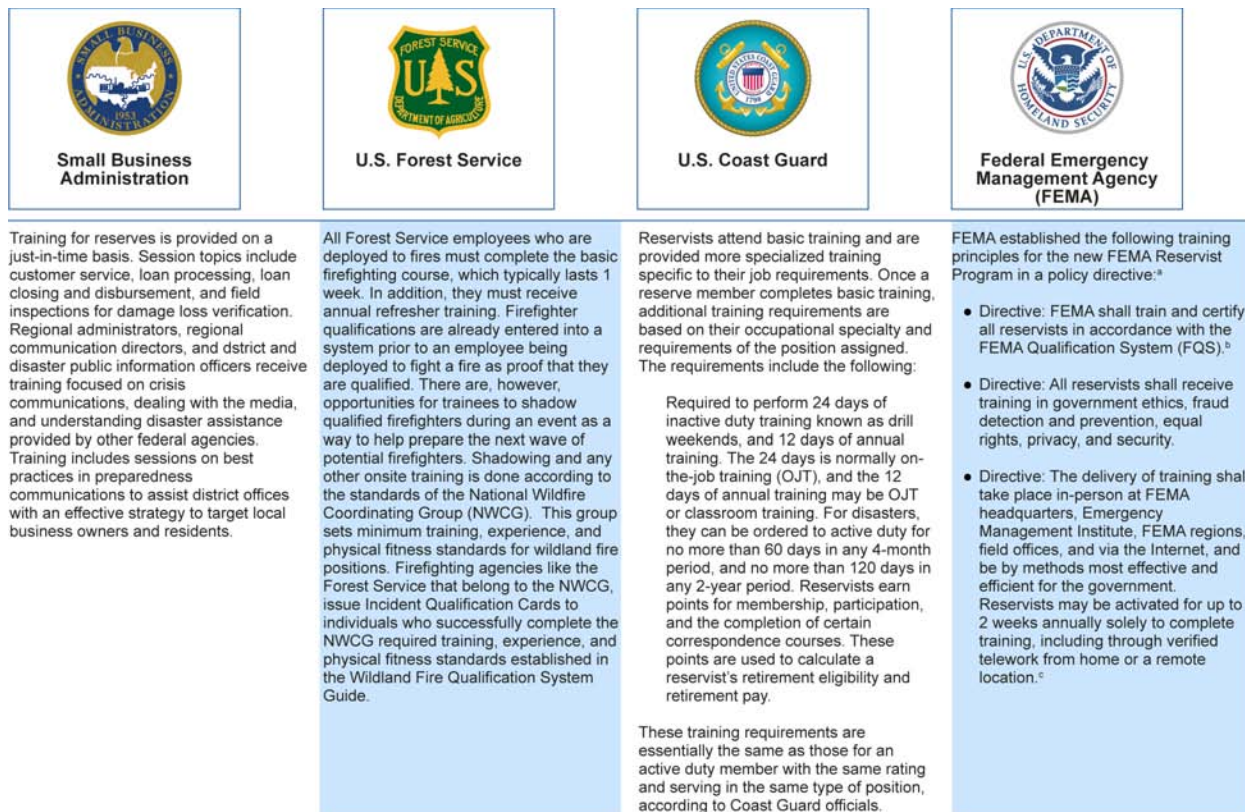
SBA, the Forest Service, the Coast Guard, and FEMA have training programs that are designed to fit the respective needs of the reservist programs. These training programs vary with regard to training requirements, funding sources and needs determination, training delivery, and training evaluation.

FEMA Shares Similarities with Selected Agency Training Programs, but Differences Exist

Overview of Training Programs at Selected Agencies

As shown in figure 1, the training programs of FEMA and the three selected agencies have varying characteristics, as called for by the specific training needs of the program.

Figure 1: Overview of SBA, Forest Service, Coast Guard, and FEMA Reservist Training Programs



Source: GAO analysis of SBA, FAM, Coast Guard, and FEMA data.

^aFEMA, *FEMA Reservist Program*. FD 010-6 Revision Number: 01. June 14, 2012.

^bAccording to FEMA officials, FQS is a performance-based system whereby employees are determined to be either in trainee or qualified status in one of 322 jobs, each of which has a related position task book. Position task books outline required activities, tasks, and behaviors, and serve as a record for task completion. FQS, which was launched in October 2012, is FEMA's effort to credential all employees in incident management or support positions, including the reservist workforce. Examples of reservist courses include field attorney training, and basic training in community relations and congressional affairs.

^cFEMA has not yet implemented this directive, but plans limited implementation in fiscal year 2013 depending on available funding.

Training Requirements

FEMA and selected agency training requirements are listed in figure 2. Similarities were evident in training types offered and in credentialing programs.

Figure 2: Comparison of Agency Training Requirements

	 Small Business Administration	 U.S. Forest Service	 U.S. Coast Guard	 Federal Emergency Management Agency (FEMA)
Introductory training (e.g., orientation, basic training)	Just-in-Time (JIT) training required of all reservists before deployment or activation; length, location, and content of introductory training depends on job function.	Basic fire training provided before responding to fires; orientation also provided to each new reservist.	Basic training, with length depending on prior experience. Drills one weekend per month and 2 weeks per year. Additionally, members are expected to participate in Class A school training, which prepares members to function as third class petty officers in the career path they chose during recruitment.	None. Prior to new reservist program, FEMA regions conducted orientation on an ad hoc basis. FEMA is considering adopting a new hire orientation, but does not yet have a deadline for making a decision.
Advanced training (i.e., courses beyond introductory training)	Some reservists receive additional training if serving as team leads; some centers allow reservists to serve as team leads, others do not.	Courses identified in Incident Qualification Certification System (IQCS), which standardizes qualifications for specific job categories and for advancement; voluntary for temps and administratively determined reservists.	Class C school provides advanced/specialized skills and knowledge to perform a task, or group of tasks, required by a specific Coast Guard position.	Courses for advancement identified in FQS, which standardizes qualifications for specific job categories and for advancement. Two-week training allowed, outside of disaster deployments, per year for FQS requirements under the new reservist program. The 2 week training allowance was not fully implemented as of December 2012.
Refresher training	Refresher training provided through JIT and is required for reservists prior to each deployment provided the employee has not been deployed within the previous 6 months.	Annual refresher training required.	Reservists are provided refresher training in the form of job aids and knowledge-based online training; refresher training is also provided during inactive drill time.	No requirement to do refresher training before deployment.
Credentialing	None	Incident Qualification Certification System (IQCS) standardizes qualifications for specific job categories. Note: National Wildfire Coordinating Group (multiple agencies) determine the classes and content for the basic and specialty training.	Performance Qualification Standards (PQS), similar to FEMA Qualification System (FQS), with task books to complete indicating certification.	FEMA Qualification System (FQS) standardizes qualifications for specific job categories and for advancement. Reservists must complete the training required for their specific job category within a predetermined amount of time.

Source: GAO analysis of SBA, FAM, Coast Guard, and FEMA data.

Training type. Each of the agencies has three types of training—introductory, advanced, and refresher.¹² Each agency has reservists across multiple functional disciplines and training is specialized for each discipline and varies depending on the specific job title. SBA’s reservists participate in a systematic Just-in-Time training program as the agency gears up to meet its disaster recovery mission. Both the Forest Service and the Coast Guard have training

¹²The Forest Service also offers intermediate-level courses, which it distinguishes from advanced-level courses. FEMA offers refresher training, but it is not required of reservists.

requirements that include a certification process for their reservists who are involved in disaster response. Upon deploying its reservists, FEMA provides on-the-job training at joint field offices or any other appropriate field offices.¹³ FEMA plans to allow 2 weeks of training outside of deployments in response to reservist concerns about lack of training before deployments.

Credentialing. Three of the four agencies have credentialing programs—to document reservist qualifications—as shown in figure 2. The Forest Service and Coast Guard have credentialing programs similar to the FEMA Qualification System (FQS), while SBA does not have a credentialing program. Additionally, industry standards may affect an agency’s credentialing requirements. For example, the National Wildfire Coordinating Group (NWCG) establishes, among other things, minimum requirements for training, experience, and physical fitness levels for wildland fire positions at all of its member agencies, including the Forest Service, as part of an effort to establish national mobilization standards.

Training Funding Sources and Needs Determination

The types of funding sources for reservist training and how training needs are determined vary across the four agencies, as shown in figure 3.

Figure 3: Comparison of Agency Funding Sources and Training Needs Determination

	 Small Business Administration	 U.S. Forest Service	 U.S. Coast Guard	 Federal Emergency Management Agency (FEMA)
Funding source	No training appropriation for reservists. Headquarters allocates funds for operations, training considered an operational cost.	No training appropriation for reservists. Headquarters allocates funds for operations, training considered an operational cost.	The Coast Guard receives an annual appropriation for reservists’ training costs, which includes weekend drills and the 2 weeks per year of required reservist training.	Appropriated Disaster Relief Fund (DRF) and, within DRF, the Disaster Readiness and Support fund (DRS). DRF is used for training at Joint Field Offices for just-in-time training. DRS is used to send reservists for formal training at Emergency Management Institute and other locations.
How training needs are determined	Training needs and curriculum determined locally.	Training need determinations depend on the course types. Introductory course needs are determined locally, intermediate regionally, and advanced are determined nationally.	Training needs determined locally by reserve program offices located at Coast Guard districts.	Under the new reservist program, training needs are to be centrally determined through FEMA Qualification System (FQS). Reservist position task books (PTB) identify courses required to be qualified for a position in FQS. PTB progress is to be tracked in FQS, which allows FEMA to determine which courses are needed for reservists. As of January 2013, this process was implemented, according to FEMA officials.

Source: GAO analysis of SBA, FAM, Coast Guard, and FEMA data.

