



Office of Inspections
Office of Inspector General
U.S. General Services Administration

**GSA Office of Mission Assurance 2018 Eagle
Horizon Exercise Results Did Not Properly
Reflect Agency's State of Readiness**

JE20-002 (Redacted)

August 13, 2020

Introduction

In February 2019, the Office of Inspector General (OIG), Office of Inspections, initiated an evaluation of the General Services Administration (GSA) Continuity of Operations Program. We initiated this evaluation based on an anonymous hotline complaint regarding the Agency's reporting of its participation in the Federal Emergency Management Agency (FEMA) 2018 Eagle Horizon exercise (2018 Exercise).

This report focuses on whether GSA planned, conducted, and reported on the 2018 Exercise in accordance with federal and GSA policies and principles. We also address the adequacy and completeness of GSA's documentation of its continuity program.

On September 26, 2019, during the course of this evaluation, we issued an Agency Management Alert report, "*GSA's Continuity Plan is Outdated and Insufficient*," to alert GSA leadership that the current agency continuity plan did not meet the requirements of U.S. Department of Homeland Security, Federal Emergency Management Agency, Federal Continuity Directive 1 (FCD-1), *Federal Executive Branch National Continuity Program and Requirements*, January 17, 2017.¹ Our alert report found that the agency did not have an updated and approved agency-wide continuity plan that included plans for the reconstitution of the agency and for supporting the physical reconstitution of the Executive Office of the President and federal executive departments and agencies, which is GSA's primary mission essential function (primary function) during a catastrophic emergency.²

Our evaluation found that GSA Office of Mission Assurance (OMA) personnel did not adequately plan the 2018 Exercise. We found that the OMA exercise planning team used an insufficient, incomplete, and outdated GSA Continuity Plan to conduct the 2018 Exercise and assigned some of the evaluators' collateral duties that limited their opportunity to observe GSA participants during the 2018 Exercise. Further, we found that OMA did not have a designated alternate location for the GSA National Capital Region (NCR) to perform its critical responsibilities related to the continuity of operations.

We also found that OMA management changed the results of two 2018 Exercise assessments in order to reflect more favorable ratings than the agency's FEMA-trained exercise evaluators assigned. OMA management changed the results for all six exercise evaluation guide rating criteria assessed by the evaluators to reflect more favorable results. The changes by OMA management to the exercise guide also misrepresented an OMA director as an exercise evaluator. OMA management also changed the results of the evaluators' After Action Report to reflect more favorable ratings for 33 of the 56 report criteria. Further, the changes made by OMA

¹ *GSA's Continuity Plan is Outdated and Insufficient*, Report JE19-006. <https://www.gsaig.gov/content/agency-management-alert-gsas-continuity-plan-outdated-and-insufficient>. On January 6, 2020, the agency provided an updated and Administrator approved GSA Continuity Plan in response to our report recommendations.



management, to both the evaluation guide and the After Action Report, misrepresented the concurrence of the evaluators on the results of the exercise, and were not supported by the 2018 Exercise documentation.

As a result, the evaluation guide submitted to FEMA did not represent the assessment of GSA’s FEMA-trained evaluators. Additionally, the After Action Report submitted to the GSA Deputy Administrator, Allison Brigati, failed to alert senior leadership of the need for corrective actions in order for the agency to achieve the state of readiness needed to fully execute its mission and primary functions. Finally, we found that GSA’s 2018 Exercise draft corrective action plan was never completed and did not address the deficiencies identified during the exercise.

Our report makes two recommendations to address the issues identified during the evaluation.

Background

National Continuity Framework

On July 15, 2016, the President issued Presidential Policy Directive 40, *National Continuity Policy*, for establishing, maintaining, and testing Executive Branch continuity programs. The *National Continuity Policy* directed the FEMA Administrator to develop and promulgate continuity directives to establish continuity programs and planning requirements for agencies.³ FEMA’s Administrator subsequently issued FCD-1.⁴

The directive requires each agency to have an approved and signed continuity plan and requires agencies to review their plans at least annually. The directive also requires agency consideration, preparation, and execution of prescribed continuity capability elements. Agencies integrate these capabilities into their daily operations so that agencies can perform their specific essential functions in order to preserve our form of government under the U.S. Constitution under all conditions, including a catastrophic emergency. The eleven continuity capabilities that are fundamental to a successful program for the continuity of government program are:

1. program management, plans, and procedures,
2. essential functions,
3. order of succession,
4. delegations of authority,
5. communications and information systems,
6. essential records management,
7. alternate location,
8. human resources,
9. devolution,
10. reconstitution, and
11. test, training, and exercise.⁵

³ Reference to “agencies” in this report includes the United States Postal Service, which is subject to FCD-1, although not included in the statutory definitions of independent establishment or executive agency. See 5 U.S.C. §§ 104-105.

⁴ The Department of Homeland Security (DHS) first issued FCD-1 in February 2008. DHS updated FCD-1, *Federal Executive Branch Continuity Program and Requirements*, in October 2012, and again on January 17, 2017. Unless otherwise noted, references are to the 2017 FCD -1.

⁵ *Id.*, at pages K-1, N-2, N-7.

Agencies must establish programs to ensure continuity, or rapid resumption, of their mission essential functions (mission functions) during a disruption to normal operations.⁶ Mission functions are defined as the functions that directly relate to accomplishing an agency's mission as set forth in statutory or executive charter. Some agencies also have one or more primary functions. These are functions that must be continuously performed to support or implement the national essential functions, those necessary to lead and sustain the Nation during a catastrophic emergency.

GSA is one of four agencies assigned the primary function of supporting reconstitution of the Executive Branch, including the Executive Office of the President. GSA's specific primary function is to lead and coordinate federal government physical reconstitution efforts, including acquisition and provisioning of real property, commercial goods, information technology, and critical contract services.

The GSA Administrator delegated responsibility for the agency's continuity program to the OMA Associate Administrator.⁷ OMA works with FEMA and coordinates with GSA's Public Buildings Service and Federal Acquisition Service to provide resources to the Executive Branch agencies. GSA also supports other agencies that may need building space or equipment to fulfill their missions, and to supplement resources provided by state, tribal, and local governments to aid in the recovery phase of a disaster.

Within OMA, the Performance Branch supports the continuity of operations test, training, and exercise program by providing nationwide guidance, procedures, and technical support to the GSA Regions, Headquarters, Services and Staff Offices, and Continuity Managers in designing, developing, conducting, and delivering major continuity-related exercises and training.

Eagle Horizon Exercises

FEMA's annual Eagle Horizon exercises are a critical part of the Executive Branch's compliance with the test, training, and exercise continuity element. These exercises enable agencies to assess their current capabilities, plans, and procedures; train individuals on their responsibilities; and develop a corrective action plan based on the events that occur during the exercise. The Department of Homeland Security's Homeland Security Exercise and Evaluation Program (Homeland Security Exercise Guide) provides guidance for agencies in planning, conducting, and evaluating exercises. FEMA also provides a training curriculum that includes such diverse courses as continuity of operations and mass care/emergency assistance planning and operations, as well as training for specific exercise roles.⁸

Evaluation is an important part of an Eagle Horizon exercise. Agency evaluators assess their agency's performance during an exercise by identifying and documenting strengths, as well as

⁶ FCD-1, at page 6.

⁷ Through the Associate Administrator, OMA provides agency wide leadership and coordination for emergency management and security policy, including occupant emergency planning, response and recovery, personal identity verification, physical security, personnel security, and suitability activities.

⁸ FEMA Emergency Management Institute, <https://training.fema.gov/emicourses/schedules.aspx>.

areas where the agency can improve. Evaluators are chosen based on their expertise in the function areas observed during the exercise. The lead evaluator for an exercise oversees all facets of the evaluation process, including the structure of the evaluation team and their training. Evaluators are responsible for collecting data by direct observation, documentation review, feedback forms, and taking notes of conversations (or using separate note takers). This information forms the analytical basis for the evaluators making an informed judgment on the agency's performance in demonstrating critical tasks and capabilities.⁹

Additionally in 2018, evaluators were responsible for completing three critical documents: the agency's evaluation guide, the FEMA evaluation guide, and an after-action report.

Two Exercise Evaluation Guides. For the 2018 Exercise, there were two exercise evaluation guides. The agency's Exercise Team developed an evaluation guide tailored to the agency's capabilities and critical tasks necessary for performing the agency's mission in the exercise. The agency evaluation guide was a standardized tool for each evaluator to collect data, document observations, and capture performance results related to the 2018 Exercise.¹⁰ In addition, FEMA developed a high-level exercise evaluation guide that outlined six specific areas, with critical tasks, for evaluators to track as the exercise proceeded.¹¹

After an exercise ends, evaluators analyze the exercise evaluation guide results containing the observations and data they obtained during the exercise. Evaluators use their specialized training and experience to identify which capabilities (and associated activities, performance measures, and tasks) participants were able to successfully demonstrate in the exercise. Evaluators also identify which capabilities need improvement. The senior evaluator records these conclusions in the FEMA evaluation guide; submits that guide for internal review; and transmits the evaluation guide to FEMA by a set date. FEMA then uses the completed evaluation guides to develop a national After Action Report used for identifying best practices and opportunities for improvement. The evaluators' exercise evaluation guides are then to be used during the process of developing the After Action Report, and are preserved with the After Action Report as supporting exercise documentation.

