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US Virgin Islands Phase 1 - Preliminary Assessment Report

June 16 - 19, 2014

Preliminary Assessment Report



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The Applicant Program

Virgin Islands Territorial Emergency Management Agency
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 Accreditation Manager: Elton Lewis, Director

The Pre-Assessment Team

Karen Windon, Manatee County Government, Florida (Assessment Team Leader)
 Mike Augustyniak, State of New Jersey, Office of Emergency Management
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Purpose and Methodology

A phase 1 assessment is an optional service catered towards applicant Programs to provide an initial evaluation of their Program's preparedness and response capabilities. This initial review of an applicant program provides a "snap-shot" of a few components of their Program, showing current strengths and standard areas that may need improvement. It will concentrate on corrective actions needed for the applicant to work through prior to undergoing a full EMAP on-site assessment. Once an applicant has completed a pre-assessment, they have nine months to undergo an on-site assessment for accreditation.

Typically, the applicant program first conducts their self-assessment and then requests a pre-assessment through EMAP, selecting standard areas for the EMAP assessment team to review. In the case of this phase 1 assessment, the US Virgin Islands requested that the assessment team review as many standards as possible while on site. The assessment team went above and beyond and reviewed documentation for 26 standards, conducted interviews with Program staff, and worked closely with the Accreditation Manager and key staff to identify additional steps and actions needed to gain compliance with the standards. The assessors met one-on-one with Program staff and the Accreditation Manager to pre-identify areas of non-compliance and discuss what documentation may be needed to achieve compliance.

An exit briefing was conducted with the Program Manager, Mr. Elton Lewis, and his leadership team on the final day of the pre-assessment (Thursday, June 19, 2014) to summarize the findings and highlight the actions needed to prepare for a future on-site assessment. In addition, Mr. Lewis was given the opportunity to ask questions and seek clarification on the process and the assessor's findings.

On-Site Pre-Assessment Schedule

The on-site phase 1 assessment began on the morning of Monday, June 16, 2014 and concluded Thursday, June 19, 2014. Appendix A outlines the agenda generated by the Assessment Team, Accreditation Manager, and EMAP.

How This Report Will Be Used

This report summarizes the findings of the pre-assessment team, standard by standard. The US Virgin Islands Territorial Emergency Management Agency will use the results of the Phase 1 assessment to correct deficiencies in the identified standard areas, and review the remaining standard areas in order to apply what they learned during the pre-assessment to improve those areas as well.

The Phase 1 assessment was conducted using the *Emergency Management Standard* by EMAP (2013 edition). The standard is intended to increase the Program's knowledge of the EMAP standards and assist them in understanding how to apply their Program documents to the

(C) 2014 EMAP

standard, and provide a comprehensive report to assist in identifying areas of focus as they plan for the on-site assessment.

Applying the EMAP Standard to the Applicant's Program

Purpose and Scope of the EMAP Standard

Purpose

The purpose of the *Emergency Management Standard* is to provide emergency management programs national criteria to assess their programs or to develop, implement, and maintain a program to mitigate, prepare for, respond to, and recover from disasters and emergencies. The *Emergency Management Standard* establishes the criteria for an emergency management program and intends that the standard be fair and equitable for all who choose to adopt it.

Scope

The *Emergency Management Standard* applies to state, federal, and/or local government emergency management programs seeking accreditation and/or a baseline assessment. Definitions published in the Emergency Management Standard apply and are included in the glossary.

Organization of Assessment Team Findings

This part of the report lists the 26 standards that were applied to the Program and describes the findings of the assessment team for each of them. Any exemplary or otherwise noteworthy aspects of the Program that were brought to light during the assessment are included.

The findings are presented on a standard-by-standard basis, and generally include:

- The primary assessor for the standard;
- The recommended finding of Compliant or Non-Compliant; and
- A brief summary of the element(s) of the applicant's program applicable to the standard, including the basis for the assessor's finding as to compliance.

Compliance At-a-Glance

Compliance at a Glance based on program elements.

3.1: Emergency Management Program Administration, Plans and Evaluation	0	of	2
3.2: Emergency Management Program Coordination	2	of	2
3.3: Advisory Committee	2	of	2
4.1: Administration and Finance	0	of	2
4.3: Hazard Identification, Risk Assessment and Consequence Analysis	0	of	2
4.4: Hazard Mitigation	0	of	5
4.6: Operational Planning	1	of	5
4.13: Training	0	of	3
4.14: Exercises, Evaluations and Corrective Actions	1	of	3
TOTAL	6	of	26

3.1: Emergency Management Program Administration, Plans and Evaluation

Standard 3.1.1

The jurisdiction has a documented Emergency Management Program that includes an executive policy or vision statement for emergency management, a multi-year strategic plan, developed in coordination with Emergency Management Program stakeholders that defines the mission, goals, objectives, and milestones for the Emergency Management Program and includes a method for implementation.

Assessment Team Findings

Primary Assessor: Karen Windon

Finding: Non-Compliant

Based on the documents reviewed and an interview conducted, the Program has not demonstrated compliance with this Standard.

The program provided a detailed *Virgin Islands Territorial Emergency Management Agency (VITEMA) 2013 Annual Report*, which delineates the mission and vision of the program. It was also noted that both the mission and vision statement are framed and posted on the wall of the lobby of the Emergency Operations Center.

Also reviewed was the *VITEMA Homeland Security Strategy 2011-2014 (THSS) (August 22, 2011)*. While titled for Homeland Security, the vision of the document speaks to a “unified, all-discipline, and all-hazards approach to homeland security and emergency management.” (pg. 2) Throughout the document are specific references to all-hazards and emergency management components. The document’s stated focus is as follows:

“Establish plans, procedures, systems, interagency relationships, training and exercise programs, and mutual aid agreements required for major events to enhance performance for all hazard responses.” The *THSS* includes the primary goals, objectives and implementation steps for the program. However, it does not delineate specific milestones nor provide any evidence that the document development included program stakeholders. In addition, it does reference the Territorial Emergency Management and Homeland Security (EMHS) Council, which is currently represented by each member from the territorial government department’s agencies, and private-sector agencies, but again there is no indication that these partners were included in the development of the *THSS*.

In discussions with Director Lewis, he indicated that he would be working on a new strategic plan. With gubernatorial primary elections in August 2014, this will ultimately be dependent on transition activities.

The Program will need an updated strategy as the current one expires in 2014. With the development of that updated strategy, the Program will need to consider the inclusion of emergency management program stakeholders for the development and review of that document, and ensure that the mission, goals, objectives, and specific programmatic milestones are included to monitor the success of the strategic plan along with the method of implementation.

Documents Reviewed

- *Virgin Islands Territorial Emergency Management Agency (VITEMA) 2013 Annual Report*
- *VITEMA Homeland Security Strategy 2011-2014 (THSS) (August 22, 2011)*

Standard 3.1.2

The Emergency Management Program has a documented method and schedule for evaluation, maintenance, revision and corrective actions for elements contained in Chapter 3 and Chapter 4 and shall conduct an evaluation of the objectives consistent with the program policies.

Assessment Team Findings

Primary Assessor: Karen Windon

Finding: Non-Compliant

Based on the documents reviewed and an interview conducted, the Program has not demonstrated compliance with this Standard. The *VITEMA Homeland Security Strategy 2011-2014 (THSS) (August 22, 2011)* delineates the components for an aggressive ongoing monitoring for the implementation progress, compiling key management information; and observing trends to keep the strategy on track. This includes the VITEMA THSS Strategic Planning team reviewing the Territory's success in achieving the previous year's performance goals, and evaluating plans for the upcoming year. The team also discusses why specific goals were not met and what corrective actions are required. The *THSS* also delineated that all homeland security partners are required to establish a review process to address concerns and issues related to the attainment of the strategy objectives and that the outcomes of the review and analysis will be utilized to assist in updating the strategy. The *THSS* also delineates that the program will conduct an annual review to reassess and update the entire strategy as necessary.

In discussions with Director Lewis, he indicated that he would be working on a new strategic plan. With gubernatorial primary elections in August 2014, this will ultimately be dependent on transition activities. To date, with the building of VITEMA as a program, work has focused on developing many components and evaluating along the way as opposed to a formal documented schedule.

The Program will need a formalized method and schedule for evaluation, maintenance, revision, and corrective actions for all the elements in the standards. While these components are occurring throughout the program, there doesn't appear to yet be a defined holistic process.

