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Philadelphia, PA 19107  
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# United States Department of the Interior



NATIONAL PARK SERVICE  
Interior Region 1  
North Atlantic-Appalachian  
1234 Market Street, 20<sup>th</sup> Floor  
Philadelphia, PA 19107

IN REPLY REFER TO:

NPS-2023-003856

June 6, 2023

This letter is in response to your April 10, 2023 Freedom of Information Act (FOIA) request, dated April 10, 2023 in which you asked for:

*“A copy of the NPS Hurricane Sandy After Action Report and Lessons Learned, prepared by the National Park Service with the aid of Guidance Group, Inc., under contract action INP13PX12000 in 2013.”*

On April 14, 2023 the Interior Region 1, North Atlantic Appalachian FOIA Office provided you with a “No records response”. In our response we informed you that “the record you are seeking was lost due to a transfer failure during our migration to Microsoft Office 365 and cannot be recovered.”

Upon receipt of our response sent to you via email, you contacted our office the same day regarding our determination. We provided you with further details as to how our searches were conducted and how our determination was made.

You were informed that our contracting office was initially contacted and provided the contract number you presented in your request to determine if 1) contracting records indicated the office of record and/or a point of contract for deliverables and/or 2) if the contracting files contained a copy of the final deliverable.

You were further informed that the contracting office searched their electronic filing system but yielded no results and that their office further advised that they had transferred from a paper filing system to an electronic filing system sometime in either 2014 or 2015. They additionally advised that the majority of paper records are maintained for roughly 6 years after final payment.

I then explained that, following outreach to Contracting, the next course of initial search outreach included contacting our Regional Law Enforcement Office to determine if the report you were seeking was maintained in their records. A search was conducted, however no files were located. However, they were able to provide me with the name of the Team Lead for the 2013 Hurricane Sandy Incident Team.

As indicated in our call, upon contacting the Team Lead they advised that they had the file you were requesting and knew precisely where to locate it. Unfortunately, when attempting to retrieve the record responsive to your request it was discovered that the file no longer existed. The Team Lead further advised that they had previously lost a number of older files during an Office 360 Migration and that the file being requested, which they had not needed to access in quite sometime, was more than likely lost in the same manner.

After further discussion with you and in closing our call, the FOIA Office offered to to conduct additional outreach to see if there were any additional parties that our office may not have been made aware of that could reasonably be considered a record holder.

The FOIA Office conducted addional outreach to see seek any additional potential contacts and was eventually provided a contact that may possibly hold a copy of the record. Our office contacted them to request a search for the record.

While on annual leave, a copy of the record was located and provided to me via email to Jessica\_McHugh@nps.gov on May 2, 2023.

After my return to the office, I reached out to you via telephone on May 23, 2023 and left you a voice message updating you on the status of second search and notifying you we would be working on a response to your reopened case.

**Full Release—43 C.F.R. § 2.22**

We are writing today to respond to your reopened request on behalf of the National Park Service.

We have enclosed one file consisting of 18 pages, which is being released to you in its entirety.

For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of FOIA. *See* 5 U.S.C. 552(c). This response is limited to those records that are subject to the requirements of FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

The 2007 FOIA amendments created the Office of Government Information Services (OGIS) to offer mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation. You may contact OGIS in any of the following ways:

Office of Government Information Services  
National Archives and Records Administration  
8601 Adelphi Road - OGIS  
College Park, MD 20740-6001  
E-mail: [ogis@nara.gov](mailto:ogis@nara.gov)  
Web: <https://www.archives.gov/ogis>  
Telephone: 202-741-5770  
Fax: 202-741-5769  
Toll-free: 1-877-684-6448

Please note that using OGIS services does not affect the timing of filing an appeal with the Department's FOIA & Privacy Act Appeals Officer.

Contact information for the Department's FOIA Public Liaison, who you may also seek dispute resolution services from, is available at <https://www.doi.gov/foia/foiacenters>.

If you have any questions about our response to your request, you may contact Jessica McHugh by email at [IR1\\_FOIA@nps.gov](mailto:IR1_FOIA@nps.gov) or by telephone at 267-279-4905. Additionally, contact information for the Department's FOIA Requester Centers and FOIA Public Liaison is available at <https://www.doi.gov/foia/foiacenters>.

