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HOMELAND DEFENSE AND WEAPONS OF MASS DESTRUCTION

Additional Steps Could Enhance the Effectiveness of the National Guard's Life- Saving Response Forces

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Why GAO Did This Study

The 2010 *National Security Strategy* emphasizes the importance of strengthening our security and resilience at home and building capability to respond to and recover from major chemical, biological, radiological, nuclear, and high-yield explosive (CBRNE) incidents. The National Guard has established 17 CBRNE Enhanced Response Force Packages (CERFP), which are staffed with National Guard part-time personnel, to provide life-saving capabilities in response to a CBRNE event. The teams are intended to coordinate operations with multiple response partners at the local, state, and federal levels—including Department of Defense (DOD) forces. The National Guard Bureau (NGB) is responsible for managing the CERFP program. GAO assessed (1) how well CERFPs are prepared to perform their mission and how such readiness is measured and reported; (2) how effectively CERFPs coordinate with incident response partners and how well this is evaluated; and (3) the effectiveness of the CERFPs' command and control framework. GAO reviewed program documentation, surveyed National Guard and emergency management officials from 27 states, observed training exercises, and interviewed DOD, NGB, and CERFP officials.

What GAO Recommends

GAO recommends that DOD take a number of actions to increase CERFP preparedness, strengthen pre-incident coordination with potential response partners, and ensure the effective command and control of operations involving CERFPs. DOD agreed with the recommendations.

View [GAO-12-114](#) or key components. For more information, contact Janet St. Laurent at (202) 512-4300 or stlaurentj@gao.gov.

HOMELAND DEFENSE AND WEAPONS OF MASS DESTRUCTION

Additional Steps Could Enhance the Effectiveness of the National Guard's Life-Saving Response Forces

What GAO Found

The National Guard's CERFPs face personnel, training, and equipment challenges that have adversely affected their preparedness to effectively execute the CBRNE mission. For example, state National Guard and CERFP officials cited ongoing difficulty in maintaining adequate numbers of personnel with the proficiency needed to execute many specialized tasks they are to perform, and stated that additional equipment may be needed to perform the mission. These challenges highlight that NGB has not established a process to comprehensively review and validate personnel, training, and equipment requirements. In addition, CERFPs' readiness information is not comprehensively available to potential DOD response partners because such information is not yet included in DOD's centralized readiness-reporting system, and final plans to do so have not yet been developed. In the absence of accurate requirements and comprehensive readiness information, NGB is unable to effectively prioritize funding and mitigate resource deficiencies that could jeopardize the CERFPs' preparedness levels.

CERFPs coordinate with some of their potential response partners—such as local and state organizations—through activities such as briefings but have achieved varying levels of success in educating such partners about CERFP capabilities because of insufficient guidance on how to conduct interagency coordination. Existing coordination guidance is imprecise on the frequency and targeting of coordination activities, thereby providing little direction for prioritizing responsibilities. Additionally, opportunities exist to enhance regional coordination through interstate agreements and planning. Such agreements would allow more effective pooling and sharing of resources across state boundaries; however, few interstate agreements exist between states with and without CERFPs. NGB is taking steps to assess the CERFPs' performance of coordination activities, but NGB's evaluation tool, based on existing guidance, does not have coordination standards against which CERFP performance can be measured. In the absence of sufficient interagency coordination guidance and evaluation standards, NGB is unable to foster a consistent approach to coordination that improves the CERFPs' ability to respond to regional events.

NGB has a framework in place for the operational command and control of CERFPs that outlines how teams will integrate with civilian and military command structures. However, the command and control of operations involving CERFPs may be limited because of (1) inadequate communications equipment; (2) the absence of required agreements between some CERFPs and their out-of-state elements; and (3) infrequent opportunities to practice potential command and control arrangements in a realistic response environment. For example, the CERFPs' authorized communications equipment is not interoperable with the equipment used by some other response organizations, such as first responders, and has a limited range. In addition, NGB has initiated plans to introduce 10 new forces—called Homeland Response Forces—to assist civil authorities in responding to disasters of all kinds. This plan will affect the existing command and control framework, but NGB has not issued updated command and control guidance to the CERFPs. As a result of these factors, NGB lacks assurance that CERFP operations can be commanded and controlled effectively.

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Abbreviations

CBRNE	chemical, biological, radiological, nuclear, and high-yield explosive
CCMRF	CBRNE Consequence Management Response Force
CERFP	CBRNE Enhanced Response Force Package
CST	Civil Support Team
DCRF	Defense CBRN Response Force
DOD	Department of Defense
DRRS	Defense Readiness Reporting System
EMAC	Emergency Management Assistance Compact
FEMA	Federal Emergency Management Agency
HRF	Homeland Response Force
NGB	National Guard Bureau

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G A O

Accountability * Integrity * Reliability

United States Government Accountability Office
Washington, DC 20548

December 7, 2011

Congressional Requesters

The potential use of weapons of mass destruction—characterized by the Department of Defense (DOD) as chemical, biological, radiological, nuclear, and high-yield explosive (CBRNE) material—presents a continuing threat to the United States and its citizens. The 2010 *National Security Strategy* emphasizes the importance of strengthening our security and resilience at home and building our capability to respond to and recover from major CBRNE incidents.¹

A catastrophic CBRNE incident in the United States would require a unified national response involving entities at the local, state, and federal levels. Responding to a major CBRNE incident would include such response partners as local and state police and fire departments, state National Guard forces, and federal agencies—including the Federal Emergency Management Agency (FEMA) and possibly federal military forces, such as the U.S. Marine Corps's Chemical Biological Incident Response Force.

The National Guard provides governors with a wide array of capabilities to assist in mitigating the consequences of a CBRNE incident—referred to as consequence management. These capabilities include (1) CBRNE detection/identification, which is provided by the Weapon of Mass Destruction Civil Support Teams (CST), and (2) search and rescue, patient decontamination, and medical capabilities that are provided by CBRNE Enhanced Response Force Packages (CERFP). Both of these National Guard capabilities are under the command of the respective state governors via the state adjutants general² but could also be part of a federal response, if so designated by the President. In the latter case, these National Guard forces would most likely come under the command of DOD's U.S. Northern Command.

The National Guard established 12 CERFPs in 2004 in order to perform the CBRNE response mission and has placed at least one of them in

¹ White House, *National Security Strategy* (Washington, D.C.: May 2010).

² The adjutant general is the highest-ranking guardsman in each state.

each of the 10 FEMA regions. In 2006, Congress authorized end strengths for the Army National Guard and Air National Guard that, according to the conference report accompanying the National Defense Authorization Act for Fiscal Year 2006, would allow for the creation of five additional CERFP teams for a total of 17 CERFPs.³ DOD has described the CERFP program as the life-saving bridge between local and state responders and a federal DOD response. Because these packages are formed from existing units primarily staffed with part-time National Guard personnel who usually are also responsible for other missions, concerns have arisen regarding their ability to respond effectively during a major CBRNE incident. The National Guard Bureau (NGB) is responsible for managing the CERFP program and is a principal channel of communication between DOD and the states.⁴ In fiscal year 2010 the federal government provided the CERFP program approximately \$20 million through the Departments of the Army and of the Air Force for personnel, training, and equipment. At the state level each adjutant general provides command and oversight to the CERFP in that state (as part of the National Guard). Each state also has some form of emergency management agency that coordinates emergency response plans and activities for the governor.⁵

This report is the latest in a body of work GAO has issued since 2006 on elements of National Guard and active DOD CBRNE consequence management capabilities. In May 2006, we reported that the CSTs were generally organized and prepared for their mission, although we highlighted management challenges that needed to be addressed.⁶ DOD

³ National Defense Authorization Act for Fiscal Year 2006, Pub. L. No. 109-163, § 412 (2006); H.R. Conf. Rep. No. 109-360, pg. 687 (2005).

⁴ The NGB is a joint activity of DOD, and the Chief of the NGB serves as the principal advisor to the Secretary of Defense through the Chairman of the Joint Chiefs of Staff on matters involving non-federalized National Guard forces. As directed by the Secretary of Defense, the Secretary of the Army or the Secretary of the Air Force, the Chief of the NGB also assists states in the organization, maintenance, and operation of National Guard units to provide well-trained and well-equipped units capable of augmenting the active forces. DOD Directive 5105.77, *National Guard Bureau* (May 21, 2008).

⁵ In some states, the adjutant general also serves as the lead state emergency management official.

⁶ GAO, *Homeland Defense: National Guard Bureau Needs to Clarify Civil Support Teams' Mission and Address Management Challenges*, [GAO-06-498](#) (Washington, D.C.: May 31, 2006).

has since taken action on all of the recommendations, including clarifying the teams' mission and establishing a standardized evaluation program to evaluate the teams. We did not include the CERFPs in our scope at the time because the program was just getting started. We reported in 2009 that as part of a federal response, DOD planned to provide needed capabilities for CBRNE consequence management through the brigade-sized CBRNE Consequence Management Response Forces (CCMRF) but that this response may be insufficient, and that challenges remain in force structure planning and in ensuring personnel and equipment for the CCMRF.⁷ Further, the 2010 Quadrennial Defense Review initiated changes to the existing structure of DOD's consequence management response efforts.⁸ These changes included shifting National Guard resources to create new Homeland Response Forces (HRF) in each of the 10 FEMA regions. DOD intends to use these forces to provide, among other things, command and control to CERFPs.

As requested and agreed with your office, we are reporting on the CERFPs as part of our body of work on DOD's CBRNE consequence management response capabilities. This report assesses (1) how well CERFPs are prepared to perform their mission based on comprehensively evaluated requirements and how such readiness is measured and reported; (2) how effectively CERFPs are coordinating with response partners and how well this effectiveness is evaluated; and (3) the extent to which an effective framework has been established to command and control the CERFPs during CBRNE consequence management operations.

To address our objectives, we reviewed regulations, studies and memorandums regarding the status of the CERFP program and compared the current status of the program with the requirements set forth in DOD and NGB guidance. To further address our objectives, we conducted five site visits to observe CERFP field training exercises including those where CERFPs were being evaluated on their mission proficiency and those where CERFPs were training with other response

⁷ GAO, *Homeland Defense: Planning, Resourcing, and Training Issues Challenge DOD's Response to Domestic Chemical, Biological, Radiological, Nuclear and High-Yield Explosive Incidents*, [GAO-10-123](#), (Washington, D.C.: Oct. 7, 2009).

⁸ Department of Defense, *Quadrennial Defense Review Report*, (Washington D.C.: Feb. 1, 2010).

partners. To obtain views at both the state National Guards and state emergency management agencies, we developed and administered surveys to (1) State Adjutants General of all 17 states that host CERFPs, (2) state level emergency managers in all 17 of the states that host CERFPs, and (3) State Adjutants General and state-level emergency managers from 10 non-randomly selected states that do not host CERFPs, including one from each of the 10 FEMA regions. All of the 17 State Adjutants General and 13 of the 15 emergency managers in states that host CERFPs responded to our survey. Also, all of the 10 State Adjutants General and 7 out of the 9 emergency managers we surveyed from states that did not host CERFPs responded.⁹ These surveys addressed questions regarding command, control and coordination, collective training, and issues related to the implementation of the HRF program. Additionally, the survey given to state Adjutants General in states that host CERFPs also addressed their preparedness. To supplement this information, we conducted interviews with representatives of all 17 CERFPs, as well as officials from DOD and NGB, and performed content analysis of the CERFP interview responses to identify recurring themes and perspectives.

To further identify the extent to which the CERFPs are prepared to execute their mission in terms of required equipment, staffing, training, and funding, we also reviewed readiness data within the National Guard's CERFP-specific, spreadsheet-based readiness system and CERFP readiness data from the DOD's Defense Readiness Reporting System (DRRS) to determine the mechanisms for and the processes involved in CERFP readiness reporting.

We conducted this performance audit from December 2009 to December 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Appendix I provides additional details on the scope and methodology of this report.

⁹ In two of the seventeen states that host CERFPs and one of the ten states that do not host CERFPs we surveyed, the Adjutant General also serves as the lead emergency management official.

Background

The *National Response Framework* establishes the principles that guide all response partners in preparing for and providing a unified national response to disasters—including those involving chemical, biological, radiological, nuclear, and high-yield explosive materials.¹⁰ Under the *Framework*, disaster response is tiered; local governments and agencies typically respond immediately following an incident. When additional resources are requested, a state may provide assistance with its capabilities, including its National Guard, or may request assistance from other states through interstate mutual agreements or the Emergency Management Assistance Compact (EMAC).¹¹ If an incident requires capabilities beyond those available at the local and state levels, the governor can seek federal assistance. The Department of Homeland Security—via FEMA—is usually the primary federal agency for coordinating federal assistance, including that provided by DOD.

Responding to CBRNE-related incidents can be especially challenging because of the additional measures needed to work in a contaminated environment and to treat victims who may have been exposed to contaminants. DOD plays a support role in managing the consequences of CBRNE incidents, including providing those capabilities needed to save lives, alleviate hardship or suffering, and minimize property damage caused by the incident. DOD has developed specialized CBRNE response capabilities that could augment a federal CBRNE response and contribute to the organization, training, and equipping of state-controlled National Guard capabilities focused on CBRNE response. These capabilities include those provided by the:

- National Guard CSTs, which are comprised of 22 full-time personnel, with at least one team located in each state, the District of Columbia,

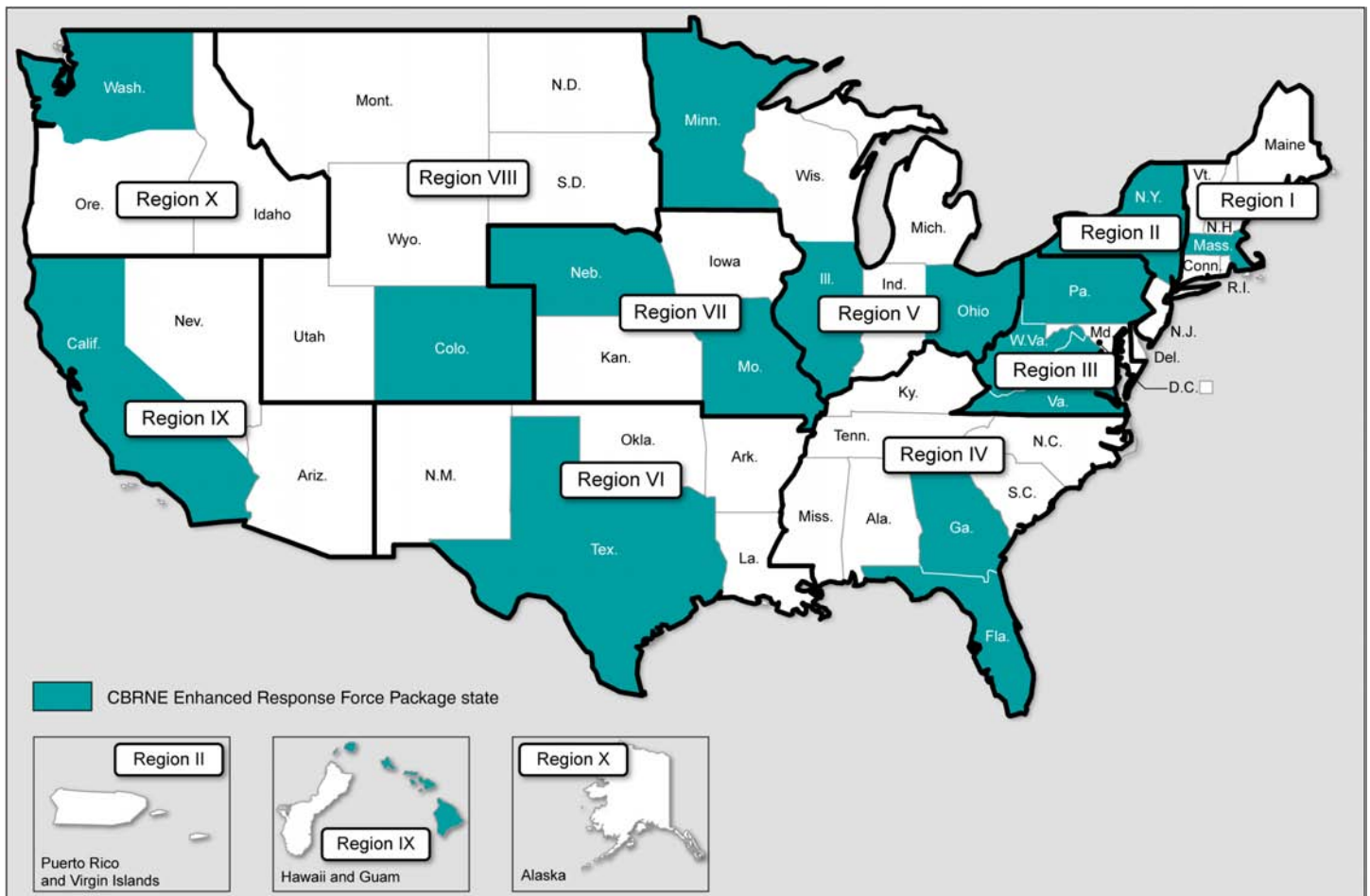
¹⁰ Department of Homeland Security, *National Response Framework* (Washington, D.C.: Jan. 2008). The *National Response Framework*—previously known as the *National Response Plan*—is the plan that guides how federal, state, local, and tribal governments, along with nongovernmental and private sector entities, will collectively respond to and recover from all hazards, including catastrophic disasters, such as Hurricane Katrina.