SBA and the Forest Service do not have appropriations separately designated for reservist training. Instead, training costs are part of overall agency operating costs. The Coast Guard, on the other hand, has reservist training funds identified each year through its annual budget request and appropriation. Of the four agencies, only FEMA funds training outside of an annual budget allocation. FEMA’s reservist training funds are provided by the Disaster Relief Fund,

¹³ Joint field offices are locations where federal, state, and local officials convene to administer their respective disaster assistance programs.

which is appropriated no-year funding that allows FEMA to manage and fund response and recovery efforts associated with domestic major disasters and emergencies.¹⁴ FEMA also funds reservist training through the Disaster Readiness and Support account, within the Disaster Relief Fund. According to FEMA officials, FEMA plans to fund most training courses through the Disaster Readiness and Support account in fiscal year 2013. For the fiscal year 2013 budget, FEMA justified its request by identifying training funding needed to fulfill reservist training needs, according to FEMA officials.

With the exception of FEMA, each agency locally determines, at a minimum, introductory training needs. FEMA uses its centralized FQS system to determine training needs of reservists. Under FQS, reservists are to complete required training and demonstrate successful performance in specific areas in order to be qualified for their job titles.

Administrative and Legal Factors May Affect Training Funding

Before implementation of the new FEMA reservist program, most of the funding for training FEMA reservists was available primarily when reservists were deployed, which limited the amount of training that was provided before deployments occur. Most reservist training occurred at field offices used during disaster response activities and was funded by the Disaster Relief Fund; limited additional training at FEMA's Emergency Management Institute was funded by the Disaster Readiness and Support account, within the Disaster Relief Fund.¹⁵ For each of the other agencies, training funds are not dependent on whether reservists are deployed, thereby allowing more flexibility in when training may be provided. Under FEMA's new reservist program, according to FEMA officials, FEMA plans for reservists to be allowed to train at the Emergency Management Institute and their homes (for web-based courses) outside of disaster deployments. While certain types of training are to continue to take place at disaster sites, FEMA officials acknowledged that having certain training courses take place in the midst of a disaster may not be feasible. Such courses include intermediate- and advanced-level training, according to the officials.

Legal requirements also affect the Coast Guard's training funding. For the Coast Guard, reservists are required to participate in at least 48 scheduled drills or training periods during each year and serve on active duty for training of not less than 12 days during each year or not more than 30 days during each year.¹⁶ Therefore, the Coast Guard must request training funding and obtain an appropriation, since the training is mandated by law. The three other agencies do not have such legal requirements for reservist training.

Training Delivery Mechanisms

FEMA's delivery of training is comparable to that of the other three agencies in terms of format, use of third-party providers, and location, but its timing of training differs, as shown in figure 4.

¹⁴No-year funds are available for obligation for an indefinite period of time.

¹⁵The Emergency Management Institute's mission is to train officials in emergency management at all levels of government to prepare for, protect against, respond to, recover from, and mitigate the potential effects of all types of disasters and emergencies.

¹⁶10 U.S.C. § 10147 and Department of Defense Instruction 1215.06, section 6.1.4.1.2.

Figure 4: Comparison of Agency Training Delivery Mechanisms

	 Small Business Administration	 U.S. Forest Service	 U.S. Coast Guard	 Federal Emergency Management Agency (FEMA)
Format	On-the-job training (OJT) and classroom.	Classroom, OJT (task books, apprenticeship), and web-based.	Classroom, web-based, OJT, and job aids.	Classroom, web-based, OJT, and correspondence courses.
Third-party providers	None.	Fire schools, interagency partnerships. The Forest Service is responsible for funding the training.	FEMA's Emergency Management Institute	Third-party partnerships include Emergency Management Institute courses taught externally through Management Concept Institute. Third-party involvement also includes collaboration with various subject matter experts on leadership and management courses.
Timing (i.e., training provided to reservist before he/she responds to a disaster event)	Reservists are provided Just-in-Time training both before events and during the agency's response to the event; reservists cannot be deployed or activated unless they received minimum training.	Prior to and during fire season.	Routinely and before events; reservists cannot be deployed unless they received basic training/boot camp.	Under the new reservist program, training is to be provided both before and during deployments to disasters. However, as of December 2012, training before deployment had not been implemented, pending funding availability.
Location	Training provided at SBA field office centers and remotely at disaster site.	Local units/forests (lower-level courses), geographical/regional training centers (higher-level) and apprenticeship academies.	Local/regional/national OJT. Training provided at Coast Guard centers (e.g., Yorktown, VA), at duty stations, at events, and online.	Emergency Management Institute, Joint Field Offices (disaster site), and regional offices. FEMA plans to allow reservists to train at home, although this delivery mechanism has not been fully implemented.

Source: GAO analysis of SBA, FAM, Coast Guard, and FEMA data.

Format. All of the agencies use a mix of classroom and on-the-job training. FEMA, the Forest Service, and the Coast Guard formalize on-the-job training using position task books to document employees' experiences. The Coast Guard makes use of an additional tool—job aids—which give reservists step-by-step instructions for job tasks after training takes place.

Third-party providers. FEMA uses third-party providers for teachers and in consultation in leadership and management courses. The Forest Service uses fire schools and interagency partnerships, such as the National Wildfire Coordinating Group, and the Coast Guard sends reservists to FEMA's Emergency Management Institute for training. SBA does not use third parties for training reservists.

Timing. FEMA differs from the three comparison agencies in terms of when it provides training for its reservists. Officials from all of the comparison agencies emphasized the importance of providing classroom and on-the-job training to reservists before they are permitted to work without supervision at a disaster. In contrast, FEMA did not provide orientation or basic training to reservists prior to deployments, nor did it generally deploy reservists for training immediately prior to responding to a disaster. According to FEMA officials, FEMA plans to seek funding in order to provide 14 days of training annually to reservists outside of disaster deployments.

Location. All of the agencies provide classroom or on-the-job training in local areas, at regional and national training centers, and at disaster sites. For example, during Hurricane Irene, SBA staff traveled to multiple field locations outside of their home regions in order to help train customer service representatives where management staff were occupied responding to the

disaster. According to SBA officials, it was more efficient to send staff to locations where there were large numbers of individuals that needed training.

Training Evaluation

The agencies we compared evaluate the effectiveness of reservist training in several ways. Both FEMA and the Coast Guard use Kirkpatrick’s evaluation technique.¹⁷ Figure 5 lists evaluation techniques used by FEMA and the selected agencies.

Figure 5: Comparison of Agency Reservist Training Evaluation Techniques

 Small Business Administration	 U.S. Forest Service	 U.S. Coast Guard	 Federal Emergency Management Agency (FEMA)
<p>Reservist training is evaluated by SBA through course evaluations and through feedback from loan customers and internal stakeholders.</p> <ul style="list-style-type: none"> • Course evaluations. Participants from each course are given an opportunity to submit an evaluation of the course to help improve the delivery of the material presented. • Feedback from loan customers. Since 2009, the Office of Disaster Assistance (ODA) has used its call center in Buffalo to reach out to its customers to rate the quality of the service they received from call center staff in order to retrain reservists as necessary. Approximately 80 percent of their customers are asked to provide their feedback about their experience with call center customer service representatives (CSR), according to ODA officials. • Internal stakeholders. In addition to consumer feedback from disaster survivors, SBA CSRs will also receive feedback from internal stakeholders, such as ODA’s loan processors, who handle much of the paperwork collected by CSRs at the Disaster Recovery Center (DRC). Likewise, operators at the call center in Buffalo may receive complaints or need clarification regarding information that they received from a CSR in the field. 	<p>According to Forest Service officials, reservist training courses are evaluated through feedback on the courses from reservists, performance evaluations on incidents, as well as completion of the mentorship process with the position task books. Forest Service employees utilize a position task book to become qualified to perform the job. In addition to evaluation of courses by students, instructors check course materials for outdated information to report to the National Wildfire Coordination Group (NWCG) training office to see if corrections need to be made. NWCG’s goal is to evaluate each course every 5 years.</p>	<p>The Coast Guard employs Kirkpatrick’s Model for evaluating the effectiveness of its training programs, according to Coast Guard officials. The Kirkpatrick’s model includes four levels of measurement at the Coast Guard, although the Coast Guard’s emphasis is on the levels 1-3, according to Coast Guard officials.</p>	<p>FEMA uses Kirkpatrick training evaluation levels 1-3 on student evaluations for all courses offered to reservists, according to FEMA officials. The officials stated that each student is allowed to provide direct feedback during each course offering.</p>

Source: GAO analysis of SBA, FAM, Coast Guard, and FEMA data.

¹⁷ The Kirkpatrick Model, developed by educational theorist Donald Kirkpatrick, employs four levels of evaluating training effectiveness. Level 1, reaction, gathers “reactive feedback” from the trainees by asking them to express their satisfaction with the training, the quality of the instructors, the content, training material, and the learning environment; Level 2, learning, assesses learners’ mastery of the training immediately after completing the course, while Level 3, behavior, determines whether the training has prepared trainees to perform various tasks and duties while on the job. Level 4, results, measures results of training that contribute to the overall organization and is normally reported as a return on investment.