Sincerely,

JESSICA MCHUGH  
Digitally signed by  
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Date: 2023.06.06  
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Jessica McHugh  
National Park Service  
Interior Region 1, North Appalachian Area  
Freedom of Information Act Officer

*National Park Service*

**HURRICANE SANDY  
AFTER ACTION REPORT**

**March 2013**

## Executive Overview 7

Hurricane Sandy was the second-largest Atlantic storm on record, affecting the East Coast from Florida to Maine, and states as far west as Indiana. Making landfall as a post-tropical cyclone in southern New Jersey on October 29, 2012, Sandy battered the densely populated New York and New Jersey region with heavy rains, strong winds, and record storm surges. The storm's effects were extensive, leaving more than 8.5 million customers without power, causing severe flooding, and contributing to acute fuel shortages in parts of New York and New Jersey. The storm damaged or destroyed hundreds of thousands of homes, caused tens of billions of dollars in damage, and claimed the lives of at least 162 people in the United States.

On October 26<sup>th</sup>, 2012 the Northeast Regional Office (NER) began making arrangements to mobilize incident management teams (IMT) to assist potentially impacted parks. Hurricane Sandy made landfall on October 29, 2012 near Brigantine, New Jersey, with winds of 80 mph (130 km/h). Hurricane Sandy caused widespread damage to many Park units in the NPS Northeast Region (NER.) Ultimately, in response to the storm, all four of the national Park Service (NPS) all-hazard incident management teams (AHIMT IMT) served on disaster recovery assignments to the NER. The response to Hurricane Sandy was complex, with more than 1,500 resources dispatched through the Emergency Incident Coordination Center (EICC.)



Emergency management is the managerial function charged with creating the framework within which communities reduce vulnerability to hazards and cope with disasters. Emergency management protects communities by coordinating and integrating all activities necessary to build, sustain, and improve the capability to mitigate against, prepare for, respond to, and recover from threatened or actual natural disasters, acts of terrorism, or other man-made disasters. Emergency management must be comprehensive, progressive, risk-driven, integrated, collaborative, coordinated, flexible and supported by a culture that is responsive to the needs of those impacted.

NPS has developed a program of emergency management in accordance with title VI of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 USC 5195-5197g); National Security Decision Directive 25 (February 4, 1987); Department of the Interior policy; and other considerations at the Washington headquarters, regional, and park levels. The program will (1) provide guidance for incident management at the park level and management and relief for emergency incidents and events beyond park capabilities; (2) ensure the agency complies with the Presidential Homeland Security Directives, the National Emergency Response Framework, and the National Incident Management System (NIMS) standards; and (3) support interagency and national response to major incidents. The purpose of the program is to provide for visitor and employee safety and the protection of resources and property to the extent possible.

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## Purpose of an AAR

An after-action review (AAR) is a professional discussion of an event that focuses on performance standards and enables development of professionals and colleagues with similar or shared interests to discover for themselves what happened, why it happened, and how to sustain strengths and improve on weaknesses. The AAR tool affords leaders, staff, and partners an opportunity to gain maximum benefit from every program, activity, or task. It provides:

- Candid insights into specific strengths and weaknesses from various perspectives
- Feedback and insight critical to improved performance
- Details often lacking in evaluation reports alone

The AAR is the basis for learning from our successes and challenges. A good manager or leader does not learn in a vacuum: the people involved in an activity – those closest to it – are the ones best poised to identify the learning it offers. No one, regardless of how skilled or experienced they are, will see as much as those who actually carry out the events, program, or activity. The AAR is the keystone of the process of learning from what went right and what challenged us.

Feedback compares the actual output of a process with the intended outcome. By focusing on the desired outcome and by describing specific observations, teams can identify strengths and weaknesses and together decide how to improve performance. This shared learning improves team proficiency and promotes bonding, collegiality, and group cohesion. The AAR provides a starting point for improvements to future activities.

Because AAR participants actively discover what happened and why, they can learn and remember more than they would from a critique or more formal evaluation. A critique only gives one viewpoint and frequently provides little opportunity for discussion of events by participants. Other observations and comments may not be encouraged. The climate of a critique, focusing on what is wrong, often prevents candid discussion and stifles opportunities for learning and team building.

This AAR is a product of the analysis information collected through interviews and data. The conclusions contained in the report are intended to reflect the perspectives of participating NPS and cooperating personnel.



## **Mitigation and Preparedness Actions – Summary**

### **Communication**

Beginning on October 26<sup>th</sup>, three days prior to the hurricane making landfall, the Northeast Regional Office (NER) initiated daily conference calls including personnel from potentially affected parks, the corresponding Regional Offices, and the NPS Washington Office (NPS - WASO). Also on the call was an NPS meteorologist, who provided invaluable information about the potential of the storm and its predicted direction. The calls proved essential for understanding potential storm impacts and for building shared situation awareness. The calls proved very useful and they helped the NPS plan for the event; adequately stage the IMTs; foster open, consistent and continuous communication; and to develop common situation awareness.