¹¹ The Emergency Management Assistance Compact—a mutual aid agreement among member states—provides form and structure to interstate mutual aid by addressing a number of key issues. Congress provided consent to this agreement in Pub. L. No. 104-321 (1996).

U.S. Virgin Islands, Puerto Rico, and Guam. There are a total of 57 civil support teams.

- National Guard CERFPs, which are comprised of roughly 200 personnel, with at least one team located in each of the 10 Federal FEMA regions. There are a total of 17 CERFPs. (See fig. 1)
- DOD's Defense Chemical, Biological, Radiological, and Nuclear Response Force (DCRF), consisting of approximately 5,200 troops separated into two force packages to provide federal military assistance in response to a request for assistance from a state governor, a lead federal agency, or at the direction of the President when a CBRNE incident exceeds local and state capabilities—including the CSTs and CERFPs. DOD previously referred to this force as the CCMRF.

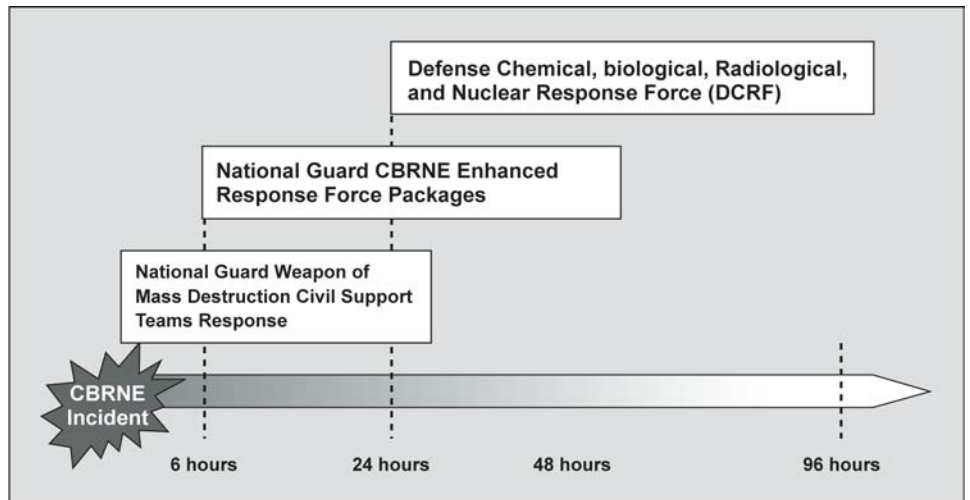
Figure 1: States That Have CERFPs within the 10 FEMA Regions



Source: GAO analysis of NGB and DOD information.

The CERFPs are intended to provide state governors with the capabilities that could relieve or augment first responders within the first few hours after an incident. CERFPs also serve to bridge the capability gap between the time local and state civilian first responders arrive and the time a federal response—including federalized DOD capabilities—is likely to be available during a large-scale CBRNE incident. Figure 2 shows the approximate time frames that the forces listed above are expected to deploy to a CBRNE incident after being notified to respond.

Figure 2: Approximate Time Frames within Which Some DOD CBRNE Consequence Management Forces Are Expected to Deploy after an Incident



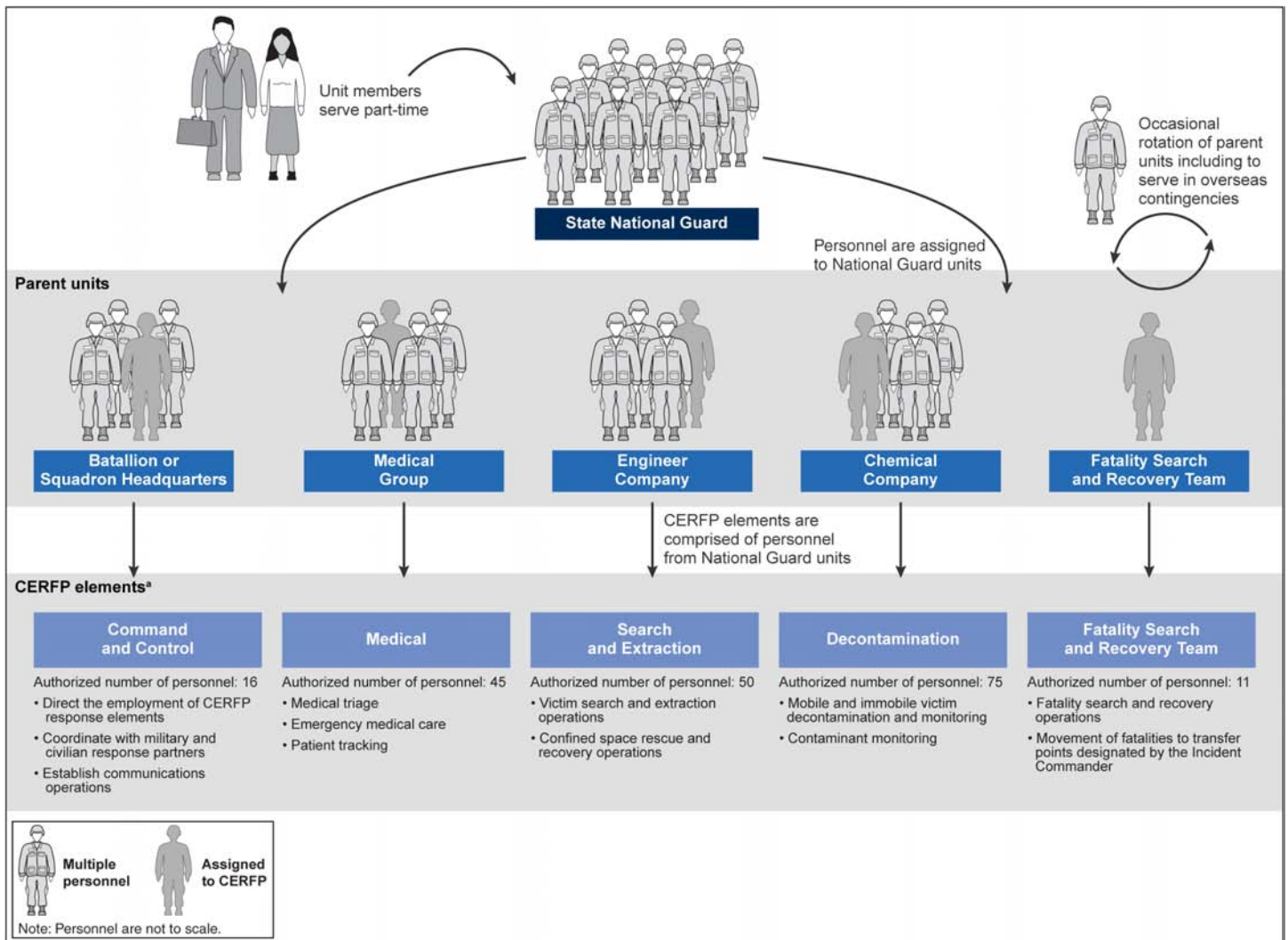
Source: GAO from DOD information.

As National Guard units, CERFP personnel may operate in Title 10 status, Title 32 status or state active duty status.¹² Personnel in a Title 10 status are federally funded and under the command and control of the President. Personnel in a Title 32 status are federally funded, but under the command and control of the governor. Title 32 status is the status in which National Guard personnel typically perform training for their federal mission. Personnel in state status are under the command and control of the governor and are state funded.

NGB is responsible for managing the CERFP program and is the principal channel of communication between DOD and the states. The CERFPs are comprised primarily of part-time reservists who are drawn from National Guard units in the host state or, in some cases, from other states. These reservists who comprise the CERFPs also support their reserve unit's dual missions—wartime and domestic missions. They are expected to train for both traditional military responsibilities and specialize in CBRNE consequence management responsibilities. Figure 3 shows how CERFP units are built from other National Guard elements.

¹² Title 10 and Title 32 refer to titles of the United States Code.

Figure 3: CERFPs Are Formed from the State's National Guard



Source: GAO analysis of NGB information.

^aThe CERFP elements are usually geographically separated within the host state, and occasionally across multiple states

The CERFPs are formed from existing units within a state. Typically, Army National Guard chemical units and engineering units are the sources of the decontamination element and the search and extraction element, respectively. Air National Guard medical units are the source of the medical element. National Guard battalion or squadron headquarters units are the source of the command and control element.

The CERFP regulation requires all CERFPs to undergo formal external evaluations of their mission capability when initially established and that they be reevaluated periodically, between months 24 and 36 in the CERFP training cycle, or earlier if the state determines it is necessary.¹³ In order to prepare the CERFPs for their mission, NGB has allotted CERFP members 14 additional training days beyond the 39 traditional days allotted to most other National Guard members. CERFP members use this additional time to conduct required individual training in domestic operations and to train collectively at least twice a year.

DOD measures a unit's readiness based on its ability to perform the functions necessary to execute the mission for which it was designed, based on identified indicators; these include possessing the required personnel, equipment, and training, and having established reporting systems to communicate readiness status. On June 3, 2002, DOD established the Defense Readiness Reporting System (DRRS)—a capabilities-based, adaptive, near-real-time readiness reporting system—which measures and reports on the readiness of military forces and the supporting infrastructure to perform mission essential tasks. In addition, in June 2004, the Secretary of Defense directed the Under Secretary of Defense for Personnel and Readiness to develop DRRS in a manner that would support the data requirements of various users of readiness information, such as the Chairman of the Joint Chiefs of Staff, the combatant commands, the secretaries of the military departments, and the Chief of the National Guard Bureau, including their requirements for data on the availability, readiness, and redeployment of forces.¹⁴

¹³ Army National Guard Regulation 500-4/Air National Guard Instruction 10-2504, *National Guard Chemical Biological, Radiological Nuclear and High Yield Explosive, Enhanced Response Force Package Management* (Oct. 16, 2009).

¹⁴ Secretary of Defense Memorandum, *Policy Implementation to Establish Commander, USJFCOM (CDRUSJFCOM), as the Primary Joint Force Provider (JFP)* (June 25, 2004). The U.S. military organizes its global presence into a series of geographic and functional combatant commands. The geographic combatant commands—U.S. Central Command, U.S. European Command, U.S. Northern Command, U.S. Pacific Command, U.S. Southern Command, and U.S. Africa Command—have authority over all U.S. military forces operating within a specified area of operation and are directly responsible for the performance of missions assigned to the command. The functional combatant commands—U.S. Special Operations Command, U.S. Strategic Command, and U.S. Transportation Command—possess worldwide functional responsibilities, such as joint training, force provision, and global command and control.

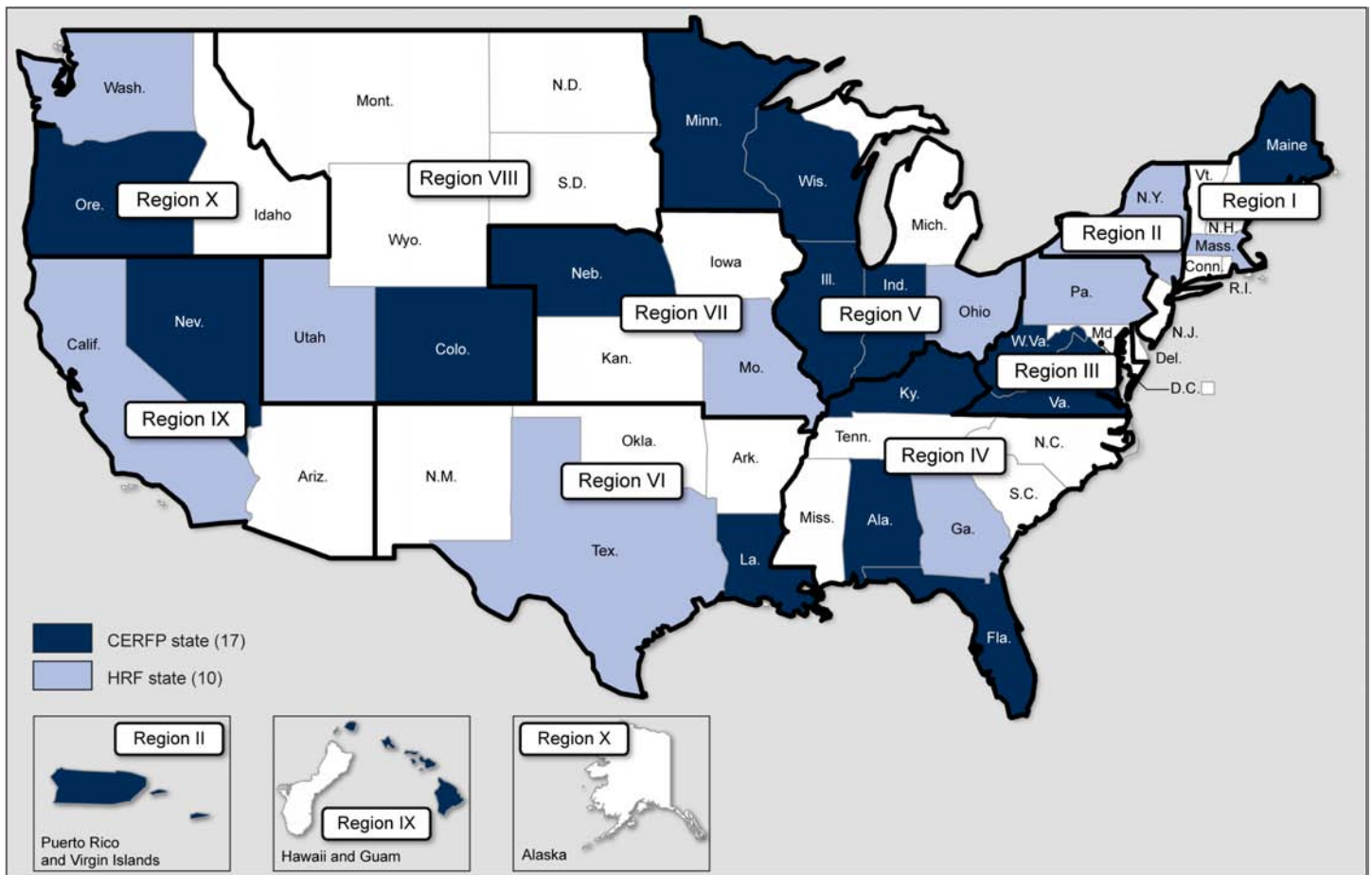
The 2010 Quadrennial Defense Review introduced several key changes to DOD's CBRNE response strategy to enhance the life-saving capabilities and flexibility of its forces and reduce response times. These changes include plans to restructure two of its three CBRNE response forces in order to establish 10 state-controlled Homeland Response Forces (HRF)—one in each of the 10 FEMA regions.¹⁵ The HRFs are to be comprised of elements from existing National Guard forces and are expected to be able to deploy within 6 to 12 hours of an incident. Eight of the HRFs will be hosted by single states, while the other two will be sourced from multiple states within those regions.