FEMA Has Not Examined Training Practices at Selected Agencies

FEMA adopted its qualification system from another agency, but has not examined the training practices of other agencies with a reservist workforce to identify applicable useful practices. According to FEMA officials, FEMA consulted the Forest Service's Wildland Fire Qualification System to develop FEMA's FQS and associated training requirements. FQS training requirements provide what training is necessary to qualify reservists for positions. FQS, however, does not address training practices, such as timing and delivery mechanisms. The officials stated that elements within the Wildland Fire Qualification System served as a baseline and guidance for establishing a FEMA credentialing system that ensures FEMA's disaster workforce is equipped with the skills, knowledge, and experience to perform effectively during a disaster. FEMA officials stated that they studied features of the Wildland Fire Qualification System including position qualifications and required training. FEMA's efforts to identify practices in developing the FQS system are noteworthy; however, evaluating training activities at other similar agencies may uncover useful practices related to training beyond qualification issues, such as timing of training delivery, course evaluation techniques, or supplementary training materials. For example, when comparing reservist programs, we identified several potentially useful practices that demonstrate how evaluating other training efforts may uncover useful activities:

- **Training reservists before deployment at SBA, the Forest Service, and the Coast Guard.** FEMA officials stated that a complaint among reservists was that training was not provided before deployment to disasters. FEMA's new program includes a provision for 2 weeks of training outside of disaster deployments. Since the new program is not yet fully implemented, pending funding availability, FEMA may learn from other agencies' approaches to this form of training.
- **Job aids used to reinforce and refresh reservists understanding of material covered in training courses at the Coast Guard.** FEMA implemented position task books as part of the October 2012 launch of FQS. The Coast Guard's job aids, in use for several years, may provide useful information for how reservists can rely on documents that reinforce training course material after course work is completed to better understand their positions.
- **Use of customer feedback at SBA call centers to retrain SBA reservists to better serve loan applicants.** According to FEMA officials, FEMA is not currently receiving feedback from SBA that could be useful for improving FEMA reservist training.¹⁸ For example, according to SBA officials, SBA routinely receives feedback from loan applicants about the level of customer service its representatives provided. While SBA solicits feedback about its own processes, some of this feedback may entail information about FEMA that may assist FEMA in better training its reservists.

A 2007 Booz Allen preliminary report that evaluated FEMA's disaster workforce program also identified certain key practices related to training—primarily that several agencies' (the Forest Service, Coast Guard, and World Health Organization) reservist training and credentialing were standardized, while FEMA's training was not standardized and did not include credentialing at that time. The report also identified benefits of standardized training and credentialing, including preparation of personnel to support disasters in any geographic location. Given that FQS went into effect in October 2012, the identification of practices that could help further standardize its reservist qualifications and training could better position FEMA to achieve such benefits.

¹⁸During disaster responses, both FEMA and SBA reservists may interact with disaster victims seeking federal assistance.

Further, as part of our work identifying key attributes of successful training programs, we have previously identified developing partnerships and learning from others as a core characteristic of a strategic training process.¹⁹ In addition to benchmarking high-performing organizations, these efforts allow an agency to keep abreast of current practices, enhance efficiency, and increase the effectiveness of its training and development programs. FEMA officials stated that while they had not looked to other agencies' training programs because they had been focused on developing the qualification system, other agencies' training practices that we highlighted in this report provide useful information as FEMA works to improve its reservist training efforts. These officials said that this information would be particularly helpful since FEMA recently launched its new reservist program. An examination of the training practices of other agencies with reservist workforces could help FEMA identify useful practices to enhance its training programs for the new reservist program.

Conclusions

FEMA relies heavily upon its reservist workforce to meet the daunting task of leading the nation in mitigating, responding to, and recovering from major natural and man-made disasters. For this reason, a fully trained and deployable reservist workforce is critical to accomplishing the agency's disaster response mission. FEMA has made some progress in addressing weaknesses in its reserve training program, for example, by planning to track training costs and ensuring that all reservists are trained and qualified before they are deployed. However, additional effort could be made to ensure that its reservist training benefits from useful practices at other agencies with disaster missions. Results of our comparison of selected agencies' training programs show similarities in the factors that may affect training, such as reservist training requirements, delivery, and evaluation. At the same time, differences we identified in training practices indicate that FEMA could benefit from examining other agencies' reserve training programs. Such an examination of the training practices of other disaster response agencies to identify applicable practices could help FEMA enhance the readiness of its reservist workforce.

Recommendation for Executive Action

To enhance its training of reservists and meet its goal of having qualified reservists, we recommend that the FEMA Administrator examine the training practices of other agencies with disaster reservist workforces to identify potentially useful practices.

Agency Comments

We requested comments on this report from the Departments of Homeland Security and Agriculture and the Small Business Administration. On March 8, 2013, DHS—commenting for FEMA and the Coast Guard—and the Department of Agriculture provided written comments, which are summarized below and reprinted in enclosures II and III. The Departments of Homeland Security and Agriculture and the Small Business Administration also provided technical comments, which we incorporated as appropriate.

In commenting on the draft report, DHS concurred with the recommendation to examine training practices of other agencies with disaster reservist workforces to identify potentially useful practices and described actions planned to address it. DHS stated that FEMA will work to coordinate with other organizations to address the recommendation and plans to develop a

¹⁹GAO-04-546G.

corrective action plan within 60 calendar days of receiving the final report. DHS also stated that FEMA agrees that valuable insight may be gained by assessing training programs of other agencies.

The Department of Agriculture stated that it agrees with the findings and recommendation that FEMA examine reservist training programs of other federal agencies.

We are sending copies of this report to the Secretaries of Homeland Security and Agriculture, the Administrator of the Small Business Administration, and selected congressional committees. This report is also available at no charge on the GAO web site at <http://www.gao.gov>. Should you or your staff have any questions, please contact me at (202) 512-9610 or CaldwellS@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report were Leyla Kazaz, Assistant Director; Ben Atwater; Martene Bryan; Tracey King; Landis Lindsey; Lauren Membreno; Linda Miller; Cindy Saunders; and Edith Sohna.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Stephen L. Caldwell". The signature is fluid and cursive, with a checkmark-like flourish at the end.

Stephen L. Caldwell
Director, Homeland Security and Justice

Enclosures—3

Enclosure I: Federal Emergency Management Agency, U.S. Coast Guard, Small Business Administration, and U.S. Forest Service's Reserve Program Profiles

To supplement our comparison of reservist training practices and to provide context for the reservist operating environment, this enclosure provides information about reserve program missions and funding, reservist definitions and organizational structure, hiring process and pay, and deployment practices for FEMA and the three selected agencies in our review.

Federal Emergency Management Agency Reservist Program

The Federal Emergency Management Agency's (FEMA) Disaster Assistance Employee (DAE) program was transformed into the current FEMA Reservist Program beginning in April 2012. All DAEs (hereafter referred to as FEMA reservists) were required to re-apply for positions in the new reservist program. According to FEMA officials, the agency anticipates hiring a total of 10,900 reservists for the new program. During the first phase of reservist hiring, 6,795 reservists were hired as of February 2013. The second phase of reservist hiring was scheduled to commence in February 2013, according to FEMA officials. Under the Post-Katrina Emergency Management Reform Act of 2006 (Post-Katrina Act), FEMA is responsible for developing standards for deployment capabilities including credentialing of personnel likely to respond to natural disasters, acts of terrorism, and other man-made disasters.²⁰ The FEMA Qualification System (FQS), which FEMA began developing in July 2010, is the agency's effort to credential all employees, including the reservist workforce, in incident management or support positions.²¹ FEMA launched FQS in October 2012 for implementation, and, as of January 2013, FQS was in use by all reservist groups (known as cadres), according to FEMA officials.

In June 2012, FEMA issued an administrative directive that governs its reservist program.²² Summarized below is the directive's content related to reservist mission, management structure, hiring process and pay, and deployment. We did not evaluate the extent to which FEMA has implemented the reservist program directives summarized here because FEMA was in the process of implementing its new reservist program during our review.

Mission

FEMA reservists support FEMA's mission, as defined by the Post-Katrina Act. FEMA's mission is, among other things, to develop a federal response capability that can act effectively and rapidly deliver assistance essential to saving lives or protecting or preserving property or public health and safety in a natural disaster, act of terrorism, or other man-made disaster.²³ The Robert T. Stafford Disaster Relief and Emergency Assistance Act also provides FEMA with authority to appoint and adjust the compensation of temporary personnel (i.e., reservists) as may be necessary, without regard to the provisions of title 5, United States Code, governing appointments in the competitive service.²⁴

²⁰6 U.S.C. § 320.

²¹According to FEMA officials, FQS is a performance-based system whereby employees are determined to be either in trainee or qualified status in one of 322 jobs, each of which has a related position task book. Position task books outline required activities, tasks, and behaviors, and serve as a record for task completion.

²²FEMA, *FEMA Reservist Program*. FD 010-6 Revision Number: 01. June 14, 2012.

²³6 U.S.C. § 313(b)(2)(C). Fiscal year 2012 funding for FEMA's reservist program totaled \$2,644,700.

²⁴42 U.S.C. § 5149(b)(1).

Reservist Definitions and Organizational Structure

FEMA reservists are federal employees who form the nucleus of FEMA's incident workforce. Reservists staff disaster response centers; interview disaster survivors; conduct and verify damage assessments; provide administrative, financial, and logistical support; and perform a wide variety of other tasks as identified by staffing needs and operational requirements. Reservist program managers (RPM) manage national-level groups of reservists organized by operational function and FQS position.

Hiring Process and Pay

DAEs holding active appointments who reapply and transition directly from the DAE Program into the Reservist Program before the end of calendar year 2012, without any break in service, shall be paid at the DAE Program rate to which they were last entitled or the Reservist Program rate for their FQS position, whichever is higher. However, if an individual applies for a position that is subordinate to his or her qualified FQS position, then the individual will receive the pay rate of the subordinate position. If there is a break in service, a former DAE who returns to the Reservist Program shall receive pay in accordance with the new reservist program requirements.

The following applies to hiring new recruits:

- FEMA's Assistant Administrator for Response, in coordination with program offices, shall determine the size of cadres by functional job category through analysis of factors such as historical deployment data, FEMA readiness requirements, and FEMA's force structure.²⁵
 - Recruiting for reservist cadres shall include efforts to hire personnel for the required number and distribution of positions identified by the FEMA Force Structure. In determining the sources and methods for recruiting reservists, FEMA shall consider the most efficient means to recruit the best-qualified candidates for the specific positions, the FQS qualifications required to perform the duties, and nondiscrimination and diversity requirements.
 - FEMA pays reservists for those periods when they are activated and working or in a travel or training status. At all other times, reservists remain FEMA employees in a nonpay status. No reservist will be entitled to civil service retirement by virtue of his/her employment as a reservist.²⁶
- Deployment Practices

²⁵According to FEMA officials, FEMA's force structure analysis will not be available until the second quarter of fiscal year 2013.