This level of communication combined with the pre-planning efforts of parks, incident management teams, and the Emergency Incident Coordination Center (EICC) provided a conduit to that allowed Park Superintendents, NER and WASO leadership to make informed decisions about mitigation and preparedness actions during the pre-landfall period. In mitigation, adverse impacts are minimized through alteration of proximity or location to hazard, general design of facilities, and other related aspects. Preparedness is a structured process of preventative measures that create a state of readiness to contain the effects of a forecasted event to minimize the loss of life, injury, and property damage.

### **Planning and Preparedness**

Park emergency planning was not consistent throughout the affected regions. Many parks failed to have a comprehensive emergency management plan that supported the strategic, operational, and tactical application of mitigation and preparedness activities. Hazards and vulnerabilities were not fully analyzed to determine the risk management concepts necessary for designing mitigation and preparedness actions. Some parks had robust and actionable plans based upon experiences and lessons learned from previous storms.

Experiences in previous hurricane recovery efforts have created an awareness of the need to adequately prepare for hurricane impacts on NPS units. The NPS response to Hurricane Sandy included considerable planning efforts to prepare in advance of the storm making landfall. Execution of the preparedness activities may have proven inadequate to protect some park infrastructure and employees. Lack of complete and comprehensive mitigation strategies and preparedness efforts contributed to the loss of property and resources.

### **Employee Accountability**

With safety of staff and visitors the paramount goal in preparedness activities the parks are responsible for accountability, safety and security of employees including advising contractors of hazards. Processes for establishing employee accountability through the EICC's hot line were not leveraged or fully implemented by the parks in the path of Sandy.

### **Use of the Incident Command System**

The use of the Incident Command System (ICS) during emergency management takes precedence over traditional management structures. Many parks did not have staff that was adequately trained in ICS resulting in a failure to organize themselves into a "team" both pre and post-landfall. Early positioning and mobilization of the Eastern and Midwest Incident Management Teams (IMT) was well received and created a posture that supported a state of readiness that could be leveraged in the post-landfall response.

## **Mitigation and Preparedness Actions – Corrective Actions**

### **Preparedness and Planning**

Issue: Park Superintendents are in a position of line authority that requires them to be responsible for the safety of their personnel and the protection of property and resources under their supervision. Superintendents should complete a path to knowledge that builds the awareness and skills needed to develop and implement policies, plans, and procedures in an emergency operations center (EOC) to protect life and property through applications of sound emergency management principles in all phases of emergency management.

*Action: NPS WASO ES in conjunction with subject matter experts from NPS IMT's will develop a course for delivery to line supervisors that will provide the necessary learning experience to fully comprehend and understand all aspects and phases of emergency management.*

### **Incident Command System Training**

Issue: Park leadership and staff should use the incident management system to coordinate and configure themselves into teams for the purpose of managing impending disasters or emergencies and organizing for the initial response efforts post-disaster. Homeland Security Presidential Directive 5 directed all Federal agencies to develop and administer an ICS that provides a consistent, nationwide to work together to prevent, prepare for, respond to, and recover from domestic security incidents.

*Action: Superintendents and sufficient supervisory leadership at parks should take the pre-requisite ICS courses as defined in NPS policy and in accordance with the concepts of the National Incident Management System.*

### **Emergency Management Planning**

Issue: Not all parks have an emergency management plan that provides a structured approach to disasters and emergencies that may impact the park. Many plans lack appropriate hazard analysis, risk mitigation steps, preparedness activities, and sufficient detail to function in a crisis.

*Action; NPS WASO ES in conjunction with subject matter experts from NPS IMT's will develop a technical reference guide and template for Emergency Management Plan development.*

*Action: Regional Directors and Emergency Services Coordinators will provide oversight and technical assistance to monitor and facilitate completion of individual Park Emergency Plans.*

### **Employee Accountability**

Issue: Many parks failed to institute a structure that enabled the timely accounting for employees post-landfall of Sandy. In some cases essential vital records and rosters of employees were not accurate or readily available for reference in locating personnel leading to difficulty in completing accountability in a timely and efficient manner.

*Action: Parks should use available processes through the EICC to provide the necessary level of accountability to ensure employee safety and security pre and post disaster or emergency.*

*Action: Employees should be reminded that it is their responsibility to establish and maintain contact with their supervisor.*

*Action: Contractors should be advised that during an emergency or disaster a situation may exist that will require actions on their part to ensure the accountability of their workforce and status.*

## **Incident Management Teams, Delegation, and Resource Coordination - Summary**

### **Incident Management Teams**

The NPS relies on four (4) regional IMT's to provide the capability and resource for Type 2 or higher incidents. These moderate to high complexity incidents require a balance of skill sets and depth of human capital within the IMT's structure. The NPS is capable of managing a Type 1, all-hazard incident in a very complex operating environment given appropriate use of the ICS. The NPS IMT's worked well during Sandy, giving park staff the ability to obtain information in a highly structured way through reporting and planning meetings; thereby raising the confidence level of the impacted parks.