Each HRF will be composed of approximately 570 personnel including a brigade-sized command and control headquarters organization. In addition, HRFs will possess the same life-saving capabilities as a CERFP and will also have a security force element. Each HRF will be capable of providing command and control for up to five CSTs and three CERFPs and will be expected to focus on planning, training, and exercising within its FEMA region, with the goal of establishing links between the local, state, and federal authorities.

The first two HRFs, hosted by Ohio and Washington, are expected to be operational by the end of fiscal year 2011; the remaining eight—New York, Massachusetts, Pennsylvania, California, Texas, Missouri, Georgia and Utah—are expected to follow by September 2012. Each of the HRFs, except Utah's, will be converted from an existing CERFP. In order to maintain the National Guard's prescribed force structure of 17 CERFPs, new ones will be established in 9 states to replace the CERFPs converting to HRFs. Figure 4 shows the placement of existing CERFPs and the anticipated placement of future CERFPs and HRFs.

¹⁵ Prior to the 2010 Quadrennial Defense Review, DOD planned to establish three CCMRFs. Subsequently, DOD increased the capability of one of the CCMRFs and restructured the other two CCMRFs as smaller command and control CBRNE response organizations.

Figure 4: States That Will Host CERFPs and Homeland Response Forces by September 2012



Source: GAO analysis of NGB and DOD information.

CERFPs Face Personnel, Training, and Equipment Requirements Challenges, and Readiness Is Not Comprehensively Reported

The National Guard’s CERFPs face personnel, training, and equipment challenges that increase the risk that they are not fully prepared to effectively execute their domestic CBRNE consequence management mission. State Adjutants General and CERFP officials cite that CERFPs often have the authorized levels of personnel and equipment but that these levels don’t reflect actual needs. They also further cite personnel, training, and equipment deficiencies that may reduce the effectiveness of a potential CERFP response. In part, this can be attributed to NGB’s not systematically reevaluating personnel, training, and equipment requirements to determine if they are appropriate. CERFPs also have difficulty maintaining proficiency in many of the specialized tasks they could be called on to perform during a CBRNE incident, because they

train infrequently or not at all on key deployment tasks and with all CERFP elements and interagency response partners. NGB has developed new training goals but does not have a strategy to assure CERFP progress in achieving these goals. In addition, comprehensive CERFP readiness information is not available to potential DOD response partners, because such information is captured in an informal spreadsheet and not yet available in DOD's centralized readiness reporting system. This impedes the ability of all response partners to know how prepared CERFPs are to fit into a broader CBRNE consequence management response. NGB does not have a plan with timelines for completing the transition of reporting CERFP readiness data into DOD's readiness reporting system.

CERFPs Are Challenged in Maintaining Adequate Numbers of Personnel to Execute the CERFP Mission

The CERFPs are intended to provide state governors and incident commanders with life-saving capabilities that could relieve or augment first responders after an incident. NGB guidance states that CERFPs must be fully trained and prepared to deploy when notified of a CBRNE event. Each CERFP is expected to be ready at all times to deploy to a regional or national level response within 6 hours. The CERFPs are staffed primarily with traditional National Guard personnel, who are part-time. But NGB also provides some full-time staff to carry out the day-to-day administrative and preventive equipment maintenance activities of the CERFP. Each CERFP is currently authorized a total of 186 personnel; five of whom are designated as full-time.¹⁶ This full-time staffing level contrasts with other DOD CBRNE-related capabilities staffed with higher percentages of full-time personnel. For example, all 22 personnel assigned to each of the CSTs who respond to events to ascertain the type of chemical or biological attack that has occurred, are full-time.¹⁷ Also, the Marine Corps' Chemical Biological Incident Response Force,

¹⁶ On May 4, 2009, NGB issued a memorandum to the Operations Directorate of the Joint Force Headquarters of the 17 States that host CERFPs. The memo set out authorized levels of personnel and equipment for CERFPs for the purpose of readiness reporting. According to the memo, the authorized size of a CERFP—for purposes of personnel reporting—is 186 personnel, not including the Fatality Search and Recovery Team, the security element or other Joint Task Force personnel that may be required during an event.

¹⁷ Each state, the District of Columbia, and three territories have at least one Civil Support Team (57 total) to support civil authorities in the event of a domestic WMD event by identifying CBRNE agents and substances used as WMD, assessing current and projected consequences, and advising on response measures.

which served as the model for the CERFP, uses all full-time personnel. Both state Adjutants General and CERFP officials stated that five full-time personnel are not enough to meet the day-to-day requirements. For example, 10 of the 17 state Adjutants General we surveyed responded that their state's CERFPs did not have a sufficient number of full-time personnel to support their daily planning and operating requirements. Similarly, officials from 13 of the 17 CERFPs we interviewed also said that an insufficient number of full-time personnel challenged their ability to adequately perform tasks, such as training personnel, maintaining equipment, and coordinating with other response organizations. Additionally, CERFP officials stated that having a larger core of full-time personnel could better ensure preparedness for responding to potential CERFP deployments.¹⁸ According to the NGB officials we spoke with, the CERFPs have raised the need for additional full-time staff positions and stated that NGB plans to add five full-time personnel to each CERFP between fiscal years 2012 and 2013 for a total of ten full-time personnel, but no specific study had been performed to determine whether ten full-time personnel would be sufficient to perform the CERFP's daily planning and operating requirements.

State Adjutants General we surveyed reported that authorized levels of personnel for each aspect of the mission were generally available but would not meet the program requirements of being available and qualified all of the time. As shown in table 1, just over half of the 17 state Adjutants General reported that, as of October 2010, their CERFPs' authorized levels of personnel would not meet program requirements to be available to conduct selected aspects of their mission all of the time.

¹⁸ The CBRNE response mission has immediacy, but officials from one CERFP told us that part-time CERFP personnel cannot always respond within the 6-hour timeframe because they may be unavailable for reasons including being away from home on business or other reasons.

Table 1: Number of CERFPs with Authorized Levels of Personnel Available to Perform Mission Tasks All of the Time, as Reported by State Adjutants General

Authorized levels of personnel have been available and qualified to	All of the time	Less than all of the time
Perform command and control of CERFP operations	13	4
Perform intended mission	8	9
Perform hazardous materials operations	8	9
Perform search and rescue operations	8	9

Source: GAO Survey of CERFP State Adjutants General.

Note: These numbers are based on a total of 17 CERFPs.

NGB’s authorized levels of personnel for the CERFPs are considered insufficient by CERFP officials and state Adjutants General. Officials from 11 of the 17 CERFPs we interviewed stated that these levels were insufficient for at least one of the elements (medical, search and extraction, decontamination, command and control) of their CERFP. For example, several CERFP officials stated that the personnel authorization for the decontamination element should be doubled in order for decontamination personnel to be able to perform sustained operations, or because of the need to frequently cycle replacement personnel who suffer fatigue from operating in protective suits and respirators. During some field training exercises, we observed personnel suffering from heat-related injuries, thereby reducing the number of available personnel. Exercise evaluators present at one of the training exercises we observed stated that more typical summer temperatures would have further reduced the amount of time that personnel could spend in the protective suits, increasing the need for replacements. To address these insufficiencies, some states have been assigning additional personnel in order to have better assurance that their states have a sufficient number of personnel to perform the mission. State Adjutants General we surveyed reported that they use different approaches to ensure that they have a sufficient number of people to execute the CERFP mission. The following reflect some of the comments we received regarding how different states individually address personnel deficiencies:

- Assigns close to 280 personnel to ensure that the CERFP will have the 186 personnel authorized for the CERFP.
- Plans to assign the entire company of 160 to perform decontamination tasks, instead of the authorized 75 personnel for this element.

-
- Assigns an entire battalion headquarters staff to perform CERFP command and control functions, instead of the 16 personnel authorized.
 - Assigns 420 personnel in order to have 186 personnel mission-ready.

NGB officials stated that the CERFP was initially developed in 2003 as a prototype capability and was developed quickly to fill a gap in DOD's CBRNE response capabilities. Accordingly, CERFPs, including their size, were designed largely based on the composition of the Marine Corps' Chemical Biological Incident Response Force, which was the only DOD CBRNE response capability at that time. Initial personnel authorizations have been modified by field experience during the prototype period, but no comprehensive CERFP unit-level study has been conducted to determine if the number of assigned personnel could meet workload requirements, such as stated victim-throughput goals, subsequent to the CERFP's being approved as a formal DOD program in 2008. NGB officials stated that some of the discrepancy between the number of personnel used by individual CERFPs and the number of personnel authorized is caused by differences in assumptions about whether individual CERFPs will be operating continuously for 24 hours. NGB envisions that additional CERFPs from other states, as well as future Homeland Response Forces, could provide augmentation for larger scale incidents that could mitigate the number of personnel needed by individual CERFPs. However, unless these personnel challenges that have been frequently raised by CERFPs and the states Adjutant Generals are addressed in a comprehensive and systematic manner, there is reduced assurance that individual CERFPs have the proper number of personnel.

CERFPs Are Challenged to Maintain a Trained and Ready Response Force and Do Not Have a Training Strategy or a Mechanism to Track CERFP Participation

CERFPs face challenges in maintaining a trained and ready response force because there are (1) limited opportunities for all elements to train collectively and with other civilian and military response partners, (2) competing demands from other missions, and (3) limited training opportunities on key deployment tasks that CERFPs could be called on to perform during a CBRNE incident. NGB recently published new collective training goals that provide promise for focusing future training, but NGB does not have a programwide strategy for CERFPs to achieve these goals within the time and funding that CERFPs are provided or a mechanism to track whether CERFPs are receiving opportunities to conduct the necessary training.

To achieve mission proficiency, National Guard guidance requires the personnel of each CERFP element to participate in collective training exercises, among other kinds of training. One purpose cited is to bring all CERFP elements together to conduct the collective tasks in a realistic training environment. National Guard guidance and joint training guidance also require CERFPs to conduct at least two state or national level collective training exercises annually under realistic conditions, and to be externally evaluated periodically, between months 24 and 36 in the CERFP training cycle or earlier if the state determines it is necessary.¹⁹ Upon successful completion of an external evaluation, state Adjutants General validate that their CERFP is properly staffed, equipped, trained and ready to respond, and will submit a validation letter to the NGB. According to NGB officials, all 17 original CERFPs were evaluated as “trained” during their most recent external evaluation exercises, which were conducted between 2009 and 2011 and were validated by the state Adjutants General. NGB officials do not track whether CERFPs meet the annual collective training exercise goals found in guidance, but CERFP officials we interviewed stated that the collective training field exercises are conducted infrequently. As a result, CERFP officials stated that units lose proficiency as skills acquired during these exercises decline over time. For example, officials from six CERFPs stated that because of the time that had elapsed from their prior collective field training exercises, their CERFP needed several days of training before regaining proficiency. More specifically, one CERFP commander stated that because some critical skills are perishable, it is difficult to maintain proficiency between external evaluations. Similarly, another CERFP commander noted that maintaining skill proficiency with limited training opportunities is a challenge and that it takes his CERFP several days of field training to “knock the rust off” of skills necessary to perform their mission requirements. An official from another CERFP stated that the infrequency of training makes it feel as if they are starting from scratch each time they train collectively. Moreover, all elements that comprise the CERFP are not always present for all collective field exercises. For example, officials from 8 of the 17 CERFPs we interviewed told us that their CERFP had never trained with its Fatality, Search, and Recovery Team element, and nine of the CERFPs we interviewed told us that their medical elements

¹⁹ External evaluations are field training exercises in which CERFPs are assessed by external evaluators against collective tasks outlined in CERFP training guidance.

are often unable to participate in all collective field training exercises because funding or personnel are unavailable.

Regulations and training guidance require CERFPs to conduct at least two state or national level collective training exercises annually under realistic conditions, but we found that interagency participation in CERFP training events is similarly limited, creating few opportunities for CERFPs to integrate with other response organizations that may be present during a large-scale incident. For example, according to the results of our four surveys, most CERFPs have had limited opportunities to train with other key partners, such as federal DOD response organizations and state emergency management agencies. For additional information regarding interagency participation in CERFP training events, see appendix II. As a result, CERFPs have little assurance that they can operate effectively with other potential response partners. As we discuss later, such limited interaction between CERFPs and interagency partners also affects the establishment of viable command and control relationships.

Moreover, we found that NGB training guidance is vague regarding the extent to which CERFPs should participate with potential interagency response partners and that NGB has not articulated a strategy for ensuring that CERFPs conduct interagency training or developed a methodology to track the extent that CERFPs train with these partners. According to the 2008 CERFP Joint Training Plan, CERFPs were encouraged to include potential response partners in collective team training exercises and were required to participate in at least one regional exercise in fiscal year 2008 or 2009 in an interagency environment under the control of the CERFP's state National Guard headquarters.²⁰ NGB has not provided specific guidance for participation in interagency field exercises (including the frequency of that participation) beyond 2009.²¹

²⁰ NGB issued the CERFP Joint Training Plan in January 2008. This guidance was in place during the majority of our review. Collective training is focused on preparing teams and units, whereas individual training is focused on the proficiency of the single soldier.

²¹ NGB sponsors special focus events—which are designed to address specific training gaps. Vigilant Guard is an exercise program sponsored by U.S. Northern Command in conjunction with the NGB. The program provides states' National Guard an opportunity to improve cooperation and relationships with civilian, federal, and military partners in preparation for emergencies and catastrophic events.

CERFPs also face challenges in maintaining proficiency because the CBRNE mission is not the only mission that units are responsible for performing. The dual capability nature of the National Guard necessitates that units meet operational and training requirements for both the CERFP and the wartime mission. For example, officials from a majority of the CERFPs we interviewed stated that unit rotations are a challenge to maintaining proficiency as new personnel have to be trained. Officials from 13 of the 17 CERFPs we interviewed stated that they had had at least one element replaced by personnel from another unit because of unit rotations necessitated by, among other things, overseas deployments. One state Adjutant General commented that the current requirement to deploy within 6 hours after notification requires additional study because it is difficult to achieve in a part-time environment. This Adjutant General believed that the 6-hour requirement was based on the National Guard CST model, which provides 22 full-time personnel who are solely dedicated to the civil support mission. Moreover, preparing for both the CERFP and wartime mission while in a part-time status is also difficult. For example, 10 of the 17 state Adjutants General we surveyed reported most or all of their CERFP elements have had difficulty in managing competing requirements from other domestic or warfighting missions, and officials from 14 of the 17 CERFPs we interviewed stated that balancing such competing requirements is a challenge.

