



January 2018

EMERGENCY MANAGEMENT

Federal Agencies Could Improve Dissemination of Resources to Colleges

GAO Highlights

Highlights of [GAO-18-233](#), a report to congressional requesters

Why GAO Did This Study

Colleges and other postsecondary schools must plan for various potential emergencies, ranging from natural disasters to violence. A number of federal agencies, including DHS, DOJ, and Education, offer resources to support these efforts. GAO was asked to review colleges' awareness of these resources.

This report examines how (1) selected colleges prepare for emergencies, and (2) federal agencies support college emergency preparedness efforts, including the extent to which selected colleges reported awareness of federal resources.

To answer these questions, GAO interviewed officials from a non-generalizable sample of 18 colleges selected for diversity in size, type, and location. GAO also interviewed officials from three states (Colorado, Kansas, and Virginia) in which some of these schools operated. The states were selected to represent varied approaches to supporting colleges' emergency preparedness efforts. GAO also reviewed federal emergency preparedness resources, agency written responses, applicable federal laws, and federal internal control standards, and interviewed federal officials and representatives from several associations recommended by agency officials.

What GAO Recommends

GAO recommends that DHS, DOJ, and Education work together to identify opportunities to more effectively publicize emergency preparedness resources to colleges. All three agencies concurred with the recommendations or described actions to implement them.

View [GAO-18-233](#). For more information, contact Jacqueline M. Nowicki at (617) 788-0580 or NowickiJ@gao.gov.

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Federal Agencies Could Improve Dissemination of Resources to Colleges

What GAO Found

Emergency managers at 18 colleges across the country told GAO that their efforts to prepare for emergencies involved working with the campus community to develop, communicate, and practice plans, as well as working with state and local partners. Campus community members who are involved often include personnel from offices such as public safety, student affairs, or facilities. Officials at all 18 colleges reported developing emergency plans addressing a range of potential events—an approach consistent with federal emergency management principles. To publicize plans, officials often reported using websites, text messages, or presentations to the campus community. Colleges also reported practicing plans through drills. College officials noted that buy-in from the college president and other top campus leaders was critical to their efforts; several officials reported struggling to obtain such support. Most officials also said they coordinate with local or state partners such as police and relied on these partners for advice or to obtain emergency preparedness resources.

The Departments of Homeland Security (DHS), Justice (DOJ), and Education (Education) offer a variety of emergency preparedness resources to colleges (see figure). However, officials GAO interviewed at 18 colleges described mixed awareness of federal resources, especially those specifically tailored to colleges, despite federal efforts to publicize these resources in a variety of ways. Federal officials and other stakeholders acknowledged this mixed awareness and identified potential causes, such as college emergency managers having networks comprised of local officials who are more likely to know about federal resources for local agencies versus those for colleges, or some college officials devoting limited time to researching federal resources for various reasons.

Types of Federal Emergency Preparedness Resources for Colleges



Source: GAO analysis of federal written responses, agency interviews, and agency websites. | GAO-18-233

DHS, DOJ, and Education all publicize their resources through electronic mailing lists, websites, or other methods, but GAO identified missed opportunities in their dissemination approaches. For example, the electronic mailing list for one key resource may reach the approximately 1,000 officials from colleges subscribed, but may miss at least 3,000 additional schools. GAO also found two federal agency websites that did not include key resources from other federal agencies. Federal internal control standards state that agencies should consider the most appropriate methods for communicating with their external audiences. By identifying opportunities to improve dissemination, federal agencies may increase their ability to effectively communicate important information to colleges.

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Abbreviations

Clery Act	Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act
DHS	Department of Homeland Security
DOJ	Department of Justice
Education	Department of Education
FBI	Federal Bureau of Investigation
FEMA	Federal Emergency Management Agency
ICS	Incident Command System
NCCPS	National Center for Campus Public Safety
NIMS	National Incident Management System
REMS	Readiness and Emergency Management for Schools

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January 23, 2018

The Honorable Daniel M. Donovan, Jr.
Chairman
The Honorable Donald M. Payne, Jr.
Ranking Member
Subcommittee on Emergency Preparedness,
Response, and Communications
Committee on Homeland Security
House of Representatives

The Honorable Susan W. Brooks
House of Representatives

The Honorable Rick Larsen
House of Representatives

Colleges and other postsecondary schools must plan for a variety of potential emergencies.¹ Recent events such as Hurricanes Harvey and Irma, active shooters, and violent rallies, underscore the importance of such preparations. Preparedness efforts involve developing plans and systems to prevent certain manmade events from occurring, protecting members of the campus community when natural or manmade emergencies do occur and minimizing the impact of such events, as well as ensuring the community's safety and maintaining or restoring operations in an event's aftermath. Adequately preparing and responding to emergencies can be complicated by the diverse needs of campus facilities that range from classrooms and dormitories to sports venues, laboratories, and medical buildings.

College emergency preparedness efforts may be influenced by requirements of and resources from local, state, and federal agencies. At the federal level, three agencies—the Departments of Homeland Security (DHS), Justice (DOJ), and Education (Education)—play a key part in providing emergency preparedness resources to colleges. Education also oversees compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), which

¹In this report, we use the terms “colleges,” “schools,” or “postsecondary schools” instead of the statutory term “institutions of higher education” as defined in 20 U.S.C. § 1002. These include both 2-year and 4-year colleges.

includes requirements related to emergency preparedness and notification.² You asked us to explore colleges' emergency preparedness efforts, as well as their awareness of related federal resources.

This report examines how: 1) selected colleges prepare for emergencies, and 2) federal agencies support colleges' emergency preparedness efforts, including the extent to which selected colleges report awareness of federal resources.

To obtain information about how selected colleges plan and prepare for emergencies, we conducted semi-structured interviews with officials at a nongeneralizable sample of 18 colleges. Prior to these interviews, we sent the 18 schools a pre-interview questionnaire to gather details on their emergency preparedness efforts and their awareness of available federal resources. In our interviews we asked follow-up questions, as appropriate, about their responses.³ In selecting these schools, we considered diversity in sector (public and private), size, 2-year and 4-year degree offerings, residential and non-residential campuses, and population density (i.e., rural versus urban).⁴ To obtain additional information about how colleges prepare for emergencies, we reviewed documents and interviewed officials from three states (Colorado, Kansas, and Virginia) in which some of these schools operated. The states were selected for their varied approaches to supporting college emergency preparedness. We also interviewed representatives from several college emergency preparedness associations that support colleges' emergency preparedness efforts and which were identified by federal agency officials. To obtain information about federal resources for college emergency preparedness, we reviewed federal resources and

² For more information about the specific requirements of the Clery Act related to colleges' emergency preparedness efforts, see 20 U.S.C. § 1092(f). This report does not address colleges' compliance with Clery Act requirements but rather describes steps colleges have reported taking related to emergency preparedness.