There are some discrepancies between the composition and size of teams across the NPS. This leads to an inconsistency in capability and functionality that makes transition from one team to another difficult in long term events or incidents. Some teams do not have depth in critical positions such as planning and finance. Several critical positions at the unit level are missing from the existing team structure that cause an undue burden on the organization. Pre-staging to the Eastern and Midwest IMT facilitated an opportunity prior to landfall for members to combine into a Type 1 organization.

### **Delegation**

Having clear Delegations of Authority (DOA) proved very helpful, both for the delegating agency administrators and for the IMTs. Most park staff and IMTs had excellent communication the resident management and the IMT. Confusion was created in several cases through a perception that because the DOA came, not from the Park's Superintendent, but from the Commissioner or the Regional Office, the Superintendents fell out of the chain of command. Delegations of authority to the IMTs should address special acquisition authorities pertaining to stabilization of life safety issues including, but not limited to food, fuel and security, with streamlined contracting and procurement requirements.

### **Resource Coordination**

The EICC is the designated coordination point for all-hazard resource mobilization. The EICC currently places orders for personnel through internal channel in an effort to control costs to the agency and ensure that the processing of resource orders is not inhibited by another resource coordination point that is not staffed to support year-around operations. The EICC does not routinely use the Resource Ordering and Status System (ROSS) for all-hazard resources or collateral resources with fire qualifications used on all-hazard events. Currently the ROSS system is not configured to provide the EICC the level of hierarchy necessary to meet the operational objectives, and the system does not contain all of the parks and units within the NPS. Personnel on the incident frequently used other channels to obtain resources that caused duplicity in effort and confusion at the sending unit.

The EICC relies upon a community of responders that are not fire qualified collaterally or otherwise, this reliance on alternative resources has evolved due to competing resource requirements during active fire seasons. This pool of responders is configured in a manner that is contemporary with their day to day structure and organization that still adheres to "span of control", differing from the interagency fire community's structure. This may cause some confusion with persons ordering resources that are not familiar with these alternative resources, their structure, and capability.

IMT's lack personnel qualified in expanded dispatch and ordering. Lacking personnel familiar with the all-hazard catalog of resources causes a potential level of inefficiency in the resource ordering and coordination system.

## **Incident Management Teams, Delegation, and Resource Coordination – Corrective Actions**

### **Incident Management Teams**

Issue: NPS IMT's do not have similar organizational structures and compositions. Many positions on standing IMT's are not rostered to sufficient depth and with the necessary level of experience. The four (4) IMT's should work in a process to conform to an accepted standard configuration. Positions within the IMT's do not reflect the optimal organization for a Type 2 all-hazard team based on actual mission requirements and needs.

*Action: A workshop facilitated by WASO consisting of the Deputy Chief of Emergency Services, a delegated representative from each team, and the EICC Center Manager will develop an architecture that represents a model team configuration, identify positions that are not currently supported, develop a training schema and evolution to reconcile any deficiencies, and promote best practices.*

*Action: NPS WASO ES in conjunction with subject matter experts from NPS IMT's will develop a training program or training programs for delivery that support identified positions within teams, such as All-Hazard Communication Leader, All-Hazard Training Specialist, All-Hazard Safety Officer (OH/EH).*

### **Delegation**

Delegations of Authority are misunderstood by management and non-incident management team personnel. Having multiple delegations of authority during a complex disaster or emergency such as Sandy causes confusion or unintentional outcomes in properly integrating all available resources into a workforce that is designed to achieve established goals and objectives.

*Action: NPS WASO ES in conjunction with subject matter experts from NPS IMT's, select Park Superintendents, and the solicitor will develop a minimum of two delegations that support single and multiple park organizations and are contemporary with the needs of an all-hazards response.*

### **Resource Coordination**

NPS IMT's and response personnel do not fully understand the role of the EICC and the operational parameters associated with the mobilization of resources for NPS incidents. This lack of understanding creates undesirable outcomes and duplication of effort. The interagency fire programs are established and designed to meet a business function that is not replicable or applicable to all-hazard responses where unique disciplines are required to operationally manage and tactically implement the incident's goals and objectives. Some all-hazards responders appear to be unqualified in positions by the receiving unit.