Maintaining a trained force is also challenging because CERFPs have not conducted key deployment exercises that could enhance their assurance that they could deploy rapidly throughout the country. National Guard guidance states that an incident taking place beyond a 500-mile radius of a CERFP's home station could warrant the use of aircraft rather than ground transportation to move necessary equipment and personnel.²² This guidance states that training CERFPs for air transport activities allows these forces to become familiar with the loading and unloading of equipment in the event that units must travel by air. However, 11 of the 17 State Adjutants General we surveyed stated that their CERFP had never practiced loading or transporting equipment and personnel by aircraft to either a real-world or simulated event. Consequently, if a CBRNE incident occurred more than 500 miles from the nearest CERFP's home station or if road travel became infeasible, then more than half of the 17 CERFPs

²² Army National Guard Regulation 500-4/Air National Guard Instruction 10-2504, *National Guard Chemical Biological, Radiological Nuclear and High Yield Explosive, Enhanced Response Force Package Management* (Oct. 16, 2009).

would not be adequately trained to rapidly deploy by air to an incident. Also, rapid response organizations conduct exercises to evaluate their ability to respond without prior notice to a simulated operational emergency, under conditions similar to those that may be encountered during an actual emergency. Officials from 13 of 17 CERFPs told us that their CERFP had not conducted a no-notice deployment exercise to test the ability to assemble and conduct deployment activities within time frames required for the mission. However, officials from 6 CERFPs told us that they have conducted telephone or other alert exercises to confirm the extent that their personnel can be located and estimate how long it may take to arrive at a designated area. A common theme from CERFP officials was that it would be impractical to conduct such exercises because it would strain relations between Guardsmen and their full-time employers as it would further increase the time that personnel may be away from their workplaces.

NGB recognizes the need to improve aspects of CERFP field training exercises. To improve training focus, it has recently issued new training guidance in March 2011 that establishes several new collective training goals that CERFPs should address during the fiscal year.²³ Specifically, fiscal year 2011 training goals include

- working to demonstrate interoperability with other CERFPs and other National Guard CBRNE organizations;
- exercising within local and State Incident Command Systems and with first responders;
- conducting air movement training to include load-planning, deployment, and redeployment operations;
- conducting at least two no-notice recall exercises;
- conducting joint training with active duty and other DOD CBRNE response organizations;
- expansion of CERFP liaison with local, state, and regional agencies; and
- increasing opportunities to exercise with and evaluate the Fatality, Search, and Recovery Team.

²³ National Guard Bureau, *CBRNE Enhanced Response Force Package, Training Year 2011, Yearly Training Guidance* (Mar. 3, 2011).

Moreover, NGB officials stated that they are developing plans to have CERFPs train in regional and national level exercises, including exercises with U.S. Northern Command's Defense CBRN Response Force.

These training goals provide promise for focusing future training, but they do not provide a programwide framework for how all CERFPs will achieve these goals within the time and funding that CERFPs are provided, particularly if all of these goals are to be met every fiscal year. CERFP officials have identified instances where training was not accomplished in the past because funding was unavailable or personnel were unavailable because of their part-time status. Without a strategy for accomplishing this training across the CERFP program, NGB has reduced assurance that all CERFPs will achieve and maintain proficiency and will be prepared to integrate effectively with local, regional, and federal response partners. Additionally, NGB's process for managing and tracking the CERFPs' inclusion in these exercises is decentralized, providing little assurance that all CERFPs have such opportunities. For example, NGB selects the CERFPs that participate in these events on a volunteer rather than a rotational basis; as a result, participation is partially driven by CERFP initiative and availability, which varies across the CERFP program. Further, NGB training officials told us that they do not comprehensively track CERFP participation in interagency exercises to determine how frequently each CERFP trains with interagency partners. Without specific and reliable data to track participation, NGB has little assurance that all CERFPs are getting access to the range of potential response partners that they may have to work with during a CBRNE incident.

CERFPs Generally Have Their Authorized Equipment, but Additional Equipment May Be Needed to Adequately Perform Mission

The NGB has deemed certain specialized equipment critical for the CERFPs' mission and has authorized the CERFPs to have specific quantities of this equipment. This specialized equipment, much of which is different from the equipment authorized for wartime missions, includes commercial-off-the-shelf items such as collapsed-structure listening devices, search cameras, specialized respiratory masks, extraction tool kits, and mass decontamination equipment. Most Adjutants General reported that their CERFPs had the authorized quantities of equipment all or most of the time. Table 2 shows the Adjutants General survey responses regarding the number of CERFPs that generally had their authorized quantities of equipment needed to perform four types of tasks as of October 2010.

Table 2: Number of CERFPs That Had Authorized Quantities of Equipment as of October 2010

CERFPs had the authorized levels of equipment needed to	All of the time	Most of the time	Some of the time
Conduct mass casualty decontamination	12	5	0
Extract victims from contaminated environments	10	7	0
Provide emergency medical triage services	11	6	0
Perform command and control	12	4	1

Source: GAO survey of State Adjutants General.

Note: Numbers are based on a total of 17 CERFPs.

However, despite reporting that CERFPs generally have the equipment they are authorized, CERFPs stated that they do not have some critical equipment specific to the CBNRE mission. Specifically, our surveys and interviews showed some CERFPs were concerned about the adequacy of their protection and transportation equipment. For example, some CERFP officials we interviewed stated that the authorized quantity of protective equipment (suits and respirators) provided to CERFPs and the level of protection it provides is inadequate for responding to a domestic CBRNE incident in some instances.²⁴ CERFP officials stated that the current protective suits worn by CERFP personnel are not well suited for domestic CBRNE incidents because they do not protect against the full range of potential toxic materials CERFP personnel may be exposed to. Another CERFP official stated that the respirators do not provide the appropriate level of protection. A CERFP working group has raised concerns to NGB about the adequacy of protection provided by the currently authorized protection equipment, but no solution has been identified. Officials from one CERFP expressed concern that the issue has not received high priority. To the extent that equipment shortfalls exist, CERFPs' effectiveness in responding to domestic incidents will be limited.

State Adjutants General and CERFP officials told us that because authorized quantities of equipment are not always adequate to

²⁴ Personal protective equipment shields a person from the chemical, physical, and thermal hazards that can be encountered at a hazardous materials incident. Personal protective equipment includes both personal protective clothing and respiratory protection. Adequate personal protective equipment should protect the respiratory system, skin, eyes, face, hands, feet, head, body, and hearing.

successfully operate in a domestic CBRNE environment, state National Guards have provided CERFPs with extra equipment, predominately to facilitate their transportation and communication. For example, 11 of the 17 state Adjutants General reported in our survey that their state's National Guard had provided their CERFPs with equipment beyond what is authorized so that the CERFP could better execute its mission. They commonly cited vehicles to transport CERFP personnel and communications equipment. Officials from a majority of CERFPs stated in interviews that their authorized vehicles are not sufficient to transport the entire CERFP to an incident site. To correct the transportation equipment deficiency, NGB has plans to provide a standardized solution to transporting CERFPs by providing buses and vans during fiscal year 2011 to provide ground transportation for CERFP personnel.

National Guard Has Not Established an Annual Requirement Review and Validation Process

National Guard guidance states that integrated working groups will be established to annually review and validate CERFP personnel, training, and equipment.²⁵ NGB has taken steps to establish and maintain various mechanisms to identify deficiencies in the CERFPs' personnel, training, and equipment capabilities, but these efforts have not yet led to a process that would comprehensively review program requirements. For example, various working groups and conferences are used as forums to discuss potential resource deficiencies, corrective actions, and other mitigation strategies. However, a formal process is not yet in place that could validate shortfalls and determine solutions. NGB drafted a CERFP working group charter in November 2009 that provides the basis for annually reviewing and validating program requirements raised by the working groups. But the charter has never been approved, and thus the formal process has not been established. NGB has addressed some deficiencies such as transportation equipment and is evaluating communication equipment deficiencies, but without a formal review process, it is unable to comprehensively assess program requirements to address potential deficiencies in personnel, training and equipment.

²⁵ Army National Guard Regulation 500-4/Air National Guard Instruction 10-2504 (Oct. 16, 2009).

CERFP Readiness Data Is Not Transparent or Complete and Cannot Be Efficiently Disseminated to Other DOD Response Partners

NGB has not yet implemented a readiness reporting system that can comprehensively report readiness data and share it with DOD stakeholders and the data being collected is not complete. NGB is currently using a stand-alone spread-sheet-based system as the primary method for measuring the CERFPs' readiness, but it is not integrated with other readiness systems that are used by DOD units, and there is no plan with timelines for completing the transition to integrated CERFP readiness with these other DOD readiness systems. CERFP readiness information is also found in other DOD readiness systems, but it is not standardized, comprehensive, or consistently reported. As such, NGB cannot facilitate efficient dissemination of complete and accurate readiness data to potential response partners in order to strengthen coordination on preparedness for CBRNE consequence management. Moreover, to the extent that program requirements have not been regularly reviewed, as previously mentioned, CERFP readiness will be limited by being assessed against potentially unrealistic authorization levels for the appropriate number and type of personnel, equipment, and training needed to carry out the CERFP mission.

In 2007, we reported that DOD recognized the need to have greater visibility over the National Guard's capabilities for domestic missions and that DOD had begun taking steps to assess the Guard's preparedness for those missions.²⁶ To achieve this improved visibility, DOD planned to include in its Defense Readiness Reporting System (DRRS) information on the National Guard's readiness to perform both its warfighting missions and domestic missions.²⁷ DRRS draws from selected DOD computer information systems and databases and is intended to capture DOD readiness data from multiple sources into a single integrated,

²⁶ GAO, *Reserve Forces: Actions Needed to Identify National Guard Domestic Equipment Requirements and Readiness*, [GAO-07-60](#) (Washington, D.C.: Jan 26, 2007).

²⁷ In 1999, Congress directed the establishment of the Defense Readiness Reporting System, and required that the system measure in an objective, accurate and timely manner, capability of the armed forces to carry out (1) the National Security Strategy prescribed by the President, (2) the defense planning guidance provided by the Secretary of Defense, and (3) the National Military Strategy prescribed by the Chairman of the Joint Chiefs of Staff. DRRS provides Combatant Commanders, Joint Task Force Commanders, Service Component Commanders, Combat Support Agency Directors, and the National Guard Bureau with relevant readiness data, in the form of capability assessments supported by resource status, based upon whether they can perform their assigned missions and associated mission essential tasks in a joint, interagency, and multinational operational environment with the forces provided.

authoritative source and provide these data to DOD decision makers and other stakeholders.

National Guard guidance requires NGB to establish and maintain a standardized reporting and information analysis system,²⁸ and NGB established a spreadsheet-based system in which CERFPs report on both the readiness of the separate elements that comprise the CERFP, in terms of various indicators of their CERFP's operational status, including personnel, equipment, and training levels. CERFPs also report on an overall assessment of the entire CERFP to perform mission tasks. This information is reported through secure networks through the state National Guard, which in turn is submitted to NGB. Although NGB uses this information to assess CERFP readiness, the spreadsheets are incompatible with other readiness reporting systems that feed into DRRS, which is intended to allow a more comprehensive, DOD-wide picture of readiness to execute critical missions of all kinds. NGB officials told us that they have been sharing CERFP readiness information with other DOD response partners, such as U.S. Northern Command, through informal methods like briefing charts, but only sporadically.

NGB's goal is to eliminate the spreadsheet-based readiness system and instead incorporate CERFP readiness information directly into DRRS, which would improve the consistency and access to readiness information to all DOD commands with CBRNE response responsibilities. As of September 2011, NGB had not achieved this goal and did not have a plan with timelines for completing the steps needed to complete the transition. At that time, some individual "parent" units were reporting their wartime readiness in DRRS as well as information on the elements that those units supply to CERFPs.²⁹ However, our analysis shows that the readiness information about CERFPs that was included in DRRS was inconsistently reported by different parent units or was incomplete compared to information found in the CERFP spreadsheet-based readiness system. For example, information on the readiness of any entire CERFP is not available in DRRS. NGB officials said this is because

²⁸ Army National Guard Regulation 500-4/Air National Guard Instruction 10-2504 (Oct. 16, 2009).

²⁹ CERFPs draw personnel to comprise the CBRNE elements from various "parent" National Guard units that provide different response capabilities. The parent unit is the usual reporting entity in the Defense Readiness Reporting System.

the CERFP is not a separate reporting entity in established readiness systems. Rather, CERFP elements' readiness is reported as a component of the parent units' reporting of their readiness. We found that 10 parent units, which supply personnel and equipment to CERFPs, reported on some aspect of CERFP readiness in addition to their wartime readiness in the Army DRRS. These 10 units were associated with 4 of the 17 CERFPs (each CERFP may be supplied by up to 5 units). As we have previously stated, the CERFP mission is considered an additional mission to the units' wartime mission. As such, most of the readiness information for those units in DRRS was related to the unit's wartime mission or core mission. The readiness information in DRRS for CERFPs was less detailed than information provided in the NGB CERFP spreadsheet-based readiness reporting system, which includes details on personnel, equipment, and training status. As a result, comprehensive and standardized information on CERFP readiness is not available in DRRS, where it could be shared with all DOD organizations that have access to the system.

NGB officials confirmed that DRRS contained incomplete CERFP readiness data and that it does not currently have a mechanism to display the readiness of the entire CERFP in one place even if all parent units were accurately and comprehensively reporting on CERFP readiness. NGB officials stated that they continue to work toward the goal of eliminating the spreadsheet-based system and instead incorporating all CERFP readiness information directly into DRRS. This step would make CERFP readiness status accessible to their DOD response partners. According to these officials, CERFP readiness information is not yet visible in DRRS and will not be until NGB has completed the implementation of its planned reporting mechanism that could distinguish CERFP readiness information within DOD's centralized readiness reporting system. NGB's efforts to complete the development of this mechanism have been delayed several times beyond the original October 1, 2010, planned completion date. As of September 2011, NGB had not developed new timelines for completing its efforts. According to NGB officials, time frame extensions have been granted to implement new reporting guidance and to establish two new DRRS Centers of Excellence.³⁰ NGB also has plans to increase state National Guards'

³⁰ NGB officials stated that there are three total DRRS Centers of Excellence, and that these centers were established to provide guidance to all 54 states and territories as they transition to a DRRS reporting standard.

access to DRRS by providing additional secure workstations to state Guard personnel that would link to DRRS—providing contractor support to states to assist with DRRS and increasing the number of state National Guard personnel who are trained to use the DRRS system. But NGB has not developed a plan for completing these steps. In addition, NGB officials stated that funding delays have directly affected their ability to add the personnel who they believe are necessary to reach full CERFP reporting visibility in DRRS. However, they told us that they are making progress in other areas that will contribute to including CERFP readiness information in DRRS, for example:

- In January 2011, DOD issued a new Directive requiring State National Guard Joint Force Headquarters to report readiness capability in DRRS,³¹ and NGB officials stated that it plans to publish an order that will provide CERFPs with compliance requirements for reporting readiness information. As of September 2011, NGB officials stated that a timetable has not been established to publish the order.
- NGB is refining mission essential tasks by CERFP units' core missions and operations, and it plans to coordinate with all 54 states and territories as well as the Joint Staff Headquarters to develop a joint CERFP mission-essential task list.

Absent a mechanism to disseminate complete CERFP readiness information within DOD's readiness reporting system, potential DOD response partners and stakeholders will not be informed of CERFPs' capacity to perform their mission. Without more consistent, comprehensive and accessible reporting of CERFP readiness, the ability of all response partners to know how prepared CERFPs are to fit into a broader CBRNE consequence management response is impeded. Furthermore, without this kind of information, NGB cannot effectively prioritize funding and mitigate resource deficiencies that could jeopardize the CERFPs' preparedness levels.