Documents Reviewed

- *VITEMA Homeland Security Strategy 2011-2014 (THSS) (August 22, 2011)*

3.2: Emergency Management Program Coordination

Standard 3.2.1

There shall be a designated emergency management agency, department or office established for the jurisdiction empowered with the authority to administer the Emergency Management Program on behalf of the jurisdiction.

Assessment Team Findings

Primary Assessor: Karen Windon

Finding: Compliant

Based on the documents reviewed, the Program has demonstrated compliance with this Standard. VITEMA is the sole U.S. Virgin Islands government agency empowered with the authority to supervise, administer and coordinate all-hazards response and recovery operations. Authority is derived from *Virgin Islands Code, Title 23, Emergency Management Act of 2009 (Act 7074), Section 1006*, the Act authorizes the creation of the VITEMA and further defines the roles and authorities of the agency, to include the development of supporting plans, resources, funding, staffing, and mutual aid, among others.

Documents Reviewed

- *V. I. Code, Title 23, the Emergency Management Act of 2009 (Act 7074), Section 1006*
- www.vitema.gov/assets/documents/2009/Act-7074.pdf

Standard 3.2.2

There is a designated individual empowered with the authority to execute the Emergency Management Program on behalf of the jurisdiction.

Assessment Team Findings

Primary Assessor: Karen Windon

Finding: Complaint

Based on the documents reviewed and an interview conducted, the Program has demonstrated compliance with this Standard. The *Virgin Islands Code, Title 23, Emergency Management Act of 2009 (Act 7074), Section 1005* designates the director of the agency with the authorities to execute the program and states that the “Director shall serve as the principal assistant and advisor to the Governor with respect to emergency management and disaster preparedness planning for the Territory...shall act on behalf of the governor...in coordinating and directing governmental and non-governmental emergency service agencies... shall promulgate rules and take actions...necessary to carry out functions.” In *Virgin Islands Code, Title 23, Emergency Management Act of 2009 (Act 7074), Section 1006(b)* the act continues, “The director shall be executive head of VITEMA and shall be responsible for coordinating the entire Emergency Management program for the territory.”

Documents Reviewed

- *Virgin Islands Code, Title 23, Emergency Management Act of 2009 (Act 7074), Section 1005 & 1006(b)*
- www.vitema.gov/assets/documents/2009/Act-7074.pdf

3.3: Advisory Committee

Standard 3.3.1

There shall be a documented, ongoing process utilizing one or more committees that provides for coordinated input by Emergency Management Program stakeholders in the preparation, implementation, evaluation, and revision of the Emergency Management Program.

Assessment Team Findings

Primary Assessor: Karen Windon

Finding: Compliant

Based on the documents reviewed, the Program has demonstrated compliance with this Standard. The Program has a Territorial Emergency Management and Homeland Security (EMHS) Council, which is established in the *Virgin Islands Code, Title 23, Emergency Management Act of 2009 (Act 7074), Section 1007*. The EMHS by Act includes a diverse stakeholder membership including the director, commissioners and agency directors as named by executive order, the attorney general, the executive directors of the semi-autonomous agencies and public corporations, the Adjutant General, public utilities directors, and private sector entities including but not limited to chambers of commerce and hotel associations. The Act also delineates that EMHS members shall attend all meetings, plan and coordinate programs with FEMA, assist the Territorial Coordinating Officer (TCO) in the event of a disaster, and provide goals and objectives to the Director for implementing the Program.

In discussion with Director Lewis, it was learned that the Director chairs the EMHS, they meet monthly and is well attended as the Governor puts a high priority on these meetings for Cabinet level staff and all attendees. The meetings frequently include a speaker on an item of importance (*VITEMA EMHS Council Agenda (June 19, 2014)*) and discussion on other issues, trainings, and responsibilities. While there is no formal evaluation process for the Program by the Council, the feedback and expertise of the Council members is taken into consideration for future actions. Additionally, the *Virgin Islands Code, Title 23, Emergency Management Act of 2009 (Act 7074)* requires the Council to provide goals and objectives for implementing the program provides the foundation for program evaluation and revision.

Documents Reviewed

- *Virgin Islands Code, Title 23, Emergency Management Act of 2009 (Act 7074), Section 1007*
- www.vitema.gov/assets/documents/2009/Act-7074.pdf
- *VITEMA EMHS Council Agenda (June 19, 2014)*

Standard 3.3.2

The advisory committee(s) shall meet with a frequency determined by the Emergency Management Program coordinator sufficient to provide for regular input.

Assessment Team Findings

Primary Assessor: Karen Windon

Finding: Compliant

Based on the documents reviewed and an interview conducted, the Program has demonstrated compliance with this Standard. The Program has a Territorial Emergency Management and Homeland Security (EMHS) Council, which is established *Virgin Islands Code, Title 23, Emergency Management Act of 2009 (Act 7074), Section 1007*.

According to Director Lewis, it was learned that the Director chairs the EMHS, they meet monthly and is well attended as the Governor puts a high priority on these meetings for Cabinet level staff and all attendees. The *VITEMA EMHS Council Agenda (June 19, 2014)* was provided, and included items such as a CDC briefing, training update, review of common responsibilities, and grants and funding. These meetings, originally held in person, are now via teleconferencing through the Emergency Operations Centers on St. John, St. Thomas and St. Croix due to the travel challenges and costs inherent with the three islands.

For an accreditation effort, the Program will want to provide multiple meeting announcements, agendas and attendance rosters as proofs of compliance of these meetings.

Documents Reviewed

- *Virgin Islands Code, Title 23, Emergency Management Act of 2009 (Act 7074), Section 1007*
- www.vitema.gov/assets/documents/2009/Act-7074.pdf
- *VITEMA EMHS Council Agenda (June 19, 2014)*

4.1: Administration and Finance

Standard 4.1.1

The Emergency Management Program shall develop financial and administrative procedures or follow existing jurisdiction-wide procedures for use before, during, and after an emergency or disaster.

Assessment Team Findings

Primary Assessor: Karen Windon

Finding: Non-Compliant

Based on the documents reviewed and an interview conducted, the Program has not demonstrated compliance with this Standard. The *VITEMA Administration and Finance Standard Operating Procedures (June 2014)*, provided procedures for use before a disaster, in day-to-day operations, as well as the process for disaster recovery. In addition, the *Office of Management and Budget Standard Operating Procedures for Federal Funds (May 11, 2010)*, *Requisitioning Standard Operating Procedures #105 (December 17, 2009)*, and *Accounts Payable Standard Operating Procedures #130 (August 14, 2009)* contained details on the program's procurement process. Also, included were examples of request letters for purchase from 2011 that showed consistency with the process. Additionally, the OMB SOP contains the *Procurement Process Overview and Guide, Department of Property and Procurement (undated)*. The Guide contains standard procurement rules and includes procedures for emergency procurements under \$25,000 and a procedure for emergency procurements over \$25,000. Spelled out in the document is the detail of when a purchase falls under a public exigency as allowed for in *Title 31, Chapter 23(239)(a)(2) of the Virgin Islands Code*.

Also reviewed was the *DRAFT VITEMA Federal Grants Programs Administrative Manual, undated*. This document provides guidance on processes related to Federal Grants management in all phases of the disaster cycle. However, as this is a draft document it cannot be considered as a proof of compliance as the Manual has not been promulgated and/or implemented.

In discussions with Deputy Director Henneman-Smith, Finance and Administration, it was provided that the process for transitioning from daily operations to disaster operations and subsequently back again is coordinated through the Territorial Coordinating Officer (TCO), the Federal Coordinating Officer (FCO) and the Governor. The Virgin Islands Territorial EMHS Council is consulted as a part of this process. This is spelled out in the *Virgin Islands Code, Title 23, Emergency Management Act of 2009 (Act 7074)*, however no supporting procedures or checklists were provided to detail implementations.

Procedures and/or checklists detailing the process for transitioning from daily operations to disaster operations and subsequently back again to daily operations will memorialize these actions and be in keeping with the intent of the standard.

- Day-to-day financial procedures as well as disaster financial and purchasing procedures / policies / rules / directives.
- Proof showing the procedures may have been utilized before, during and after a disaster or emergency
- Grant requirements and closeout reporting by stakeholder organizations.
- Broad application to laws and authorities for the program and program stakeholders.
- Township Bylaws.
- Provisions should be made for the conflict of policies, directives and laws within the Program.
- Succession of Authority (Orders / Laws on Continuity of Government)

Documents Reviewed

- *VITEMA Administration and Finance Standard Operating Procedures (June 2014)*
- *Office of Management and Budget Standard Operating Procedures for Federal Funds (May 11, 2010)*
- *Requisitioning Standard Operating Procedures #105 (December 17, 2009)*
- *Accounts Payable Standard Operating Procedures #130 (August 14, 2009)*
- *Procurement Process Overview and Guide, Department of Property and Procurement (undated)*
- *Title 31, Chapter 23(239)(a)(2) of the Virgin Islands Code*
- *VITEMA Federal Grants Programs Administrative Manual, undated*
- *V. I. Code, Title 23, the Emergency Management Act of 2009 (Act 7074)*
- www.vitema.gov/assets/documents/2009/Act-7074.pdf

Standard 4.1.2

Procedures exist providing flexibility to expeditiously request, receive, manage, and apply funds in emergency situations for the delivery of assistance and cost recovery.