*Action: NPS WASO ES in conjunction with subject matter experts from NPS IMT's will educate and socialize team personnel on procedures found in the EICC Mobilization Guide.*

*Action: NPS WASO ES in conjunction with subject matter experts from NPS IMT's will educate and socialize team personnel on alternative all-hazard resource configurations and capabilities.*

*Action: NPS IMT's will ensure that a qualified All-Hazard Ordering Manager that is fully qualified, has access to the Resource Ordering and Status System (ROSS), and understands the NPS resource mobilization schema is a member of each team.*

*Action: NPS WASO ES in conjunction with the EICC will convert positions and qualification found in IQS WEB into the Incident Qualifications and Certification System (IQCS) in an effort to create a single database of qualified response personnel.*

## **Contracting and Finance - Summary**

### **Contracting**

Contracting during major incidents and events like Sandy there are challenges due immediacy to obtain a specific service. Many of the required services are for elements of the response that are related to life safety and the preservation of resources. Support for contracting is limited based on the number of qualified contracting officers, location and centralization of contracting services, and warrant levels. A concept of support remotely causes difficulty due to lack of physical presence and interaction with IMT personnel. Most contract personnel do not have sufficient ICS experience to fully understand the organization roles and processes associated with the provisioning of services required to support the goals and objectives of a large incident such as Sandy.

Many decisions on the Sandy response were scaled to meet the restriction on what level of effort could be accomplished by the contracting team in a timely manner. This presents a undue limitation on meeting critical mission elements, some potentially impacting life safety. Contracting resources provided locally with the team and those working remotely could not adequately meet the demand for services. Contingency authorities were unclear and often conflicting in nature.

### **Buying**

In support of daily operations during Sandy the requirement to establish buying teams with convenience checks and purchase cards with a high ceiling presented a challenge. Many persons recruited into buying team roles lacked ICS training, and a firm grasp of their responsibilities. The buying team members serving the Hurricane Sandy recovery effort learned as they worked and adapted well to their many challenges by creating responsibilities, organizational structure, and operating procedures on-the-fly. Limitations and constraints on purchasing placed artificial ceiling on some buying team members with higher levels of authority that were underutilized.

### **Finance**

Managing the finance function represented one of the greatest challenges of the NPS response to Hurricane Sandy. The IMTs struggled to fill critical finance section positions with qualified personnel. The Finance Section depended heavily on trainees and ended-up with too many trainees and too few mentors.

Personnel associated with the incident indicated that training associated with FBMS implementation in the NPS made qualified finance personnel unavailable and that NPS administrative and budget personnel prioritized this training above incident response because the agency had inadequately communicated the severity of the incident and the critical need for qualified finance personnel.

Financial challenges will become very apparent post-incident. Many of those challenges will arise due to decisions made and actions taken relating to limited finance and contracting support available, particularly personnel with clear understanding of key policies and procedures, and issues resulting from temporary lodging of both displaced employees and responders.

### **Cost**

The use of an Incident Business Advisor (IBA) worked well. Cost estimation and controls were adequate during the initial phase of the incident.

## **Contracting and Finance – Corrective Actions**

### **Contracting**

IMT's and Park leadership identified a deficit in the number of contracting personnel available and their knowledge of ICS.

*Action: NPS Contracting will identify and train sufficient personnel in ICS to support a minimum of two Contracting personnel per Regional IMT.*

There are constraints on NPS contracting officers concerning purchase card and convenience check authorities, and these constraints interfere with the ability of contracting officers to efficiently and effectively redeem their incident related responsibilities.

*Action: NPS Contracting will work the subject matter experts from the IMT's to determine the contracting and purchase authority limits necessary to affect the timely and proper acquisition of services, materials, and supplies during an incident.*

### **Buying Team**

IMT's required a buying team of warranted contracting personnel and people with purchase cards, which understand incident needs, ICS, and are prepared to quickly obtain required supplies, materials and services.

*Action: NPS Contracting will identify and train sufficient personnel in ICS to support a minimum of two Buying Team personnel per Regional IMT.*

*Action: NPS Contracting will work the subject matter experts from the IMT's to buying team personnel with the credit card purchase authority limits and convenience checks necessary to affect the timely and proper acquisition of services, materials, and supplies during an incident*

### **Finance**

NPS has a difficult time staffing finance section personnel on the Regional IMT's, each team is required to have three identified personnel in this role.

*Action: NPS WASO ES and the IMT's will identify and train sufficient personnel in ICS to support a minimum of three finance section personnel per Regional IMT.*

Finance personnel on the incident often lacked sufficient experience or tools to prepare and maintain the necessary documentation for audit and control purposes.

*Action: NPS WASO ES and the IMT's will develop training plans and opportunities to support the learning and experience requirement of a fully qualified finance section leader.*

### **Cost**

NPS should continue with the use of IBA's during all-hazard response efforts. IBAs with local or regional knowledge about the area are preferred and can be especially useful to assist an IMT from out of the area.