³¹ Department of Defense, Directive 5105.83, *National Guard Joint Force Headquarters-State (NG JFHQs-State)* (Jan. 5, 2011).

Opportunities Exist to Enhance Coordination with Other Response Organizations

CERFPs achieved varying levels of success in coordinating with some of their potential response partners because of challenges, including (1) insufficient guidance for how CERFPs should conduct coordination activities, (2) limited awareness of guidance, and (3) limited time for conducting coordination activities. NGB is taking steps to formally evaluate the CERFPs' performance of pre-incident coordination activities, but NGB's evaluation tool does not have coordination standards against which CERFP performance can be measured. Additionally, NGB has identified having interstate agreements between states with and without CERFPs, as well as advanced planning, as key to enhancing regional preparedness. Such agreements, however, generally do not exist, and our review showed that CERFPs are generally not included in state and local response plans.

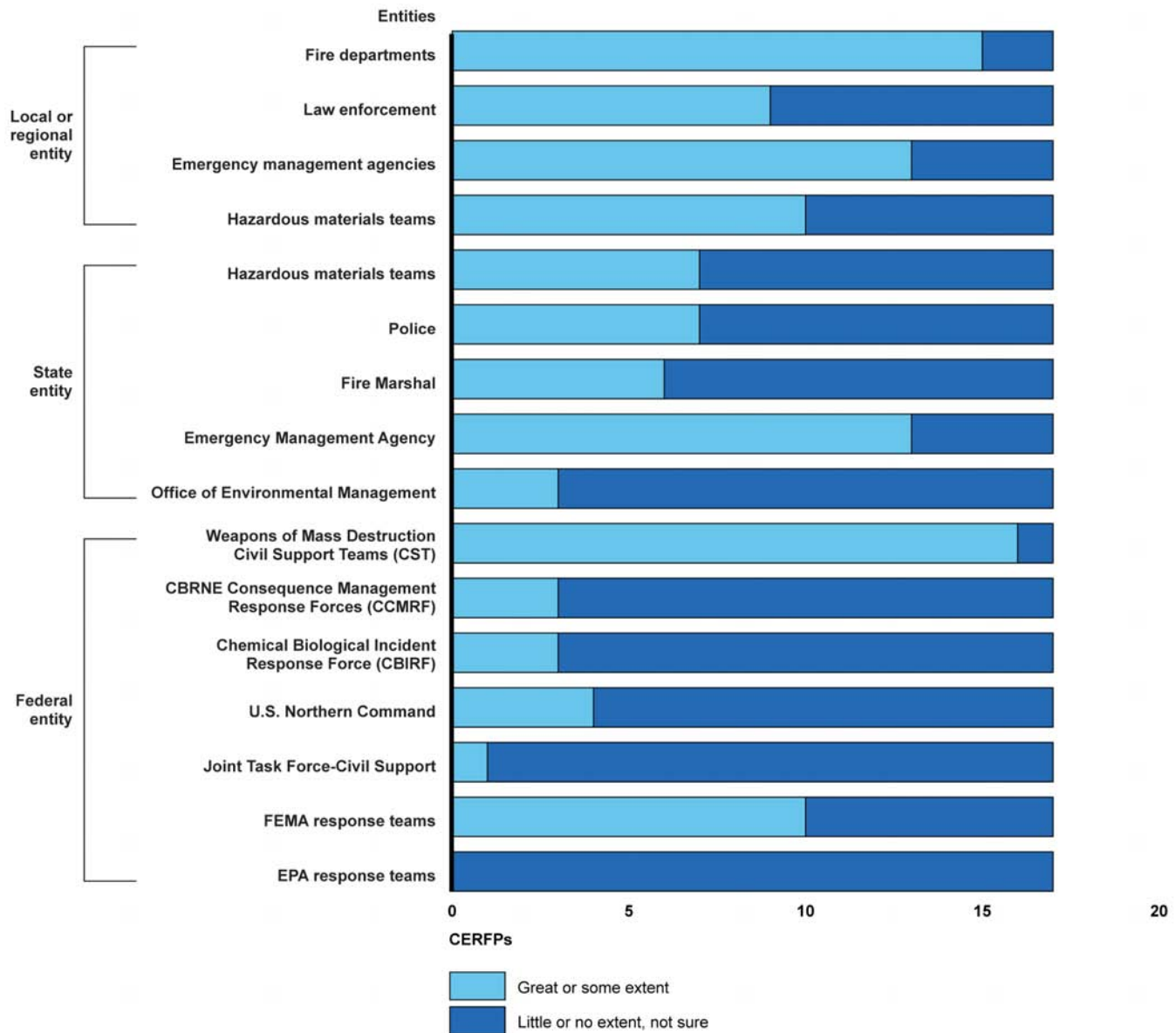
CERFPs Achieved Varying Levels of Success in Coordinating with Some of Their Potential Response Partners

CERFPs coordinate with some of their potential response partners through various formal and informal activities, but our review found that these activities have achieved varying levels of success in terms of educating potential response partners about CERFP capabilities. National Guard guidance directs CERFPs to participate in local, state, and federal emergency response planning meetings and to ensure that CERFP capabilities are understood and integrated appropriately. According to the CERFP concept of operations, establishing relationships with these other response organizations is vital and can be accomplished through response planning meetings as well as briefings, fact sheets, and other activities. The concept of operations also notes that CERFPs can enhance coordinated operations by ensuring other response organizations are aware of their capabilities and the processes for requesting support. Most of the CERFP officials we interviewed stated that they coordinate with some potential response partners through such activities, as well as through other mediums, such as conferences.

CERFPs make efforts to coordinate with potential response partners, but we found these efforts vary in frequency and reach, in part because there are numerous potential response partners within the CERFPs' host states, in the related FEMA regions, and at the national level. For example, officials from 10 of the 17 CERFPs stated that they are unable to coordinate frequently with most other response organizations. In addition, about half of the state emergency managers we surveyed responded that there was little to no coordination with the CERFPs hosted in their states. The Adjutants General we surveyed from states that host CERFPs reported a higher opinion of coordination between their states' CERFPs and emergency management offices. Our interviews and

surveys also indicate that the extent to which CERFPs interact with local, state, and federal response organizations differs, and that coordination with federal organizations is particularly limited. For example, officials from most of the CERFPs we interviewed said that they interact with the CSTs but have little to no interaction with other federal response organizations, such as U.S. Northern Command. These views were also held by the 17 Adjutants General in CERFP host states whom we surveyed and who generally reported that with the exception of the CSTs, their states' CERFPs have limited interaction with potential federal response partners. Figure 5 shows the response of Adjutants General to our survey, capturing their perspectives regarding the extent to which CERFPs interact with various local, state, and federal response organizations. The extent of views on CERFP interaction with the listed response organizations varies. Although such variability is reasonable in some cases, the results also capture instances in which some of the CERFPs have little to no interaction with key response organizations at the local, state, and federal levels.

Figure 5: Adjutants General Responses on CERFP Interaction with Local, State, Regional, and Federal Response Organizations



Source: GAO Survey of CERFP State Adjutants General on state CBRNE Response Capabilities.

Our surveys and interviews show that the CERFPs' coordination efforts have achieved varying levels of success in educating response partners about CERFP capabilities. For example, about half of the CERFPs we interviewed said that many potential response partners—such as first

responders—have little knowledge of the CERFP’s capabilities. In particular, officials from one CERFP told us that despite coordination efforts, civilians are generally unfamiliar with CERFP capabilities, that integration of capabilities within the region is poor, and that the military lacks understanding of civilian and military force integration. As an example, they cited a recent exercise in which the civilian organizations with which they were training thought they were there to provide site security, whereas CERFPs are designed to augment first responders with life-saving CBRNE capabilities. Officials from another CERFP noted that the CERFP concept may be difficult for others to understand until they have had an opportunity to see the team operate, such as during a training event. Four of the 13 state-level emergency managers from states that host CERFPs that responded to our surveys also said that they had a limited understanding of the roles and capabilities of their states’ CERFPs. For example, one emergency manager contrasted his office’s levels of familiarity with his state’s CERFP and its CST, noting that his office coordinates frequently with his state’s CST, but that he was unfamiliar with CERFPs. Another emergency manager from a state with a CERFP similarly noted that CSTs are a constant presence in his state, but that CERFPs and other DOD assets are less well-known.

Insufficient Coordination Guidance, Limited Awareness of Guidance, and Other Challenges Inhibit Coordination Efforts

CERFPs face potential obstacles to conducting successful coordination with other response organizations, including insufficient guidance for conducting pre-incident coordination activities, limited CERFP awareness of guidance, and limited time for conducting coordination activities. Nearly half of the CERFPs we interviewed and Adjutants General we surveyed believed that existing DOD and NGB interagency coordination guidance—including CERFP-specific guidance such as National Guard Regulation 500-4/Air National Guard Instruction 10-2504 and the CERFP concept of operations—was insufficient, or they were unsure whether the guidance was sufficient to facilitate the development and maintenance of cooperative relationships between CERFPs and relevant federal, state, and local organizations. Many of the comments that we received from our interviews and surveys reflected the theme that guidance had limited usefulness in informing coordination efforts, for example:

- Officials from 5 of the 17 CERFPs told us that their coordination activities are driven more by their own initiative than by guidance, suggesting that the utility of existing CERFP coordination guidance is limited.
- One host state Adjutant General we surveyed responded that guidance indicates the most likely relationships for various types of

emergencies, but that it does not prescribe the nature and frequency of coordination efforts, and that state and regional planning efforts provide more concrete guidance for CERFP coordination.

- Officials from one CERFP we interviewed told us that the guidance does not detail when and how to seek out interagency partners.
- Officials from another CERFP told us that guidance helped guide interactions within the state, but not with other states.

We also found that the CERFP guidance addressing coordination is not specific on where coordination efforts should be focused—such as on key state or metropolitan area response organizations. NGB officials told us that CERFPs should coordinate with major response organizations within their areas or responsibility, including metropolitan organizations, state agencies tasked with major disaster response, federal installations, and other DOD response elements. However, while CERFP coordination guidance stresses the need to establish relationships with local, state, and federal response organizations, such as state emergency management agencies and first responders, it does not include the level of detail noted by NGB officials, and in particular, it does not (1) delineate the desired frequency of coordination efforts, (2) define the CERFP area of responsibility for coordination, (3) specify where CERFPs should focus their efforts within that area of responsibility, or (4) fully identify the key types of organizations that CERFPs should target—particularly at the state and federal levels, and across state lines. Without more specific guidance, full-time CERFP staff may be unable to optimize their limited time for coordination activities.

We also found that awareness of coordination guidance within the CERFPs is limited. For example, officials from 7 of the 17 teams we interviewed were unaware that CERFP-specific coordination guidance existed. Officials from one such CERFP told us that they believe coordination to be the sole responsibility of their state National Guard. Similarly, officials from another CERFP told us that they coordinate with local organizations, but that coordinating with state and federal organizations was the responsibility of their state National Guard. Ultimately, deficiencies in the clarity of existing CERFP coordination guidance, coupled with poor awareness of guidance within the CERFPs, hamper existing coordination efforts and fail to foster a consistent approach to coordination that is conducive to achieving the intended outcomes of these activities. By clarifying CERFP coordination responsibilities in existing guidance and increasing awareness of such guidance within the CERFPs, NGB could better ensure the ability of

CERFPs to effectively target their coordination efforts and achieve desired outcomes.

CERFPs face an array of other challenges in coordinating with potential response partners. Chief among these is limited time to conduct coordination activities. Officials from 10 of the 17 CERFPs we interviewed cited this as a challenge to establishing and maintaining cooperative relationships with relevant federal, state, and local organizations. Moreover, officials from one CERFP we interviewed told us that because they had a limited number of full-time staff, they simply did not have the time to establish and maintain such relationships. Further, 12 of the 17 Adjutants General we surveyed from states with CERFPs reported challenges to coordination and communication between CERFPs and potential response partners, most commonly citing insufficient personnel and limited time.

The CERFPs we interviewed and Adjutants General and emergency managers we surveyed also cited several other challenges to establishing and maintaining relationships with potential response partners, such as the frequent turnover of personnel and cultural differences between civilian and military response organizations. For example, one emergency manager from a state with a CERFP reported that personnel turnover in both the National Guard and state agencies can hamper coordination. Similarly, officials from one CERFP told us that turnover in one of their CERFP's full-time positions had disrupted the continuity of coordination efforts. As an example of cultural differences, officials from two CERFPs told us that the military does not know how to communicate effectively with civilian responders. Similarly, an emergency manager we surveyed from a state with a CERFP reported that differences in civilian and military methods of communication and terminology are an impediment to successful coordination.

As previously mentioned, the NGB officials we spoke with said that CERFPs face challenges because of the current allotment of full-time CERFP staff and stated that they plan to provide each CERFP with five additional full-time positions by the end of fiscal year 2013. If implemented, NGB's plans to increase full-time staff for the CERFPs could help to alleviate the existing resource constraints. However, it is unclear to what extent such an increase will improve coordination without accompanying changes to guidance and because a requirements evaluation had not been performed to determine the appropriate size of the increase, according to NGB officials.

NGB's Tool for Evaluating the CERFPs' Coordination Efforts Is Limited by Current Guidance

NGB is taking steps to evaluate the effectiveness of some CERFP-led coordination efforts as part of its overall assessment of the CERFPs' compliance with program guidance. However, NGB's evaluation tool has not been fully implemented. Moreover, because existing CERFP coordination guidance—which forms the basis of the coordination segment of NGB's evaluation tool—does not provide standards against which CERFP coordination efforts can be measured, NGB's evaluation tool will likely supply program officials with limited data regarding the extent and success of coordination activities.

We have previously reported that federal agencies can enhance and sustain their collaborative efforts in part by developing mechanisms to monitor their results.³² We further reported that reporting on these activities can provide program officials with the data necessary to improve coordination policy and practice.³³ NGB guidance recognizes that the standardization and continual improvement of activities are key to ensuring consistency and interoperability among CERFPs. Accordingly, NGB is implementing a standardization and evaluation program to assess the CERFPs' performance of a wide array of required activities—including those pertaining to pre-incident coordination—and to provide NGB management with detailed information for use in program management decisions.³⁴ For example, the program assesses whether CERFPs have coordinated with local, state, and federal military response organizations to ensure they understand the CERFP mission and capabilities, and whether CERFPs are involved in local, state, and federal regional response planning meetings. However, this program is still in the beta test phase, with full implementation not scheduled until July 2012. Moreover, because coordination guidance is imprecise with regard to the frequency and targeting of coordination activities, as previously mentioned, the

³² GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005).

³³ GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005).

³⁴ When fully implemented, the Standardization, Evaluation, and Assistance Team program will conduct periodic field evaluations of the 17 CERFPs in order to assure Congress and DOD of program oversight; assess the degree of compliance with law, policy and doctrine and audit the disposition of allocated resources; assist states with the CERFP mission to develop programs to establish and maintain capabilities and compliance; and provide NGB with detailed information for use in CERFP management decisions.

evaluation tool is without established standards against which CERFP performance can be measured. For example, NGB officials told us that there are no published criteria for evaluators to measure the CERFPs' performance of pre-incident coordination activities and that evaluation is at this time subjective. We were similarly told by an evaluation program representative that there is currently "no degree of compliance" in evaluations in the sense that no distinction is made between minimal and extensive coordination efforts. NGB officials expect this to change as the CERFPs and the evaluation program mature. These same officials also noted, however, that as part of the evaluation, evaluators will need to assess the CERFP's interaction with major response organizations within the CERFP's area of responsibility,³⁵ including metropolitan area organizations, state agencies tasked with major disaster response, federal installations, and other DOD response elements. Yet because such information is not formalized by guidance, the CERFPs' approach to pre-incident coordination will likely vary, and NGB is without specific criteria that could provide a uniform approach to evaluating CERFP coordination efforts—thus reducing NGB's assurance that its evaluation results can provide program officials with data sufficient to shape coordination policy and practice.