After Action Report. Evaluators use the completed agency evaluation guide and underlying data to prepare an After Action Report for senior agency leadership. This report is an internal agency document that provides information at a more detailed level than the agency evaluation guide.

The After Action Report, prepared according to FEMA guidance, is intended to objectively report progress and lessons learned, and lead to the development and implementation of an agency improvement plan. This report includes an exercise overview, the strengths or areas for improvement in the capabilities tested in the exercise, and a list of corrective actions. FEMA

⁹ Homeland Security Exercise Guide, at page 5-5.

¹⁰ *Id.*, at pages 5-2 and Glossary-4.

¹¹ National Level Exercise 2018 Evaluation Plan, April 24, 2018, page 10.

considers the ability to communicate exercise evaluation results to stakeholders as crucial to the improvement planning process.¹²

2018 Eagle Horizon Exercise

In 2018, in response to the devastating 2017 Atlantic hurricane season, FEMA decided to integrate the public/private National Level Exercise to examine the ability of all levels of government (federal, state, and local), private industry, and nongovernmental organizations to protect against, respond to, and recover from a major weather disaster. The 2018 Eagle Horizon tested the effectiveness of FEMA's national continuity programs as part of the larger National Level Exercise. In order to improve the Nation's preparedness, the exercise assumed a category 4 hurricane making landfall in Virginia and affecting other mid-Atlantic states, passing directly over Washington, D.C. as a category 2 storm with sustained winds of 100 mph.¹³

Participating in Eagle Horizon exercises enables OMA to evaluate GSA's ability to meet the exercise objectives, demonstrate familiarity with continuity plans and procedures, and validate the agency's ability to operate while maintaining mission functions. As required, GSA continuity personnel from its Headquarters and NCR participated in the 2018 Exercise.¹⁴ GSA's NCR supports the agency's mission and primary functions. The two agency segments, Headquarters and NCR, co-located during the exercise, conducted and evaluated the 2018 Exercise separately.

FEMA's planning for the full-scale 2018 Exercise began in December 2017, and GSA's exercise planning team convened in January 2018 to begin preparations for the exercise. Key members of the team include the exercise director, the lead for the team of simulators (persons who deliver scenario messages that represent actions, activities, and conversations of non-participating agencies, organizations, and individuals), and the lead for the evaluation team. Table 1 below shows the titles of key OMA personnel and their roles on the Exercise Team.

¹² Homeland Security Exercise Guide, at page 6-2.

¹³ National Level Exercise 2018, *After-Action Report Executive Summary August 2018*, at pages iii, 5-7, 10 May 5, chart), found at <https://www.fema.gov/nle-2018> (NLE 2018 Conduct Executive Summary).

¹⁴ FCD-1, at page K-3.

Table 1. Key OMA Exercise Team Members

Exercise Role	OMA Position	OMA Personnel	Responsibilities
Exercise Director	Deputy Associate Administrator	[REDACTED]	Oversee exercise functions during exercise set up, conduct, and cleanup; debrief and provide oversight to controllers and evaluators.
Deputy Exercise Director	Western Region Director	[REDACTED]	Assist the Exercise Director with overseeing exercise functions during exercise set up, conduct, and cleanup; debrief and provide oversight to controllers and evaluators.
Lead Simulator	Director of Policy and Performance	[REDACTED]	Oversee the control staff personnel who role-play as nonparticipating organizations or individuals.
Lead Evaluator	Deputy Director for Performance	[REDACTED]	Oversee the personnel assigned to view the exercise from a designated observation area and remain within the observation area during the exercise. Develop an After Action Report identifying participants' ability to respond to the situation and any corrective actions.

As described above, FEMA developed a high-level exercise evaluation guide that outlined six specific areas, with critical tasks, for evaluators to track as the exercise proceeded. On April 26, 2018, FEMA requested GSA and other participating agencies to complete and submit the guide to FEMA by May 15, 2018.

On May 8, 2018, participating GSA personnel went to the agency's alternate location, where both Headquarters and NCR conducted the 2018 Exercise. At the end of the exercise, some participants met to collect initial impressions, observations, and comments so that the information could later be included in the After Action Report.

On May 31, 2018, the Lead Evaluator submitted the completed FEMA evaluation guide to her supervisor. Subsequently, almost a month after the due date, the Deputy Exercise Director provided the finalized GSA evaluation guide to FEMA.

GSA's *Eagle Horizon 2018 Exercise Participant's Handbook* states that the senior evaluator is responsible for developing the After Action Report by compiling the information collected by all evaluators. Accordingly, the Lead Evaluator provided her supervisor (the Lead Simulator) the After Action Report on June 6, 2018. OMA Associate Administrator Robert Carter submitted the final After Action Report to Deputy Administrator Brigati on September 24, 2018.

Both the finalized FEMA evaluation guide and After Action Report scored GSA's exercise substantially higher than the evaluation team scored the exercise.

Findings

1. OMA's Exercise Team did not adequately plan the 2018 Exercise.

It is critical for organizations to plan and conduct routine internal test, training, and exercise events. FCD-1 requires annual participation in these events to evaluate agency program readiness, and ensure adequacy and viability of continuity plans, communications, and information technology systems.¹⁵ To assist in planning exercises, FCD-1 directs organizations to the Homeland Security Exercise Guide, which provides additional information on exercise best practices.¹⁶ The Homeland Security Exercise Guide also states that Exercise Team members are responsible for scheduling planning meetings, identifying and developing exercise objectives, designing the scenario, creating documentation, planning exercise conduct and evaluation, and coordinating logistics.¹⁷

The OMA Exercise Team did not plan or prepare for the 2018 Exercise in accordance with the Homeland Security Exercise Guide. Specifically, the OMA exercise planning team did not ensure that the GSA continuity plans were sufficient and current; that alternative locations were available for all participants; and that dedicated exercise evaluators were assigned to observe GSA participants. GSA's participation in the 2018 Exercise did not fully test and validate the GSA continuity plans or GSA policies as intended by FCD-1 and Homeland Security Exercise Guide requirements.

Exercise Documentation Did Not Meet Requirements

FCD-1 explains that the annual exercises, such as the 2018 Exercise, allow personnel to demonstrate their familiarity with the continuity plans and procedures to validate the organization's ability to continue its essential functions.¹⁸ In order to validate performance, the continuity plans need to reflect the current processes and procedures of the organization. In addition, FCD-1 outlines requirements for planning the exercise in order to ensure that participants can complete the processes and procedures, as outlined in the continuity plan, to continue essential functions.

Insufficient, Incomplete, and Outdated Continuity Plans. FCD-1 requires an organization to have a continuity plan approved and signed by the organization head, and an annual record of review of the continuity plan. An agency must carry out a continuity plan that includes detailed processes and procedures, including a decision matrix used to activate the plan, which may include moving to an alternate location.

The OMA Exercise Team used an outdated continuity plan from 2012, based on the 2008 version of FCD-1, when planning and conducting the 2018 Exercise. We found that OMA had not updated the agency's continuity plan since February 2012, even though FEMA amended FCD-1 later that same year, and again in 2017. We asked Associate Administrator Carter and the

¹⁵ FCD-1, Annex K, at page K-3.

¹⁶ Homeland Security Exercise Guide, at page Intro-1.

¹⁷ *Id.*, at page 1-3.

¹⁸ FCD-1, at page K-3.

Exercise Director why the continuity plan had not been updated since 2012. Associate Administrator Carter stated that OMA had many competing priorities, such as revamping the physical security program, personnel security, financial resources, and the emergency management program and priorities. The Exercise Director stated that OMA's focus had been on real world events, and as a result, they were unable to update the 2012 continuity plan.

On September 26, 2019, we issued a Management Alert Report to notify Deputy Administrator Brigati that GSA did not have an updated and approved agency-wide continuity plan that included plans for GSA's primary function during a catastrophic emergency: the reconstitution of the agency and supporting the physical reconstitution of the Executive Office of the President and federal executive departments and agencies.¹⁹ GSA's continuity plan must include a comprehensive reconstitution plan that clearly identifies roles, responsibilities, processes, and procedures to ensure continued business operations during a catastrophic event. We recommended that GSA update their continuity plan and develop a reconstitution plan. On January 6, 2020, in response to our management alert, OMA provided the OIG an updated continuity plan, approved by the GSA Administrator, Emily Murphy, which included a reconstitution annex to address the recommendations.²⁰

In addition to FCD-1 requirements, GSA Order ADM 2430.1A, *The U.S. General Services Administration Continuity Program*, October 29, 2017, states that all Regional Administrators must:

Incorporate continuity functions, requirements, and responsibilities into Regional continuity of operations program (COOP) plans (or supplemental guidance as appropriate), that adequately plan, program, and budget for the GSA National Continuity Plan and address the continuity requirements....²¹

When we requested the NCR continuity plan the Lead Simulator provided the most recent plan, dated 2013. According to the OMA Deputy Regional Director, NCR had not updated their continuity plan because they were waiting for the updated GSA continuity plan, which was expected to include a template for the regional continuity plans. As a result, the Exercise Team and 2018 Exercise participants did not have complete and up to date continuity plans identifying the reconstitution process, reconstitution manager, or current processes and procedures necessary to identify, and move to, alternate locations and resume business operations.