*Action: NPS WASO ES and the IMT's will identify and train sufficient personnel in ICS to support a minimum of one IBA per Regional IMT.*

*Action: NPS WASO ES and the IMT's will develop training plans and opportunities to support the learning and experience requirement of a fully qualified IBA.*

## **Workforce Management and Human Resources - Summary**

### **Workforce Management**

Many employees had to cope with the aftermath of Hurricane Sandy. Disasters like Sandy place employees in potentially dangerous situations, with little warning. Many employees were unaware of pay and leave benefits available to them as they handle the challenges in the aftermath of the hurricane. The NPS has and exercised the authority to excuse employees from duty without pay or charge to leave. In addition leave was granted to employees that faced a personal emergency from the effects of the storm.

Special leave authorities were unclear and the circumstances where these authorities could be used had unique circumstances that did not always allow for a clear answer. In some cases this process was considered unfair or ambiguous. Although legal definitions are in place for most circumstances there is not a single yes or no answer that can be uniformly applied to all employees impacted by Sandy.

Overtime pay for employees who are not covered by the Fair Labor Standards Act (i.e., FLSA-exempt employees) generally is earned for hours of work officially ordered or approved in excess of 8 hours in a day or 40 hours in a week. In this case a waiver was executed on the second day after landfall eliminating the bi-weekly pay cap for those applicable individuals.

### **Short-Term Employee Housing**

Employee housing issues turned out to be considerably more complex than the IMT had anticipated. Consequently, the IMT was understaffed and underprepared to handle the concerns of some employees displaced from NPS housing. Some NPS employees displaced from NPS housing had not been contacted with instructions by Day 15, resulting in lack of clarity on, and misunderstandings about, NPS policy. These displaced employees had been contacted to account for their whereabouts and well-being, but had received little information regarding their living arrangements. Displaced employees were sent to motels without clear instructions or expectations, which resulted in several inadvertent violations of fiscal policy including employees using travel cards without being in travel status and using personal credit cards. These errors created undesirable fiscal challenges that need to be cleaned up.

### **Waiver for 1039 Employees**

The Office of Personnel Management (OPM) was requested by DOI to waive the 1,040 hours limitation for approximately two-hundred and fifty employees that supported, or could support the response and recovery efforts. This process is not delegated to the individual agency, it is retained at the Department and a formal request must be submitted to OPM citing the critical nature of work and identifying the number and types of personnel that will be affected by a “waiver”.

### **Administratively Determined Pay Plan**

While it was helpful to have administratively determined (AD) employees to fill the gaps, some incident personnel pointed out that relying on ADs prolongs the agency’s dearth of qualified personnel. The DOI Administratively Determined (AD) Pay Plan is a hiring authority approved by OPM to hire emergency workers/casual employees for emergency incidents/events. The use and requirements for use of the AD Pay Plan are often overlooked as the hiring process is simple and can be done a local level.



## **Workforce Management and Human Resources – Corrective Actions**

### **Workforce Management**

Issue: Disasters make responders victims and some NPS employees who the NPS would normally count on as emergency responders became victims who could not deal with their personal situation without NPS support. Both local park units and arriving IMTs need to recognize and plan for the double impact of having local emergency response personnel who are in need of employee assistance.

*Action: NPS Regional Leadership and Park Superintendents should develop planning materials in their park emergency plans to ensure that adequate level response personnel are ordered and that specific criteria for evaluating resource requirements are established.*

Issue: Supervisors were unclear in the authorities associated with administrative leave for employees who had suffered a loss or significant impact to their personal property.

*Action: NPS WASO Human Resources in conjunction with subject matter experts from NPS IMT's will develop a Human Resources Guide (or refine the Employee Assistance Guide) for use during disasters and emergencies that clearly defines the latitudes provided supervisors in assisting employees with the necessary time to stabilize their personal situation(s).*

### **Short-Term Employee Housing**

Employee housing requests for those personnel displaced from government housing was considerably more complex than anticipated. Displaced employees were sent to motels without clear instructions or expectations, which resulted in the confusion about the use of government funds.

*Action: NPS WASO Human Resources in conjunction with subject matter experts from NPS Travel will develop a Human Resources Guide for use during disasters and emergencies that clearly define the resources that may be used in assisting employees that have been displaced from government housing.*

### **Waiver for 1039 Employees**

A “waiver” of the 1,040 hour limitation was requested by NPS ES on November 1<sup>st</sup>. The request was formally transmitted to OPM on November 8<sup>th</sup> and approved by the Principal Deputy Associate Director of OPM on the 15<sup>th</sup> of November. This process was lengthy and resulted in missing and opportunity to retain resources by the incident for response and recovery efforts.