²⁶In November 2012, the U.S. Office of Personnel Management (OPM) granted FEMA reservists, and other intermittent federal employees engaged in emergency response and recovery work, eligibility for health benefits while they are in pay status. OPM stated the following in its notice of the new rule: In light of the need for agencies to attract and bring emergency workers on board quickly and in recognition of the hazardous conditions those employees often face, OPM has concluded that its current policy of categorically excluding intermittent employees from Federal Employee Health Benefit Program (FEHBP) coverage is no longer in the public interest and should be changed. Therefore, OPM is issuing this interim regulation to allow agencies to request FEHBP coverage for intermittent employees engaged in emergency response and recovery work as defined by the Stafford Act. In addition, if OPM grants any such requests, it is reserving the authority to limit FEHBP coverage for intermittent employees to the periods during which they are in a pay status. This would promote parity between intermittent employees and temporary employees like the wildland firefighters, who receive FEHBP coverage when called up for duty. It would also allow OPM the discretion to craft an appropriate approach to health insurance coverage based on the potentially diverse work schedules of intermittent employees.

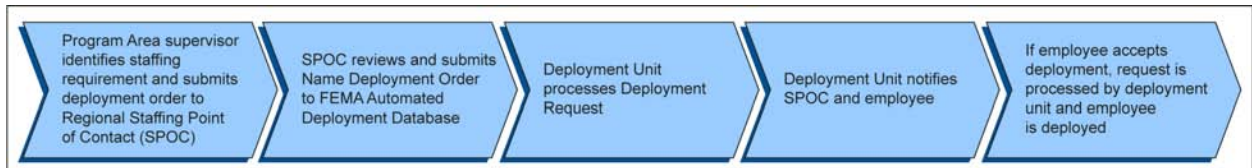
Enclosure I: Federal Emergency Management Agency, U.S. Coast Guard, Small Business Administration, and U.S. Forest Service's Reserve Program Profiles

FEMA's Incident Workforce Management Office (IWMO) leads the effort to identify and select the FQS-qualified reservist personnel from the FEMA headquarters program offices, which train, maintain, and provide program policy for distinct reservist cadres deployed in support of disaster declarations. Each cadre has at least one designated, full-time manager responsible for a wide range of cadre-specific activities, including ensuring that reservists in their cadres are trained, available, and ready to perform incident management and support functions in accordance with FQS.

IWMO centrally deploys fully equipped, FQS-certified reservists and trainees in specific FQS positions. Upon arrival in the field, reservists join the incident management and support organization under the day-to-day direction of on-site FQS-certified supervisors, and perform work that corresponds to their FQS position task book positions. Those on-site supervisors manage day-to-day reservist performance, referring certain matters of recognition and discipline to FEMA management to ensure consistent, nationwide application of policy.

The process outlined below in figure 6 describes how FEMA deploys reservists during a disaster:

Figure 6: FEMA Reservist Deployment Process



Source: FEMA.

U.S. Coast Guard Reserve Program

Mission

The U.S. Coast Guard is responsible for maritime safety and security when preparing for and responding to natural disasters or incidents, in accordance with the National Response Framework (NRF), issued by FEMA in 2008 to present the guiding principles for all response entities to prepare for and provide a unified national response to disasters and emergencies. For example, according to the NRF, the Coast Guard has lead authority for certain mass migration management scenarios and significant oil or hazardous substance spill incidents in the maritime environment. The purpose of the Coast Guard reserve is to provide trained units and qualified persons available for active duty in the armed forces, in time of war or national emergency, and at other times as national security may require to fill the needs of the armed forces whenever more units and persons are needed than are in the active duty components.²⁷ These trained units and qualified individuals also respond to domestic disasters, such as Hurricane Sandy.

The Coast Guard reserve is one of the reserve components of the armed forces.²⁸ By federal law, any member of the Coast Guard reserve serving on active duty or inactive duty training status has "the same authority, rights and privileges in the performance of that duty as a member of the regular Coast Guard of corresponding grade or rating."²⁹ This provision allows qualified reservists to enforce federal law and make lawful arrests, when necessary, within the scope of their assigned duties. This authority allows reservists to function, interchangeably, with the same military and civil powers as their regular component counterparts, whether during inactive duty drills or while serving under active duty orders.

Funding

Congress appropriated \$134.3 million for the Coast Guard reserve program in fiscal year 2012.³⁰ The appropriation funds all training and administration costs related to reservists. When reservists are activated for duty, the Coast Guard's financial accounts used to fund active duty personnel activities are used by requesting commands to fund reservist costs, according to Coast Guard officials. As of March 2013, the Coast Guard was operating under the continuing resolution for funding across the federal government.³¹

Reservist Definitions and Organizational Structure

According to Coast Guard policy documentation, the reserve force is to be always ready to mobilize with competencies in boat operations, disaster planning and response, expeditionary warfare, marine safety, port security, and law enforcement. Coast Guard officials stated that reservists respond to coastal disasters as well as to emergencies on the Great Lakes and in the Midwest. For example, after Hurricane Sandy, in October 2012, 157 reservists were deployed to assist in the response. The Coast Guard, including reservists, deployed to areas throughout New York and New Jersey with environmental threats caused by the hurricane, according to FEMA documentation of agency roles during the response. Coast Guard responders, including reservists, assessed affected areas and environmentally sensitive areas for pollution and

²⁷ 10 U.S.C. § 10102.

²⁸ 10 U.S.C. § 10101.

²⁹ 14 U.S.C. § 704.

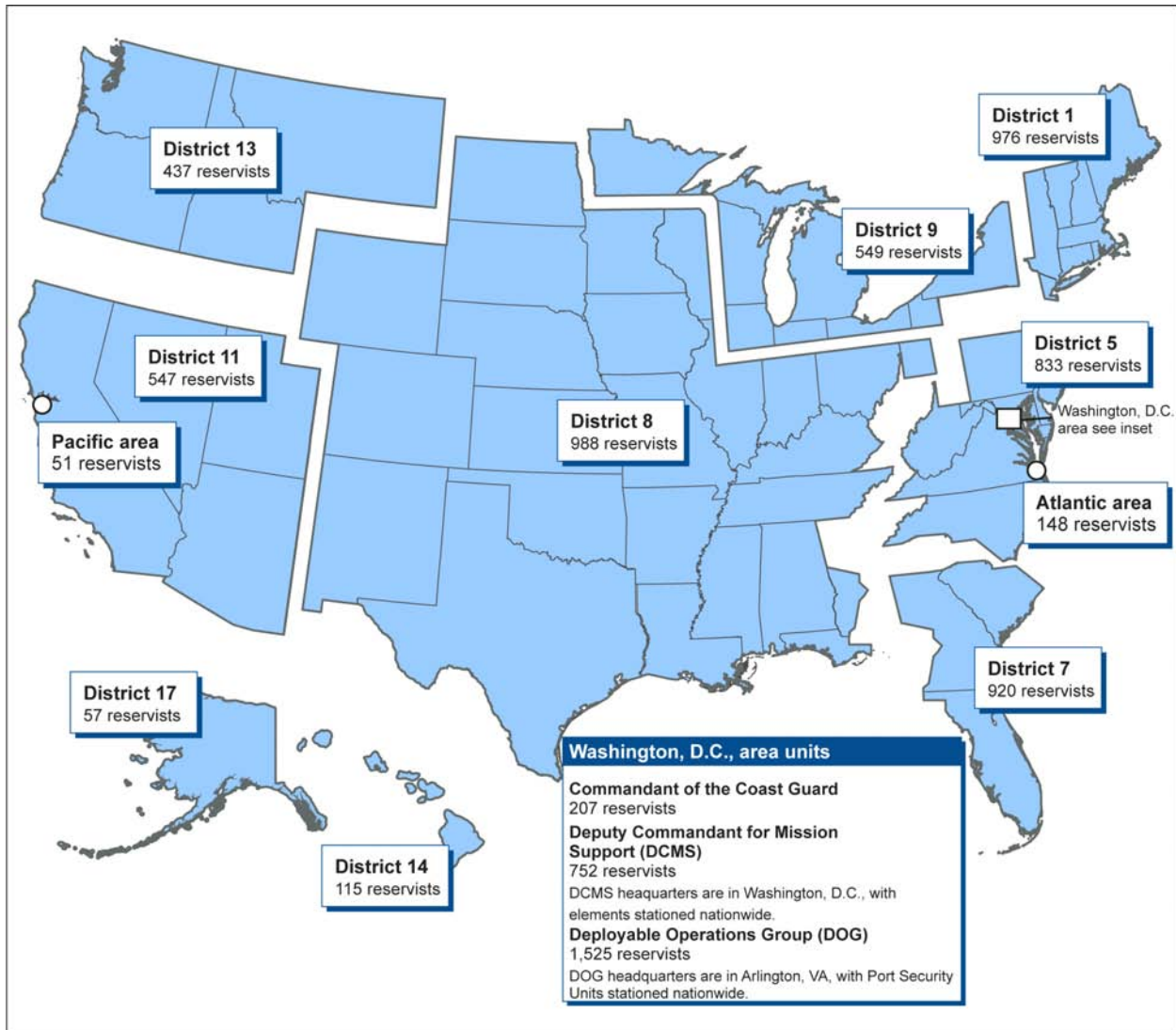
³⁰ Pub. L. No. 112-74, 125 Stat. 786, 953 (2011).

³¹ Pub. L. No. 112-175, 126 Stat. 1313 (2012).

Enclosure I: Federal Emergency Management Agency, U.S. Coast Guard, Small Business Administration, and U.S. Forest Service's Reserve Program Profiles

hazardous materials. The assessments were to be used to appropriately respond to identified areas of pollution for cleanup. Figure 7 shows Coast Guard reservist locations throughout the United States.