GSA's new continuity plan, updated in response to our alert report, now includes a link to a template for regions to use when developing their continuity plans. In March 2020, the NCR Regional Administrator approved the new continuity plan.

¹⁹ OIG Agency Management Alert Report, *GSA's Continuity Plan is Outdated and Insufficient*, Report JE09-006, September 26, 2019.

²⁰ We have not assessed the adequacy of the updated continuity plan provided on January 6, 2020.

²¹ The Order includes GSA's Heads of Service and Staff Offices, Regional Administrators, and Service and Staff Offices at page B-8.

Resources Not Adequately Identified

Once the Exercise Team completes the exercise planning documents, they use that information to determine the resources and logistics needed to conduct the exercise. The Exercise Team determines, based on the exercise objectives, whether they need to move personnel to an alternate location, and if so, what equipment is needed to conduct the exercise. In addition, the Exercise Team identifies the personnel needed to conduct and evaluate the exercise.

National Capital Region Did Not Have a Dedicated Alternate Location. In accordance with FCD-1, GSA is required to have a physical alternate site that supports the performance of mission functions and primary function. GSA is also required to review alternate locations for suitability and functionality at least annually to validate continuity requirements, and to document the date and names of personnel conducting the review and validation.

Because NCR is responsible for the agency's primary functions, FCD-1 requires the establishment of an alternate location for that regional office that is far enough away from its primary facility in Washington, D.C. to ensure that the alternate location is not impacted by the same catastrophic event or emergency that required relocation from the primary facility.²² FCD-1 also states:

Organizations should consider locations that are not uniquely susceptible to risks associated with natural disasters and select facilities in locations that provide the continuity facilities with power, telecommunication services, and Internet access separate from those grids that provide their services to the primary facility, whenever possible.²³

GSA policy further requires the establishment of an alternate location that is at least 60 miles from the primary facility.²⁴

During the 2018 Exercise planning and preparation, the Exercise Team should have validated the existence and location of the alternate sites for the Headquarters and the NCR. Headquarters had an alternate location for participants to relocate to on the day of the exercise and to test their ability to work from an alternate location and complete tasks related to the mission functions and primary function. However, the NCR did not have a dedicated alternate location to support continuity operations, the mission functions, or the primary function because the previously designated location had been decommissioned in 2017.

In January 2018, four months prior to the start of the exercise, the Exercise Team realized that the NCR dedicated alternate location no longer existed, and in April 2018, the Exercise Director decided to use the ground floor of the Headquarters alternate location as the NCR alternate location for the duration of the exercise. The Exercise Director communicated this decision to

²² FCD-1, at page G-1.

²³ *Id.*

²⁴ GSA Order, ADM 2450.1, Alternative Sites for Continuity of Operations Plan (COOP) Relocation, revalidated August 2, 2013, at page 2.

NCR OMA personnel just weeks before the 2018 Exercise. An April 30, 2018, email from the Exercise Director stated the NCR's alternate location would not have teleconference capabilities with the Headquarters staff on the 8th floor. Additionally, NCR did not have alternate facility power or internet access on the ground floor, as required by FCD-1.²⁵

According to the NCR Regional Administrator, the ground floor space for the 2018 Exercise was not effective and did not meet their continuity of operations needs. He explained that several times during the exercise he had to leave the ground floor space in order to brief Administrator Murphy on the 8th floor. The Regional Administrator stated the space issues identified during the 2018 Exercise prompted him to look into a dedicated alternate location. Without a dedicated alternate location, NCR personnel cannot resume their mission functions and primary function duties outside of the primary site in the event of a catastrophic emergency.

Evaluators with Multiple Responsibilities. The Exercise Team did not adequately staff the 2018 Exercise with dedicated evaluators. The Homeland Security Exercise Guide provides guidance on establishing an Exercise Team, which is responsible for the exercise design, development, conduct, and evaluation.²⁶ The Exercise Team determines any organization specific exercise objectives beyond those identified by FEMA, and develops the exercise evaluation guide identifying specific actions or tasks to evaluate the organization's ability to achieve the exercise objectives. The amount and complexity of actions and tasks the evaluators will need to track determines how many evaluators the planning team needs to recruit, the type of subject matter expertise the evaluators should possess, and the type of training or instruction required prior to the exercise.

The Homeland Security Exercise Guide states that for operations-based exercises, such as the 2018 Exercise, evaluators should be strategically pre-positioned in locations to gather useful data.²⁷ In addition, evaluators should not interfere with the exercise.²⁸ The Exercise Team assigned eight evaluators to the 2018 Exercise – five to evaluate Headquarters and three to evaluate NCR. However, three of the five Headquarters' evaluators could not fully participate in the exercise evaluation because the Exercise Director also assigned them to drive the vans carrying the Senior Emergency Response Team members to the alternate location. In addition, NCR's Lead Evaluator was required to shift focus during the exercise play in order to assist with keeping the exercise running instead of conducting the evaluation. The other two evaluators stated that they had to help guide the exercise or answer participants' questions. The Homeland Security Exercise Guide states that evaluators should not guide participants on actions or answers. Even though the Exercise Team identified eight evaluators, only four evaluators were dedicated to evaluating the participants for the duration of the 2018 Exercise.

²⁵ FCD-1, at pages G-4 and G-5.

²⁶ Homeland Security Exercise Guide, at page 3-2.

²⁷ *Id.*, at page 4-7.

²⁸ *Id.*, at page 4-3.

2. Deputy Exercise Director submitted an inaccurate evaluation guide to FEMA.

Departments and agencies participating in the 2018 Exercise were required to submit a completed FEMA evaluation guide, appraising their personnel on how well they were able to achieve the objectives of the 2018 Exercise. The FEMA evaluation guide contained the following six focus areas:

1. Decision Making and Implementation,
2. Reporting and Situational Awareness,
3. Inter and Intra Agency Coordination,
4. Resilience of Communications and Information Technology,
5. Mission Performance, and
6. Exercise Design and Follow-up.

FEMA's evaluation guide provided a rating system for evaluators to use when assessing participants on the six areas. For each of the six areas, the evaluators were to assign one of four ratings: P – performed with no challenges, S – performed with some challenges, M – performed with major challenges, or U – unable to perform.

GSA's evaluation team completed the FEMA evaluation guide based on their observations and contemporaneous notes from the exercise, noting the evaluators' findings for the six focus areas, and indicating that the participants had some challenges with four of the focus areas, major challenges with one focus area, and were unable to perform one focus area entirely.

On May 31, 2018, the Lead Evaluator forwarded the completed FEMA evaluation guide to her supervisor, the Lead Simulator, for review and submission to FEMA. Upon reviewing the FEMA evaluation guide, the Lead Simulator contacted the Deputy Exercise Director stating that she did not think the ratings for the tasks matched the explanations provided for the ratings. The Lead Simulator told the Deputy Exercise Director that she would schedule a meeting to discuss. The Lead Simulator, Exercise Director, Deputy Exercise Director, and OMA Chief of Staff met the next day to discuss the evaluation guide results and make it more reflective of what happened.

On June 2, 2018, the Deputy Exercise Director emailed the Lead Simulator, stating:

...BC [OMA Associate Administrator, Robert (Bobby) Carter] overheard [redacted] [Principal Director of Resilience and Interagency Program] and [redacted] [Exercise Director] talking about the EEG [evaluation guide].. and he asked to see it.. he flipped. ...So he wants it all redone, and with high marks and observations...

In response, the Lead Simulator and Deputy Exercise Director agreed to discuss the FEMA evaluation guide when they were back in the office on June 4, 2018. On June 6, 2018, the Lead Simulator notified the Exercise Director that they [the Lead Simulator and Deputy Exercise Director] were doing the final edits and would send FEMA the evaluation guide that week. The Exercise Director responded within minutes, stating he agreed with what was written.

The Lead Simulator stated she changed the ratings based on her opinion and the opinions of the Exercise Director, Deputy Exercise Director, and the OMA Chief of Staff – none of whom were

trained evaluators – because they felt that GSA had performed better than the original ratings indicated by the evaluators. When asked, the Deputy Exercise Director initially stated he did not recall having the FEMA evaluation guide redone with more favorable ratings. However, the Lead Simulator stated that she and the Deputy Exercise Director changed the evaluators’ ratings to reflect positive results. Later, both the Deputy Exercise Director and the Lead Simulator stated that they based the changes on their own observations and opinions.

When asked if OMA leadership pressured them to make changes to the evaluation guide, the Lead Simulator stated that she was not saying it did not happen, but also said she did not remember and deferred to the Deputy Exercise Director to answer the question. The Deputy Exercise Director stated he did not remember. However, as noted above, the Deputy Exercise Director’s contemporaneous email to the Lead Simulator clearly stated that OMA Director Carter “. . . flipped. So he wants it all redone, and with high marks and observations. . . .”

When the Lead Simulator and Deputy Exercise Director changed the ratings in the evaluation guide, they did not follow FEMA’s instructions on assigning a rating. For two of the six areas, the Lead Simulator combined two rating categories to make new ratings of “P/S,” or performed with no to some challenges, and “S/M,” performed with some to major challenges. However, if some or major challenges existed it was not possible to complete the tasks with no to some challenges. By changing the rating scheme rather than complying with FEMA’s rating system, OMA tried to mask its shortcomings during the exercise.