*Action: NPS WASO Human Resources in conjunction with NPS ES will develop and ensure that actions taken by the Department in respect to the 1,040 hour waiver are timely and reportable.*

### **Administratively Determined Pay Plan**

While it was helpful to have administratively determined (AD) employees to fill the gaps, some incident personnel pointed out that relying on ADs prolongs the agency’s depth of qualified personnel.

*Action: NPS WASO ES should work with the incident and IMT's to assign at trainee with all AD personnel in an effort to build internal capacity within the agency. This procedure should be supported by senior leadership.*

Hiring paperwork was not completed or filled out correctly. Justifications for AD position exception codes did not follow established processes.

*Action: NPS WASO ES should work with the IMT's to educate ordering and finance personnel on the proper procedures and use of the DOI AD Pay Plan.*

## **Organizational Management**

### **Base 8 Pay and Backfill**

NPS leadership made an informed decision early in the Sandy response that “Base 8” pay would not be reimbursed to the sending unit for resources deployed to the incident. This produced some reluctance by sending units to bear the costs of employee salaries. This financial decision was made in consultation with Washington, DC and Northeast Region leadership.

### **Communication with Employees**

Incident personnel felt that the Director and his staff communicated an expectation that personnel from all disciplines should respond. WASO personnel also provided generally effective guidance. Both lent a sense of gravity to the requests for NPS personnel to contribute to the effort.

For Hurricane Sandy, the initial IC clearly explained to the superintendents of the affected units, what an IMT is, what an IMT does, what an IMT is not, and what an IMT does not do. Doing so helped put the superintendents at ease.

### **Communication with Concessions**

Concession contractors were unsatisfied with the level of communication from the Region, Park, and the IMT’s regarding the status of operations and the timeline for returning to normal service.

### **Policy**

The NPS Concept of Operations (formerly the National Emergency Response Plan) required interpretation in regards to the provision of back-fill and overtime at the sending units. The current policy allows for interpretation by Senior Leadership on the expense of funds for this purpose.

NPS has a lack of clear policy that provides either guidance or resources for properly handling displaced personnel that are residents in government housing that has been damaged beyond safe habitation. Determining the judicious and proper use of government funds for temporary lodging proved difficult for employees, supervisors, human resources, and finance personnel.

## **Organizational Management – Corrective Actions**

### **Base 8 Pay and Backfill**

NPS pay policy traditionally does not allow for the incident to cover the employee's "Base 8" for all-hazard incidents. Many personnel verbalized reluctance by their sending units to commit personnel to the incident due to this policy. This process is different than policies for responding to wildland fire assignments; however is it contemporary with the National Response Framework and the Stafford Act.

*Action: NPS WASO ES and leadership will work to complete a revision of the NPS CONOPS and distribute to NPS staff at all levels.*

### **Communication with Employees**

Some personnel on the incident and in the affected parks suggested that they had not been adequately informed and involved so that they might anticipate needs, understand their role, establish points of contact and lines of communication, and develop a system for sharing information. Overall, most persons involved in the incident felt that there was excellent communication between the IMT and the affected parks.

*Action: NPS WASO in conjunction with subject matter experts from NPS IMT's, select Park Superintendents, and the NPS Office of Communications will document successes and establish standard operating procedures that support effective communications.*

### **Communication with Concessions**

Concession operators voiced that a need to maintain contact with them and their staff is important and that critical information should be shared by both parties in the decision making process of closing and re-opening park areas.

*Action: NPS WASO Contracting in conjunction with subject matter experts from select Park Superintendents, Business Services will develop a communications plan that addresses planning considerations and communications with concession operators for emergency operations*

*Action: NPS WASO Contracting and Business Services will develop a cadre of Liaison Officers to work with the IMT's and the concessionaires.*

### **Policy**

While there has been considerable progress since 2005, the lack of clear, well-defined NPS policy in the area of emergency stabilization vs. long-term recovery, and the lack of clarity presents a challenge to IMTs deployed to disaster recovery efforts.

*Action: NPS WASO ES in conjunction with subject matter experts from NPS IMT's and select Park Superintendents will incorporate guidance on long-term recovery in the revision of the NPS CONOPS.*

Park Superintendents were unclear on where policy exists and how to access that policy during a disaster and emergency.