³ Seventeen of the 18 schools completed the questionnaire. For the school that chose not to complete a questionnaire, we ensured that we obtained all information needed for our analysis during the course of our interview, including on issues raised by the other 17 schools in their questionnaires, as appropriate.

⁴ Throughout the report, we use "most" to describe comments made by officials from 13 to 17 of the 18 colleges whose officials we interviewed. We use "about half" to describe comments made by officials from 7 to 12 of the 18 colleges and "several" to describe comments from officials at 4 to 6 of the 18 colleges.

interviewed officials from DHS, DOJ, and Education.⁵ We also asked officials from these agencies to provide written descriptions of the resources they offer to colleges regarding emergency preparedness. We focused on these three agencies based on their central role in developing the 2013 Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education (an interagency effort) and our subsequent interviews and document review.⁶ We also asked officials at our 18 selected colleges about their awareness of federal resources. We reviewed relevant federal laws, regulations, and agency guidance and compared federal efforts to internal control standards for the federal government.⁷

We conducted this performance audit from October 2016 to January 2018 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.

Background

Colleges are a unique and diverse sector, varying from small, private schools in rural environments to large public schools in major cities. As of the 2015-2016 school year (the most recent available data), there were approximately 4,000 degree-granting colleges in the United States.⁸ In addition to educating students in classrooms, many colleges also manage a number of related business operations, such as dormitories, scientific

⁵ These agency interviews also included meetings with personnel at organizations that contract with Education and DOJ to provide emergency preparedness resources.

⁶ U.S. Department of Education, et al. *Guide For Developing High-Quality Emergency Operations Plans For Institutions Of Higher Education*, (Washington D.C.: June 2013). We also interviewed officials from the Department of Health and Human Services, but determined that their resources were less directly or extensively related to preparedness at colleges than the resources developed by DHS, DOJ, and Education.

⁷ GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington D.C.: September 2014).

⁸ This information is from the Department of Education, National Center for Education Statistics, Integrated Postsecondary Education Data System and includes colleges that grant associates' degrees or higher degrees, enroll first-time undergraduates, and have been certified to receive federal financial aid, as stipulated in Title IV of the Higher Education Act of 1965, as amended.

research facilities, hospitals, performing arts centers, athletic venues, child care facilities, transportation systems, and agricultural facilities. These various roles and responsibilities increase the complexity of emergency preparedness efforts.

DHS has developed a national approach to emergency preparedness by setting a national preparedness goal and outlining activities for achieving it. This approach is designed to apply across all levels of government and sectors of the economy—including colleges, as well as local, state, and federal governments—and to prioritize collaboration among these entities. The National Preparedness Goal identifies activities to prevent, protect against, mitigate, respond to, and recover from threats and hazards and recognizes that preparedness is a shared responsibility of the whole community.⁹ The National Incident Management System (NIMS), which was developed by DHS' Federal Emergency Management Agency (FEMA), operationalizes the goal by providing a guide with advice for government and nongovernmental entities for managing emergencies, including identifying a common vocabulary and processes for responding to emergencies.¹⁰ For example, NIMS establishes a standardized approach for communicating information during emergencies and outlines a leadership structure for managing emergencies, called an "Incident Command System," so that the various entities responding to an emergency can operate seamlessly.

DHS, DOJ, and Education all develop and disseminate emergency preparedness resources in line with their respective missions. Other agencies, such as the Department of Health and Human Services and the National Weather Service, also produce information that can help with colleges' emergency preparedness efforts.

⁹ U.S. Department of Homeland Security, *National Preparedness Goal: Second Edition* (Washington, D.C.: September 2015).

¹⁰ For more information about NIMS, see FEMA's NIMS website: <https://www.fema.gov/national-incident-management-system>.

Selected Colleges Prepare for Emergencies by Involving the Campus Community, Developing and Publicizing Plans, and Partnering with Local and State Agencies

Selected Colleges Varied in Organizational Structures for Emergency Preparedness and Involvement of Campus Community

College offices responsible for emergency preparedness efforts and the number of staff assigned to such efforts varied among the 18 selected colleges we interviewed and generally received some input from other members of the campus community. According to guidance for emergency planning from DHS' Federal Emergency Management Agency (FEMA), emergency preparedness staff are generally responsible for tasks such as developing emergency plans, communicating and updating those plans, and taking a lead role during an actual event. College officials we spoke with said that their schools generally designated a lead office for emergency preparedness efforts. This lead office ranged from a dedicated emergency preparedness office at some colleges to offices that had non-emergency preparedness responsibilities as well, such as offices of public safety, student affairs, or facilities. About half of the officials responsible for emergency preparedness efforts at the 18 selected colleges we interviewed also spent time on other types of responsibilities that were not specific to emergency preparedness, such as health and safety issues. State agency officials and representatives from a college emergency preparedness association we spoke with also noted that emergency managers at colleges often "wear many hats," or have limited time to devote to emergency planning, which makes their jobs more difficult. College officials often said balancing competing priorities was challenging. For example, an official at one college told us that if his school had more staff it could expand outreach efforts to students and faculty and design specific actions for a wider range of emergencies.

In addition to having a lead office, most of the 18 colleges reported convening advisory committees or teams from the campus community to help develop or revise emergency preparedness plans. For example, one official at a large public university with over 36,000 students told us emergency plans are reviewed by an emergency response committee comprised of representatives from the business office, student housing, faculty, and the provost, among others. An official from another college reported that, while some campus community members played a less active part in developing the emergency plan, they were still responsible for understanding their roles and responsibilities in the event of an emergency. According to FEMA’s guidance for emergency plans, there are benefits to using a team approach. For example, the campus community is more likely to follow a plan if members have been involved in developing it because of a sense of shared ownership (see text box.)

Two College Emergency Managers’ Descriptions of Emergency Preparedness Efforts

Shooting on Campus

On the day a campus police officer was shot and killed, several of the members of the campus leadership, including myself (the emergency manager) and chief of police, were off campus. Fortunately, many people on campus have been trained to manage a significant event because college leadership had placed a strong emphasis on emergency preparedness, including succession planning. When something occurs it is important to have a team that has practiced together and can provide leadership even if some key individuals are not on campus at the time.