The Lead Simulator also acknowledged that she changed the name of the evaluator on the evaluation guide from the “Evaluation Team” to her own name. The Lead Simulator did not perform in the role of an evaluator during the exercise, and was not in a position to directly observe the participants’ actions during the exercise. We found an email from the Exercise Director to the Lead Simulator directing the name change on the evaluation guide. The Deputy Exercise Director submitted the changed evaluation guide to FEMA on June 8, 2018.

Table 2 below shows the difference between the ratings for the six focus areas in the FEMA evaluation guide prepared by the evaluators on May 31, 2018, and those submitted by the Deputy Exercise Director to FEMA on June 8, 2018. For a complete list of the focus areas, associated critical tasks, evaluators’ ratings, and changed ratings, please see Appendix 2.

Table 2. Summary of FEMA Evaluation Guide Ratings

	Evaluator Ratings 5/31/2018	Changed Ratings 6/8/2018	New OMA Categories
Focus Area Ratings	Number of Focus Areas	Number of Focus Areas	
Performed without Challenges (P)	0 Scored P	4 Scored P	
Performed with Some Challenges (S)	4 Scored S	0 Scored S	
		1 Scored P/S	None to Some Challenges (P/S)
		1 Scored S/M	Some to Major Challenges (S/M)
Performed with Major Challenges (M)	1 Scored M	0 Scored M	
Unable to Perform (U)	1 Scored U	0 Scored U	
Total Focus Areas Measured	6	6	

We reviewed each of the evaluators’ ratings and related documentation to determine if the changed ratings were supported. The Lead Simulator and the Deputy Exercise Director were unable to provide any documentary evidence to support the changes they made.

For example, evaluators were to assess whether participants used a valid continuity plan that outlines the decision-making process and a decision matrix. In addition, evaluators were to assess whether participants activated the reconstitution plan, in consultation with the Reconstitution Manager, during the decision making process.²⁹ The evaluators rated the participants at a U - unable to perform. The evaluators’ notes showed that the continuity plan was outdated, the decision matrix was not used, and a Reconstitution Manager was not identified. However, the changed Evaluation Guide submitted to FEMA rated GSA as S/M - some to major challenges existed in performing the assigned tasks – a rating level created by OMA and not provided by FEMA. Additionally, the changed evaluation guide noted that GSA could improve by refining its reconstitution plan, identifying roles and responsibilities of the Reconstitution Manager, and using the decision matrix for assembling the Senior Emergency Response Team – the critical tasks the evaluators identified as unable to perform.

We found, consistent with the evaluators’ ratings, GSA’s continuity plan was insufficient and outdated. GSA did not have an approved reconstitution plan, and did not have a Reconstitution Manger identified for the 2018 Exercise. Further, we confirmed with several exercise

²⁹ FCD-1 identifies the Reconstitution Manager as the individual that oversees all phases of the reconstitution process. Reconstitution is the process by which surviving and/or replacement agency personnel resume normal agency operations from the original or replacement primary operating facility. This may include, but is not limited to, assessing the status of affected facilities, determining how much time is needed to repair or acquire a new facility, and implementing a priority-based phased approach. See pages J-2, L-6, L-7, and N-7.

participants, including the Deputy Exercise Director, that the decision matrix was not provided to the participants, who therefore could not use it to decide on whether to activate the continuity plan.

3. OMA Associate Administrator submitted a misleading and inaccurate 2018 Exercise After Action Report to the GSA Deputy Administrator.

The GSA Participants Handbook describes the After Action Report as a comprehensive assessment of the exercise prepared by the Lead Evaluator. The After Action Report includes a summary of the exercise scope, scenario, participants, play, deficiencies, and corrective actions. Most importantly, it contains an analysis of the achievement of each exercise objective.

Prior to the start of the 2018 Exercise, the exercise evaluation team created a GSA-specific exercise evaluation guide for the eight evaluators to document their observations and notes during the exercise. The GSA exercise evaluation guide aligned specific tasks to the six primary objectives that OMA chose to test during the exercise. OMA submitted these objectives to FEMA in the Extent of Play Agreement:

1. Exercise the National Alert and Accountability System;
2. Implement the GSA continuity plan activation, continuity of operations activation, deployment, devolution and reconstitution;
3. Evaluate deployment of the designated emergency response teams to the alternate facility;
4. Prioritize and execute mission functions;
5. Evaluate GSA's ability to utilize the Standard Form (SF) 2050 database;³⁰ and,
6. Reconstitution Planning.

In April 2018, a FEMA-trained GSA evaluator provided training for six evaluators assigned to the Exercise. Five evaluators were assigned to the Headquarters exercise and three evaluators were assigned to the NCR exercise. The Lead Simulator acknowledged that the GSA evaluation teams are FEMA-trained credible subject matter experts.

During the 2018 Exercise, seven evaluators used the exercise evaluation guide to record contemporaneous notes.³¹ The evaluators met after the 2018 Exercise to discuss their observations and complete a comprehensive assessment of GSA's ability to complete tasks related to the six objectives. From this discussion, the evaluators developed the After Action Report based on their observations and the participants' ability to respond to the situations presented during the exercise. The evaluators used FEMA's rating system to assess the exercise and complete their After Action Report. The FEMA ratings ranged, in increasing proficiency, from unable to perform - U, performed with major challenges - M, performed with some

³⁰ The SF 2050 is a questionnaire that the agencies complete to document their current business needs and their anticipated reconstitution needs for their Headquarters facilities located in the Washington, D.C. area. *See*: SF 2050 Guidance. FCD-1 requires departments and agencies to update their SF 2050 annually and resubmit to GSA. *See* FCD-1, pages J-2 and J-3. The SF 2050 is available from GSA at <https://www.gsa.gov/Forms/TrackForm/32899>.

³¹ Evaluation guides are designed to support the development of the After Action Report. *See* Homeland Security Exercise Guide, at pages 5-2 and 5-3.

challenges - S, to performed without challenges - P. The evaluators provided the After Action Report to OMA leadership, identifying strengths and areas for improvement.

Development of the After Action Report

According to the GSA Participant's Handbook, the Lead Evaluator is responsible for developing the After Action Report by compiling the information collected by all evaluators.³² Because the Extent of Play included objectives that are performed predominantly by NCR, the evaluators needed to consider both the Headquarters and NCR participants' responses when assessing and reporting on the 2018 Exercise. According to Associate Administrator Carter, NCR was responsible for GSA's reconstitution. As a result, the evaluators considered NCR and Headquarters' ability to respond to the two exercise objectives that involved reconstitution in preparing the Headquarters/NCR After Action Report.

On June 7, 2018, the Lead Evaluator submitted the evaluators' finalized and signed combined Headquarters/NCR After Action Report, dated June 6, 2018, to the Lead Simulator via email.³³ The Lead Evaluator's email transmission of the After Action Report to the Lead Simulator included the statement:

The evaluators' comments and rating cannot be changed or modified as it is taken directly from the evaluators checklist used during the observation and evaluation of the exercise. We had some deficiencies that can be easily mitigated without issue.

The Lead Evaluator said she added this disclaimer in the email because she wanted to make sure that the Lead Simulator, who was neither an exercise evaluator nor a trained evaluator, did not change the document.

On June 21, 2018, Associate Administrator Carter convened a meeting on the 2018 Exercise After Action Report ratings with the Lead Evaluator, one other evaluator, and six GS-15 managers from OMA. According to an earlier email from the OMA Chief of Staff, Associate Administrator Carter requested the meeting:

"...to have her [Lead Evaluator] present the after action report to the Directors. He [Carter] knows there are major issues/concerns with the document as written and wants to convey this directly to [Lead Evaluator] so that she understands that he is not in agreement."

According to OMA personnel in attendance, Associate Administrator Carter had the evaluators present their ratings to OMA leadership – none of whom were exercise evaluators, and three of whom were not in attendance at the 2018 Exercise. The OMA leadership, comprised of Associate Administrator Carter and GS-15 level OMA managers, provided their opinions on whether they agreed or disagreed with the evaluators' ratings (the evaluators were GS-13 and GS-14 level OMA employees). According to one evaluator, Associate Administrator Carter

³² Participant's Handbook, at page 24.

³³ The Lead Evaluator transmitted the After Action Report to the Director of Policy and Performance with the marking, "/S/" over the title, "GSA Exercise, Evaluation Team."

suggested to the evaluators what the After Action Report ratings should be. Associate Administrator Carter described the meeting as a discussion. He denied pressuring, directing, or insinuating that changes should be made to the ratings.

After the June 21, 2018, meeting, which at least three participants described as a bullying session, one of the evaluators adjusted the ratings to reflect Associate Administrator Carter's suggested ratings. The evaluator also included notes for each objective and sub-objective to describe the evaluators' original rating of the objective or sub-objective. The evaluators stated that they felt bullied into making the changes because they felt Associate Administrator Carter was not going to permit them to leave the room without agreeing to make changes to the After Action Report. However, Associate Administrator Carter and some of the managers described the meeting as "good," and "productive." While Associate Administrator Carter denied that he directed anyone to change the After Action Report, he stated that many things needed to be changed, and that the report was unprofessional and needed to be updated.³⁴

The Lead Evaluator provided an updated After Action Report on June 27, 2018, that contained the suggested changes to the ratings and the evaluators' original signature page. The June 27, 2018 After Action Report also contained a narrative to explain what the original ratings were, that a meeting occurred on June 21 [2018] that generated discussion between the evaluators and the exercise participants, and that ultimately changes were based on that meeting.