Assessment Team Findings

Primary Assessor: Karen Windon

Finding: Non-Compliant

Based on the documents reviewed and an interview conducted, the Program has not demonstrated compliance with this Standard. The *V. I. Code, Title 23, the Emergency Management Act of 2009 (Act 7074), Section 1008* provides “it is the intent of the Legislature and declared to be policy... that funds to meet emergencies or major disasters shall always be available”. The Act also

establishes the Disaster Contingency Fund (DCF), which will be used when local resources are insufficient for the response. The Act includes provisions for disaster loans either from the federal government or from non-governmental entities, which will go into the DCF, as will donations for disaster relief.

The *V. I. Code, Title 23, the Emergency Management Act of 2009 (Act 7074), Section 1008* also provides for the Emergency Management Assistance Compact (EMAC) and spells out the language of that compact to include requirements for reimbursement.

The *VITEMA Administration and Finance Standard Operating Procedures (June 2014)*, and the *Office of Management and Budget Standard Operating Procedures for Federal Funds (May 11, 2010)* both provided the process for disaster recovery Project Worksheet management related to FEMA funded post disaster activities. The OMB SOP includes procedures for emergency procurements under \$25,000 and a procedure for emergency procurements over \$25,000. Spelled out in the document is the detail of when a purchase falls under a public exigency as allowed for in *Title 31, Chapter 23(239)(a)(2) of the Virgin Islands Code*.

In discussions with Deputy Director, Henneman-Smith, Finance and Administration, she explained the process for the DCF and for cost recovery from the EMAC.

There are currently no specific procedures for the flexibility of processes including requesting, receiving, managing, and applying funds neither for assistance nor for the cost recovery process. The tools which have been provided through the *V. I. Code, Title 23, the Emergency Management Act of 2009 (Act 7074), Section 1008* seem to serve the Territory well, however existing procedures are required to meet the intent of the standard.

Documents Reviewed

- *V. I. Code, Title 23, the Emergency Management Act of 2009 (Act 7074), Section 1008*
- www.vitema.gov/assets/documents/2009/Act-7074.pdf
- *VITEMA Administration and Finance Standard Operating Procedures (June 2014)*
- *Office of Management and Budget Standard Operating Procedures for Federal Funds (May 11, 2010)*

4.3: Hazard Identification, Risk Assessment and Consequence Analysis

Standard 4.3.1

The Emergency Management Program shall identify the natural and human-caused hazards that potentially impact the jurisdiction using a broad range of sources. The Emergency Management Program shall assess the risk and vulnerability of people, property, the environment, and its own operations from these hazards.

Assessment Team Findings

Primary Assessor: Mike Augustyniak

Finding: Non-Compliant

Based on the documents review and an interview conducted, the Program has not demonstrated compliance with this Standard.

The *DRAFT Territorial Hazard Mitigation Plan, (May 2014), Section 4, page 4-1*, identifies and addresses only natural hazards. In Section 4.2.1, page 4-6, the *DRAFT HMP* references the Federal Interim Final Rule (IFR) 201.4(c)(2), stating, "Statewide risk assessments must characterize and analyze natural hazards and risks to provide a statewide overview." The eight (8) natural hazards inventoried and profiled are analyzed as part of a four-step risk assessment process as per FEMA guidance, which includes identification of hazards, profiling hazard events, inventorying assets, and estimating losses. This information is then used to create risk assessment outputs to prepare a comprehensive hazard mitigation plan.

In Section 4.3, page 4-9, footnote #2 states that the *DRAFT HMP* is consistent with Disaster Management Act of 2000, and is "...focused on natural hazards". The *DRAFT HMP* does not include consideration of any man-made hazards beyond the secondary effects of natural disasters on sites and facilities with technological, hazardous materials or other man made considerations." To this, however, EMAP Standard 4.3.1 states the "Program shall identify the natural and human-caused hazards that potentially impact the program...and shall assess the risks and vulnerability of people, property, the environment, and it's own operation from these hazards."

The *DRAFT HMP* does well by documenting for each of the hazards identified: hazard description; nature of the hazard; hazard location, extent, and distribution; disaster history; climate variability, hazard frequency, and magnitude; and data sources, models and methodologies. The data sources, models and methodologies sections for each hazard provide a clear list of how hazard information and data was gathered from a wide range of sources. While the *DRAFT HMP* assesses risk and vulnerability to people, property, and environment, it does not appear to include the risk and vulnerability to VITEMA's (the Program's own) operation.

In addition, as this is a draft document it cannot be considered as a proof of compliance as the *Territorial Hazard Mitigation Plan, (May 2014)* has not been promulgated and/or implemented.

The *USVI Territorial Threat / Hazard Identification and Risk Assessment (THIRA) (March 2013)* was also provided and reviewed. Mr. Ozzie Bradshaw explained this as the second version of the document, and while the process of gathering hazard, risk, vulnerability, and consequence information included all key stakeholder agencies, their participation has been very limited. Still, the information and analysis contained in this Assessment is very well done and very comprehensive. Both natural and human-caused hazards are thoroughly covered using FEMA's THIRA process.

Recommend VITEMA perform a hazard analysis and vulnerability assessment for human-caused hazards, and incorporated into the *DRAFT Territorial Hazard Mitigation Plan, (May 2014)*. Ensure the revision includes assessing risk and vulnerability to include VITEMA's own operation.

An alternate recommendation would be to consider utilization of the *USVI Territorial Threat / Hazard Identification and Risk Assessment (THIRA) (March 2013)* to be the focal point for maintaining the master list of hazards for all of USVI, covering both natural and human-caused hazards. This could be documented in a separate policy document or referenced in the THIRA and finalized version of the *Territorial Hazard Mitigation Plan* respectively.

Documents Reviewed

- *DRAFT Territorial Hazard Mitigation Plan, (May 2014), Section 4*
- *USVI Territorial Threat / Hazard Identification and Risk Assessment (March 2013)*

Standard 4.3.2

The Emergency Management Program shall conduct a consequence analysis for the hazards identified in standard 4.3.1 to consider the impact on the public; responders; continuity of operations including continued delivery of services; property, facilities, and, infrastructure; the environment; the economic condition of the jurisdiction and public confidence in the jurisdiction's governance.

Assessment Team Findings

Primary Assessor: Mike Augustyniak

Finding: Non-Compliant

Based on the documents reviewed, the Program is found to be non-compliant with this Standard. The *DRAFT Territorial Hazard Mitigation Plan (May 2014)* does not appear to review consequences, but rather, only risk and vulnerability, and estimated losses. In addition, as this is a draft document it cannot be considered as a proof of compliance as the *Territorial Hazard Mitigation Plan (May 2014)* has not been promulgated and/or implemented.

The *DRAFT Territorial Hazard Mitigation Plan, (May 2014), Section 4.6*, provides a risk assessment for each of the natural hazards listed, but only covers impact to the public, property, facilities and infrastructure, and the economic condition of the jurisdiction. It is currently lacking impact to the responders, continuity of operations, including delivery of services, the environment and public confidence in the jurisdictions governance.

The *DRAFT Territorial Hazard Mitigation Plan, (May 2014), Section 4.7*, provides loss estimation to general building stock and to critical facilities and infrastructure for earthquake, riverine flooding, coastal flooding, hurricane winds, and tsunamis. For drought, the estimated loss provided was economic impact, due to limited availability of data. A table listing return period, critical facility losses, residential losses, commercial losses, and totals were provided for each of the islands of St. Thomas, St. Croix, and St. John. Table 4.82 of the *DRAFT THMP* is a summary of hazard rankings.

The *USVI Territorial Threat/Hazard Identification and Risk Assessment (THIRA) (March 2013)* does well in inventorying and analyzing risk, vulnerability. It also covers human-caused hazards in addition to natural hazards. The THIRA also covers desired outcomes versus core capabilities, and estimated impact broken down by prevention, protection, mitigation, response, and recovery activities. It then provides a table applying all this information to target capability moving forward.