Figure 7: Coast Guard Locations and Number of Reservist Positions Assigned, as of October 2012



Source: USCG; Map Resources (map).

Note: According to Coast Guard officials, reservists are assigned to Coast Guard locations but may be deployed to respond to disasters worldwide. The officials also stated that Coast Guard districts have merged over time, resulting in the elimination of some district numbers.

Hiring Process and Pay

Hiring process. Federal enlistment regulations for the armed forces govern Coast Guard hiring of the selected reserve. Coast Guard requires the qualifications listed in figure 8.

Figure 8: U.S. Coast Guard Recruit Qualifications

U.S. Coast Guard recruit qualifications				
Citizenship	Age	Education	Family	Background
U.S. citizen or resident alien	Active duty: 17 with parental consent to 27 years old (up to 32 if attending a Coast Guard specialty school)	Must have a high school diploma GEDs are accepted in very rare cases	Maximum of two dependents	Credit check Security clearance check Criminal record review
	Reserve: 17-39 years old	Minimum score of 45 on the Armed Services Vocational Aptitude Battery test of qualifications for military service		

Source: USCG.

According to Coast Guard officials, for certain positions or skill sets, the Reserve program hires a mix of personnel with prior service, who already have been tested and trained, as well as new recruits without such skill sets. The Coast Guard also recruits first responders, such as police officers, according to officials. The Coast Guard does not advertise for vacant positions, but instead conducts general military advertising through local recruiting offices for both active duty and reserve personnel.

Reserve candidates take the Armed Services Vocational Aptitude Battery (ASVAB) test at a Coast Guard recruiting office. If a potential recruit receives a qualifying score on the ASVAB, the recruit completes a hiring package that includes information for a background check, criminal history, and financial history. The package is reviewed by the Coast Guard, and if the hiring package is approved, the recruit is to be assigned a job specialty and position, which is determined by a combination of the ASVAB results, individual preference, and the needs of the Coast Guard. There are three categories of recruits: (1) New Accessions (no prior military service), (2) Released from Active Duty, and (3) Direct Entry Program (new to the Coast Guard but have specialized expertise). The hiring process takes 4 to 6 months. The Coast Guard recruits approximately 1,000 people per year to maintain its desired reservist staffing levels, according to Coast Guard officials. Coast Guard officials determine the number of recruits required each year based on the forecasted reservist attrition rate, which includes factors such as separations, retirements, and integrations to active duty. Active duty and reservist personnel commit to serving for 8-year-long periods, which can be a combination of active and reserve duty.

Pay. With respect to pay structure, the different duty statuses determine pay. For example, during active duty for training (2 weeks per year), a reservist is provided the same pay as active duty personnel and may receive a similar allowance, according to Coast Guard officials. During inactive duty (2 days per month), the pay scale for reserve pay is used. Pay is also based on the reservist's military rank, years of service, and status as an officer or enlisted member.

Deployment

Deployment of Coast Guard reservists is governed by U.S. statute. Deployment scenarios are listed in figure 9, including deployments that may be ordered with and without the consent of reservists, which include overseas deployments.

Figure 9: Coast Guard Reservist Activation Legal Framework

Activation with reservist consent	Activation without reservist consent
At any time, with the consent of that reservist. ^a	<p>In time of war or of national emergency declared by Congress, or when otherwise authorized by law, for the duration of the war or emergency and for 6 months thereafter.^b</p> <p>In time of national emergency declared by the President for not more than 24 consecutive months.^c</p> <p>When the President determines that it is necessary to augment the active forces for any named operational mission or to provide assistance in responding to an emergency involving the use or threatened use of a weapon of mass destruction or a terrorist attack or threatened terrorist attack in the United States that results, or could result, in significant loss of life or property, for not more than 365 consecutive days.^d</p> <p>To aid in the prevention of an imminent, serious natural or man made disaster, accident, catastrophe, act of terrorism, or transportation security incident, for not more than 60 days in any 4-month period and not more than 120 days in any 2-year period.^e</p>

Source: U.S. Code.

^a10 U.S.C. § 12301(d).

^b10 U.S.C. § 12301(a).

^c10 U.S.C. § 12302.

^d10 U.S.C. § 12304.

^e14 U.S.C. § 712.

The Coast Guard's Mobilization Readiness Tracking Tool (MRTT) is used to determine who is available for mobilization within needed skill sets, according to Coast Guard officials. The Coast Guard area commands enter requirements into MRTT based on the skill sets, military occupational specialties, and required pay grades needed for the disaster response. Reservists may apply to fulfill a requirement or the operational commander may involuntarily recall a reservist based on the reservist's skill set and the recall authority relied upon for the disaster response, according to Coast Guard officials.

Reservist activation decisions for deploying to disasters are executed by the Coast Guard Pacific or Atlantic area commands. If reservists must be involuntarily deployed for domestic response, both the Commandant of the Coast Guard and the Secretary of Homeland Security must approve the activation. Reservists have up to 48 hours from the time of activation notification to report for duty, according to Coast Guard officials.

Small Business Administration's Office of Disaster Assistance

Mission

The Small Business Administration's (SBA) Office of Disaster Assistance's (ODA) mission is to provide low-interest disaster loans to homeowners, renters, and businesses of all sizes. This mission also includes providing loans to private and nonprofit organizations. Disaster victims may use these loans to repair or replace real estate, personal property, machinery; equipment, inventory, and business assets that have been damaged or destroyed in a declared disaster. SBA's disaster loans are the primary form of federal assistance for the repair and rebuilding of nonfarm, private sector disaster losses, particularly those not covered by insurance. Specifically, SBA provides disaster assistance through its Disaster Loan Program (DLP) to help recovery efforts after disasters, such as earthquakes, hurricanes, floods, and terrorist attacks. In addition to its disaster loan program, SBA helps small businesses recover from disasters through technical assistance and procurement programs. As of March 31, 2012, SBA had approved more than 1.9 million loans, for over \$50 billion, since its inception in 1953.

SBA provides financial assistance for non-insured losses in the form of Home Disaster Loans to homeowners or renters to repair or replace disaster-damaged real estate or personal property owned by the victims.³² Renters are eligible for their personal property losses, including automobiles. Business Physical Disaster Loans are also made available to qualified businesses to repair or replace disaster-damaged property owned by the business, including real estate, inventories, supplies, machinery, and equipment. Businesses of any size are eligible. Private nonprofit organizations such as charities, churches, and private universities, are also eligible. Additionally, SBA's Economic Injury Disaster Loans provide working capital loans for a variety of small businesses to help meet their ordinary and necessary financial obligations that cannot be met as a direct result of a disaster. These loans are intended to assist through the disaster recovery period.

SBA's reservists are hired and deployed to accommodate the anticipated workload of declared disasters. The size of a disaster affects the number of loan requests SBA receives, and consequently the resources SBA must activate to serve its customers. Upon declaration of a disaster, SBA assesses its need to deploy or activate reservists to help with recovery. ODA maintains reserve lists to keep a running count of employees that are available to report back to work when called upon. As an event unfolds, ODA expands office space and calls on staff and reservists to meet the anticipated workload.

Funding

Costs for ODA travel and per diem for Just-in-Time training for reservists was \$4,088,165 in fiscal year 2012.

Reservist Definitions and Organizational Structure

ODA reservist personnel available for duty totaled 3,049 as of December 2012. Reserve employees are either selected through competitive procedures to term intermittent appointments

³²SBA can make loans to eligible victims of declared disasters as defined by the Small Business Act. Section 7 of the Small Business Act, as amended, authorizes SBA's Physical Disaster and Economic Injury Loan Programs. 15 U.S.C. § 636.

Enclosure I: Federal Emergency Management Agency, U.S. Coast Guard, Small Business Administration, and U.S. Forest Service's Reserve Program Profiles

or hired directly outside of the competitive placement process as Schedule A appointees.³³ Additionally, management has identified certain former ODA employees as resources to call back to service for response to large-scale events, according to ODA officials. Table 2 identifies SBA reservist categories we evaluated for this report.

Table 2: SBA's Office of Disaster Assistance Reserve Categories

Reserve category	Description	Number of reservists, as of December 2012
Term intermittent (surge)	<p>Term intermittent employees are surge staff who are called upon to respond to disaster activity when the core group of permanent, cadre^a and term seasonal^b staff have all been exhausted. Term intermittent staff compete for employment for a period of more than 1 year and not to exceed 4 years. Term intermittent employees are typically used when</p> <ul style="list-style-type: none"> work is sporadic, unpredictable, and cannot be regularly scheduled in advance and there is a drastic increase in disaster activity. 	1,730
Surge plus	<p>Surge plus employees are called when all permanent, cadre, term seasonal, and term intermittent staff have been exhausted. These individuals are Schedule A employees who are hired without competing for employment.</p>	1,319

Source: GAO analysis of SBA data.

Notes: For the purposes of this report, we did not compare term seasonal employees with FEMA reservists because of the nature of their appointments. Employment for term seasonal employees is expected to last at least 6 months and is less sporadic than for FEMA reservists.

^aCadre employees are full-time equivalent employees on a seasonal schedule.

^bTerm seasonal employees compete for employment and are appointed for more than 1 year and not to exceed 4 years.