On June 27, 2018, the Lead Evaluator granted permission to the Lead Simulator to edit the After Action Report. The subsequent version contained the changed ratings from the June 21 meeting but also contained significant edits made by the Lead Simulator to the evaluators' narrative comments. The Lead Simulator's edits resulted in material changes to the narrative comments for 22 of 56 measures, and were often contradictory to the narrative comments provided by the evaluators.

On July 23, 2018, the Lead Simulator sent an email to the Exercise Director stating:

I made more changes to the draft today per BC [OMA Associate Administrator, Robert (Bobby) Carter]. Mostly, he wanted almost all the objectives changed to 'P.' Will you agree to sign this version? If not, we can leave the cover page blank for the Exercise Director. Just let me know.

That same day the Exercise Director responded via email:

[I]t is what it is..in this case we won't fight city hall.

When asked, the Exercise Director stated that he directed his email response towards the evaluators, because the evaluators were "acting as a mini IG [Inspector General]" and he was not

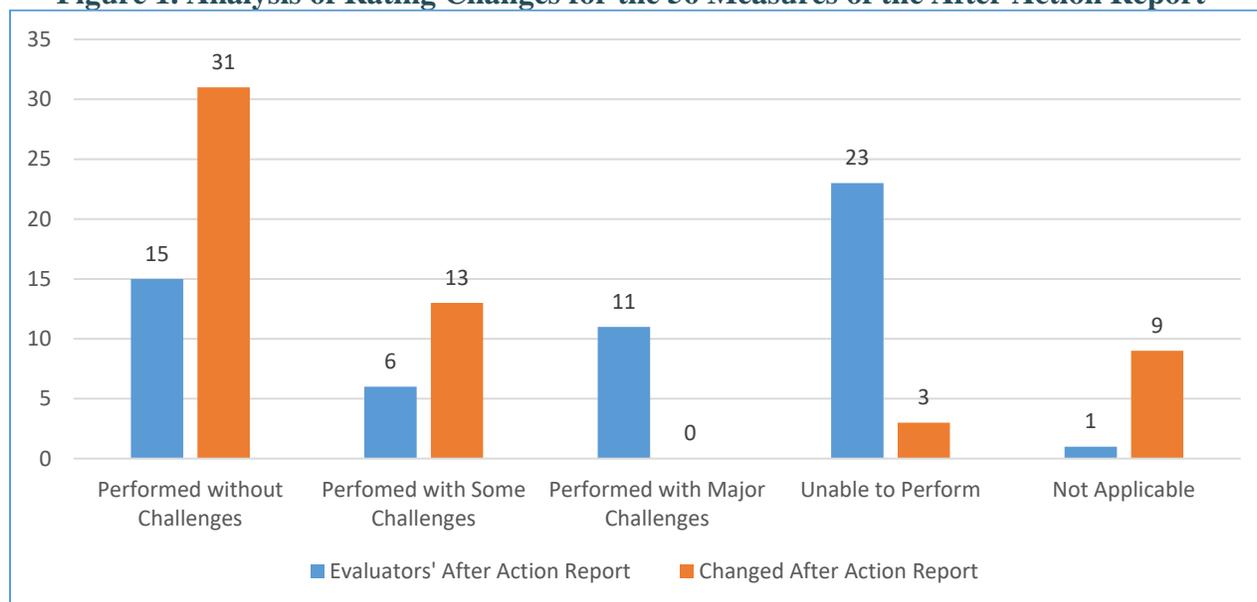
³⁴ Associate Administrator Carter also told our inspectors that he received false evaluation reports, and the evaluator notes were unprofessional. He also said that some people on his staff were colluding against him. Our interviews did not find evidence that supports these assertions.

going to argue or fight with the evaluators. Given that the email described changes to the evaluators' ratings, we found this response to be nonsensical.

When asked the meaning of the emails, the Lead Simulator initially told us that she was not directed to change the After Action Report ratings to all P's, or performed without challenges. She explained that she made changes to the narrative comments of the report to remove the evaluators' notes because they did not align with the changed ratings. However, in a later interview, the Lead Simulator told us that she did what she needed to do to make her supervisors [the Exercise Director and Associate Administrator Carter] happy. The Lead Simulator explained she did this to present a positive assessment of the 2018 Exercise for the Associate Administrator to present to Deputy Administrator Brigati and other GSA heads of staff and service offices. The eliminated information would have given GSA management additional information on GSA's continuity program and identified the necessary actions needed to improve GSA's readiness to continue their mission and primary function during a catastrophic event.

Figure 1 below contains a comparison of the ratings of the 56 After Action Report measures as prepared by the evaluators on June 6, 2018, and as changed after the meeting with OMA leadership. The altered report reflected more favorable ratings for 33 of the 56 measures. For a listing of changes by objective and sub-objective, see Appendix 3.

Figure 1. Analysis of Rating Changes for the 56 Measures of the After Action Report



Changes to the After Action Report

We reviewed the evaluators' notes, the exercise email inbox that contained participants' responses to exercise situations, and additional exercise documentation to determine whether there was support for changing the After Action Report ratings. We found that the evaluators' notes, exercise email inbox, and exercise documentation did not support the changes to the ratings in the After Action Report for several of the objectives, including two objectives with tasks related to NCR testing reconstitution, which is GSA's primary function. One objective focused on testing GSA's ability to use the reconstitution database to respond to another

agency’s requests for new facilities or equipment. The second objective focused on whether GSA had planned and prepared to execute the reconstitution process.

Evaluation of GSA’s Ability to Utilize Reconstitution Database. During a catastrophic emergency, GSA’s primary function is the reconstitution of the agency and supporting the physical reconstitution of the Executive Office of the President and federal executive departments and agencies. In supporting reconstitution, GSA uses a web portal for managing Reconstitution Questionnaire forms, Standard Form 2050, that the agencies submit to document current business needs and anticipated reconstitution needs for their Headquarters facilities located in the Washington, D.C. area.

During the 2018 Exercise, the evaluators assessed GSA participants’ ability to utilize the SF 2050 database and determined that the NCR participants, who were responsible for the primary function of reconstitution, were unable to complete all of the reconstitution objectives. NCR’s ability to respond to these situations, on behalf of GSA, would be reported in both the Headquarters and NCR After Action Reports in order for both to develop corrective action plans.

One evaluator noted that both the Central Office and NCR Senior Emergency Response Teams were unfamiliar with the SF 2050, and another evaluator told us that it did not appear that the NCR participants understood their role in reconstitution. An evaluator told us that at one point during the exercise, a NCR Senior Emergency Response Team member asked, “what’s reconstitution?” which prompted the NCR Deputy Regional Director, who was also an evaluator, to step in and provide quick training during the exercise.

Rather than reporting the evaluators’ findings, OMA leadership pressured the evaluators until the ratings were changed to report that the tasks were performed with some challenges. Our review of the exercise documentation found no support for the changed ratings. Furthermore, both Associate Administrator Carter and the Exercise Director stated that NCR could not complete all parts of reconstitution. Table 3 below shows the differences between the evaluators’ ratings and the After Action Report ratings following the June 21, 2018 meeting with OMA Leadership.

Table 3: Assessment of GSA’s Ability to Utilize Standard Form 2050

Sub-objective	Evaluators’ After Action Report Rating	Changed After Action Report Rating
5.1 – Did the Reconstitution Manager submit an up to date SF 2050 for GSA Central office and regional office and is it located within the Reconstitution database	U – Unable to Perform	S – Performed with Some Challenges
5.2 – Demonstrated the ability to prioritize the reconstitution efforts of all Department/Agencies	U – Unable to Perform	S – Performed with Some Challenges
5.3 – Demonstrated the ability to execute all aspects of the SF 2050	U – Unable to Perform	P – Performed without Challenges

In addition to the changes in the ratings, the Lead Simulator changed the narrative explaining the ratings sometime between her receipt of the June 6, 2018, evaluators After Action Report and the submission of the After Action Report to Deputy Administrator Brigati. Table 4 below shows the narratives from each of the After Action Reports. The bolded language in the evaluators' After Action Report was removed in the changed After Action Report.

Table 4. Changes to Comments for GSA's Ability to Utilize SF 2050 Database Ratings

Evaluators' After Action Report	Changed After Action Report
<p><i>The SF 2050 that was on file in the Reconstitution Database was outdated[.] The NCR [National Capital Region] SERT [Senior Emergency Response Team] demonstrated the ability to process reconstitution requests for D/A [Departments and Agencies] but with the lack of Agency procedures they along with the CO [Central Office] SERT [Senior Emergency Response Team] were unable to distribute findings to the proper D/A's. A centralized reporting structure is needed for the Agency in order to handle these inquires.</i></p>	<p><i>The SF-2050 is on file in the Reconstitution Database, but it is outdated. The measure was accomplished but needs to be updated. The NCR SERT [Senior Emergency Response Team] was able to process reconstitution requests for D/As; but GSA needs procedures to distribute findings along with a centralized reporting structure to handle these inquires.</i></p>

Evaluation of GSA's Ability to Complete Reconstitution Planning. The final objective assessed during the 2018 Exercise was GSA's capabilities and abilities related to reconstitution planning. The evaluators found that the participants attempted to respond to the reconstitution planning situations presented, but were generally unable to perform the tasks. The evaluators also noted that the agency did not have a reconstitution plan. Rather than reporting the evaluators' findings, OMA leadership pressured the evaluators until the ratings were changed to report that the testing was not applicable and was not part of the 2018 Exercise. Our review of the exercise documentation found no support for the changed ratings, or the denial that the testing was part of the exercise. Table 5 below shows the changes from the evaluators' ratings to the After Action Report ratings following the June 21, 2018 meeting with OMA Leadership.