Hurricane

Hurricane Irma was 340 miles across, wider than the states of Florida and Georgia in some places. We were on the “dirty side” of the hurricane, just to the east of the eye. We were relieved that the damage on our campuses was not worse. Because of our actions before the storm—such as removing loose items like traffic cones and signage and tying down large equipment— we minimized the damage.

Source: GAO interviews with selected college emergency managers | GAO-18-233

Selected Colleges Reported Preparing for a Range of Emergencies and Varied in How They Communicated and Practiced their Plans

College officials we interviewed described preparations for a range of emergencies and used a variety of tools to communicate and practice their plans (see text box). Officials we interviewed at all 18 colleges said their school developed “all hazards” emergency plans, which means the plans are designed to address a range of emergencies while prioritizing those that are most likely to affect their campus. This “all hazards” approach is supported by federal emergency preparedness principles as outlined in NIMS. Most college officials we spoke with said they prioritize at least one type of natural disaster that could occur in their geographical area, as well as manmade threats like active shooters. Most of the college officials reported talking with state or local partners or using some type of risk assessment tool or similar analysis to prioritize specific types of emergencies. College officials sometimes described this process as prioritizing emergencies that either occur more frequently, or are likely to have a significant effect on the college if they were to occur. For example, several officials at selected colleges said their schools prioritized active shooter events—even though they occur relatively rarely—because of incidents at other colleges or the potential effects on the community if such an event were to occur. A college’s specific characteristics can also inform its emergency plan. For example, officials from two colleges said their schools serve as research institutions and may need to take extra steps to secure scientific infrastructure in an emergency. Two officials described emergency preparedness efforts related to the physical location of their campus, such as bordering a body of water or being adjacent to an airport.

Two College Emergency Managers' Descriptions of Responding to Emergencies

Housing Hurricane Evacuees

We knew that the hurricane was likely to hit other parts of our state badly, but we were not overly concerned that the hurricane would hit us directly. I came to work that morning and there were 20 buses on campus by our football field. We are an evacuation center but someone had forgotten to tell us that they were sending us 1,100 evacuees. Where were we going to put 1,100 people? These are the types of events that you plan for and hopefully you never have to implement those plans, but that day we had to do it. It took us about 4 or 5 hours between the time the buses showed up to when we had prepared the gymnasium with cots that were provided by the American Red Cross and food for the evacuees. The evacuees were here for 3 days. Our administrative staff slept on cots in our offices so that we were on campus the whole time the evacuees were here.

Rally that Turned Violent

Prior to the rally, we set up cameras in the area and arranged for additional security through mutual aid agreements with other police departments. We also convened in a nearby meeting room to monitor the situation. The situation turned violent very suddenly. At first, a couple hundred students and other individuals were in the area peacefully. Then a more rowdy group convened and within 15 minutes of their arrival, bottles were flying through the air and windows were being broken. I looked down for just a moment, then looked up again and a generator was on fire. We tried very hard to continue with the event because we believe in free speech, but safety became a concern and we had to cancel. It was very stressful and hard to watch. We were worried about the safety of our students.

Source: GAO interviews with selected college emergency managers | GAO-18-233

College officials we interviewed also outlined a variety of methods to communicate with the community in the event of an emergency and to conduct emergency drills.

Emergency Communications

Officials we interviewed at the 18 selected colleges most commonly described using college websites, text messages, or mass email alerts to communicate emergency preparedness information to the campus community (see text box). Officials at several colleges also said they developed more detailed applications that students and faculty could download to their electronic devices for up-to-date emergency preparedness information.

Two College Emergency Managers' Descriptions of Emergency Communications

Shooting on Campus

Within minutes of the shooting, an alert was sent utilizing multiple channels including texts, email, message boards, web, desktop and voice messages. This serves two functions; it provides redundancy of delivery and also considers the different information receiving preferences of the community. Emergency messages, at a minimum, provide what happened, where it happened, and what action needs to be taken. Updates are sent when there is new information. It is recommended that during an emergency you communicate at least every 30 minutes. It is also important to ensure that correct up to date information is available, since inaccurate rumors can spread quickly through social media.

Rally that Turned Violent

Twitter helped us amplify our messages. We wrote these messages quickly, while doing many other things, so that the community could have information as soon as possible including about areas to avoid for safety reasons. After the fact, the messages also provided a time-stamped record of the events and the campus response to those events.

Source: GAO interviews with selected college emergency managers | GAO-18-233

About half of the colleges also told us that they offer training to communicate emergency preparedness information to specific groups such as students, faculty, and administrators. For example, an official at one college told us the college has targeted outreach to faculty by developing specific trainings that cover specific issues, such as what to do when classes are disrupted or a building is no longer accessible, for

example, as the result of a weather event. Officials from several colleges also said they communicate emergency preparedness information during new student orientation. Several college officials acknowledged that engaging students can be challenging, and some officials said they address this challenge by making presentations or printed and online materials as engaging as possible.

Emergency Preparedness Drills and Exercises

College officials we interviewed also said their colleges practice and test emergency preparedness plans by conducting drills and exercises at least once a year. Most officials from the 18 selected colleges said they conducted evacuation drills, such as fire drills; a few officials said they conducted more time-intensive activities such as “tabletop exercises” (i.e., sessions in which officials meet to discuss their roles during a specific type of emergency). For example, a large public college conducted a tabletop exercise to simulate a hypothetical weather event that damaged a dormitory. One official at a large university also described how the college uses emergency preparedness principles to manage non-emergency events such as sports events in order to practice their plans.

College emergency managers said that buy-in from a college’s top leadership was very important for promoting emergency preparedness efforts and increasing campus involvement. For example, one official described top leadership buy-in as the “guiding light” for the campus community. Another official said the president of his college made it mandatory for all executive staff to attend emergency preparedness trainings, which demonstrated his commitment to emergency planning and preparedness. When such support is lacking, officials said it is often difficult to engage students and faculty. For example, one college official told us that his college’s previous president viewed emergency preparedness as bothersome and a burden. The lack of support limited the type of drills that could be conducted on campus, the official said. Another official at a private 4-year school explained that his college could not participate in the “The Great ShakeOut” program because the drill fell outside of the allowable hours when drills were permitted to occur to avoid any conflicts with classroom instruction time.¹¹

¹¹ The Great ShakeOut began in Southern California in 2008 as a drill designed to educate the public about how to protect themselves during a large earthquake and how to get prepared. Great Shakeout Earthquake Drills are now held in more than 20 Official ShakeOut Regions. International ShakeOut Day is held in October of each year.