The ODA organizational structure and assets are functionally based and geographically dispersed, minimizing reliance on a single region, according to ODA staffing strategy documentation. See figure 10 for location of ODA field office centers. While there are additional offices within SBA that support disasters, the primary offices that support a disaster response are as follows:

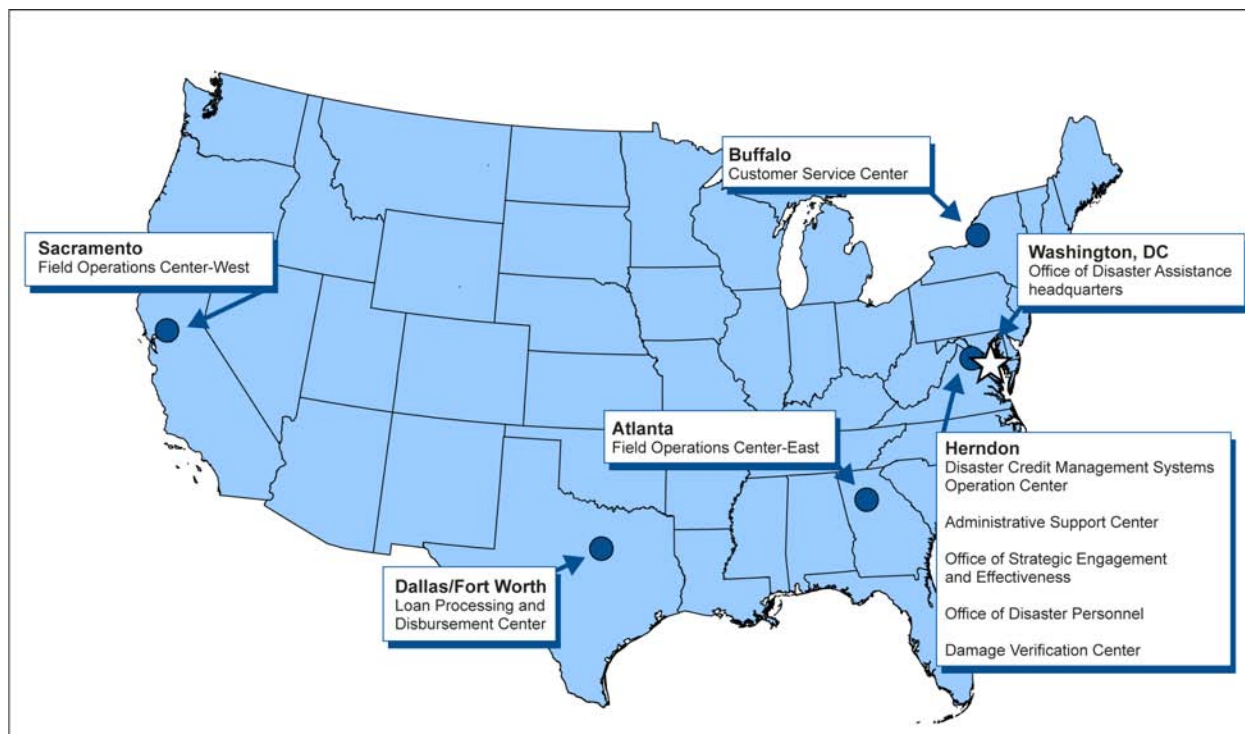
- **ODA headquarters** at SBA's central office in Washington, D.C.
- **The Customer Service Center (CSC)**, located in Buffalo, New York. Disaster victims contact this center when they have questions about their loan applications. Services for disaster victims include a call center, e-mail response, disaster application mailing capabilities, and preapplication data entry assistance, and the center provides services to the other centers as needed.
- Two disaster **Field Operations Centers (FOC)**: FOC-E (East) is located in Atlanta, Georgia, and FOC-W (West) is located in Sacramento, California. The two FOCs are responsible for the coordination of preliminary damage assessments, field operations, and information dissemination.

³³Schedule A appointees may be used to fill special jobs and unique circumstances such as short-term, critical hiring situations where the use of standard qualification requirements and rating practices required during traditional competitive procedures are impractical.

Enclosure I: Federal Emergency Management Agency, U.S. Coast Guard, Small Business Administration, and U.S. Forest Service's Reserve Program Profiles

- A centralized loan **Processing and Disbursement Center (PDC)** located in Fort Worth, Texas. The PDC mails out and receives applications, evaluates them, and disburses funds to eligible borrowers.
- The **Office of Disaster Personnel (ODP)** provides human resource support, the **Administrative Services Center (ASC)** provides administrative support, the **Office of Disaster Strategic Engagement and Effectiveness (ODSEE)** provides employee relations, training, and development support, the **Disaster Credit Management Systems (DCMS) Operations Center** oversees the DCMS system, and the **Damage Verification Center (DVC)** provides the loss verification/inspection function. All of these units are located in Herndon, Virginia.

Figure 10: Office of Disaster Assistance Field Office Center Locations



Source: SBA; Map Resources (map).

Hiring Process and Pay

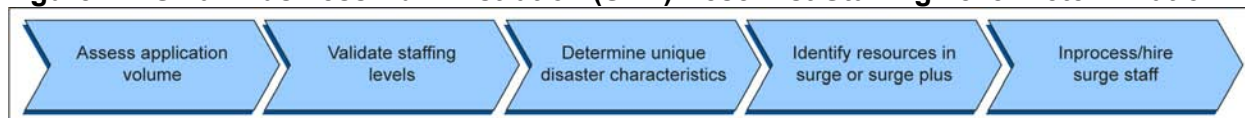
Hiring process. Center directors are instructed to submit a reservist staffing request to ODA headquarters. If the request is approved, then the Office of Disaster Personnel manages the hiring process for each center. The vast majority of ODA's hiring processes for reservists follow Office of Personnel Management's (OPM) guidance—which is closely associated with the position descriptions (PD) for each of its employee types. Prior to posting a reservist job announcement, ODA's Office of Disaster Personnel performs a job analysis and uses an assessment tool to determine the specific functions performed under the job title it plans to fill. Additionally, it gathers information from in-house subject matter experts (SME)—usually staff who work with human resources staff to provide additional background information for the position description. ODA also uses OPM qualification standards to help determine the experience requirements related to the job title. ODA posts all job openings on the USA Jobs

web site, but during a major disaster, employs various other methods, including advertising locally, to get the largest pool of applicants as possible. Once the announcement closes, both the SMEs and human resources staff review applications to determine which applicants are best qualified. Applicants deemed qualified are asked to complete a self-assessment that rates the applicant's experience using a numerical value. According to ODA officials, this process also follows OPM's standards and helps determine which applicants are best qualified, well qualified, or qualified.

ODA does not use face-to-face interviews with reservists, which is a departure from how permanent staff are hired. Once reservists are brought on board, SBA uses their introductory training period (between 1 and 3 weeks) to help determine who is qualified to be a reservist in its program. SBA's goal is to cast a wide net in order to have a large enough pool of reservists. Hiring is done year round, but the agency may increase the number of job announcements it publishes based on an increase in disaster activity. All hiring decision making and processing are done centrally in ODA's Herndon, Virginia location.

Figure 11 outlines how SBA determines the appropriate staffing levels and skills required for specific disasters and more details are presented below.

Figure 11: Small Business Administration (SBA) Reservist Staffing Level Determination



Source: SBA.

- **Assess application volume.** When deemed necessary, the ODA Scalability Model is to be executed to validate the staffing needs.³⁴
- **Validate staffing levels.** When appropriate, upon receiving the results from the Scalability Model, as well as other disaster information, centers are to review and identify the predetermined staffing levels to ensure that they have the staff needed to respond.
- **Determine the unique disaster characteristics.** In addition to validating that their current staffing levels are adequate to respond to the disaster, centers are also to make sure that their available staff have requisite skill sets needed to meet the needs of the disaster.
- **Identify resources in surge or surge plus pool.** Once the resource requirements are identified, the centers, along with the Office of Disaster Personnel, are to identify staff with the requisite skills within the surge or surge plus pools if these skills are not available within the core staff.
- **In process/hire surge staff.** According to the application/workload analysis to determine the appropriate staffing action, if it is determined that SBA's field centers require resources from the surge or surge plus pools, the centers, in coordination with ODP, are to either place staff in pay status, hire staff, or execute a contract based on the needs for responding to the disaster.

³⁴According to SBA's Disaster Preparedness and Recovery Plan, SBA has a system in place that employs risk modeling to scale its existing operations to effectively respond to disasters that require varying levels of support. This scalability model covers five functional components: human capital, infrastructure, partnerships, and technology, and communications ensuring appropriate responses in each. Each component can scale, separately or in concert with the others, according to the surge that is required to meet various levels of disaster.

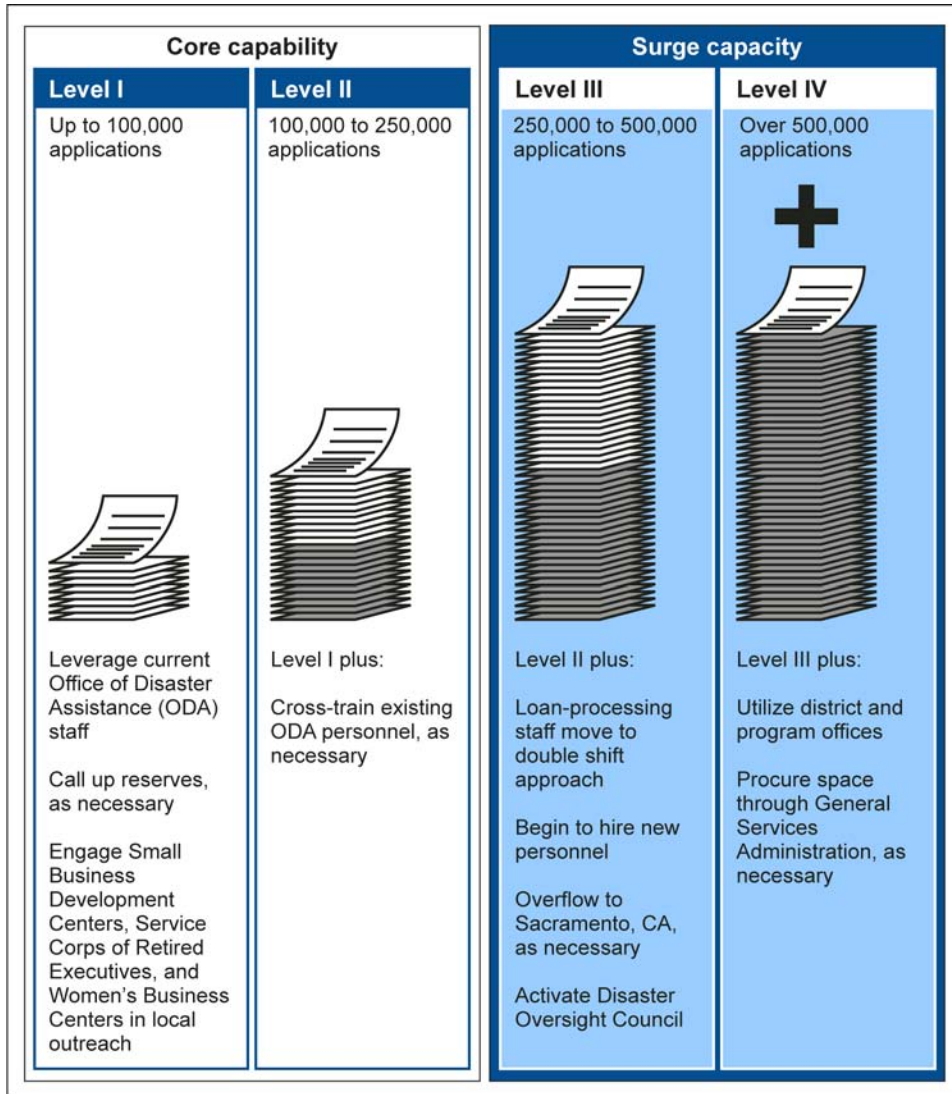
Enclosure I: Federal Emergency Management Agency, U.S. Coast Guard, Small Business Administration, and U.S. Forest Service's Reserve Program Profiles