Within the *DRAFT Territorial Hazard Mitigation Plan, (May 2014)*, there is no consequence analysis done for the hazards listed, and this list does not include human-caused hazards. The *USVI Territorial Threat/Hazard Identification and Risk Assessment (THIRA) (March 2013)* does cover natural and human-caused hazards, although the list of natural hazards is not exactly the same as those found in the *DRAFT Territorial Hazard Mitigation Plan, (May 2014)*. Since both documents provide excellent hazard information, done in similar and complimentary ways, consideration should be given to either combining both documents, or revising them to reference each other. A single, master list of hazards would need to be established in one document, and referenced in all other plans and procedures as per EMAP standards.

Consequences cover the "what if" or "so what" for each hazard. Since neither the *DRAFT THMP* nor the THIRA does so, a section covering consequences for each hazard would need to be included and address all the elements of EMAP Standard 4.3.2 (listed above).

Documents Reviewed

- *DRAFT Territorial Hazard Mitigation Plan, (May 2014), Section 4*
- *USVI Territorial Threat/Hazard Identification and Risk Assessment (March 2013)*

4.4: Hazard Mitigation

Standard 4.4.1

The Emergency Management Program shall develop and implement its mitigation program to eliminate hazards or mitigate the effects of hazards that cannot be reasonably prevented. The mitigation program identifies ongoing opportunities and tracks repetitive loss. The Emergency Management Program implements mitigation projects according to a plan that sets priorities based upon loss reduction.

Assessment Team Findings

Primary Assessor: Mike Augustyniak

Finding: Non-Compliant

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. As the *Territorial Hazard Mitigation Plan (May 2014)* is a draft document it cannot be considered as a proof of compliance as it has not been promulgated and/or implemented.

The hazard mitigation program for USVI is documented in their *DRAFT Territorial Hazard Mitigation Plan (May 2014)*. The purpose of the *DRAFT THMP* is "to identify strategies and actions that can be taken before a disaster strikes that can greatly reduce the human suffering, damage to property, and long-term economic impact of natural hazards." Section 1 addresses adoption of the plan, which is in final revision, following FEMA review, and due to be promulgated in the near future. Section 2 addresses the planning process, including program committee participation and stakeholders. Section 3 is a capabilities assessment, covering various agencies' abilities to implement mitigation actions and achieve goal and objectives. Section 4 addresses risk assessment, covering hazards, risk, and vulnerability. Section 5 is the mitigation strategy, establishing mitigation goals, objectives, and actions, and describing how weighting, ranking and prioritizing was accomplished. Section 6 covers plan maintenance responsibilities. Section 7 is a bibliography. Appendix A includes copies of sign-in rosters. Appendix B includes copies of public notices for mitigation meetings. Appendix C outlines their repetitive loss strategy and how statistics are captured and used in planning, funding and documenting mitigation actions. Appendix D is a matrix review of mitigation actions from their previous 2011 HMP. Appendix E lists identified high-risk structures. Appendix F describes the programmatic and project options for mitigation actions. Appendix G provides tables of all the specific mitigation programmatic and project actions, weighting, ranking and prioritization, which can be used as an ongoing tracking tool.

The overall hazard mitigation program and *THMP* for USVI should be expanded to include and encompass human-caused hazards as well as natural hazards.

Documents Reviewed

- *DRAFT Territorial Hazard Mitigation Plan, (May 2014)*

Standard 4.4.2

The mitigation program includes participation in applicable jurisdictional, inter-jurisdictional and multi-jurisdictional mitigation efforts.

Assessment Team Findings

Primary Assessor: Mike Augustyniak

Finding: Non-Compliant

Based on the documents reviewed and an interview conducted, the Program has not demonstrated compliance with this Standard. As the *Territorial Hazard Mitigation Plan (May 2014)* is a draft document it cannot be considered as a proof of compliance as it has not been promulgated and/or implemented.

VITEMA has set up both an overall Hazard Mitigation Steering Committee (HMSC) for the Territory, as well as individual Hazard Mitigation Monitoring and Evaluation Committees (HMMEC) for each of the main islands of St. Thomas, St. Croix, and St. John. While the HMSC includes members only from VITEMA, the three island HMMECs included a number of individuals, however, the agencies they represent were not provided. The *DRAFT THMP* defines the role of each committee in Section 2.2.3, and provides tables of hazard mitigation planning meetings, and public "town hall" workshops. Sample copies of sign-in sheets and meeting notices are provided in Appendices A and B to the draft Plan.

As coordinated by VITEMA, invited to meetings and included in much of the review of the *DRAFT THMP* and its revision, were representatives from eleven public sector organizations, three private sector companies, as well as the University of the Virgin Islands, and the American Red Cross. In addition, the local (Caribbean) FEMA office participated in the plan update as well. The actual stakeholders group that makes up the steering and three island Committees includes core membership from five key organizations. Outreach and interagency coordination is maintained through VITEMA. Finally, four ongoing planning initiatives were also evaluated in the *DRAFT THMP* update.

Consider expanding the lead Steering Committee to include more than just membership from VITEMA. This would ensure that other agency input is included in voting on and ranking mitigation projects.

Documents Reviewed

- *DRAFT Territorial Hazard Mitigation Plan, (May 2014)*

Standard 4.4.3

The Emergency Management Program provides technical assistance consistent with the scope of the mitigation program such as implementing building codes, fire codes, and land-use ordinances.

Assessment Team Findings

Primary Assessor: Mike Augustyniak

Finding: Non-Compliant

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. As the *Territorial Hazard Mitigation Plan (May 2014)* is a draft document it cannot be considered as a proof of compliance as it has not been promulgated and/or implemented.

Section 2 of the *DRAFT Territorial Hazard Mitigation Plan, (May 2014)* identifies how the lead and respective island Committees work to provide technical assistance and develop mitigation opportunities. Key agency roles are also reviewed. Noteworthy is an upcoming revision to the *USVI Zoning and Subdivision Code*, due out in mid-2014. Section 4.3 of the *DRAFT THMP* covers a capability assessment, which includes flood plain, coastal zone and land use management, which translates to how local codes and ordinances are affected. The draft Plan discusses how mitigation ties to specific legislation of the Virgin Islands, and how the various Committees utilize and consider these laws and regulations when identifying mitigation strategies and applying technical assistance, discussed in Section 5 of the draft Plan. In addition, Appendix C reviews available mitigation funding programs and then ties to area-specific repetitive loss mitigation strategies.

Consideration may be given to including a section in the *THMP* specifically covering technical assistance for the Territory's mitigation program.

Documents Reviewed

- *DRAFT Territorial Hazard Mitigation Plan, (May 2014)*

Standard 4.4.4

The Emergency Management Program shall implement a process to monitor overall progress of the mitigation strategies, document completed initiatives, and resulting reduction or limitation of hazard impact in the jurisdiction.

Assessment Team Findings

Primary Assessor: Mike Augustyniak

Finding: Non-Compliant

Based on the documents reviewed, the Program not demonstrated compliance with this Standard. As the *Territorial Hazard Mitigation Plan (May 2014)* is a draft document it cannot be considered as a proof of compliance as it has not been promulgated and/or implemented.

Appendix D to the Territory's *DRAFT THMP* provides a review of the 2011 mitigation actions matrices for both programmatic and island-specifics, covering ranked action, description, whether the action is completed, removed, or still valid, and comments. Appendix G then takes the updated mitigation actions and lists the description, goal/objective, potential for loss reduction, priority, the specific hazard source, lead agency, projected time frame, comments, projected resources, and a comprehensive overall scoring for the action. This allows VITEMA and it's

supporting Hazard Mitigation team to provide monitoring of mitigation strategies and outcomes when complete.

Documents Reviewed

- *DRAFT Territorial Hazard Mitigation Plan, (May 2014)*

Standard 4.4.5

The mitigation plan shall be based on the natural and human-caused hazards identified by the Emergency Management Program and the risk and consequences of those hazards. The mitigation plan for the jurisdiction is developed through formal planning processes involving Emergency Management Program stakeholders and shall establish interim and long-term strategies, goals, objectives, and actions to reduce risk to the hazards identified. The Emergency Management Program implements a process and documents project ranking based upon the greatest opportunity for loss reduction and documents how specific mitigation actions contribute to overall risk reduction.

Assessment Team Findings

Primary Assessor: Mike Augustyniak

Finding: Non-Compliant

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. As the *Territorial Hazard Mitigation Plan (May 2014)* is a draft document it cannot be considered as a proof of compliance as it has not been promulgated and/or implemented.