Selected Colleges Often Coordinated with Local Partners or State Agencies

Officials at most of the 18 selected colleges stated that they relied on either their local or state partners, or both, for advice, questions, or to obtain resources for emergency preparedness. These partners were also the first responders for colleges experiencing emergencies and may include local and state police and fire departments, hospitals, and emergency management offices. Coordinating with partners is a key component of the federal emergency preparedness principles, as outlined in the National Preparedness Goal and NIMS.

Local Partners

Most of the officials we spoke with at our selected colleges said they work with partners in their local community, such as police, fire, and emergency management departments or local public health agencies, in preparing for emergencies. For example, one official at a large public university described a mutual aid agreement with its local emergency management department, which allows his school access to the county's radio communication system in the event of an emergency. The specific nature of local partnerships often varied based on factors such as the size of the college and the surrounding community. For example, we heard from some state, college, and association representatives that some smaller colleges did not have very extensive police or security departments, and therefore, relied heavily on local police departments when emergencies occurred. While coordination often involved planning for how a community could help a college in the event of an emergency, college and emergency preparedness association officials also described instances in which large universities in small towns had more emergency preparedness resources than the town and were therefore the ones offering help. For example, one large university in a part of the country prone to tornadoes offers shelter to town residents and employs emergency response coordinators to help individuals quickly find shelter.

Officials also said interpersonal relationships play a big part in deciding to whom they reach out. Most of the college officials with whom we spoke highlighted the importance of their interpersonal relationships with local and/or state law enforcement or emergency management officials and in some cases, attributed these relationships to having previously worked in local or state law enforcement or emergency management. For example, one college official told us that his former role as a local police chief has made it easy to identify and maintain contacts with local police, fire, and emergency medical services and to include them in all campus drills and exercises.

State Partners

College officials also described partnering with state agencies to develop their emergency plan and identify roles in the event of an emergency, adhere to state requirements, or obtain resources (see text box). Officials at about half of the 18 selected colleges described working with state law enforcement entities to, for example, obtain information about emerging threats, or involve state officials in drills and exercises to practice their colleges' emergency plans. About half of the college officials also described cases in which they were required by state law or regulation to complete certain college-specific emergency preparedness activities, such as developing an emergency operations plan, although officials from a college emergency preparedness association noted that state requirements related to college emergency preparedness vary widely. In addition to describing requirements from state emergency management agencies, officials from several public colleges described emergency preparedness requirements from the head office of their state's college system. Other officials said that their state did not have any requirements specific to emergency preparedness at colleges.¹²

States sometimes also provided resources for colleges' preparedness efforts. Officials at most of the 18 colleges we contacted said that they received some state written guidance, training, or technical assistance that was either specifically tailored to colleges, or was designed for various entities including colleges. For example, Colorado has an online school safety center that disseminates emergency preparedness resources and offers technical assistance. An official from the Kansas Board of Regents told us the Board's staff helps to facilitate a new emergency preparedness community of practice led by colleges, and an official from the state's Division of Emergency Management said they hold general emergency preparedness trainings in which colleges may participate.

In addition to supports from local and state government, officials at most of the selected colleges reported that they received support or assistance from college emergency preparedness associations. For example, these

¹² Our review did not analyze states' emergency preparedness laws and regulations.

associations host conferences and conduct studies on emergency preparedness.¹³

¹³ For example, among other initiatives, the International Association of Emergency Managers, Universities & Colleges Caucus developed a National Intercollegiate Mutual Aid Agreement in 2015 to help colleges share information on emergency preparedness, and the International Association of Campus Law Enforcement Administrators holds annual conferences.

Three College Emergency Managers' Descriptions of Working with Community Partners

Housing Hurricane Evacuees

Informal networks were essential. People who know each other will help each other. I have a friend in the state police department and requested his assistance with security for the evacuation center. The state police provided approximately 10 troopers to assist the campus police officers. Some evacuees brought their pets with them, so the county office of emergency management activated its animal shelter resources and positioned an animal shelter on campus. Someone brought a 4-foot iguana. What do you do with an iguana?

Rally that Turned Violent

The group that was being destructive moved back and forth between campus and the city, so we communicated and coordinated a lot with community partners. We work together on a daily basis, so the communication that night was seamless. We also had a member of the local police department in our emergency management headquarters during the event, which was very helpful.

Hurricane

In the days leading up to Hurricane Irma, statewide briefings were held twice a day with a variety of emergency personnel in the room, including local police and fire chiefs, mayors, power companies, communications personnel, and the state emergency management department. Everyone had already discussed how we would work together in the event of an emergency, so the conversation focused on coordinating specific actions. For example, we are a state system of technical colleges with many tractor-trailer drivers on campus. We were asked to deploy those drivers to deliver supplies to various state and FEMA locations around the state.

In addition to managing emergencies for the college, I am also the mayor of one of the local towns and those responsibilities dovetail nicely. Responding to emergencies never becomes second nature, but it's nice to know that when something natural or manmade strikes, there are systems, people, and assets in place. One of the reasons that the system works so well now is because frameworks like NIMS were put in place after Hurricane Katrina.

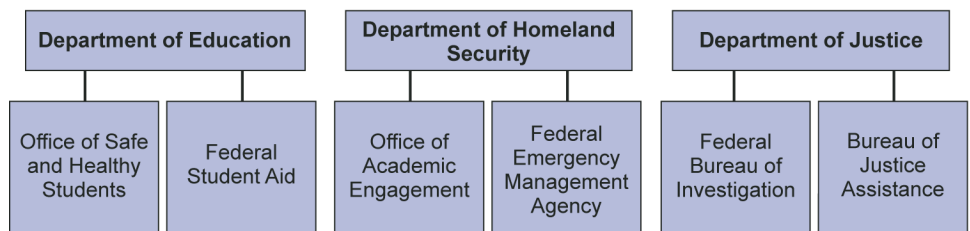
Source: GAO interviews with selected college emergency managers | GAO-18-233

Several Federal Agencies Offer Emergency Preparedness Resources Although Selected Colleges Reported Mixed Awareness

Federal Agencies Provide Guidance, Training, Technical Assistance, and Other Resources to Help Colleges Prepare for Emergencies

Various sub-agencies within DHS, DOJ, and Education are involved in developing and providing emergency preparedness resources for colleges (see fig. 1).¹⁴

Figure 1: Key Federal Agencies That Provide Emergency Preparedness Resources to Colleges



Source: Federal agency officials and websites. | GAO-18-233

Note: Federal agencies and sub-agencies depicted above are those that have several dedicated college-specific resources. The Office of Safe and Healthy Students is under Education’s Office of Elementary and Secondary Education. The Bureau of Justice Assistance is under DOJ’s Office of Justice Programs. Other federal agencies also play a role, including the Department of Health and Human Services, but we determined that their resources were less directly or extensively related to preparedness at colleges than the resources developed by DHS, DOJ, and Education.