Pay. According to SBA officials, the agency's reservist pay rates are aligned with OPM's General Schedule (GS) and range from GS-5 to GS-12. Reservist pay grade and rate of pay are determined using the same set of OPM guidelines as for other classes of employees, which includes meeting certain qualification requirements in accordance with OPM's Qualification Standards. With the exception of those reservists who are Fair Labor Standards Act (FLSA) exempt, SBA's reservists are eligible for overtime, which is offered at a rate of 1.5 times an individual's hourly regular rate of pay. SBA uses OPM guidelines and policies to determine if reservists are eligible for pay raises, including within-grade increases and promotions. SBA's term intermittent employees are not authorized benefits unless they were enrolled in benefits in a federal appointment immediately preceding the term intermittent appointment.

Deployment Practices

SBA categorizes disasters into levels based on estimates of the number of anticipated applications. This categorization enables SBA to determine an appropriate surge level for scaling resources and operations to meet the needs of disaster victims. Figure 12 provides an overview of the surge process.

Figure 12: Overview of SBA Surge Process



Source: SBA.

Note: Small Business Development Centers (SBDC) are made up of a unique collaboration of SBA, state and local governments, and private sector funding resources that are to work together to provide an array of technical assistance to small businesses and aspiring entrepreneurs. Service Corps of Retired Executives Association is a nonprofit association supported by SBA that is dedicated to helping small businesses achieve their goals through education and mentorship. Women's Business Centers is a national network of nearly 100 educational centers designed to provide entrepreneurs (especially women who are economically or socially disadvantaged) comprehensive training and counseling on a variety of topics to help them start and grow their own businesses.

Forest Service Fire and Aviation Management

Mission

The Fire and Aviation Management (FAM) unit within the U.S. Department of Agriculture's Forest Service is charged with fire prevention, fire suppression, and using prescribed fires to support environmental resource and social objectives. As part of its mission, FAM protects life, property, and natural resources on 193 million acres of national forest system land and 20 million acres of adjacent state and private property. In addition to wildland fire management, FAM has increasingly been tasked with responding to nonfire national emergencies like Hurricane Katrina. FAM does not have a formal reserve program, and it operates under legal authorities that govern all temporary federal employees, which we discuss later in the hiring and pay section of this enclosure.

Funding

FAM analyzes historical trends and drought conditions to estimate firefighting capability requirements for each year. This planning is used to support funding requests for firefighting resources that fall into two categories: pre-suppression and suppression. Pre-Suppression funds, used to secure and train fire fighting assets, and support the prevention and the state and volunteer fire assistance programs, are allocated at the beginning of the fiscal year, while suppression funds, used to fight fires, are allocated during suppression activities. If depletion of suppression funds occurs as a result of support of regional and or national wildfires, the agency has the ability to leverage funding from other Forest Service programs to meet the funding need.

Wildland fire management represents a growing portion of the Forest Service's program activities, increasing from 13 percent of its total budget in 1991 to about 50 percent in 2009. In fiscal year 2012, the total Wildland Fire Management appropriations—including both the regular Wildland Fire Management appropriations, as well as the FLAME Wildfire Suppression Reserve Fund—was \$2 billion.³⁵

Reservist Definitions and Organizational Structure

The FAM workforce organizational structure is three-tiered, made up of firefighters from local, state, and federal governments. Given the unpredictable nature of fires, FAM utilizes established federal and state cooperative agreements to enable it to surge beyond annual firefighting capability projections by using local, state, and federal firefighting personnel. Command and control for FAM fire suppression operations is also decentralized, with locations in national forests, for example, to cope with the unpredictable nature of fires.

As previously mentioned, unlike the Coast Guard and FEMA, FAM does not have a traditional reserve program. All FAM employees who are deployed to fight a fire, including full-time and part-time employees, must abide by the same basic training requirements. See table 3 for a full description of the two employee reserve types, and figure 13 for the location of operating centers that utilize FAM reservists, as well as the number of reservists assigned to these centers as of December 2012.

³⁵ Pub. L. No. 112-74, 125 Stat. 786, 1022-24 (2011). The FLAME Wildfire Suppression Reserve Fund is an appropriation providing funds to cover fires that are sufficiently large and complex or when the Suppression account is expected to be completely obligated. It is intended to address the impacts of increasing wildfire suppression costs and their effects on other agency programs.

Enclosure I: Federal Emergency Management Agency, U.S. Coast Guard, Small Business Administration, and U.S. Forest Service's Reserve Program Profiles

Table 3: Fire and Aviation Management (FAM) Reserve Categories

Reserve category	Description	Number of reservists, as of November 2012
Temporary ¹⁰³⁹ employees ^a	A temporary appointment is appropriate for work that is expected to last no more than 1 year. Temporary appointments can also be used for seasonal work that is needed every year when the work requires less than 1,040 hours of duty, excluding overtime and eligible training each year. Temporary employees with a seasonal schedule, that is, "temporary seasonal," have annually recurring work that is expected to last less than 6 months (less than 1,040 hours) each year. This time limitation can be exceeded for training purposes up to 120 days in the first year of the appointment and up to 80 hours each subsequent year.	3,725
Administratively determined (AD) ^{casuals} /emergency firefighters	An individual who is not a regular agency employee and is hired for temporary emergency (nonrecurring) service under the AD Pay Plan and procedures. Once the emergency has ended, the individual's employment is terminated.	6,273

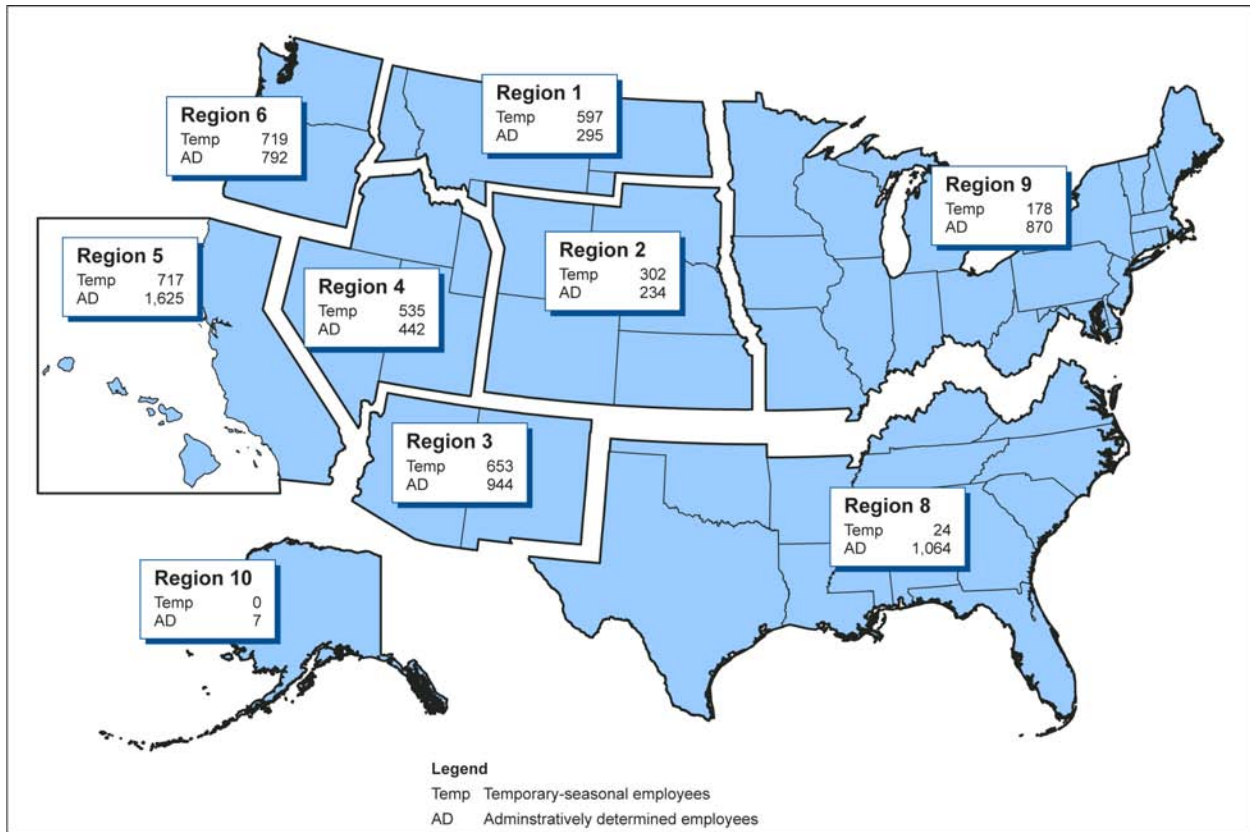
Source: GAO analysis of FAM data.