USVI has an existing *DRAFT Territorial Hazard Mitigation Plan, (May 2014)*, which is in its final revision, and will be published shortly as a new 2014 plan. For this pre-assessment, VITEMA provided the new draft Plan for our review. However, the *DRAFT THMP* specifies that it only focuses on natural hazards (Section 4.3, footnote 2). There is no mention of human-caused hazards being inventoried or analyzed. Risks and vulnerability is included, however, a consequence analysis is not evident, rather loss estimation and impacts on certain parameters (see review of EMAP Standard 4.3.2). The *DRAFT THMP* outlines the structure of USVI's mitigation program, its committees, roles and responsibilities, and how mitigation opportunities are developed into strategies. The membership of the (lead) Steering Committee and three island-specific Monitoring and Evaluation Committees involves an appropriate range of key stakeholder organizations, and meetings often include additional agencies, both public and private.

Section 5 of the *DRAFT THMP* explains how goals and objectives are developed and tracked. Noted in Section 5.4.1, the *DRAFT THMP* states that the Program's "strategy for the *DRAFT THMP* update has not fundamentally changed since the 2005 and 2008 plans. In 2004 and 2005, VITEMA identified four goals and several related objectives based on the risk assessment and capability assessment. Both the findings and assessments have not changed significantly in the past three years. Therefore, it was not considered necessary to develop new goals and objectives." Section 5.4 of the *DRAFT THMP* reviews the goals, objectives and actions, but does not give a breakdown, as EMAP Standard 4.4.5 states, by interim, and long-term. The *DRAFT THMP* describes the process of how mitigation projects are identified, developed and ranked. Section 5.5.2 reviews a ranking criteria used to capture the potential for loss reduction, and in Appendix G, an evaluation technique is described, which provides an excellent method of

applying weight to scoring mitigation actions. This tool allows clear visibility for documenting how their mitigation opportunities contribute to overall risk reduction.

It should be noted that due to budgetary constraints of late, the *DRAFT THMP* does document that progress on achieving some of their mitigation actions has been slow. Committees still meet however, to discuss whatever they can continue to do, and maintain focus on their mitigation priorities.

The *DRAFT THMP* will need to address human-caused hazards to meet the intent of this standard, and complete a consequence analysis. Additionally, interim and long-term strategies, goals, objectives and actions will need to be identified.

Consideration should be given to re-evaluating the set of goals and objectives of the *THMP*, since they are several years old at this point in time, and growth and economics have changed since many of these opportunities were captured and documented. To their credit, however, as noted above, they state their risks and capabilities remain the same, so their strategies, goals, objectives, and mitigation actions have not changed.

Documents Reviewed

- *DRAFT Territorial Hazard Mitigation Plan, (May 2014)*

4.6: Operational Planning

Standard 4.6.1

The Emergency Management Program, through formal planning processes involving stakeholders, has developed the following plans:

- (1) emergency operations;
- (2) recovery
- (3) continuity of operations; and
- (4) continuity of government.

The process addresses all hazards identified in Chapter 4.3, and provides for regular review and update of plans.

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Compliant

Based on the documentation review and interviews, the Program has demonstrated compliance with this Standard. The *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)* was developed through a formal process involving the Territorial Emergency Management and Homeland Security (EMHS) Council. Roles of Council are well defined as to their planning role and the freedom to include other stakeholders as the need arises. The *TEOP* addresses emergency operations in four key action areas: gain and maintain situational awareness, activate and deploy key resources and capabilities, effectively coordinate response actions and then demobilize. A lead is established for Emergency Support Functions (ESFs) and separate ESF annexes are part of the *TEOP*. It is recommended that a review and update schedule be referenced in the *TEOP*.

The *TEOP, ESF #14, Long Term Community Recovery* includes the priorities of development, coordination, and execution of service- and site-restoration plans; reconstitution of government operations and services; programs to provide housing and promote restoration; long-term care and treatment of affected persons; and additional measures for social, political, environmental, and economic restoration. As ESF #14 is part of the TEOP then it is understood that the same formal process that the TEOP was developed under also applies to ESF#14.

As VITEMA has not begun their COOP or COG development process and the TEOP is not sufficient to address the elements of the neither the COOP or COG plans so this portion of the Standard is found to be non-complaint. However, both Continuity of Operations and Continuity of Government are referenced in the *TEOP*. For example, the document outlines the role of the Governor and offers a reminder that he/she should ensure proper emergency management leadership is in place. This is the basic theme of all COOP and COG planning so the fact that these priorities have already been established will be very helpful.

The *TEOP* mentioned natural and man-made hazards, but did not address the hazards referenced in the program's *DRAFT Territorial Hazard Mitigation Plan, (May 2014)*. VITEMA is encouraged to list the hazards identified in the finalized *Territorial Hazard Mitigation Plan* in all of their planning documents.

VITEMA has done a great job of formally involving stakeholders in the planning process. Documenting those processes through distribution/posting of meeting minutes will be helpful as VITEMA seeks EMAP accreditation. It is also important to establish a review/update timeline that is appropriate for the program and then document when those reviews/updates are completed.

Documents Reviewed

- *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)*
- *ESF #14, Long Term Community Recovery*
- *DRAFT Territorial Hazard Mitigation Plan, (May 2014)*

Standard 4.6.2

The emergency operations plan, recovery, continuity of operations and continuity of government plans shall address the following:

- (1) purpose, scope and/or goals and objectives;
- (2) authority;
- (3) situation and assumptions;
- (4) functional roles and responsibilities for internal and external agencies, organizations, departments and positions;
- (5) logistics support and resource requirements necessary to implement plan;
- (6) concept of operations; and
- (7) plan maintenance.

Standard 4.6.2- 1. purpose, scope and/or goals and objectives;

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Non-Compliant

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. It is recommended that VITEMA use a consistent format for all of its planning efforts that establish the seven items required in this standard. As Standard 4.6.2 states, each plan must have each of the seven items.

The *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)* does not follow a standardized format and therefore although the scope and/or goals and objectives can be found they are not readily identified as such. The *TEOP* purpose is “used as a guide to how the Territory conducts an all hazard response.”

The *TEOP, ESF #14, Long Term Community Recovery* does not follow a standardized format and therefore although the scope and/or goals and objectives can be found they are not readily identified as such. The *TEOP* purpose is “used as a guide to how the Territory conducts an all hazard response.” It is recommended that VITEMA develop a Recovery Plan, based on the work they began in the *TEOP, ESF #14*.

The program does not have COOP and COG plans. Both, however, are referenced in their *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)* and *VITEMA Homeland Security Strategy 2011-2014 (THSS) (August 22, 2011)* as a priority for completion. VITEMA has done a good job of outlining roles and responsibilities for stakeholders, which should aid in that body of work. The formal development of territorial COOP plans are scheduled to begin in July 2014. As noted in Standard 4.6.1, VITEMA is encouraged to develop COOP and COG plans.

In regard to the *TEOP*, it does not follow the standard format, which identifies authorities, and situation and assumptions. Some of these elements can be found but are not readily identified as such.

Standard 4.6.2- 2. authority;

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Non-Compliant

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. It is recommended that VITEMA use a consistent format for all of its planning efforts that establish the seven items required in this standard. As Standard 4.6.2 states, each plan must have each of the seven items.

The *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)* does not follow a standardized format and therefore although the authority can be found it is not readily identified as such.

The *TEOP, ESF #14, Long Term Community Recovery* does not follow a standardized format and therefore although the authority can be found it is not readily identified as such. It is recommended that VITEMA develop a Recovery Plan, based on the work they began in the *TEOP, ESF #14*.

The program does not have COOP and COG plans. As noted in Standard 4.6.1, VITEMA is encouraged to develop COOP and COG plans.

Standard 4.6.2- 3. situation and assumptions;

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Non-Compliant

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. It is recommended that VITEMA use a consistent format for all of its planning efforts that establish the seven items required in this standard. As Standard 4.6.2 states, each plan must have each of the seven items.

The *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)* does not follow a standardized format and therefore although the situation and assumptions can be found they are not readily identified as such.

The *TEOP, ESF #14, Long Term Community Recovery* does not follow a standardized format and therefore although the situation and assumptions can be found they are not readily identified as such. It is recommended that VITEMA develop a Recovery Plan, based on the work they began in the *TEOP, ESF #14*.

The program does not have COOP and COG plans. As noted in Standard 4.6.1, VITEMA is encouraged to develop COOP and COG plans.