Table 5. Testing of Reconstitution Planning

Sub-objective	Evaluators' After Action Report Rating	Changed After Action Report Rating
6.1 – Identify reconstitution team, personnel and the Reconstitution Manager points of contact.	U – Unable to Perform	N/A – Not Applicable
6.2 – Execution of process and procedures to begin reconstitution phase.	U – Unable to Perform	N/A – Not Applicable
6.3 – Execution of process and procedures to commence transition to phase down operations and assume normal operations.	U – Unable to Perform	N/A – Not Applicable
6.4 – Demonstrate the ability to submit the Readiness Status Report.	P- Performed without Challenges	N/A – Not Applicable

Additionally, when we requested the agency’s reconstitution plan to determine if perhaps the evaluators had overlooked this key piece of documentation, the Lead Simulator provided an incomplete and insufficient draft reconstitution plan dated 2011.³⁵ When we asked who was the agency’s Reconstitution Manager, Associate Administrator Carter, the Exercise Director, the Lead Simulator, and the Director of Operations and Plans all could not identify the person or position that filled this role for GSA.

When asked about the contradictory reporting, Associate Administrator Carter told us that GSA did not have a reconstitution team for the 2018 Exercise, and therefore they did not test reconstitution during the exercise. However, the Extent of Play submitted to FEMA listed reconstitution planning as one of the objectives for the 2018 Exercise.³⁶ Furthermore, the exercise email inbox clearly showed that exercise participants provided responses to the situations specifically designed to test their abilities related to reconstitution planning.

The evaluators’ June 6, 2018, After Action Report noted that GSA participants from Headquarters and NCR were unable to complete the reconstitution objectives and they identified actions that GSA could take to improve the reconstitution planning for the agency. However, in the changed After Action Report, the corrective actions identified by the evaluators were removed and replaced with the statement, “*Since this exercise was to evaluate the NEF #6 Primary Mission Essential Functions, this was not part of this year’s exercise.*”

³⁵ The NCR continuity plan is dated 2013; however, the reconstitution plan, Annex M to the NCR continuity plan, was dated 2011.

³⁶ According to the Homeland Security Exercise Guide, the extent of play agreement defines the organizations that will participate in the exercise, what days and times each organization will participate, and the exercise objectives, at page 3-18.

National Capital Region After Action Report

On or about April 25, 2018, the Exercise Director directed the NCR OMA personnel to conduct their own 2018 Exercise. That instruction implemented *GSA's Continuity of Operations, Test, Training and Exercise Program, Exercise Study Guide*, which required NCR to develop their own After Action Report and corrective action plan for the 2018 Exercise.³⁷

The NCR evaluators prepared an After Action Report specific to the NCR participants' ability to respond and complete the situations presented during the 2018 Exercise. However, as noted above the Headquarters After Action Report had already accounted for some of the participants responses in NCR's exercise. In July 2018, Associate Administrator Carter became aware of the separate NCR After Action Report. According to Carter, he requested a copy of the report because he believed the 2018 Eagle Horizon Exercise was a combined exercise for NCR and Headquarters, and he therefore anticipated a combined After Action Report.

The Lead Evaluator for NCR provided a draft NCR After Action Report to the OMA Chief of Staff on July 20, 2018. Associate Administrator Carter stated that after reading it, he did not concur with the NCR After Action Report ratings. The NCR After Action Report ratings and notes more closely aligned with the June 6, 2018 evaluators' Headquarters/NCR After Action Report.

Associate Administrator Carter stated that the NCR Regional Administrator also was not happy with the NCR After Action Report. However, the Regional Administrator told us that the results did not surprise him, and that he only provided minor edits to the report.

At the request of Associate Administrator Carter, the OMA Chief of Staff directed the Lead Simulator to have the Lead Evaluator work with the NCR Lead Evaluator, "...to ensure that the HQ [Headquarters] and NCR reports are consistent." This request was made after the changes were made to the evaluators' Headquarters/NCR After Action Report. Despite the Lead Simulator directing the evaluators to change the NCR After Action Report, they did not do so.

The NCR evaluators submitted their unchanged report to the Regional Administrator for review and approval, without going through or notifying OMA leadership. The NCR evaluators were not aware that the Headquarters After Action Report already included the region's results. The NCR Regional Administrator signed the regional After Action Report on November 15, 2018, without any additional changes to the evaluators' ratings, language, or corrective actions.

Final Submission of the Headquarters/National Capital Region After Action Report

On September 24, 2018, Associate Administrator Carter submitted a combined Headquarters and NCR After Action Report to Deputy Administrator Brigati via email. As described above, that report contained more favorable ratings for 33 of the 56 report criteria than those in the evaluators' June 6, 2019 After Action Report. The signature block of the report for the Exercise Team also retained the signature page from the evaluators' initial June 6, 2018 report. This

³⁷ (FOUO) *GSA's Continuity of Operations, Test, Training and Exercise Program, Exercise Study Guide*, March 2017, [REDACTED]

indicated that the evaluators had approved or agreed with the After Action Report submitted to Deputy Administrator Brigati. However, the evaluation team had not seen, nor approved, the changes made after they submitted it to the Lead Simulator. According to the Lead Simulator, she took the evaluators' original signature page and added it to subsequent versions of the After Action Report. The Lead Evaluator was not provided a copy of the report to review, nor was she aware that the changed After Action Report signature page indicated that the evaluation team prepared the report.

The After Action Report sent to Deputy Administrator Brigati on September 24, 2018 referenced attachments for the corrective action plan, evaluator notes, and a copy of the exercise inbox as Annexes A, B, and C, respectively. However, the report did not include those appendices, and Deputy Administrator Brigati stated she did not recall being provided them.

On October 1, 2018, Deputy Administrator Brigati signed the report. Later that same day, the OMA Chief of Staff, on behalf of Associate Administrator Carter, directed the Lead Simulator to attach the NCR After Action Report to the report already signed by the Deputy Administrator Brigati. Unbeknownst to Deputy Administrator Brigati, the NCR After Action Report contained rating results contradictory to the report she signed, and left her unaware of the need for substantive corrective actions.

4. OMA Associate Administrator did not ensure the corrective action plan was completed to address deficiencies identified during the 2018 Exercise.

The Homeland Security Exercise Guide explains that corrective actions are part of the improvement planning phase and the final step in conducting an exercise. Corrective actions are concrete, actionable steps intended to resolve capability gaps and shortcomings identified in exercises or real world events.³⁸ All corrective actions are to be consolidated in the final improvement plan and included as an annex to the After Action Report. The After Action Report and improvement plan are then considered final, and are distributed to exercise planners, participants, and other preparedness stakeholders, as appropriate. Corrective actions captured in the After Action Report and final improvement plan should be tracked and continually reported on until completion.

The corrective action plan is an important part of the National Preparedness System, and contributes to the strengthening of preparedness and achievement of the National Preparedness Goal. GSA policy reinforces this importance by providing: "OMA Associate Administrator must ensure that areas identified as needing improvement during the exercise are prioritized for corrective action and tracked through resolution."³⁹

For the 2018 Exercise, the After Action Report stated a corrective action plan must be submitted within 30 days of approving the After Action Report. As part of the report process, the evaluators identified corrective action items to improve the GSA continuity program, including the office responsible for completing the action. However, most of the evaluators' recommendations

³⁸ Homeland Security Exercise Guide, at page 6-1.

³⁹ (FOUO) GSA Order ADM 2430.1A, *The U.S. General Services Administration Continuity Program*, October 29, 2017, at page B-4.

related to corrective actions were removed as part of the revisions to the After Action Report. As a result, the final After Action Report did not contain specific corrective actions to improve GSA's ability to continue business operations during a continuity event.

Despite not including a corrective action plan with the report, the Exercise Director and the Lead Simulator stated that they completed a corrective action plan; however, they could only provide the OIG a draft version. The draft corrective action plan failed to address the significant deficiencies identified by the evaluators. Instead, the plan included items such as:

All GSA shirts should be ordered in a mix of sizes and male/female styles.

And:

Someone needs to sit full time to set out food and keep kitchen tidy.

The draft corrective action plan failed to address those sub-objectives identified by the evaluators as being U - unable to be performed or S - performed with some challenges. Additionally, where a U rating was unchanged between the evaluator and final reports, such as for sub-objective 1.6, "Accountability of all personnel," no actions were identified to correct the issue.