¹⁴ There are also federal initiatives to support students pursuing emergency management careers in multiple sectors such as federal, state, and local government, or at colleges. Such initiatives to train future managers are generally outside the scope of this report.

These three agencies use a variety of methods to provide resources, such as written guidance, webinars, and individual technical assistance (see fig. 2). The content of these resources ranges from general emergency management information to guidance specifically tailored to schools (see text box). Agency officials we interviewed said federal agencies have specific areas of expertise as it relates to college emergency preparedness. For example, DHS' FEMA provides broad emergency preparedness information and tools and DOJ approaches emergency preparedness through a law enforcement and public safety perspective. Education's role includes the work of its Federal Student Aid office, which approaches emergency preparedness by issuing relevant guidance, providing technical assistance, and enforcing compliance with the Clery Act.¹⁵

Figure 2: Types of Federal Emergency Preparedness Resources for Colleges



Source: GAO analysis of federal written responses, agency interviews, and agency websites. | GAO-18-233

Federal officials noted that colleges can have differing needs when it comes to emergency preparedness, based on their size, funding, and current threats. As a result, agency officials said they strive to provide tailored resources when possible. For example, DHS officials said that the Campus Resilience Program is building a website portal that will include a menu of FEMA resources tailored to colleges' needs, including a downloadable self-assessment of risk and vulnerability. This new program is meant to expand on a similar pilot program that operated from 2013 to 2016; officials expect it to be accessible to schools midway through fiscal year 2018. Education and DOJ officials said that college officials have recently been requesting information and assistance with demonstrations and large events on campus. Specifically, the DOJ-funded National Center for Campus Public Safety (NCCPS) publicized a "For Official Use Only" report on maintaining safety and order on campuses during protests

¹⁵ See 20 U.S.C. § 1092(f).

and demonstrations, which was produced by DHS and DOJ. According to NCCPS tracking records, 325 colleges and other parties requested this guidance from January through August 2017. Additionally, agencies have developed resources based on current events, including webinars in response to a series of severe hurricanes in fall 2017.

Examples of Federal Resources for Colleges' Emergency Preparedness Efforts

- **National Incident Management System:** The Department of Homeland Security's (DHS) Federal Emergency Management Agency (FEMA) provides general emergency management resources through its National Incident Management System (NIMS) and Incident Command System (ICS). FEMA officials have also helped produce some college-specific resources within NIMS and ICS, such as a guide for NIMS implementation for colleges, and courses tailored to college officials, including a course titled "Multi-Hazard Emergency Management for Higher Education."
- **National Center for Campus Public Safety (NCCPS):** Funded by the Department of Justice (DOJ), NCCPS maintains a website with a library of resources and training for colleges, and distributes a weekly electronic newsletter to officials who request to be on the distribution list. NCCPS also staffs research associates who answer email requests from college officials.
- **Readiness and Emergency Management for Schools (REMS) Technical Assistance Center:** Administered by the Department of Education (Education), the center includes a community of practice, and links to federal resources and training. The REMS Center addresses emergency preparedness for both K-12 schools and colleges; according to officials, the center devotes approximately 20 percent of its resources to emergency preparedness for colleges.
- **2013 Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education:** Developed by Education, DOJ, DHS, and other agencies, this is an overall guide for colleges as they develop their emergency plans.
- **Assistance related to Clery Act components on emergency preparedness:** Offices within Education provide guidance (such as the Handbook for Campus Safety and Security Reporting) and assistance with calls to the Campus Safety and Security Help Desk.

Examples of Federal Resources for Colleges' Emergency Preparedness Efforts

- **Campus Resilience Program:** As part of this program, the Office of Academic Engagement, within DHS, leads the National Seminar and Tabletop Exercise Series for Institutions of Higher Education, a series of campus-based events where college officials discuss their roles during a simulated emergency situation. DHS officials collaborate with officials from DOJ and other agencies to conduct these events. In 2016, the tabletop exercise focused on responding to campus violence.
- **Campus Liaison Program:** Federal Bureau of Investigation (FBI) Campus Liaison Agents, comprised of both Special Agents and Task Force Officers on the Joint Terrorism Task Forces in FBI field offices, provide information, training, exercises, and response capabilities to campus public safety officials.
- **Research and reports on manmade threats:** Agencies have published reports on manmade threats applicable to higher education settings, such as the 2010 report "Campus Attacks: Targeted Violence Affecting Institutions of Higher Education," which was a collaborative among the FBI, Education, and Secret Service.^a

Notes:

^aDrysdale, D., Modzeleski, W., and Simons, A.. Campus Attacks: Targeted Violence Affecting Institutions of Higher Education. U.S. Secret Service, U.S. Department of Homeland Security; Office of Safe and Drug-Free Schools, U.S. Department of Education; and Federal Bureau of Investigation, U.S. Department of Justice. Washington, D.C., 2010.

Source: GAO analysis of federal written responses; agency interviews; and agency websites | GAO 18 233

Most of the federal agency officials we interviewed said they were generally aware of resources produced by other federal agencies and reported that collaboration is based on relationships formed through prior collaborative efforts, such as the White House-initiated effort to produce emergency preparedness guidance for colleges in 2013.¹⁶ For example, Education officials described being contacted by their colleagues at other agencies with questions or requests, and DHS and DOJ officials said they

¹⁶ U.S. Department of Education, et al. *Guide For Developing High-Quality Emergency Operations Plans For Institutions Of Higher Education*, (Washington D.C.: June 2013).

frequently cross-promote each other's resources. Further, various agencies have advisory boards and committees to inform their agency-specific initiatives, such as the DHS Homeland Security Academic Advisory Council, which includes officials from other agencies. However, some agency officials shared potential issues with information sharing. For example, one official said he continues to encounter federal offices that have emergency preparedness resources of which he was unaware, indicating there are continued opportunities for increased collaboration.