Standard 4.6.2- 4. functional roles and responsibilities for internal and external agencies, organizations, departments and positions;

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Non-Compliant

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. It is recommended that VITEMA use a consistent format for all of its planning efforts that establish the seven items required in this standard. As Standard 4.6.2 states, each plan must have each of the seven items.

The *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)* is scalable, flexible and adaptable by linking roles and responsibilities across the territory. Functional roles and responsibilities are defined, but it is recommended that specific authorities (laws, codes, regulations) be referenced as well.

The *TEOP, ESF #14, Long Term Community Recovery* as part of the *TEOP* addresses functional roles and responsibilities. It is recommended that VITEMA develop a Recovery Plan, based on the work they began in the *TEOP, ESF #14*.

The program does not have COOP and COG plans. As noted in Standard 4.6.1, VITEMA is encouraged to develop COOP and COG plans.

Standard 4.6.2- 5. logistics support and resource requirements necessary to implement plan;

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Non-Compliant

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. It is recommended that VITEMA use a consistent format for all of its planning efforts that establish the seven items required in this standard. As Standard 4.6.2 states, each plan must have each of the seven items.

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. It is recommended that VITEMA use a consistent format for all of its planning efforts that establish the seven items required in this standard. As Standard 4.6.2 states, each plan must have each of the seven items.

The *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)* does not follow a standardized format and does not address logistics support and resource requirements necessary to implement the *TEOP*. The *Territorial Commodities Distribution Concept of Operations Plan* and the *Tsunami Incident Annex 2011* do an excellent job of outlining logistics support and resource requirements necessary to implement the plan.

The *TEOP, ESF #14, Long Term Community Recovery* as part of the *TEOP* does not follow a standardized format and does not address logistics support and resource requirements necessary to implement the *TEOP, ESF #14*. It is recommended that VITEMA develop a Recovery Plan, based on the work they began in the *TEOP, ESF #14*.

The program does not have COOP and COG plans. As noted in Standard 4.6.1, VITEMA is encouraged to develop COOP and COG plans..

Standard 4.6.2- 6. concept of operations;

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Non-Compliant

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. It is recommended that VITEMA use a consistent format for all of its planning efforts that establish the seven items required in this standard. As Standard 4.6.2 states, each plan must have each of the seven items.

The *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)* does not follow a standardized format and therefore although the concept of operations can be found it is not readily identified as such.

The *TEOP, ESF #14, Long Term Community Recovery* does not follow a standardized format and therefore although the concept of operations can be found it is not readily identified as such. It is recommended that VITEMA develop a Recovery Plan, based on the work they began in the *TEOP, ESF #14*.

The program does not have COOP and COG plans. As noted in Standard 4.6.1, VITEMA is encouraged to develop COOP and COG plans.

Standard 4.6.2- 7. plan maintenance;

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Non-Compliant

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. It is recommended that VITEMA use a consistent format for all of its planning efforts that establish the seven items required in this standard. As Standard 4.6.2 states, each plan must have each of the seven items.

The *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)* does not follow a standardized format and does not address plan maintenance. VITEMA has established a *TEOP* Resource Center to aid in the review, update and further development of the *TEOP*. The *TEOP* Resource Center was referenced in the *TEOP* as an area with supporting documents to the basic plan. The provided link was broken and it appears from questions to VITEMA staff that this potentially valuable resource may be in transition.

The *TEOP, ESF #14, Long Term Community Recovery* does not follow a standardized format and does not address plan maintenance. It is recommended that VITEMA develop a Recovery Plan, based on the work they began in the *TEOP, ESF #14*.

The program does not have COOP and COG plans. As noted in Standard 4.6.1, VITEMA is encouraged to develop COOP and COG plans.

Documents Reviewed

- *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)*
- *TEOP, ESF #14, Long Term Community Recovery*
- *Territorial Commodities Distribution Concept of Operations Plan (June 2013)*
- *Tsunami Incident Annex (2011)*

Standard 4.6.3

The emergency operations plan (EOP) shall identify and assign specific areas of responsibility for performing functions in response to an emergency or disaster. Areas of responsibility should

address needs of the population at risk as defined by the Emergency Management Program's HIRA. Areas of responsibility to be addressed include the following:

- (1) administration and finance;
- (2) agriculture and natural resources;
- (3) alert and notification;
- (4) communications;
- (5) critical infrastructure and key resource restoration;
- (6) damage assessment;
- (7) debris management;
- (8) detection and monitoring;
- (9) direction, control, and coordination;
- (10) donation management;
- (11) emergency public information;
- (12) energy and utilities services;
- (13) fatality management and mortuary services;
- (14) firefighting/fire protection;
- (15) hazardous materials;
- (16) human services (including food, water and commodities distribution);
- (17) incident and needs assessment;
- (18) information collection, analysis, and dissemination;
- (19) law enforcement;
- (20) mass care and sheltering;
- (21) mutual aid;
- (22) population protection (evacuation and shelter-in-place);
- (23) private sector coordination;
- (24) public health and medical;
- (25) public works and engineering;
- (26) resource management and logistics;
- (27) search and rescue;
- (28) transportation systems and resources;
- (29) volunteer management; and
- (30) warning.

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Non-Compliant

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. The program is found to have met a majority of the criteria established in this standard. The *TEOP*, accompanying ESFs and Annexes identify and assign specific areas of responsibility for performing functions in response to an emergency or disaster. VITEMA is encouraged to expand its planning efforts in the areas of volunteer management and donations management. If these response actions reside with another agency, VITEMA could insert those plans in the *TEOP* or add additional ESFs or Annexes. As mentioned in other the other planning standards, VITEMA is encouraged to reference the hazards identified in the *DRAFT Territorial Hazard Mitigation Plan, (May 2014)*.

Documents Reviewed

(C) 2014 EMAP

- *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)*
- *Emergency Support Functions #1-#15*

Standard 4.6.4

The recovery plan shall address short- and long-term recovery priorities and provide guidance for restoration of critical community functions, services, vital resources, facilities, programs, and infrastructure to the affected area.

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Non-Compliant

Based on the documents reviewed and interviews conducted, the Program has not demonstrated compliance with this Standard. The *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)* defines short and long-term recovery and offers policy considerations, but neither it nor *TEOP, ESF #14, Long Term Community Recovery* identify specific priorities or provide specific guidance for restoration. The *TEOP* states that once immediate lifesaving activities are complete, the focus must shift to assisting individuals, households, critical infrastructure, and businesses in meeting basic needs and returning to self-sufficiency. It continues by noting recovery can include the development, coordination, and execution of service- and site-restoration plans; reconstitution of government operations and services; programs to provide housing and promote restoration; long-term care and treatment of affected persons; and additional measures for social, political, environmental, and economic restoration. These considerations will facilitate the enhancement of existing plans. The *TEOP* highlights traditional FEMA recovery programs (DRCs, IA, PA, etc.) for short-term recovery and *TEOP, ESF #14, Long Term Community Recovery* provides good organizational guidance and structure for long-term recovery. It is recommended that VITEMA develop a Recovery Plan, based on the work they began in the *TEOP, ESF #14*.

Documents Reviewed

- *VITEMA Territorial Emergency Operations Plan (TEOP) (October 2010)*
- *TEOP, ESF #14, Long Term Community Recovery*

Standard 4.6.5

Continuity of operations plans (COOP) shall identify and describe how essential functions will be continued and recovered in an emergency or disaster. The plan(s) shall identify essential positions and lines of succession, and provide for the protection or safeguarding of critical applications, communications resources, vital records/databases, process and functions that must be maintained during response activities and identify and prioritize applications, records, processes and functions to be recovered if lost. Plan(s) shall be developed for each organization performing essential functions. The plans address alternate operating capability and facilities.

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Non-Compliant

As VITEMA has not begun their COOP or COG development process, the Program has not demonstrated compliance with this Standard.

VITEMA provided that they will begin the COOP planning process in July 2014 and will include other territorial departments and agencies. The Governor has established a USVI Continuity Working Group with representatives from each department. In July 2014, FEMA NCP, Region II and VITEMA personnel will work together in order to complete the USVI COOP. The initial COOP will serve as the template for all USVI government agencies. In September 2014, the COOP Planners' Workshop will provide COOP training to Federal, State, Territorial, Local and Tribal Continuity Planners. The goal of this workshop is to provide the tools and hands-on experience necessary to develop and/or improve department and agency COOP plans. At the end of September 2014, the FEMA team and VITEMA will complete the initial COOP planning effort. A multiagency tabletop exercise will be included in the planning process.

Documents Reviewed

- *None provided*

4.13: Training

Standard 4.13.1

The Emergency Management Program has a formal, documented training program composed of training needs assessment, curriculum, course evaluations, and records of training. The training needs assessment shall address all personnel with responsibilities in the Emergency Management Program, including key public officials.