Additional State-to-State Compacts Could Enhance Regional CBRNE Coordination through Planning

CERFPs were designed to be regional assets, but we found that states that host CERFPs generally do not have agreements specific to their interstate deployment and that CERFPs are generally not included in state and local response plans. The EMAC establishes a structure for member states to request and deploy assistance, reimburse states that provide assistance, and confer liability and workers' compensation protections.³⁶ As the most widely adopted state-to-state mutual aid agreement, EMAC constitutes an important mechanism for interstate resource sharing, and states have increasingly relied on EMAC during disasters as a means of accessing resources, such as National Guard assets, from other states.

³⁵ According to NGB officials, the CERFP area of responsibility for pre-incident coordination includes organizations within the CERFP's FEMA region, as well as national-level organizations.

³⁶ GAO, *Emergency Management Assistance Compact: Enhancing EMAC's Collaborative and Administrative Capacity Should Improve National Disaster Response*, [GAO-07-854](#) (Washington, D.C.: June 29, 2007).

National Guard guidance recognizes the value of EMAC, but notes that EMAC is generally for the use of the National Guard personnel in a State Active Duty Status, not a Title 32 status.³⁷ The guidance also notes that states may develop other state-to-state compacts to facilitate National Guard CERFP deployments between states for response outside of EMAC agreements. Additionally, the CERFP concept of operations encourages states to develop state-to-state compacts and memorandums of agreement, outside of the EMAC, to enhance preparedness, and facilitate a more effective response. NGB stated that other agreements may be useful in enabling CERFPs to respond to non-emergency events in other states and in allowing CERFPs to deploy in advance of preplanned events, such as the Super Bowl or another major event that CERFPs have supported in the past. The *National Response Framework* identifies planning as a cornerstone of preparedness, providing a common blueprint for activity in the event of an emergency. For incidents that may occur without notice—such as those involving CBRNE materials—advanced planning can be of increased importance. As it relates to interstate response operations involving CERFPs, planning can establish response coordination and operating procedures and help ensure that CERFP capabilities are understood and integrated appropriately—thus improving the timeliness of CERFP deployments and the efficacy of interstate response operations.

Our surveys of state Adjutants General and state-level emergency managers indicate that few interstate agreements exist between states with and without CERFPs and that CERFP roles and responsibilities are generally not integrated with state and local response plans. For example, only 1 of 17 Adjutants General and 2 of 13 emergency manager survey respondents from states with CERFPs stated that their National Guard or states were party to an agreement outside of EMAC that would facilitate the interstate deployment of their states' CERFPs. Similarly, only 1 of 10 Adjutants General and 1 of 7 emergency manager survey respondents from states without CERFPs reported that their National Guard or states were party to an agreement outside of EMAC that would facilitate their states' use of another state's CERFP. Those that indicated they were party to such an agreement generally reported that, although the agreement was not specific to CERFPs, it could facilitate their interstate

³⁷ Army National Guard Regulation 500-4/Air National Guard Instruction 10-2504 (Oct. 16, 2009).

deployment. Several other Adjutants General we surveyed and state National Guard representatives we contacted stated that they believed EMAC to be sufficient to facilitate interstate deployments and were unsure why other agreements might be needed, indicating that opportunities exist for NGB to inform relevant stakeholders as to how these agreements could facilitate more effective responses.

Consistent with CERFP guidance, several of the after-action reports we reviewed from National Guard exercises highlighted the potential utility of such agreements. For example, reports from the Vigilant Guard exercises identified interstate agreements as a vehicle to specify how states receiving support from out-of-state CERFPs would use those CERFPs.³⁸ Another Vigilant Guard report recommended that, because resources obtained through EMAC may arrive slowly in a terrorist-related scenario in which multiple states are threatened, states should explore establishing additional agreements whereby regional resources might be more effectively pooled or shared across regional boundaries. As previously stated, NGB guidance recognizes the benefits of agreements outside of EMAC, and NGB is well-positioned to facilitate National Guard support among states, but NGB officials told us that they have not taken a role in the development of such agreements between states.

Regarding planning, the Adjutants General and state-level emergency managers we surveyed generally reported that broader National Guard roles, responsibilities, or capabilities are included in their states' emergency response plans. The overwhelming majority of CERFPs we spoke with also said that they participate in joint response planning meetings with federal, state, and local response organizations at least to some extent. However, only 3 of 13 emergency managers from states with CERFPs reported in our survey that CERFP roles, responsibilities, or capabilities were specifically outlined in their state's CBRNE response plan, emergency response plan, or incident annexes. Moreover, the overwhelming majority of Adjutants General and emergency managers we surveyed from CERFP states, and officials from 14 of the 17 CERFPs we interviewed, were unaware of their CERFP's inclusion in local emergency response plans within their state.

³⁸ Vigilant Guard is an exercise program sponsored by the U. S. Northern Command in conjunction with NGB. The program provides state National Guards an opportunity to improve cooperation and relationships with civilian, federal, and military partners in preparation for emergencies and catastrophic events.

NGB officials told us that the integration of civilian and military plans is a major challenge and that they are in the process of developing initiatives to foster this type of collaboration. For example, officials stated that they expect to leverage the planned HRFs as regional planning mechanisms to coordinate with FEMA regional offices and state emergency management agencies to ensure that their plans reflect military capabilities. According to the draft HRF concept of operations, between three and eight planners will be provided to each HRF to develop and synchronize CBRNE plans within each FEMA region—although their specific activities and responsibilities have not yet been formalized. Another option cited by NGB officials is to place National Guard personnel in each FEMA regional office to allow for ongoing integrated planning. These efforts, if implemented, could enhance coordination and preparedness, but it remains unclear how they would affect interstate CERFP deployments. Specific deployment agreements between states that host CERFPs and those that may receive CERFPs could improve regional CERFP support and response planning—specifying, for example, command and control relationships for interstate operations—and thereby substantially enhance regional preparedness for CBRNE events.

A Command and Control Framework Is in Place, but Several Factors May Inhibit CERFPs' Operational Effectiveness

NGB has a general framework in place for the operational command and control of CERFPs, outlining how teams will integrate with civilian and military command structures and operate in support of civil authorities when under state control or when federalized.³⁹ However, our review showed that command and control of consequence management operations involving the CERFPs may be limited because (1) CERFPs' capabilities for communicating with other response organizations are inadequate; (2) there are no agreements between CERFPs and their out-of-state Fatality, Search, and Recovery Teams; and (3) opportunities to practice and evaluate potential command and control arrangements in a realistic response environment are infrequent. Moreover, NGB is

³⁹ DOD defines command and control as the exercise of authority and direction by a properly designated commander over assigned and attached forces in the accomplishment of the mission. Command and control functions are performed through an arrangement of personnel, equipment, communications, facilities, and procedures employed by a commander in planning, directing, coordinating, and controlling forces and operations in the accomplishment of the mission. See Joint Chiefs of Staff, Joint Pub. 1-02, *Department of Defense Dictionary of Military and Associated Terms* (Nov. 8, 2010; as amended through Aug. 15, 2011), p. 61.

establishing 10 HRFs, which—as currently planned—will affect the existing command and control framework for the CERFPs by altering their communications and relationships with other response organizations.

NGB Has Established a Command and Control Framework for CERFP Operations

National Guard guidance and the CERFP concept of operations establish a general framework for the operational command and control of CERFPs, outlining how teams are to integrate with civilian and military command structures and operate in support of civil authorities when under state control and when federalized.⁴⁰ For example, according to the CERFP concept of operations, the CERFP is assigned to the state and operationally committed to support a civilian incident commander through the military chain of command. NGB's framework is predicated on national guidance for domestic incident response delineated by the *National Response Framework* and *National Incident Management System*, as well as military civil support and CBRNE consequence management doctrine.⁴¹ In accordance with national response protocols, CERFP and other National Guard or federal military response operations are conducted in support of civil authorities in a three-tiered approach.⁴² During operations, the chain of command that CERFPs operate under corresponds to the CERFP's duty status and is generally determined by the size and scope of an incident. CERFPs may operate in state active duty status, Title 32 status, or Title 10 federal duty status. The state Governor and Adjutant General provide command and control for state National Guard forces, such as the CERFP, operating in state active duty status or operating under the authorities of Title 32 of the U.S. Code. The President provides command and control of National Guard forces

⁴⁰ Army National Guard Regulation 500-4/Air National Guard Instruction 10-2504 (Oct. 16, 2009).

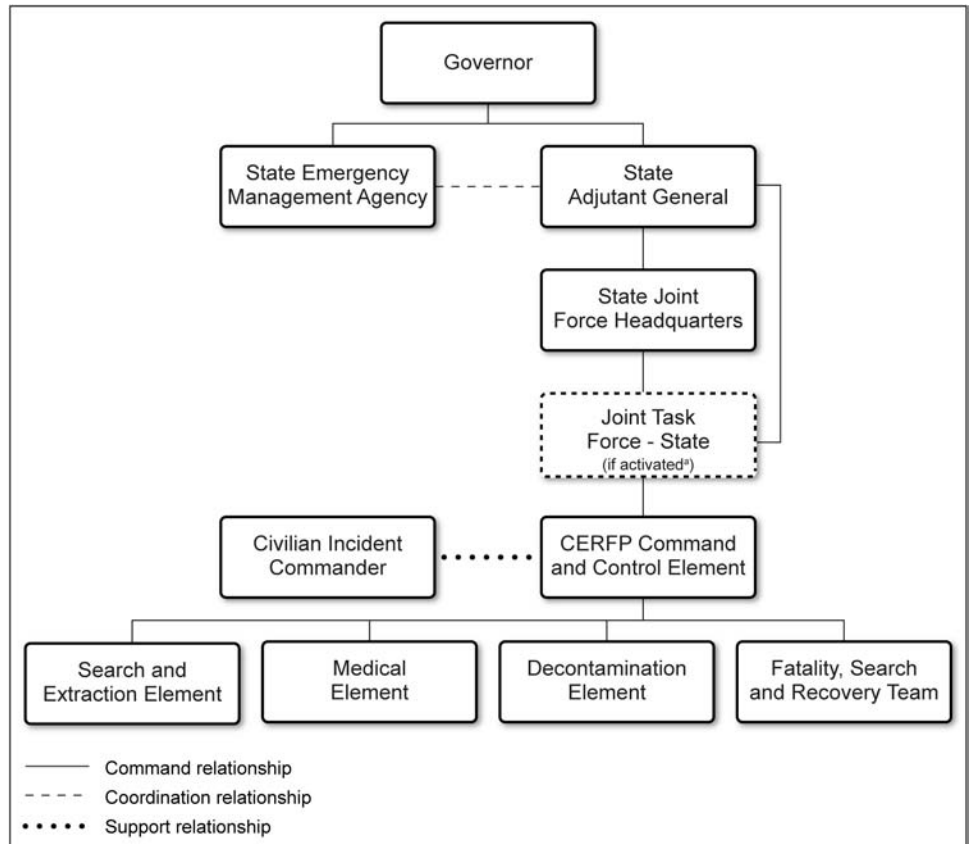
⁴¹ The *National Response Framework* and *National Incident Management System* comprise the national framework for domestic incident response, providing the structure and mechanisms for national level policy of incident response and a template for the management of incidents. See also Joint Chiefs of Staff, Joint Pub. 3-28, *Civil Support* (Sept. 14, 2007) and Joint Pub. 3-41, *Chemical, Biological, Radiological, Nuclear, and High-Yield Explosives Consequence Management* (Oct. 2, 2006).

⁴² Local fire and rescue, law enforcement, and emergency medical personnel constitute the first tier. If the extent of an event exceeds the ability of the first tier to manage the consequences of the situation, the state-level civil and military forces may be activated and deployed as the second tier. If the governor determines that the forces and resources available in the state require additional support, then the governor may request assistance from the President of the United States, constituting the third tier.

operating under Title 10 of the U.S. Code. While operating in Title 10 status during large-scale incidents, CERFPs will operate under the command and control of the designated joint military response headquarters. In most cases, DOD's federal response within the U.S. would be under U.S. Northern Command.

According to the National Guard Bureau, CERFPs would normally operate as an element of a state-level response under a state National Guard command and control structure in either state active duty or Title 32 status. Each state National Guard has established a standing Joint Force Headquarters under the Adjutant General—referred to as Joint Force Headquarters-State. The Joint Force Headquarters-State controls National Guard forces within the state's borders, either directly or—in large scale incident responses—through a Joint Task Force-State. When established, the Joint Task Force-State provides day-to-day command, control, coordination, and logistical support to deployed National Guard forces within the state's borders. At the CERFP level, operations are commanded and controlled by the CERFP Command and Control element. Among other things, the CERFP Command and Control element employs the appropriate CERFP capabilities to accomplish the incident mitigation objectives of the Incident Commander, and maintains communications with the Incident Commander and Joint Force Headquarters-State to ensure the synchronization of CERFP actions. Figure 6 shows the basic command and control structure for State Active Duty and Title 32 CERFP response operations.

Figure 6: Command and Control Structure for State Active Duty and Title 32 CERFP Response Operations



Source: GAO analysis of NGB information.

^a A Joint Task Force-State may be established under the Joint Force Headquarters-State to provide day-to-day command, control, coordination, and logistical support of deployed National Guard response forces

In addition to operations within their states, CERFPs may deploy outside their states based on requests for assistance and in accordance with established mutual aid agreements. In such cases, command and control is conducted according to provisions of the agreement and applicable military plans and orders. States are encouraged to develop state-to-state compacts to facilitate regional CERFP support and response. In the case of an emergency and in the absence of formal or informal agreements, National Guard guidance states that the Governor and Adjutant General of a state providing support may agree with the Governor and Adjutant General of a supported state or develop a simple memorandum of agreement on CERFP support on a case-by-case basis. The governor of

an affected state may also request assistance through the NGB for the deployment of a CERFP. NGB serves a coordinating function to facilitate such requests but does not have command authority over National Guard forces.