The corrective action plan is a vital part of the exercise process, and is intended to provide GSA leadership with information to improve the agency's business operations so that GSA is prepared to continue operations, with minimal disruptions, in the event of an emergency. GSA policy assigns responsibility to the OMA Associate Administrator for ensuring that areas identified as needing improvement during the exercise are prioritized for corrective action and tracked through resolution. Associate Administrator Carter did not fulfill this responsibility. Although he stated a corrective action plan for the 2018 Exercise should have been developed and sent to FEMA, he admitted that he had never actually seen the corrective action plan.

Conclusion

The Exercise Team did not plan or prepare an exercise that incorporated federal directives or best practices. Further, the Deputy Exercise Director and the Lead Simulator, at the behest of Associate Administrator Carter, collaborated to change the evaluator's ratings in the evaluation guide submitted to FEMA and the After Action Report submitted to Deputy Administrator Brigati. In each case, the changes inaccurately represented GSA's ability to perform mission and primary functions in the event of a catastrophic event. Significantly, Associate Administrator Carter acknowledged that he had no information to support the changes to the After Action Report he sent to Deputy Administrator Brigati. Carter also failed to fulfill his responsibilities regarding the development and tracking of a corrective action plan.

As a result, Administrator Murphy, Deputy Administrator Brigati, and FEMA do not have accurate information on whether GSA is prepared to execute mission and primary functions in a catastrophic event. By changing the scoring and removing the evaluators' concerns from the After Action Report, OMA's leadership failed to give Administrator Murphy and Deputy Administrator Brigati an opportunity to decide for themselves whether GSA met its objectives in the 2018 Exercise, and what corrective actions must be taken to ensure GSA's senior leadership

is prepared to perform the critical missions entrusted to this agency in the event of a major disaster or catastrophic event.

Recommendations

1. The GSA Deputy Administrator should conduct an independent review of the 2018 Eagle Horizon results, including the evaluators' notes, the FEMA exercise evaluation guide, and the initial June 6, 2018 After Action Report, and develop a corresponding corrective action plan. Any resultant updated FEMA exercise evaluation guide should be resubmitted to the Federal Emergency Management Agency.
2. The OMA Associate Administrator should update or develop internal policies on planning and reporting on test, training, and exercise events to align with federal continuity of operations directives and requirements.

Response to Management Comments

The agency's response, found at Appendix 4, accepts the report Recommendations but reserves judgment on the factual findings, stating that many of the findings are disputed by OMA. However, the agency did not provide any specifics on exactly what factual findings are disputed by OMA and why, or the scope of the agency's intended factual inquiry. As stated, the report's recommendation is specific, that the "Deputy Administrator should conduct an independent review of the 2018 Eagle Horizon results, including the evaluators' notes, the FEMA exercise evaluation guide, and the initial June 6, 2018 after action report..." in order to develop a corresponding corrective action plan. We reserve judgment on any disagreements with our report findings following that review, and we caution the agency against taking any action in or beyond the recommended review that might give rise to claims of retaliation against witnesses in the OIG evaluation.

In their response, the agency suggests that one report sub-finding is based only on an inference of impropriety. Our sub-finding on this matter addressed the issue of whether the evaluators were able to fulfill their role without the distractions of other responsibilities. The Homeland Security Exercise Guide clearly states that evaluators should be strategically pre-positioned, and that they should not interfere with the exercise. Our report found that the evaluators responsible for driving participants were not pre-positioned and could not fully participate in the exercise evaluation. Further, we found that evaluators were called upon to assist with keeping the exercise running, to help guide the exercise, and to answer participants' questions; thus interfering with the participants' independent completion of the exercise. The agency states that the agency has discretion as to the number of evaluators assigned to an exercise. We found that the agency, through the OMA Exercise Team, exercised that discretion by assigning eight evaluators, but only four evaluators were dedicated to evaluating the participants for the duration of the 2018 exercise.

Appendix 1 – Objective, Scope, and Methodology

In February 2019, the OIG Office of Inspections initiated an evaluation of GSA’s Continuity of Operations Program and participation in the 2018 Eagle Horizon exercised. We focused our review on whether GSA planned, conducted, and reported on the 2018 Eagle Horizon exercise in accordance with federal and GSA policies and principles.

The OIG evaluation team performed the evaluation from February 2019 to June 2020. During the evaluation, we:

- Researched laws, rules, regulations, and other federal guidance on Continuity of Operations Programs and their related exercises.
- Reviewed policies and processes related to GSA’s planning, conduct, and reporting of Eagle Horizon 2018.
- Interviewed GSA staff and officials in the Office of Mission Assurance, and officials in the Office of the Chief Financial Officer, Office of the Chief Information Officer, and National Capital Region.
- Interviewed FEMA officials.
- Reviewed OMA documentation related to the planning, conduct, and reporting for Eagle Horizon 2018.
- Reviewed email documentation.

We conducted this evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency, *Quality Standards for Inspection and Evaluation*, issued January 2012.

Appendix 2 – Detailed Results of GSA Eagle Horizon 2018 Exercise Evaluators Guide (Evaluation Guide)

Focus Area	Associated Critical Tasks	Evaluator's Evaluation Guide 5/31/18	Changed Evaluation Guide 6/8/18
		Rating	Rating
Decision Making and Implementation	<ul style="list-style-type: none"> • Does the Organization have a valid continuity plan which outlines a decision-making process regarding activation of their continuity plan? • Was the decision making matrix used to implement all, part, or none of the plan? <ul style="list-style-type: none"> • What considerations drove decision-making within the Organization? • Did the Organization Leadership discuss activating the Organization reconstitution Plans? • Was the Reconstitution Manager consulted during the decision making process? 	U	S/M
Decision Making and Implementation	<p>Were activated continuity plans and procedures effective to enable the continuation of essential functions?</p> <ul style="list-style-type: none"> • Which plans and procedures were “activated” or otherwise used? • What went well? • What are areas for development? 	M	P
Reporting and Situational Awareness	<ul style="list-style-type: none"> • Were organizational or national-level situational reporting templates and instructions adequate to facilitate the collection, analysis, and reporting? • Did reporting aid to inform or otherwise capture the activation of continuity strategies to assure operations? • Did reporting support a complete picture of essential function operations and risks? 	S	P
Inter and Intra Agency Coordination	<ul style="list-style-type: none"> • Was situational awareness and outreach maintained with internal and external interdependencies as identified in the organization’s continuity plan with respect to performance of the essential functions? • Did you have awareness of whether other organizations that support your mission functions had implemented their continuity plans, from where they were operating, and how to reach them? • Organization successfully communicated status to its personnel. 	S	P

Focus Area	Associated Critical Tasks	Evaluator's Evaluation Guide 5/31/18	Changed Evaluation Guide 6/8/18
		Rating	Rating
	<ul style="list-style-type: none"> • Did everyone get the notifications? What was the procedure for those affected by the scenario and unable to report? <ul style="list-style-type: none"> • How were Emergency Relocation Group members notified and kept abreast of the situation? • Were non-Emergency Relocation Group members notified of the agencies status and provided direction? 		
Resilience of Communications and IT	<ul style="list-style-type: none"> • Were communications capabilities adequately maintained and available for use at continuity site? • Did continuity personnel properly demonstrate the use of communications equipment required for performance for essential functions? • Were alternate communications methods used to enable the performance of essential functions? 	S	P
Mission Performance	<ul style="list-style-type: none"> • Was the organization able to perform their mission essential functions in accordance with their continuity plan and procedures? • Report on those services/tasks that were affected and how it impacts your ability to perform you[r] mission essential functions? <ul style="list-style-type: none"> • Were there sufficient staff resources available to sustain the essential function for as long as required? • Were personnel able to access essential records? <i>If not, what caused the issue (training on locations/options, technological factors, awareness of what records are essential for job performance, etc.)?</i> • Did the reconstitution team meet to determine reconstitution requirements? • Was reconstitution plan activated immediately? 	S	P/S

Ratings Definitions Per FEMA Evaluation Guide	
P – Performed without Challenges	The targets and critical tasks associated with the core capability were completed in a manner that achieved the objective(s) and did not negatively impact the performance of other activities. Performance of this activity did not contribute to additional health and/or safety risks for the public or for emergency workers, and it was conducted in accordance with applicable plans, policies, procedures, regulations, and laws.
S – Performed with Some Challenges	The targets and critical tasks associated with the core capability were completed in a manner that achieved the objective(s) and did not negatively impact the performance of other activities. Performance of this activity did not contribute to additional health and/or safety risks for the public or for emergency workers, and it was conducted in accordance with applicable plans, policies, procedures, regulations, and laws. However, opportunities to enhance effectiveness and/or efficiency were identified.
M – Performed with Major Challenges	The targets and critical tasks associated with the core capability were completed in a manner that achieved the objective(s), but some or all of the following were observed: demonstrated performance had a negative impact on the performance of other activities; contributed to additional health and/or safety risks for the public or for emergency workers; and/or was not conducted in accordance with applicable plans, policies, procedures, regulations, and laws.
U – Unable to Perform	The targets and critical tasks associated with the core capability were not performed in a manner that achieved the objective(s).