Assessment Team Findings

Primary Assessor: Karen Windon

Finding: Non-Compliant

Based upon the documents reviewed and an interview conducted, the Program has not demonstrated compliance with this Standard. The *VITEMA Multiyear Training and Exercise Plan (TEP): 2012-2014 (February 8, 2012)* is a companion to the *VITEMA Homeland Security Strategy 2011-2014 (THSS) (August 22, 2011)*, defining training courses and exercises, which support their strategic goals. The *TEP* was developed from a baseline of needs reflecting the then current status of plans, policies, procedures and protocols, taking into consideration the involved agencies history and ability to work together in real life events as well as exercises. The exercise schedule takes into account the three primary islands of the USVI with training suggested to be replicated on each of the islands.

The *TEP* purpose statement speaks to it as a living document that will be updated and refined annually, and while updating that document specifically hasn't occurred, the training program is updated annually to reflect the needs assessment for training and budgetary constraints. The needs assessment is performed annually by polling each agency for their needs and assessing course availability either locally or partnering with outside agencies such as FEMA and DHS.

In discussions with Training Coordinator Mason, he described in detail the records maintained for each of the courses, whether provided on island or off. These records include sign in logs, certificates, curricula, and trainers credentials and are maintained for five years. Training is

addressed with key officials through the Territorial Emergency Management and Homeland Security (EMHS) Council.

An update of the *VITEMA Multiyear Training and Exercise Plan (TEP)* will need to occur to maintain a formal, documented training program as delineated in Standard 4.13.1. This could include circulating the developed needs assessment program and details through the program stakeholders to ensure all personnel with responsibilities in the Emergency Management Program are addressed by that formalized needs assessment and this distribution be documented.

Documents Reviewed

- *VITEMA Multiyear Training and Exercise Plan (TEP): 2012-2014 (February 8, 2012)*
- *VITEMA Homeland Security Strategy 2011-2014 (THSS) (August 22, 2011)*

Standard 4.13.2

Emergency personnel receive and maintain training consistent with their current and potential responsibilities. Specialized training related to the threats confronting the jurisdiction is included in the training program.

Assessment Team Findings

Primary Assessor: Karen Windon

Finding: Non-Compliant

Based on the documents reviewed, the Program has not demonstrated compliance with this Standard. The *VITEMA Multiyear Training and Exercise Plan (TEP): 2012-2014 (February 8, 2012)* is a companion to the *VITEMA Homeland Security Strategy 2011-2014 (THSS) (August 22, 2011)*, defining training courses and exercises, which support their strategic goals.

A needs assessment from each agency is performed annually to ensure the appropriate schedule of training is developed. Training is provided at least two-three training opportunities occurring monthly. A focus on the primary natural hazards (tsunamis, earthquakes and hurricanes) occurs, but also covers a gamut of prevention and preparedness topics as well as utilizing train the trainer courses to maintain the ability to continue on island training.

Due to the unique geography of the USVI, each training course offered on St. Thomas is also replicated in the other two locations – once on St. John's and once on St. Croix to ensure emergency personnel are afforded the opportunity to receive the necessary training.

Again, with the formalized needs assessment as discussed in Standard 4.13.1, there should be a documented process that shows training is consistent with the current and potential responsibilities. This could include position specific training (plans chief, safety officer, etc.) as well as hazard specific information.

Documents Reviewed

- *VITEMA Multiyear Training and Exercise Plan (TEP): 2012-2014 (February 8, 2012)*
- www.vitema.gov - *Training and Exercises*

Standard 4.13.3

Training is regularly scheduled and conducted in conjunction with the overall goals and objectives of the training program. Training is based on the training needs assessment, internal and external requirements and mandates (i.e. NIMS) and addresses deficiencies identified in the corrective action process.

Assessment Team Findings

Primary Assessor: Karen Windon

Finding: Non-Compliant

Based upon the documents reviewed and an interview conducted, the Program has not demonstrated compliance with this Standard. The www.vitema.gov - *Training and Exercises* provides a calendar of upcoming training and exercise opportunities and those are planned out for the upcoming four months. This training is based on the needs assessment, as well as course offering and budgetary constraints. The need to offer each course twice due to the challenges of separate islands also drives this assessment and offering.

In discussions with Training Coordinator Mason, he described the use of hot wash briefings and after action reports in driving the training needs assessment and scheduling of trainings. He relayed that over 95% of the first responders are NIMS trained and that all EOC personnel regardless of agency are trained in ICS.

By presenting training opportunities to the Territorial Emergency Management and Homeland Security (EMHS) Council, the key officials who attend that meeting (at the direction of the *V. I. Code, Title 23, the Emergency Management Act of 2009 (Act 7074)* and the full support of the governor) are able to provide staff direction on attending these training offerings.

The Program is encouraged to continue to formalize the training plan and the needs assessment process in a documented fashion for consistency across the Program and to meet the intent of the standard.

Documents Reviewed

- *VITEMA Multiyear Training and Exercise Plan (TEP): 2012-2014 (February 8, 2012)*
- www.vitema.gov - *Training and Exercises*

4.14: Exercises, Evaluations and Corrective Actions**Standard 4.14.1**

A documented exercise program is established that regularly tests the skills, abilities, and experience of emergency personnel as well as the plans, policies, procedures, equipment, and facilities of the Emergency Management Program. The exercise program is tailored to the range of hazards (reference standard 4.3.1) that confronts the jurisdiction.

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Compliant

Based on the documents reviewed and an interview conducted, the Program has demonstrated compliance with this Standard. The Program regularly tests the skills, abilities and experience of personnel as well as the plans, policies, procedures, equipment and facilities of the program. The Program utilizes a variety of scenarios tailored to the range of hazards identified by the program. The *VITEMA Homeland Security Strategy 2011-2014 (THSS) (August 22, 2011)* states VITEMA's strategic vision aims to enhance homeland security and emergency management capabilities through planning, training, and exercises. The *THSS* continues by noting the principal mission of VITEMA is to protect lives and property by preparing territorial organizations to respond to, recover from, and mitigate against all-hazards, through planning, coordinating, and training and exercise activities. These two references alone demonstrate that having a robust exercise program is a priority for VITEMA.

Exercise Planner McFarlene manages the program and implements the three-year training and exercise calendar, which is published in the *VITEMA Multiyear Training and Exercise Plan (TEP): 2012-2014 (February 8, 2012)*. The *TEP* identifies the following priority areas: public education and preparedness; public information and warning; operational coordination – emergency management; operational communications; intelligence and information sharing; mass care services and public health and medical services, specifically medical surge.

Per the *USVI Earthquake and Tsunami Functional Exercise 2009 After Action Report (AAR) and Improvement Plan (September 4 2009)*, VITEMA involved five separate facilities and approximately 280 personnel from dozens of agencies throughout the territory. The *AAR* identified which capabilities and plans were tested.

Both the *USVI Hurricane Functional Exercise 2010 After Action Report/Improvement Plan (August 4, 2010)* and the *USDHS/United States Coast Guard Operation Secure Port Functional Exercise Plan (June 19-22, 2012)* followed the same model of evaluation and corrective action as the *USVI Earthquake and Tsunami Functional Exercise 2009 After Action Report (AAR) and Improvement Plan (September 4 2009)*.

Exercise Planner McFarlene provided that he was waiting for documentation regarding a more recent exercise, Operation Tide breaker III, held in December 2013, however, this assessor finds that adequate documentation has been provided to demonstrate a program exists that meets the criteria established in the standard.

Documents Reviewed

- *VITEMA Multiyear Training and Exercise Plan (TEP): 2012-2014 (February 8, 2012)*
- *VITEMA Homeland Security Strategy 2011-2014 (THSS) (August 22, 2011)*
- *USVI Earthquake and Tsunami Functional Exercise 2009 After Action Report (AAR) and Improvement Plan (September 4 2009)*
- *USVI Hurricane Functional Exercise 2010 After Action Report/Improvement Plan (August 4, 2010)*
- *USDHS/United States Coast Guard Operation Secure Port Functional Exercise Plan (June 19-22, 2012)*

Standard 4.14.2

The Emergency Management Program shall evaluate plans, procedures, and capabilities through periodic reviews, testing, post-incident reports, lessons learned, performance evaluations, exercises and real-world events. The products of these evaluations are documented and

disseminated within the Emergency Management Program including and to key stakeholders and selected partners.