There is currently no systemic way for federal agencies to share information about resources for college emergency preparedness. Federal officials have established an interagency working group, "Federal Partners in School Emergency Management and Preparedness"¹⁷ that currently focuses on resources for K-12 schools, and Education officials said it plans to expand its focus to include colleges, perhaps by fall 2018.¹⁸ Most federal agency officials we spoke with said having an interagency working group focused on colleges would be useful, for example, to ensure that officials are aware of all available resources across the federal government.

Selected Colleges and Stakeholders Cited Schools' Mixed Awareness of Federal Resources Despite Agency Efforts to Publicize Them

Officials from the selected 18 colleges cited mixed levels of awareness regarding federal resources on emergency preparedness developed specifically for them. For example, officials at all 18 colleges said they were aware of FEMA resources focused on general emergency preparedness, such as NIMS. However, we found that college emergency managers were less frequently aware of college-specific resources produced or funded by Education, DOJ, and others. Specifically, college emergency managers at almost half of the selected schools said that they were unaware of each of the following key resources: the 2013 Guide for

¹⁷ This interagency working group is comprised of the following members: Department of Agriculture, Department of Education, Department of Health and Human Services, Department of Homeland Security, Department of Justice, and the White House National Security Council. The interagency working group was established by Education in response to a recommendation from a previous GAO report on emergency preparedness: GAO, *Emergency Management: Improved Federal Coordination Could Better Assist K-12 Schools Prepare for Emergencies*, [GAO-16-144](#) (Washington, D.C.: March 2016).

¹⁸ GAO has previously reported on leading practices for collaboration. See GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: September 2012) and GAO, *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*, [GAO-14-220](#) (Washington, D.C.: February 2014).

Developing High-Quality Emergency Operations Plans, the NCCPS website, or Education’s Readiness and Emergency Management for Schools (REMS) Technical Assistance Center website. In addition, the college officials with whom we spoke sometimes requested the federal government develop specific resources without realizing these resources already exist. For example, one college official described wanting resources on how to manage active shooter and weather-related emergencies, although several agencies currently fund or provide such resources. Additionally, another college official who generally accessed federal resources through DHS suggested that the agency develop tailored guidance for colleges beyond NIMS, without realizing that a NIMS guide for colleges exists on Education’s REMS website.

Federal officials and representatives from college emergency preparedness associations have also observed gaps in awareness of federal resources among college officials and have acknowledged it as a challenge. For example, one agency official said that every time she goes to a conference, she finds more college officials who have not heard of key federal resources, signaling a continued need for more outreach. A needs assessment funded by DOJ also found that awareness of federal resources may be an issue.¹⁹ Further, NCCPS staff conducted a survey among colleges to assess the level of engagement these schools have with entities such as FBI Campus Liaison Agents, and told us they found about half of colleges—especially private colleges—are unaware of the federal entities included in the survey.²⁰

This limited awareness among some schools is occurring despite federal agencies’ efforts to disseminate resources and engage with the higher education community. Agencies publicize resources through electronic mailing lists (i.e., listservs), social media, conferences, websites, direct outreach, and college emergency preparedness associations.²¹ For example, Education’s Office of Safe and Healthy Students, which

¹⁹ *National Higher Education Emergency Management Program Needs Assessment*, by NCCPS, Disaster Resilient Universities, and International Association of Emergency Managers – Universities & Colleges Caucus, (November 2016).

²⁰ NCCPS officials said they plan to administer a similar survey to determine schools’ engagement with FEMA regional offices.

²¹ College emergency preparedness associations that publicize federal information include Disaster Resilient Universities, the International Association of Emergency Managers—Universities & Colleges Caucus, and the International Association of Campus Law Enforcement Administrators.

publishes its resources on its REMS website, publicizes these resources through social media. DHS publicizes its Campus Resilience Program at conferences. Other agency officials we spoke with said they also use conferences as opportunities to increase school officials' awareness of federal resources, and they partner with college emergency preparedness associations to publicize their resources. NCCPS includes information on various resources in its weekly e-newsletter. Additionally, following up on the results of the NCCPS survey on colleges' engagement with FBI Campus Liaison Agents discussed above, NCCPS staff have discussed the results with the FBI Program Manager of the Campus Liaison Program so the FBI can improve engagement with colleges.

Officials from colleges, college emergency preparedness associations, and federal agencies we interviewed identified several factors, such as colleges' staffing resources dedicated to emergency preparedness and the nature of the professional networks used by their emergency managers, that may lead officials to be less familiar with college-specific federal resources on emergency preparedness:

- Without full-time emergency preparedness staff, colleges, particularly small colleges, must prioritize the most urgent tasks, and thus, officials reported not having enough time to research available federal resources. Representatives from college emergency preparedness associations also said that, in their experience, larger schools were more likely to be aware of federal resources than private and smaller colleges.
- College emergency managers we spoke with often have backgrounds in local or state emergency preparedness or law enforcement or have networks comprised of local or state officials. These managers often said they learned about federal resources through their more general local and state emergency preparedness networks. As a result, they were more frequently aware of general FEMA resources applicable to these localities versus resources specifically designed for colleges. In particular, college officials we contacted were more likely to report seeking information from DHS than from Education or DOJ.
- Some college officials may be uninterested in learning about additional resources provided by the federal government, especially if they receive resources from states, localities, or college emergency preparedness associations or potentially in cases where campus leadership does not prioritize emergency preparedness.