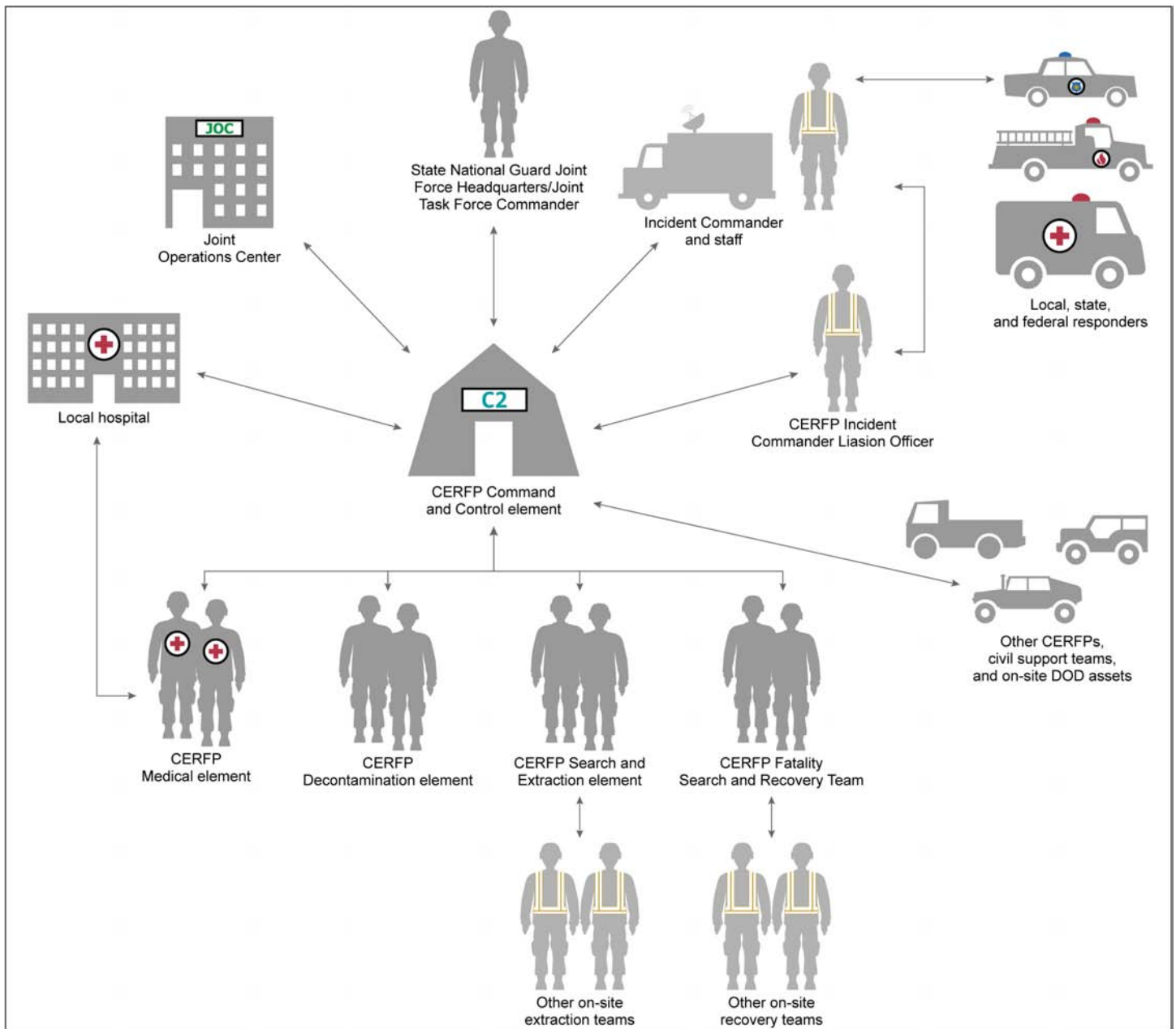
Inadequate Communications Capabilities May Hamper the Command and Control of Operations Involving CERFPs

Communications are central to the execution of command and control functions, allowing commanders to exercise authority and direction and enabling the information sharing necessary to maintain situational awareness, but the CERFPs are not assured access to communications equipment that would enable them to share and manage information with military and civilian response organizations during a CBNRE incident. The *National Response Framework* and DOD respectively identify communications interoperability as a critical component of preparedness and a key factor in the effective use of the National Guard under state control, enabling coordination, cooperation, and information sharing among federal, state, and local responders. Moreover, draft NGB guidance addresses possible sources for a dedicated, deployable long-range communications capability for CERFPs and states that dedicated communications equipment is essential to establishing “technical reach-back” capability for the CERFP.⁴³ However, we found that the hand-held radios provided to the CERFPs as part of their baseline authorization are not interoperable and have limited range and that the communications platforms provided by state National Guards to CERFPs are not dedicated to them, reducing assurance that they would be available during an incident. For example, officials from 11 of the 17 CERFPs we interviewed cited the lack of interoperability of CERFP radios with communications equipment used by other response organizations, such as first responders, as a challenge. Further, officials from three of the CERFPs we interviewed noted that the range of these handheld radios is limited, to the extent that one CERFP representative commented that it will allow you to communicate with other individuals if they are at the end of the block—if a building does not get in the way. Such communication limitations could severely impede information sharing and situational

⁴³ “Technical reach-back” is the capability to contact a technical subject matter expert when an issue exceeds the expertise of on-site personnel. Army Tactics, Techniques, and Procedures No. 3-11.47/Air Force Tactics, Techniques and Procedures No. 3-2.79, *Chemical, Biological, Radiological, Nuclear, and High-Yield Explosives Enhanced Response Force Package Operations* is currently in draft form and has not yet been published.

awareness between the CERFP command and control element and the other CERFP elements, and between the CERFP and the civilian Incident Commander it supports—particularly when the CERFP Command and Control element is not located close to the other CERFP elements or the Incident Commander. Moreover, as shown in figure 7, CERFPs may interact with various other potential response partners, requiring communication pathways for maintaining situational awareness.

Figure 7: Potential CERFP Incident Site Response Partners and Communications Pathways



Source: GAO analysis of NGB information.

To mitigate communications limitations, CERFPs may be able to access equipment with the aforementioned key capabilities from other state

National Guard organizations. According to National Guard guidance and the CERFP concept of operations, CERFPs may access this equipment through either their state's National Guard headquarters or state CST, if the latter is tasked to support the CERFP. However, while officials from nine CERFPs that told us their state could provide such equipment, officials from seven of these nine also stated that there are no specific agreements for accessing state-owned communications equipment—such as the Joint Incident Site Communications Capability.⁴⁴ As a result, CERFP access could be limited by competing requests from other entities during a large-scale incident. Similarly, CERFPs' access to the CST's Unified Command Suite is also dependent on the availability of these systems and whether a CERFP operates within close proximity to the CST at an incident site.⁴⁵

NGB officials said that they believe that state National Guards would provide CERFPs with the communications equipment necessary to accomplish the mission. Nevertheless, these officials also stated that NGB recognizes that the CERFPs face a communications equipment gap related to interoperability and reach-back access, among other things. NGB has initiated a study to determine interoperability and reach-back requirements for CERFP communications equipment and has begun to explore potential equipment options—one of which would entail the reassignment of state National Guard Joint Incident Site Communications Capability systems to each CERFP command and control element. These same officials also noted, however, that there are challenges related to states having insufficient numbers of personnel to operate and maintain this equipment. During a working group session focused on communications shortfalls, several CERFP representatives echoed these concerns, stating that the CERFPs do not have the manpower to maintain such equipment or the training time necessary to sustain operational proficiency. Because the absence of interoperable communications

⁴⁴ The Joint Incident Site Communications Capability provides interoperable communications and emergency satellite links to command and control centers to share information and tools needed to support collaboration with other federal, state, and local responders including the Federal Emergency Management Agency, Department of Homeland Security, and state emergency management agencies.

⁴⁵ The Unified Command Suite is a mobile communications system employed in support of the Weapons of Mass Destruction Civil Support Teams. The Unified Command Suite provides real-time voice, data, and video connectivity among Civil Support Team members, local and state emergency response agencies, lead federal agencies, and supporting military activities.

equipment with long-range and reach-back capabilities may impede the timely, continuous flow of critical information about site hazards and response requirements between CERFPs and other response entities—particularly the Joint Force Headquarters and Incident Commander—the collective ability of all responders to maintain situational awareness and coordinate movements may be diminished.

Some CERFPs Do Not Have Agreements with Their Out-of-State Elements

According to the CERFP concept of operations, CERFPs are comprised of individual units from the host state if the state has the required structure. When a state lacks the force structure necessary to support all of the CERFP mission capabilities, units from another state may provide the capability. If elements of a CERFP are from more than one state, NGB guidance states that memorandums of agreement, laying out a clear chain of command and activation authority, must be established. The number of states that rely on units from other states to compose their CERFPs may ebb and flow over time as a result of force allocation challenges—such as the overseas deployment of CERFP personnel—that may affect a state’s ability to support the entire CERFP mission. For example, we found that there were nine CERFPs whose Fatality, Search, and Recovery Teams were sourced outside of the CERFP host state.⁴⁶ Officials from these CERFPs told us that they had not established the required formal agreements with their out-of-state Fatality, Search, and Recovery Team components, although officials from two of the nine CERFPs told us that they had agreements that were in draft form, one of which was awaiting approval from NGB.

According to NGB officials, NGB has not had a role in facilitating the development of these agreements, nor has it attached consequences to noncompliance with requirements to establish the agreements. In the absence of such agreements, NGB has no assurance that CERFPs with out-of-state elements, such as Fatality, Search, and Recovery Teams, will deploy and operate as unified forces.

⁴⁶NGB officials stated that they have subsequently realigned the Fatality, Search, and Recovery Teams geographically, reducing the number of CERFPs aligned with out-of-state teams from 9 CERFPs to 2 CERFPs.

Opportunities to Exercise and Evaluate Command and Control in a Realistic Response Environment Are Limited

Because CERFPs must support the goals and objectives of a civilian incident commander while adhering to the military chain of command, practicing command and control relationships is critical to ensuring operational effectiveness. Some of the training and exercise issues we previously noted, such as the gaps in exercise participation by critical CERFP elements and potential interagency and DOD response partners, produce command and control challenges and directly affect the level of assurance that all response partners have about the viability of command and control relationships. For example, the limited opportunities that CERFPs have had to train with their Fatality, Search, and Recovery Team elements, and in some cases, their medical elements, limits the ability of the CERFP to practice critical command and control mechanisms in advance of an actual event.

As we have previously stated, despite guidance emphasizing the importance of training with interagency partners, CERFPs have trained to a limited extent in interagency environments, creating few opportunities for CERFPs to exercise and evaluate certain command and control structures—such as those that would be in place during a large-scale incident under federal control. For example, according to the results of our four surveys, in each of the last 3 years, three or fewer CERFPs had trained with DOD’s federal CBRNE Consequence Management Response Forces or Marine Corps Chemical, Biological, Incident Response Force, and only around half trained with U.S. Northern Command. Limited interagency participation in CERFP training events increases the risk that command and control mechanisms between CERFPs and other military and nonmilitary partners will not function effectively during an actual incident. For additional information regarding interagency participation in CERFP training events, see appendix II. As previously mentioned in our discussion of training challenges, NGB neither comprehensively tracks the CERFPs’ participation in interagency exercises nor provides specific participation goals that could be used to measure progress. As a result, NGB has little assurance that all CERFPs, which are considered regional and national assets, have opportunities to practice command and control in an interagency environment.

Moreover, formal evaluations of CERFP command and control do not provide realistic testing of command and control relationships because they occur in controlled environments that typically do not include interagency response partners. According to the 2008 Joint Training Plan, external evaluations should preferably be conducted during regional exercises focused on performing tasks in an interagency environment under the command and control of the state National Guard Joint Force

Headquarters or Joint Task Force-State. However, in two of the three formal evaluations that we attended, interagency organizations observed these exercises but played no active role. At the third evaluation, one organization participated to a limited extent by conducting an initial assessment of the incident scene at the onset of the evaluation. We also found that during these events, key players—such as the civilian Incident Commander and National Guard Joint Force Headquarters—are often simulated by evaluators. According to several exercise officials, NGB prefers to simulate these roles since the evaluators are familiar with CERFP operations and therefore can more efficiently provide orders and control the pace of the exercise. Officials we spoke with from two CERFPs provided a contrasting view, noting that such conditions contribute to a fabricated environment that ultimately fails to stress the command and control system. One of the after-action reports we reviewed for an exercise that included interagency partners similarly noted that it was vital to have interagency participation, not just simulation, to achieve the goals of the exercise.

As indicated previously in our discussion of training challenges, NGB officials have recognized the need to improve aspects of CERFP field training and exercises by, for example, including in its annual training guidance, issued in March 2011, collective training goals related to exercising with local, state, and federal responders. However, as noted, it is unclear whether units will be able to meet collective training goals and participate in proposed exercises, as challenges related to the CERFPs' part-time status and funding have limited the CERFPs' participation in training in the past. Without a strategy to ensure that such opportunities to practice and evaluate command and control are provided across the program, the CERFPs are at risk of decreased effectiveness when they operate in diverse response environments that include the full range of local, state, and federal response organizations.

The Introduction of New Homeland Response Forces Will Affect Command and Control of CBRNE Capabilities

The advent of HRFs will materially affect the command and control framework for CERFPs by altering how CERFPs interact with other response partners. The first two HRFs and the replacement CERFPs are scheduled to become operational by the end of fiscal year 2011. When deployed in response to an incident, NGB officials told us that the HRFs are supposed to establish a regional command and control structure to synchronize State Active Duty and Title 32 National Guard CBRNE response forces—including CERFPs—and prepare for follow-on forces. In this capacity, HRFs may command and control multiple CERFPs during large-scale consequence management operations and thereby

affect both the nature and extent of the CERFPs' interactions with military and civilian command structures. For example, when operating under the HRFs, CERFPs may coordinate directly with the HRF instead of the state National Guard Joint Force Headquarters. Similarly, while NGB officials told us that the HRF will not act as a communication layer between the CERFP and Incident Commander during such incidents, NGB has not issued guidance delineating command and control relationships for joint HRF-CERFP operations, making it unclear whether the CERFPs will continue to coordinate directly with the civilian Incident Commander, or if that coordination will become the duty of the HRF.

According to NGB officials, NGB has postponed its initial plans to update existing CERFP guidance by late summer 2011 to reflect the new command and control relationships associated with the HRF construct. These officials told us that they now plan to concomitantly update and develop existing CERFP and new HRF guidance to create an overarching guidance manual. This approach will delay issuance by approximately 6 months. The delay, according to NGB, is acceptable given the expected benefits of combining the guidance. However, because NGB does not plan to update its CERFP command and control guidance before the first two HRFs become operational at the end of fiscal year 2011, CERFPs will likely face a range of operational ambiguities during joint HRF-CERFP operations that could limit prospects for the seamless integration of military and civilian response operations. For example, without new guidance, CERFPs may not have a clear understanding of how they are to interact with the state National Guard Joint Force Headquarters and the civilian Incident Commander during joint HRF-CERFP operations, resulting in confusion and inefficiencies that could lead to reduced operational effectiveness.

Conclusions

CERFPs are considered a critical component—within DOD's overall CBRNE response strategy—to support local and state responders during a significant or catastrophic CBRNE-related incident. The fact that CERFPs are staffed by National Guard soldiers and airmen who do not train and prepare for the mission on a full-time basis adds to the challenge to be fully ready to rapidly respond anywhere within the United States and its territories within hours and be capable of integrating with other response partners—including other CERFPs and DOD's other CBRNE response capabilities. Gaps that we identified in NGB's CERFP management efforts—gaps that include (1) evaluating the resources and capabilities necessary for the CERFP mission; (2) providing guidance for CERFP participation in key training and exercises; and (3) capturing and

reporting CERFP readiness data—represent further challenges to the long-term success of the program. Now that the CERFP program has gained some maturity, a more comprehensive approach to address these gaps can build on efforts DOD and NGB already have under way to better ensure that CERFPs can provide an effective emergency response.

A successful response to a large-scale domestic CBRNE incident requires the synchronization of response efforts across local, state, and federal-level response organizations, including DOD. This integration, in turn, requires extensive pre-incident coordination. As state and regional assets, CERFPs are uniquely positioned to coordinate their efforts with civilian and military response organizations at various levels of government. Likewise, the NGB—as manager of the CERFP program and a key channel of communication between DOD and the states—is well positioned to guide CERFP coordination practice and to facilitate interstate planning for the use of CERFPs across state lines. Addressing the challenges that have led to sporadic coordination efforts between CERFPs and other potential response partners—challenges such as gaps in the areas of (1) existing guidance that specifies direction for CERFP coordination efforts; (2) awareness and understanding of that guidance by the CERFPs; (3) standards that would allow NGB and DOD to assess the effectiveness of CERFP coordination with military and civilian response partners; and (4) agreements between states regarding interstate CERFP deployments—all represent opportunities for DOD, NGB, and the individual CERFPs to improve their existing coordination efforts and thereby further solidify the concept of a unified national response that is at the heart of the nation’s emergency planning.