Note: For the purposes of this report, permanent seasonal employees were not compared with FEMA reservists because they are permanent career employees.

^aSee 5 C.F.R. § 316.401.

According to FAM officials, the annual cost to support and train reservists (temporary and administratively determined) is difficult to estimate because reservist training is conducted simultaneously with training for permanent employees and does not require additional funds. Further, this cost is minimal because, according to FAM officials, there are only two training requirements for FAM reservists. When first hired, reservists are required to take a 1-week basic firefighting training, typically offered at a local fire station. Subsequently, reservists are to attend a 1-day fire refresher training annually. This refresher training is already scheduled for regular/permanent employees and involves no additional training cost, such as for a hired instructor, or travel costs, if offered in an area in which reservists are located.

Figure 13: Number of Temporary and Administratively Determined Employees at Fire and Aviation Management (FAM) Operating Centers, as of December 2012



Source: USDA FAM; Map Resources (map).

Hiring Process and Pay

Hiring. As temporary employees, FAM reservists are hired in accordance with OPM regulations that authorize federal temporary employment programs in the excepted and competitive service.³⁶ The specific applicable qualification requirements for these temporary appointments focus on the applicant's ability to demonstrate that he or she can successfully perform the duties of the position. FAM utilizes detailed position descriptions to hire temporary employees. However, the ultimate responsibility lies with the applicant to provide enough information during the application process so a qualification determination can be made. ADs are hired by the local FAM unit in the event of an emergency and sent to where there is a need. Such hiring is of uncertain or temporary duration and must be terminated when other employment methods can be initiated, such as the hiring of temporary or seasonal employees to replace the ADs.

Pay. FAM temporary employee pay rates are aligned with the federal General Schedule and depend on the employee's position. Employees are paid overtime at a rate of 1.5 times their normal salary. Depending on the severity of the fire, employees may be offered additional hazard pay or Sunday and night pay. AD salaries are not aligned with the General Schedule. These reservists are paid under the provisions of the AD pay plan in effect at the time of hire. This pay plan applies when it becomes necessary to hire persons to

³⁶See 5 C.F.R. pt. 316, § 213.104.

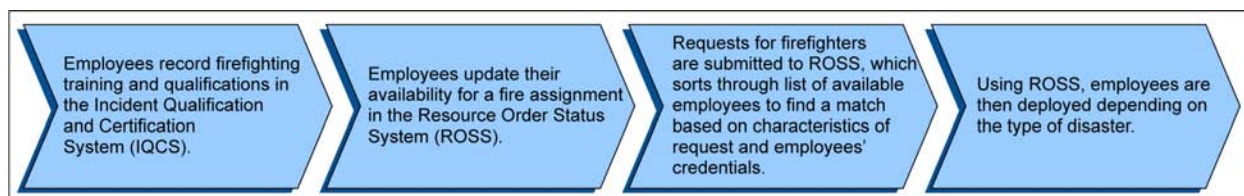
Enclosure I: Federal Emergency Management Agency, U.S. Coast Guard, Small Business Administration, and U.S. Forest Service's Reserve Program Profiles

- cope with a sudden and unexpected emergency caused by a fire, or extreme fire potential, flood, storm, or any other all-hazard emergency, and
- provide emergency assistance to states under formalized agreements, and meet mission assignments issued by FEMA.

Deployment Practices

FAM has a mobilization process in place for deployments that, according to FAM officials, endeavors to use the regular employed personnel that are available for incidents first before using the ADs to supplement the work-force. The local FAM unit or team at the fire determines the resources needed to fight the fire and places a request for reservists in FAM's Resource Order Status System (ROSS). FAM does not deploy specific individuals; instead, requests entered into ROSS specify certain qualifications needed to respond to the fire. As shown in figure 14, employees are required to update their availability for a fire assignment in ROSS, being sure to check with their supervisors to make sure they can actually take the time off to help fight the fire. These employees are then deployed through a dispatch system. Depending on the type of disaster, requests for specific types of positions are submitted to the dispatch system, which sorts through all of the employees that have made themselves available to find a match based on the characteristics of the request and the employees' credentials.

Figure 14: Fire and Aviation Management (FAM) Deployment Process



Source: U.S. Forest Service.

Note: Fires are distinguished by Type (Type I through Type V). Each type of fire requires a different skill set or firefighters who are increasingly more qualified to work more dangerous fires. Type I fires are significantly more complex than Type V.

The local dispatch office is to check ROSS for availability of qualified personnel locally and order regular employees before ordering an AD. FAM attempts to utilize the “closest forces” concept to save costs on mobilization of resources. If no one with the desired qualifications is available locally, the request is elevated to the Geographic Area Coordination Center. If the request cannot be filled there, it is then elevated to the National Interagency Coordination Center. Individuals can be dispatched either locally or nationally, or both. FAM attempts to fulfill requests and make decisions at the local level, unless the local level does not have the desired resources. Also, FAM attempts to deploy on a rotational basis; however, if there is an employee who needs training or additional experience, FAM is to try to deploy the employee to the fire. ROSS does not identify whether an individual's task book (used by the Forest Service to track on-the-job experience after getting basic training) is about to expire or how many assignments a person has had.³⁷ This information is all locally managed. Once employees are deployed, they have to remove themselves from ROSS to prevent being called again. Typical deployments are for 14-day periods.

³⁷ Position task books (PTB) identify all critical tasks required to perform the job for most standard incident management and prescribed fire positions. PTB responsibilities are contained within the *Wildland Fire Qualifications Systems Guide*, PMS 310-1. A PTB must be completed within 3 years from the time the first task is evaluated.

Enclosure II: Comments from the Department of Homeland Security

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



**Homeland
Security**

March 8, 2013

Stephen L. Caldwell
Director, Homeland Security and Justice
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Draft Report GAO-13-250R, "FEMA Reservists: Training Could Benefit from Examination of Practices at Other Agencies"

Dear Mr. Caldwell:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security appreciates the U.S. Government Accountability Office's (GAO's) work in planning and conducting its review and issuing this report.

The Department is pleased to note GAO's acknowledgement of progress made by the Federal Emergency Management Agency (FEMA) to address weaknesses in its Reservist Training Program. The information and analysis provided in this report will help FEMA further strengthen the training of its Reservist workforce.

The draft report contained one recommendation, with which the Department concurs. Specifically, GAO recommended that the FEMA Administrator:

Recommendation: Examine the training practices of other agencies with disaster reservist workforces to identify potentially useful practices.

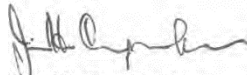
Response: Concur. The FEMA Response Incident Workforce Management Office (IWMO) agrees that valuable insight may be gained by assessing training programs and support systems of other agencies that maintain a similar reservist workforce. For example, developing and implementing the FEMA Qualification System (FQS) to track qualifications and courses needed for specific reservist job categories, we employed the services and expertise of various external organizations to create and expand the training and certification of our reservist workforce. These partnerships proved useful in developing the current FQS, and we look forward to continuing to expand our reservist training program through the examination and possible application of best practices from other federal agencies with similar workforces.

Moving forward, the IWMO program staff will work to coordinate with other organizations and agencies to address this recommendation and will prepare a detailed corrective action plan within 60 calendar days upon receipt of GAO's final report. As our corrective action plan has not yet

been developed, the estimated completion date for fully responding to this recommendation is:
To Be Determined.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,



Jim H. Crumpacker
Director
Departmental GAO-OIG Liaison Office

Enclosure III: Comments from the Department of Agriculture



Forest
Service Washington
Office

1400 Independence Avenue, SW
Washington, DC 20250

File Code: 1420

Date:

MAR 08 2013

Mr. Stephen L. Caldwell
Director, Homeland Security and Justice
U.S. Government Accountability Office
441 G. Street, N.W.
Washington, DC 20548

Dear Mr. Caldwell:

Thank you for the opportunity to comment on the draft report "FEMA Reservists: Training Could Benefit from Examination of Practices at Other Agencies" (GAO-13-250R). The report examines how FEMA's reservist workforce training compares with training of other similar agencies, and to what extent FEMA has examined these agencies' training programs to identify useful practices.

The Department of Agriculture generally agrees with GAO's findings and recommendation that FEMA examine the reservist training programs of other federal agencies.

If you have any questions, please contact Thelma Strong, Chief Financial Officer, at (202) 205-1321 or tstrong@fs.fed.us.

Sincerely,


THOMAS L. TIDWELL
Chief



Caring for the Land and Serving People

Printed on Recycled Paper



This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's website (www.gao.gov). Each weekday afternoon, GAO posts on its website newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to www.gao.gov and select "E-mail Updates."

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <http://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#). Subscribe to our [RSS Feeds](#) or [E-mail Updates](#). Listen to our [Podcasts](#). Visit GAO on the web at www.gao.gov.

To Report Fraud, Waste, and Abuse in Federal Programs

Contact:

Website: www.gao.gov/fraudnet/fraudnet.htm

E-mail: fraudnet@gao.gov

Automated answering system: (800) 424-5454 or (202) 512-7470

Congressional Relations

Katherine Siggerud, Managing Director, siggerudk@gao.gov, (202) 512-4400, U.S. Government Accountability Office, 441 G Street NW, Room 7125, Washington, DC 20548

Public Affairs

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800 U.S. Government Accountability Office, 441 G Street NW, Room 7149 Washington, DC 20548