While agency officials and representatives from college emergency preparedness associations said that federal agencies have made strides in publicizing their resources to a population of college officials that can be challenging to reach, and expressed desire to increase awareness, we identified potential gaps or missed opportunities in their dissemination approaches, including:

- Agencies commonly publicize new resources through their existing listservs and social media accounts. While these dissemination strategies are effective for alerting colleges already connected to federal agencies, they are less likely to reach additional colleges not already subscribed to these distribution lists. For example, a REMS official reported that the REMS listserv includes approximately 1,000 officials from colleges and related associations. Given that approximately 4,000 colleges were operating in the 2015-2016 school year, according to Education data, most colleges do not receive these electronic communications.²² In addition, DHS officials told us that one of their college emergency preparedness distribution lists includes representatives from college emergency preparedness associations and state college and university systems, but is not designed to include individual colleges unless they request to be included.²³
- Agencies also often publicize their efforts at conferences, but these conferences may miss some colleges, especially some smaller colleges with fewer resources with which to send college officials, according to several agency and college emergency preparedness association officials. As a result, colleges that can afford to send officials to these conferences may already be more informed than colleges not in attendance.
- In reviewing various federal websites, we found some lists of resources that did not include key federal resources, or included web

²² This information is from the Department of Education, National Center for Education Statistics, Integrated Postsecondary Education Data System and includes colleges that grant associates' degrees or higher degrees, enroll first-time undergraduates and have been certified to receive federal financial aid, as stipulated in Title IV of the Higher Education Act of 1965, as amended.

²³ In addition to listservs specifically about college emergency preparedness, there are also more general emergency preparedness listservs. These general emergency preparedness listservs also do not necessarily include all colleges because officials must choose to subscribe. In addition, the content of the listservs is not necessarily tailored to all the specific steps involved in emergency preparedness at colleges.

links that directed visitors to other agencies' resources that were out of date. For example, one federal website included a list of resources related to emergency planning for colleges, but did not list the NCCPS website among these resources, even though it is a key resource focused on the topic. Another federal website for college emergency preparedness did not include a link to Education's REMS website, which was specifically developed for school emergency preparedness. Further, this same resource included a link to another Education webpage that was empty of content and had not been updated since 2015. When federal emergency preparedness websites are out of date or incomplete, federal agencies miss opportunities to provide accurate, up-to-date information about their resources and initiatives and those of their partner agencies, and may contribute to colleges' gaps in awareness about these resources.

- We heard from several college officials that they would like direct outreach from the federal government. Agencies do not generally distribute information directly to all colleges, especially those not previously signed up for listservs or other distribution services. However, Education has email contact information for the official at every college who reports campus crime statistics to the agency, which may be a natural entry point for federal agencies to disseminate information on emergency preparedness to all colleges.
- As discussed above, agency officials do not have a systematic method for notifying each other about their resources for colleges. This could limit officials' ability to cross-publicize each other's resources; an important activity given that some colleges we contacted only seek information from one agency or website and were unaware of resources from others.

According to federal standards for internal control, in communicating information to achieve their objectives, agencies should consider appropriate methods of communication with their external audience (in this case, college emergency managers).²⁴ Relatedly, these standards also state that agencies should communicate with each other on necessary information for achieving their objectives.²⁵ Limited awareness of federal resources may result in colleges unnecessarily focusing their

²⁴ GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

²⁵ [GAO-14-704G](#).

limited time and resources on developing strategies or information that federal agencies have already addressed, or advancing preparedness efforts that are not fully informed by federal agencies' expertise.

Conclusions

Emergency preparedness is a vital and challenging task for the higher education community. Various sub-agencies within three key federal agencies—DHS, DOJ, and Education—provide a number of resources for colleges, but over the course of our review, we found that colleges were sometimes unaware of key federal resources that could assist them in meeting their important emergency preparedness needs. The breadth of many colleges' responsibilities beyond education—such as housing students, running research facilities, and operating hospitals—increases their exposure to risks. Being underprepared in the face of an emergency could dramatically increase both human and economic consequences, not only for the colleges themselves, but also for the larger communities to which they are connected.

Emergency preparedness is a shared responsibility and colleges bear some responsibility for learning about federal resources that can assist them in protecting their students and staff. However, striking an appropriate balance between meeting colleges' main mission—educating students—and other equally important responsibilities, such as emergency preparedness, can be difficult, especially given resource constraints. While federal agencies also face resource constraints, supporting the safety of college community members is an important part of the missions of DHS, DOJ, and Education. These agencies have developed a variety of resources intended to support colleges in their emergency preparedness efforts, but colleges are not always aware of these resources. This problem is exacerbated by federal agencies' choice of dissemination methods, which could miss a large portion of college emergency managers, and because federal agencies have missed opportunities to cross-promote each other's resources. Unless federal agencies address these issues, they will continue to miss opportunities to more effectively communicate important information to colleges, particularly those that may be harder to reach, such as smaller schools. The planned interagency working group on emergency preparedness for colleges may offer an opportunity to systematically explore areas in which communication and connection between colleges and federal agencies can be improved, while leveraging and improving existing agency relationships.

Recommendations

We are making a total of three recommendations—one to each of the three agencies in our review—to improve awareness of federal resources for emergency preparedness among colleges. Specifically:

The Secretary of Education, in collaboration with other agencies through the planned interagency working group or another mechanism, should identify further opportunities to more effectively publicize resources to reach additional colleges. (Recommendation 1)

The Secretary of Homeland Security, in collaboration with other agencies, through the planned interagency working group or another mechanism, should identify further opportunities to more effectively publicize resources to reach additional colleges. (Recommendation 2)

The Attorney General, in collaboration with other agencies through the planned interagency working group or another mechanism, should identify further opportunities to more effectively publicize resources to reach additional colleges. (Recommendation 3)

Agency Comments and Our Evaluation

We provided a draft of this report to Education, DHS, and DOJ for each agency's review and comment. All three agencies agreed with our recommendations or described steps they would take to implement them. Education's written comments are reproduced in appendix I and DHS' written comments are reproduced in appendix II. DOJ did not provide written comments. DHS and DOJ provided technical comments. We incorporated changes based on their comments into the report, as appropriate.

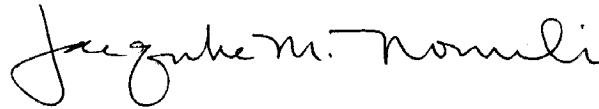
Education stated that the agency is always interested in increasing utilization by colleges of the emergency management resources that the Department and other federal agencies develop. It also stated that the planned interagency working group would be a very appropriate and effective vehicle for increasing utilization of these resources, and that it will consider that group or other mechanisms to identify further opportunities to publicize resources to colleges.

DHS concurred with our recommendation to the agency and said that it would continue to collaborate with its partners to further publicize resources available to colleges. It also highlighted several of the Department's current and planned resources for its related Campus Resilience Program.

DOJ did not provide written comments, but stated that it agreed with our recommendation to the agency. Officials stated that they would outline steps for addressing the recommendation in future communications.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Attorney General of the United States, the Secretary of Education, and the Secretary of Homeland Security. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (617) 788-0580 or nowickij@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in Appendix III.