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Non-Compliant

Based on the documents reviewed and an interview conducted, the Program has not demonstrated compliance with this Standard. VITEMA's program evaluates plans, procedures and capabilities through contracted exercises, but does not document evaluations of non-contracted exercises or real-world incidents. VITEMA provided contractor-produced exercise documents that demonstrate the program's ability to evaluate plans, procedures, and capabilities through exercises, after actions and corrective action reports. Each after action/improvement plan lists to whom the document is distributed.

Exercise Planner McFarlene indicated VITEMA Director Lewis utilizes the monthly Territorial Emergency Management and Homeland Security (EMHS) Council meetings to follow up on the status of completed corrective action items. Mr. McFarlene said that VITEMA has completed numerous non-contracted exercises and recently responded to two real world incidents – a gas station explosion and school building collapse – but proof of compliance documents were not available for review.

VITEMA is encouraged to document all evaluations of plans, procedures and capabilities, and disseminate those findings to appropriate stakeholders and partners.

Documents Reviewed

- *VITEMA Multiyear Training and Exercise Plan (TEP): 2012-2014 (February 8, 2012)*
- *VITEMA Homeland Security Strategy 2011-2014 (THSS) (August 22, 2011)*
- *USVI Earthquake and Tsunami Functional Exercise 2009 After Action Report (AAR) and Improvement Plan (September 4 2009)*
- *USVI Hurricane Functional Exercise 2010 After Action Report/Improvement Plan (August 4, 2010)*
- *USDHS/United States Coast Guard Operation Secure Port Functional Exercise Plan (June 19-22, 2012)*
- *Virgin Islands Territorial Emergency Management Agency (VITEMA) 2013 Annual Report*

Standard 4.14.3

A process for corrective actions shall be established and implemented to prioritize and track the resolution of deficiencies in real world and exercise events. Corrective actions identified in the process shall be used to revise relevant plans.

Assessment Team Findings

Primary Assessor: Jody Woodcock

Finding: Non-Compliant

Based on the documents reviewed and an interview conducted, the Program has not demonstrated compliance with this Standard. The Program has demonstrated it has established and implemented a process for corrective actions in exercise events but not for real world incidents. The Program also lacked the documentation to show that corrective actions identified in the process are used to revise relevant plans.

The *USVI Earthquake and Tsunami Functional Exercise 2009 After Action Report (AAR) and Improvement Plan (September 4 2009)* and *USVI Hurricane Functional Exercise 2010 After Action Report/Improvement Plan (August 4, 2010)* both identify areas of improvement with correlating corrective actions. The corrective actions are organized by Planning, Organization, Equipment, Training and Exercises (POETE) and document the observation, recommendations, capability element, responsible party, agency point of contact, start date and completion date. The structure facilitates tracking to ensure plans are revised, as well as the other key POETE elements. As an example, one of the key findings from the *2009 AAR* was the need for an emergency warning system and plan to alert the public when a tsunami warning has been issued. VITEMA now operates an all hazard warning system that includes “VI Alert” to reach residents via land telephone lines and through wireless devices, as well as a siren notification system that includes public address capabilities. Relevant plans had been updated as part of this corrective action process.

Exercise Planner McFarlene provided that VITEMA recently responded to two (2) real-world incidents – a gas station explosion and a partial building collapse at a school. While reports were completed by the lead agency for each incident, a formal corrective action process does not exist to document, prioritize and track the resolution of deficiencies.

VITEMA has a strong corrective action process in place for exercises and is encouraged to apply a similar process to real-world incidents. Once that comprehensive process is in place, the program is encouraged to then document that corrective actions were used to revised applicable plans – for every incident or event, large or small.

Documents Reviewed

- *USVI Earthquake and Tsunami Functional Exercise 2009 After Action Report (AAR) and Improvement Plan (September 4 2009)*
- *USVI Hurricane Functional Exercise 2010 After Action Report/Improvement Plan (August 4, 2010)*

Glossary

Chapter 2. Definitions (from the *Emergency Management Standard* by EMAP, 2013)

- 2.1 Applicant. An Emergency Management Program that seeks to fulfill the requirements for accreditation and has submitted an accreditation application.
- 2.2 Continuity of Government. Capability to ensure survivability of government.
- 2.3 Continuity of Operations. Capability to continue program essential functions and to preserve essential facilities, equipment and records across a broad range of potential emergencies.
- 2.4 Disaster. A severe or prolonged emergency, which threatens life, property, environment and/or critical systems.
- 2.5 Emergency. An incident or set of incidents, natural, or human caused, which requires responsive actions to protect life, property, environment, and/or critical systems.
- 2.6 Emergency Management Program. A system that provides for management and coordination of prevention, mitigation, preparedness, response, and recovery activities for all hazards. The system encompasses all organizations, agencies, departments, and individuals having responsibilities for these activities.
- 2.7 Essential Program Function(s). Activities that enable an agency, department, organization or individual to carry out emergency response actions, provide vital services, protect the safety and well-being of the citizens of the jurisdiction, and maintain the economic base of the jurisdiction.
- 2.8 Gap Analysis. Gap analysis involves a comprehensive assessment of capability, against established resource management objectives, to determine areas of improvement for response and recovery based on the hazards identified by the Program.
- 2.9 Hazard. Something that has the potential to be the primary cause of an incident.
- 2.10 Human-caused. Incidents caused by human activity, which include but are not limited to chemical, biological, radiological, nuclear, explosive, and technological, including cyber hazards, whether accidental or intentional.
- 2.11 Incident. An occurrence, natural or human-caused, that requires action by the Emergency Management Program.
- 2.12 Incident Management System. An incident management system is formalized and institutionalized and addresses the principles of command and basic functions of planning, operations, logistics, finance and administration. An incident management system is modular, scalable, interactive, and flexible; it includes common terminology, manageable span of control, unified command, consolidated action plans, multi-agency coordination, and integrated communications. Examples include the National Incident Management System, Incident Command System (ICS), or a multi-agency coordination system.

- 2.13 Intelligence. The results of the process by which specific types of information are requested, collected, and analyzed.
- 2.14 Jurisdiction. The state, territory, region, tribal government, county, parish, municipality or other entities, which the Emergency Management Program serves. For accreditation purposes, the jurisdiction is the applicant.
- 2.15 Mitigation. The activities designed to reduce or eliminate risks to persons or property or to lessen the actual or potential effects or consequences of a disaster. Mitigation measures may be implemented prior to, during, or after a disaster. Mitigation measures are often informed by lessons learned from prior disasters. Mitigation involves ongoing actions to reduce exposure to, probability of, or potential loss from hazards.
- 2.16 Mutual Aid Agreement. Written agreement between agencies and/or jurisdictions that provides for assistance upon request, by furnishing personnel, equipment, and/or expertise in a specified manner.
- 2.17 Preparedness. The range of deliberate, critical tasks and activities necessary to build, sustain, and improve the operational capability to prevent, protect against, mitigate against, respond to, and recover from disasters. Preparedness is a continuous process.
- 2.18 Prevention. Actions to avoid an incident or to intervene to stop an incident from occurring. Prevention involves actions to protect lives and property. It involves identifying and applying intelligence and other information to a range of activities that may include such countermeasures as deterrence operations; heightened inspections; improved surveillance and security operations; investigations to determine the full nature and source of the threat; public health and agricultural surveillance and testing processes; immunizations, isolation, or quarantine; and, as appropriate, specific law enforcement operations aimed at deterring, preempting, interdicting, or disrupting illegal activity, and apprehending potential perpetrators.
- 2.19 Procedure(s). Detailed written description of activities that support implementation of a plan(s).
- 2.20 Recovery. The development, coordination, and execution of plans or strategies for the restoration of impacted communities and government operations and services through individual, private sector, nongovernmental and public assistance.
- 2.21 Resource Management Objective(s). Resource management objectives are defined and measurable actions that act as operational guidance for/by the Emergency Management program. Objectives are developed utilizing the impact and consequence analysis for the hazards identified by the Program to determine the short and long term response and recovery priorities that must be accomplished.
- 2.22 Response. Efforts to minimize the short term direct effects of an incident threatening life, property, environment or critical systems.
- 2.23 Shall. Indicates a mandatory requirement to demonstrate compliance with this standard.
- 2.24 Stakeholder(s). Stakeholders are, at a minimum, public, private, and non- governmental agencies, departments, organizations, and individuals that have functional roles in the Emergency Management Program.

2.25 Standard. The Emergency Management Standard is the criterion used to determine qualification for accreditation. Within the Standard, individual standards (such as 3.1.1) describe qualities or facts that must be present for accreditation.

Preliminary Assessment Report