Appendix 3 – Detailed Results of GSA Eagle Horizon 2018 After Action Report

Objectives	Evaluators' After Action Report 6/6/2018	Changed After Action Report 10/1/2018
	Rating	Rating
Objective 1		
Exercise the National Alert and Accountability System (NAAS)	M	P
Measures		
1.1 – Complete alert notification and convene Emergency Relocation Group/Senior Emergency Response Team within 15 minutes of notification of possible incident using GSA National Alert and Accountability System (NAAS). No simulations are permitted. Actual phone calls, text messages, and emails must be generated and observed by SERT evaluators.	P	P
1.2 – Alert, notification and accountability of Region/Staff and Service Office employees, backup Regions, continuity facilities, stakeholders, vendors and customers	M	P
1.3 – Notify all Emergency Relocation Group employees within 30 minutes of continuity of operations activation (no simulations, actual phone calls and emails must be generated and observed by evaluators)	U	P
1.4 – Notify all remaining standby continuity of operations employees within one hour of activation of continuity of operations (no simulations, actual phone calls and emails must be generated and observed by evaluators)	U	P
1.5 – Provide accountability report to the GSA Administrator (RA) within four hours (no simulations, actual report must be presented to evaluators via email to gsa.national.exercise@gsa.gov)	P	P
1.6 – Accountability of all personnel	U	U
Objective 2		
Implement the GSA continuity of operations plan (Emergency Relocation Group/Devolution Emergency Response Group) activation, devolution, and reconstitution	M	S
Measures		
2.1 – Implement procedures to include using decision matrix for continuity plan activation	U	P
2.2 – Demonstrate the notification procedures of backup Regions, continuity facilities, stakeholders, vendors and customers	M	S
2.3 – Demonstrate Orders of Succession throughout the event	M	S
2.4 – Demonstrated Delegation of Authorities throughout the event	M	S
2.5 – Demonstrate transitioning Emergency Relocation Group/Senior Emergency Response Team personnel (incoming staff is briefed by staff already on-site)	N/A	N/A

Objectives	Evaluators' After Action Report 6/6/2018	Changed After Action Report 10/1/2018
	Rating	Rating
2.6 – Demonstrate or discuss utilization of human resources guidance, as needed, to assist in continuing essential functions	S	S
2.7 – Demonstrate knowledge of essential functions and ability to proceed	P	P
2.8 – Identified and convened the Reconstitution Manager at the same time the Emergency Relocation Group/Senior Emergency Response Team convened	U	N/A
2.9 – Demonstrated familiarity with devolution procedures	U	N/A
2.10 – Demonstrate or discuss reconstitution and continuity facility phase down operations	U	N/A
Objective 3		
Evaluate deployment of Emergency Relocation Group/ Devolution Emergency Response Group/SERT to the alternate facility and interoperability of communications both internal and external	S	P
Measures		
3.1 – Senior Emergency Response Team and Emergency Relocation Group employees report to alternate site at designated time (follow continuity of operations Plan). All staff and alternate facilities must be listed in the continuity of operations Plan. Alternate facilities include a catastrophic site more than 60 miles or five miles for a non-catastrophic site from the office building.	U	S
3.2 – Identify staffing availability and determine successor implementation requirements within 15 minutes of designated time of arrival	S	P
3.3 – Demonstrate operability of communications systems and ability to access essential records. Send a test fax to OMA 202- 219-3254 and a test email to gsa.national.exercise@gsa.gov upon arrival to the alternate site. Fax landline capability at the alternate site is a requirement for GSA Headquarters and Headquarters devolution sites	P	P
3.4 – Demonstrate proper use of interoperable communications systems	S	P
3.5 – Demonstrated effective information flow to and from the Senior Emergency Response Team	P	P
3.6 – Demonstrated effective and efficient disposition of all requests	P	P
*Evaluator After Action Report 6/6/2018 version 3.7 – Demonstrate the ability to test a non-secure voice and fax land line between the alternate site and the successor region(s) (actual call and fax is made to the primary and secondary backup regions) *Changed After Action Report 10/1/2018 version	P	P

Objectives	Evaluators' After Action Report 6/6/2018	Changed After Action Report 10/1/2018
	Rating	Rating
3.7 – Demonstrate the ability to test a non-secure voice and fax Local Area Network line between the alternate site and the successor region(s) (actual call and fax is made to the primary and secondary backup regions)		
3.8 – Demonstrate the ability to test alternate communications systems between the alternate site and the successor region(s) (actual phone call and fax is made to the primary and secondary backup region)	P	P
*Evaluator After Action Report 6/6/2018 3.9 – Demonstrate the ability to test a secure voice and fax land line between the alternate site and the GSA Emergency Operations Center (EOC). Call OMA 202-219-0338 to arrange for a secure voice or secure fax communication	P	P
*Changed After Action Report 10/1/2018 version 3.9 - Demonstrate the ability to test a secure voice and fax Local Area Network line between the alternate site and the GSA Emergency Operations Center (EOC). Call OMA 202-219-0338 to arrange for a secure voice or secure fax communication		
3.10 – Demonstrate the ability to submit the Continuity Status Report	P	P
3.11 – Demonstrate the ability to update the emergency hotline with a voice-recorded message	U	U
3.12 – Demonstrate reporting of operational status to Senior Emergency Response Team	U	P
3.13 – Demonstrate the ability to test Local Area Network/Wide Area Network connectivity between alternate site and successor Region(s)	U	P
3.14 – Demonstrate the ability to test Information Technology capability to access essential records	P	P
3.15 – Demonstrate the ability to Test email capability between alternate site and successor region(s) and internal and external customers	S	S
3.16 – Demonstrate reporting of operability status to appropriate Heads of Services or Staff Office	U	P
Objective 4		
Prioritize and execute essential functions	M	P
Measures		
4.1 – Execution of tracking process to ensure accomplishment of essential functions	M	S
4.2 – Performance of essential operational functions (Master Scenario Events List/action items)	P	P

Objectives	Evaluators' After Action Report 6/6/2018	Changed After Action Report 10/1/2018
	Rating	Rating
4.3 – Execution of Region/Staff and Service Office Communications: Methods of communication, instructions and operating status with all personnel before, during, and after the continuity event	M	S
4.4 – Demonstrate knowledge of essential functions and ability to proceed	P	P
4.5 – Identify and alert replacement personnel as necessary	U	P
4.6 – Execution of GSA Employee Emergency Plan (Family Support Plan)	U	U
4.7 – Utilization of human resources guidance for emergencies	S	S
4.8 – Demonstrated the ability to communicate with impacted customer agencies, the Department of Homeland Security (DHS), and the White House	M	P
4.9 – Demonstrate the capability to coordinate the development and dissemination of clear, accurate, and timely information	M	P
4.10 – Demonstrate process of handling media inquiries	P	P
4.11 – Demonstrated the ability to return to normal operations	U	P
Objective 5		
Evaluate GSA's ability to utilize Standard Form (SF)-2050 database	U	S
Measures		
5.1 – Did the Reconstitution Manager submit an up to date SF 2050 for GSA Central Office and the National Capital Region, and is it located within the Reconstitution Database	U	S
5.2 – Demonstrated the ability to prioritize the reconstitution efforts of all Departments/Agencies	U	S
5.3 – Demonstrated the ability to execute all aspects of the SF 2050	U	P
Objective 6		
Reconstitution Planning	U	N/A
Measures		
6.1 – Identify reconstitution team, personnel and the Reconstitution Manager points of contact	U	N/A
6.2 – Execution of process and procedures to begin reconstitution phase	U	N/A
6.3 – Execution of process and procedures to commence transition to phase down operations and assume normal operations	U	N/A
6.4 – Demonstrate the ability to submit the Reconstitution Status Report	P	N/A

Appendix 4 – Management Comments



The Administrator

August 7, 2020

TO: PATRICIA D. SHEEHAN
ASSISTANT INSPECTOR GENERAL FOR
INSPECTIONS (JE)

FROM: ALLISON F. BRIGATI *Allison F. Brigati*
DEPUTY ADMINISTRATOR (AD)

SUBJECT: Comments on Draft Report regarding GSA's Continuity of Operations
Program 2018 Eagle Horizon Exercise (JEF19-001-000)

This is in response to the Office of Inspector General's draft report entitled *GSA Office of Mission Assurance 2018 Eagle Horizon Exercise Results Did Not Properly Reflect Agency's State of Readiness*, dated July 24, 2020. I accept the recommendations in the draft report, and the agency will conduct a review related to the 2018 Eagle Horizon results to include the relevant facts, develop an appropriate corresponding corrective action plan, and share any resulting documentation with the Federal Emergency Management Agency (FEMA), as needed. In addition, the Associate Administrator of the Office of Mission Assurance (OMA) will update or develop internal policies on planning and reporting on test, training, and exercise events as necessary to align them with Federal continuity directives and requirements.

I am reserving judgment on the factual findings in the draft report until after the recommended review is complete. Many of the findings are disputed by OMA. In addition, I do not believe there is an inference of impropriety to be drawn from the fact that some evaluators had other duties assigned to them. At least four of the evaluators did not have other duties assigned to them, and FEMA does not require a specific number of evaluators. That is a matter left to agency discretion.

In conclusion, GSA takes its Continuity of Operations responsibilities very seriously and recognizes the importance of exercises that evaluate the agency's readiness. Thus, the agency will take action consistent with the draft report's recommendations and notify the Office of Inspector General of the findings. In the meantime, please do not hesitate to contact me with any questions or concerns.

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