*Action: NPS WASO ES and leadership will work to complete a revision of the NPS CONOPS and educate Superintendents on its use.*

**Table – Corrective Actions**

<b>Coordinator</b>	<b>Lead</b>	<b>Corrective Action or Concept</b>
WASO-ES	NPS IMT's	Develop a course for delivery to line supervisors that will provide the necessary learning experience to fully comprehend and understand all aspects and phases of emergency management.
WASO-Director	Park Staff	Take the pre-requisite ICS courses as defined in NPS policy and in accordance with the concepts of the National Incident Management System.
WASO-ES	NPS IMT's	Develop a technical reference guide and template for Emergency Management Plan development.
Regional Directors	Regional Chiefs	Provide oversight and technical assistance to monitor and facilitate completion of individual Park Emergency Plans
WASO EICC	Park Staff	Parks should use available processes through the EICC to provide the necessary level of accountability to ensure employee safety and security pre and post disaster or emergency.
Regional Directors	Park Staff	Employees should be reminded that it is their responsibility to establish and maintain contact with their supervisor.
Regional Directors	Park Staff	Contractors should be advised that during an emergency or disaster a situation may exist that will require actions on their part to ensure the accountability of their workforce and status.
WASO-ES/EICC	NPS IMT's	Develop an architecture that represents a model team configuration, identify positions that are not currently supported, develop a training schema and evolution to reconcile any deficiencies, and promote best practices.
WASO-ES	NPS IMT's	Develop a training program or training programs for delivery that support identified positions within teams, such as All-Hazard Communication Leader, All-Hazard Training Specialist, All-Hazard Safety Officer (OH/EH).
WASO-ES	NPS IMT's Park Staff	Develop a minimum of two delegations of authority that support single and multiple park organizations and are contemporary with the needs of an all-hazards response.
WASO-ES	NPS IMT's	Educate and socialize team personnel on procedures found in the EICC Mobilization Guide.
WASO-ES	NPS IMT's	Educate and socialize team personnel on alternative all-hazard resource configurations and capabilities.
WASO-ES	EICC	Ensure that a qualified All-Hazard Ordering Manager that is fully qualified, has access to the Resource Ordering and Status System (ROSS), and understands the NPS resource mobilization schema is a member of each team.



WASO-ES	EICC	Convert positions and qualification found in IQS WEB into the Incident Qualifications and Certification System (IQCS) in an effort to create a single database of qualified response personnel.
WASO-ES	Contracting Office	Identify and train sufficient personnel in ICS to support a minimum of two Contracting personnel per Regional IMT.
WASO-ES	Contracting Office	Determine the contracting and purchase authority limits necessary to affect the timely and proper acquisition of services, materials, and supplies during an incident.
WASO-ES	Contracting Office	Identify and train sufficient personnel in ICS to support a minimum of two Buying Team personnel per Regional IMT.
WASO-ES	Contracting Office	Develop credit card purchase authority and convenience checks availability necessary to affect the timely and proper acquisition of services, materials, and supplies during an incident
WASO-ES	NPS IMT's	Identify and train sufficient personnel in ICS to support a minimum of three finance section personnel per Regional IMT.
WASO-ES	NPS IMT's	Develop training plans and opportunities to support the learning and experience requirement of a fully qualified finance section leader.
WASO-ES	NPS IMT's	Identify and train sufficient personnel in ICS to support a minimum of one IBA per Regional IMT.
WASO-ES	NPS IMT's	Develop training plans and opportunities to support the learning and experience requirement of a fully qualified IBA.
WASO-WM	SME	Develop a Human Resources Guide (or refine the Employee Assistance Guide) for use during disasters and emergencies that clearly defines the latitudes provided supervisors in assisting employees with the necessary time to stabilize their personal situation(s).
WASO-WM	SME	Develop a Human Resources Guide for use during disasters and emergencies that clearly define the resources that may be used in assisting employees that have been displaced from government housing.
WASO-WM	SME	Develop and ensure that actions taken by the Department in respect to the 1,040 hour waiver are timely and reportable.
WASO-ES	NPS IMT's	Assign at trainee with all AD personnel in an effort to build internal capacity within the agency. This procedure should be supported by senior leadership.
WASO-ES	NPS IMT's	Educate ordering and finance personnel on the proper procedures and use of the DOI AD Pay Plan.
WASO-ES	Regional Chiefs	Complete a revision of the NPS CONOPS and distribute to NPS staff at all levels.
WASO-ES	Office of Communications	Establish standard operating procedures that support effective communications.

WASO-ES	Contracting Office	Develop a communications plan that addresses planning considerations and communications with concession operators for emergency operations
WASO-ES	Contracting Office	Develop a cadre of Liaison Officers to work with the IMT's and the concessionaires.
WASO-ES	NPS IMT's Park Staff	Incorporate guidance on long-term recovery in the revision of the NPS CONOPS.
WASO-Director	WASO-ES	Complete a revision of the NPS CONOPS and educate Superintendents on its use.