Jacqueline M. Nowicki, Director
Education, Workforce, and Income Security Issues

Appendix I: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

WASHINGTON, D.C. 20202

DEC 15 2017

THE ASSISTANT SECRETARY

Ms. Jacqueline M. Nowicki
Director
Education, Workforce, and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Nowicki:

I am writing in response to the recommendation made in the U.S. Government Accountability Office (GAO) draft report, "Emergency Management: Federal Agencies Could Improve Dissemination of Resources to Colleges" (GAO-18-233). I appreciate the opportunity to comment on the draft report on behalf of the U.S. Department of Education (Department). As you know, the Office of Safe and Healthy Students (OSHS) within the Office of Elementary and Secondary Education handled this study for the Department because of OSHS' work for K-12 school districts and institutions of higher education on emergency management and preparedness issues.

We appreciate GAO's review of how Federal agencies address college emergency planning. The draft report acknowledged some of the successful work Federal agencies, including the Department, and interagency groups have done in this area. The draft report has offered a recommendation, and we provide our response to the recommendation below:

Recommendation: The Secretary of Education, in collaboration with other agencies through the planned interagency working group or another mechanism, should identify further opportunities to more effectively publicize resources to reach additional colleges.

Response: We are always interested in increasing utilization by colleges of the emergency management resources that the Department or other Federal agencies develop. The planned interagency working group identified in the draft report would be a very appropriate and effective vehicle for increasing utilization of these resources, and we will consider that working group or other mechanisms to identify further opportunities to publicize resources to colleges.

We appreciate the opportunity to review the draft report and comment on the recommendation. We do not have any technical comments.

Sincerely,

Jason Botel
Principal Deputy Assistant Secretary,
Delegated the authority to perform the functions and
duties of the position of Assistant Secretary,
Office of Elementary and Secondary Education

Appendix II: Comments from the Department of Homeland Security

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



**Homeland
Security**

December 27, 2017

Jacqueline M. Nowicki
Director, Education, Workforce, and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Management's Response to Draft Report GAO-18-233, "EMERGENCY
MANAGEMENT: Federal Agencies Could Improve Dissemination of Resources to
Colleges"

Dear Ms. Nowicki:

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

The Department is pleased to note GAO's positive recognition of the existing federal resources tailored for the higher education community, including the DHS Campus Resilience Program (CR Program). DHS established the CR Program to support college and university efforts to become more resilient by building upon best practices, lessons learned and resources already developed. Through the program, DHS works with intra- and interagency partners to leverage existing resources and expertise to build awareness, support threat assessments and conduct exercises to test campus-specific vulnerabilities. DHS remains committed to working with its partners to provide programs and resources that support college and university emergency preparedness.

The draft report contained one recommendation specific to DHS with which the Department concurs. Attached find our detailed response to the recommendation.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Jim H. Crumacker".

JIM H. CRUMACKER, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

Attachment

**Attachment: DHS Management Response to the Recommendation
Contained in GAO-18-233**

GAO recommended that the Secretary of Homeland Security:

Recommendation: In collaboration with other agencies, through the planned interagency working group or another mechanism, should identify further opportunities to more effectively publicize resources to reach additional colleges.

Response: Concur. The DHS Office of Academic Engagement (OAE) will continue to collaborate with its partners to further publicize resources available to colleges and universities.

The CR Program is designed to provide structured resources, outreach efforts, and strategic partnerships to help colleges and universities understand the threats and risks in the environment; recognize the vulnerabilities of their home institutions; take steps to address those threats and vulnerabilities; and evaluate their planning and preparedness. Through the CR Program's National Seminar and Tabletop Exercise for Institutions of Higher Education (NTTX), OAE facilitates workshops and events that are designed specifically to share and publicize resources for colleges and universities. Since its launch in 2014, the NNTX has reached 225 unique college and universities with scenarios covering a range of threats including cybersecurity, campus violence, pandemic outbreak and physical infrastructure failure. As part of the NNTX events, OAE has facilitated 41 workshops and seminars that featured presentations from 28 intra- and interagency partners. Two of the primary objectives of the NNTX are to raise awareness of the threats facing college and university campuses and to provide participants with resources to help mitigate those threats. As part of the 2017 NNTX, 100 percent of surveyed respondents indicated that they identified at least one risk or vulnerability at their institution based on their participation at the event.

The CR Program will be expanded during FY 2018 to include additional offerings aligned to each its lifecycle phases (Awareness, Assessment, Action and Evaluation). FY 2018 offerings will include: an information and awareness campaign to increase understanding of the threat environment and promote relevant resources; common platform to share DHS and federal partner resources on resilience; existing DHS assessment capabilities to increase community participation and empower stakeholders through training to complete risk and vulnerability assessments; and an expanded Tabletop Exercise Series (TTX Series) to include regional, leadership, and virtual events in addition to the national event.

The CR Program's TTX Series is a collection of tailored events, each with unique objectives and outcomes, designed for the higher education community. Each event in the series challenges participants with multi-faceted threat-based scenarios that test and strengthen their institution's preparedness, response, and recovery capabilities. In FY 2018, the TTX Series will include one NNTX, three Regional Tabletop Exercises (RTTX), and two Leadership Tabletop Exercises (LTTX). The next scheduled TTX Series events are: RTTX Philadelphia hosted by Drexel

**Appendix II: Comments from the Department
of Homeland Security**

University on February 2, 2018 on the topic of a hazardous materials spill near campus; and LTTX North Dakota hosted by the North Dakota State University System on February 7, 2018 on the topic of a leaderships response to a cyber data breach. After Action Reports from all TTX Series events will be made available to all colleges and universities through the CR Program-dedicated webpages on DHS.gov.

Estimated Completion Date: September 30, 2018.

Appendix III: Staff Acknowledgments

GAO Contact

Jacqueline M. Nowicki, (617) 788-0580, nowickij@gao.gov

Staff Acknowledgments

In addition to the individual named above, Janet Mascia (Assistant Director), Barbara Steel-Lowney (Analyst-in-Charge), Shilpa Grover, and Vernetta Shaw made key contributions to this report. Also contributing to this report were: Susan Aschoff, Rachael Chamberlin, Jessica Moscovitch, Jessica Orr, Mimi Nguyen, Deborah Bland, Benjamin Sinoff, Sheila McCoy, Jean McSween, Lori Rectanus, and Sarah Veale.

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