To effectively respond to incidents of varying scale in support of civil authorities, it is crucial that CERFPs be able to seamlessly integrate with civilian and military command structures as well as response organizations at the local, state, and federal levels. Gaps in the areas of (1) communications and interoperability; (2) agreements between CERFPs and other states that host a team’s Fatality, Search, and Recovery component; and (3) practicing and evaluating key command and control relationships could each inhibit the ability of CERFPs to operate effectively in interagency environments. The advent of HRFs amplifies such challenges by introducing a new set of relationships and procedures that will affect the framework of integration for military and civilian response operations. Without an updated command and control framework that clearly delineates relationships related to the HRFs, CERFPs are likely to experience confusion and inefficiencies during joint

operations that could lead to reduced operational effectiveness and weaken the overall national response structure.

Recommendations for Executive Action

To address these issues, we recommend that the Secretary of Defense take the following three actions:

(1) To increase assurance that CERFPs can effectively conduct CBRNE consequence management in support of civil authorities, we recommend that the Secretary of Defense direct the Chief of the National Guard Bureau, in coordination with the Secretaries of the Army and Air Force, the state Adjutants General, and the Under Secretary of Defense for Personnel and Readiness, as appropriate, to

- implement a well-defined process to systematically examine and validate total resources and capabilities necessary to successfully conduct the CERFP mission including personnel, training, and equipment requirements;
- develop a training strategy linked to specified goals to guide CERFPs' participation in the range of field collective training exercises and systematically track progress that CERFPs are making in achieving the specified training goals; and
- develop and implement a plan—with timelines—to complete the implementation of the standardized mechanism for capturing and reporting readiness data within DOD's centralized readiness reporting system.

(2) To enhance regional CBRNE preparedness and facilitate the CERFPs' ability to respond to regional events, we recommend that the Secretary of Defense direct the Chief of the National Guard Bureau in concert with the Secretaries of the Army and Air Force and the state Adjutants General, where appropriate, to

- strengthen existing guidance related to interagency coordination by specifying, for example, the key types of response organizations with which CERFPs should coordinate in their geographical areas of responsibility;
- increase awareness and understanding of coordination guidance within the CERFPs;
- establish agreed-upon coordination evaluation standards by incorporating updated coordination guidance in the Standardization, Evaluation, and Assistance Team checklist(s) or another coordination evaluation tool; and

-
- take steps to encourage states to develop state-to-state compacts regarding CERFP interstate deployment and coordination to supplement EMAC.

(3) To ensure the effective command and control of consequence management operations involving CERFPs and to make certain that CERFPs are able to integrate effectively with military and civilian response partners, we recommend that the Secretary of Defense direct the Chief of the National Guard Bureau, in concert with the Secretaries of the Army and Air Force and the state Adjutants General, where appropriate, to

- formalize an interim solution—as NGB conducts its long-term review—to ensure that CERFPs responding to an event will have access to equipment providing key communications capabilities—including interoperability with military and first responder equipment, long-range connectivity, and technical reach-back;
- foster the development of memorandums of agreement between states that host CERFPs and states that provide out-of-state elements such as Fatality, Search, and Recovery teams;
- develop a strategy to ensure that all CERFPs are able to practice and be evaluated on command and control relationships within realistic environments that include the range of interagency partners that CERFPs are likely to encounter; and
- issue interim guidance to clarify the new command and control relationships resulting from the changes to DOD’s consequence management strategy

Agency Comments and Our Evaluation

In written comments on a draft of this report, DOD concurred with the recommendations. DOD also provided technical comments, which we have incorporated into the report where appropriate.

DOD provided additional comments with respect to the first and third recommendations that addressed CERFP training and exercises. DOD stated that US Northern Command and NGB are provided resources for approximately eight full-scale exercise opportunities per year that allow National Guard units (CERFPs or other units) to train with military and interagency partners and that additional funding and dedicated National Guard “man-days” would be required to exercise all 17 CERFPs and 10 HRFs each year or each time a new force assumes the mission. Further, DOD stated that given the large amount of training (for individuals, units, and with interagency partners) for the complex mission, stabilization of the assigned CBRNE consequence management forces for 3 years or

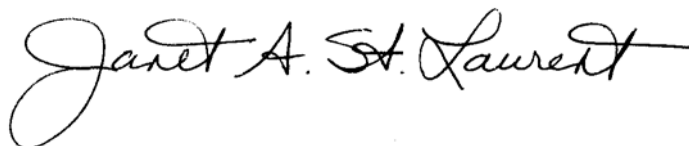
more is needed. We agree that expanding the scope of the exercise program for CERFPs (and other CBRNE units) to encompass full-scale interagency exercises for each unit every year would tax the existing structure and resources for CBRNE consequence management exercises. We continue to believe that if DOD implements our recommendations to develop strategies to (1) guide CERFP participation in the range of field exercises and tracking progress in participating in such exercises and (2) ensure that all CERFPs are able to practice and be evaluated on command and control relationships within realistic environments and with a range of interagency partners, the CERFPs will benefit from improved standards and goals to increase the effectiveness of their exercises. In some cases, this may mean increased frequency of exercises. However, the current fiscal environment is not likely to allow dramatic increases in both the frequency and scope of major exercises. Successful development and implementation of the strategies we recommend would allow NGB to better utilize existing resources to more evenly distribute training opportunities—and thereby better ensure a consistent level of preparedness—across the CERFP program.

We also agree that providing some stability to the CERFPs in terms of the units assigned for a period similar to the 3 years or more, as DOD suggested in response to our third recommendation, would help improve the effectiveness of existing and planned training and exercises, as it will allow a unit as a whole to benefit from that experience for longer than is now the case.

DOD's comments are reproduced in their entirety in appendix III.

We are distributing this report to the appropriate congressional committees, the Secretary of Defense, and other interested parties. In addition, the report will be available at no charge on GAO's Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-4300 or stlaurentj@gao.gov. Contact information for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix IV.

A handwritten signature in black ink that reads "Janet A. St. Laurent". The signature is written in a cursive style with a large, looping initial "J".

Janet A. St. Laurent
Managing Director
Defense Capabilities and Management

List of Requesters

The Honorable Joseph I. Lieberman
Chairman

The Honorable Susan M. Collins
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Adam Smith
Ranking Member
Committee on Armed Services
House of Representatives

The Honorable W. "Mac" Thornberry
Chairman
The Honorable James R. Langevin
Ranking Member
Subcommittee on Emerging Threats and Capabilities
Committee on Armed Services
House of Representatives

Appendix I: Scope and Methodology

To address our objectives, we held discussions with the Office of the Assistant Secretary of Defense, Reserve Affairs, and the Assistant Secretary of Defense, Homeland Defense and Americas' Security Affairs, the Joint Chiefs of Staff, and NGB operations, training, and readiness officials and reviewed regulations, studies, briefings and memoranda to gain perspectives on the status of the CERFP program. We compared the current status of the program with the requirements set forth in DOD and NGB guidance, such as NGB's CERFP *Concept of Operations*,¹ NGB's CERFP Management regulation,² NGB's CERFP training guidance,³ and the Army's final draft of CERFP operations doctrine.⁴ We reviewed NGB's future plans related to the implementation of its Standardization Evaluation and Assistance Team Program to determine NGB's planned framework for providing oversight of the CERFP program, and reviewed future plans that affect the CERFPs' role in DOD's restructured plan for providing CBRNE response capabilities, including those related to the Homeland Response Forces. We also conducted five site visits to observe a total of six CERFPs conducting training during various types of field exercises, including three field exercise where CERFPs were preparing for, and being evaluated on, their mission proficiency. We attended the other two field training exercises to observe CERFPs training with some of their potential response partners, such as local fire chiefs and fire departments, sheriff departments, state level rescue organizations, FEMA search and rescue teams, other National Guard response capabilities, and the Marine Corps' Chemical Biological Incident Response Force. We held discussions with exercise participants and exercise evaluators that were part of, or working in support of, the NGB's Joint Interagency Training and Education Center, which provides training

¹ National Guard Bureau. *National Guard Chemical Biological, Radiological Nuclear and High Yield Explosive, Enhanced Response Force Package, Concept of Operations* (July 7, 2009).

² National Guard Bureau, Army National Guard Regulation 500-4/Air National Guard Instruction 10-2504, *National Guard Chemical, Biological, Radiological, Nuclear, and High-Yield Explosive Enhanced Response Force Package Management* (Oct. 16, 2009).

³ National Guard Bureau, *Joint Training Plan* (Jan. 16, 2008) and National Guard Bureau, *CBRNE Enhanced Response Force Package and Training Year 2011, Yearly Training Guidance* (Mar. 3, 2011).

⁴ Department of Army. Army Tactics, Techniques, and Procedures 3-11.47/Air Force Tactics, Techniques, and Procedures 3-2.79, *Final Coordination Draft, National Guard Chemical Biological, Radiological Nuclear and High Yield Explosive, Emergency Response Force Package Operations* (Washington, D.C.: January 2011).

support to CERFPs. These exercises were conducted in Colorado, Florida, Ohio, Virginia and Wisconsin.

To gain the perspectives of both the state National Guard and state-level emergency management officials who would be involved in planning or executing a CBRNE emergency response, we designed and implemented separate web-based surveys of (1) state Adjutants General from all 17 states that host CERFPs (2) state Adjutants General from 10 states that do not host CERFPs, (3) state-level emergency managers from all 17 states that host CERFPs, and (4) state-level emergency managers from 10 states that do not host CERFPs. For states that do not host CERFPs, one state or territory was non-randomly selected from each of the ten FEMA regions to reflect different geographical and population characteristics. The ten additional states that were selected were Alabama, Alaska, Arizona, Connecticut, Kansas, Maryland, Michigan, Montana, New Mexico, and Puerto Rico.⁵ In total, 51 surveys were sent via email invitation across 27 states (17 CERFP host states and 10 non-host states) and were conducted between September and October 2010. Contact information for each state Adjutant General was provided by the National Guard Bureau and verified against contact information available on state National Guard Web sites. Contact information for each state emergency management official was provided by the National Emergency Management Association and verified against state emergency management Web sites. We took steps to minimize nonsampling errors by pretesting the survey instruments in July and August 2010 with officials from eight of the states eventually surveyed. The surveys addressed CERFP planning, coordination, command and control, and collective training, and the new DOD CBRNE consequence management strategy articulated by the 2010 *Quadrennial Defense Review*. Additionally, the survey given to state Adjutants General in states that host CERFPs also addressed CERFP preparedness.

To maximize our response rate, we sent reminder emails and contacted non-respondents by telephone. In total, we obtained responses from 47 of the 51 survey recipients (92 percent). We received responses from all 17 Adjutants General from states that host CERFPs and from all 10 Adjutants Generals from the states we selected that do not host CERFPs.

⁵ CERFPs' areas of responsibility include the 50 states, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands. For purposes of our surveys, we treated all of these entities as states.

We received responses from 13 of the 15 state-level emergency managers from states that host CERFPs and from 7 of the 9 emergency managers from the states we selected that do not host CERFPs.⁶ Despite repeated inquiries, emergency management officials from Maryland, New Mexico, Texas, and Washington did not respond to the surveys.

We supplemented our survey results with semi-structured telephone interviews of key representatives from each of the 17 CERFPs. These interviews consisted of both standardized and variable questions to capture tactical-level perspectives on a range of issues related to CERFP readiness; coordination; collective planning and training; and DOD's new CBRNE consequence management strategy. We performed content analysis of the interview responses to identify recurring themes and perspectives.

To identify the extent to which the CERFPs are prepared to execute their mission in terms of required equipment, staffing, training, and funding, we reviewed readiness data within the National Guard's CERFP-specific spreadsheet-based readiness system dated from October 2006 through January 2011 and data from the Defense Readiness Reporting System (DRRS) dated January 2011 to determine the mechanisms for and the processes involved in CERFP readiness reporting. We also reviewed our prior work on National Guard readiness and DRRS to supplement our work.⁷ We reviewed CERFP-specific readiness briefings and CERFP specific-readiness spreadsheets to determine the extent that readiness data is being reported to NGB. Additionally, we used the Army Readiness Management System to review Army unit reported readiness data. The Army reports its readiness data through DRRS-Army, which is one of the interconnected systems within DRRS. We reviewed this data in order to determine whether units that were identified by the National Guard as having the CERFP mission could be seen as reporting their readiness for

⁶ In total, three states we surveyed do not have separate state-level emergency managers. In Hawaii and Nebraska, which host CERFPs, and Kansas, which does not host a CERFP, the State Adjutant General also serves as the lead emergency management official.

⁷ GAO, *Military Readiness: Army and Marine Corps Reporting Provides Additional Data, but Actions Needed to Improve Consistency* [GAO-11-526](#) (Washington, D.C.: June 3, 2011); *Military Readiness: DOD Needs to Strengthen Management and Oversight of the Defense Readiness Reporting System* [GAO-09-518](#) (Washington, D.C.: Sep. 25, 2009); and *Reserve Forces: Actions Needed to Identify National Guard Domestic Equipment Requirements and Readiness* [GAO-07-60](#) (Washington, D.C.: Jan. 26, 2007).

that mission as part of their unit readiness reports. We used the Army's system because typically at least two of the four CERFP elements come from Army National Guard units. To the extent that CERFP readiness data was found in the Army unit reported readiness data, we compared this data to the type of data found in NGB's readiness spreadsheets. We also interviewed readiness and program officials to determine their plans for integrating CERFP data from the stand-alone spreadsheets into DRRS. We assessed the reliability of the DRRS data and determined that the data is sufficiently reliable for the purpose of assessing the consistency of the implementation of the current readiness reporting policies and discussing the findings in this report.

To determine the extent to which (1) existing coordination mechanisms facilitate future CERFP operations, and the effectiveness of CERFP-led coordination activities is evaluated, and (2) NGB has established an effective framework to command and control the CERFPs during consequence management operations, we reviewed and analyzed an array of relevant program and issue area documentation, law, and literature; interviewed military stakeholders; conducted site visits to observe CERFP field training; attended CERFP working group sessions; and collected and analyzed information from our four surveys. We examined CERFP-related documents, including DOD and NGB guidance; briefings; training materials and after action reports; and memorandums regarding the status of the CERFP program. We also reviewed law relevant to disaster response and the domestic employment of National Guard troops, including the Stafford Act and certain provisions of Titles 32 and 10 of the United States Code. We examined an array of documentation related to DOD's other CBRNE consequence management assets, including DOD reports, testimonies, and initial plans related to DOD's CBRNE enterprise restructuring efforts. We also examined national-level policy pertaining to response coordination and planning, such as the *National Response Framework* and *National Incident Management System*, and reviewed relevant literature related to response operations, the Emergency Management Assistance Compact, and state-to-state mutual aid.

We conducted this performance audit from December 2009 to December 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: CERFP Interagency Training, 2008-2010

NGB's training guidance covering 2008-2010 encouraged CERFPs to include potential response partners in collective team training exercises and to participate in at least one regional training event in fiscal year 2008 or fiscal year 2009 that focused on performing collective tasks in an interagency environment including local, state, federal, or other DOD response partners.¹ Figures 8, 9, 10, and 11 illustrate the results of our surveys of state Adjutants General and state-level emergency managers regarding the extent to which CERFPs have trained with various potential response partners in 2008, 2009, and 2010.

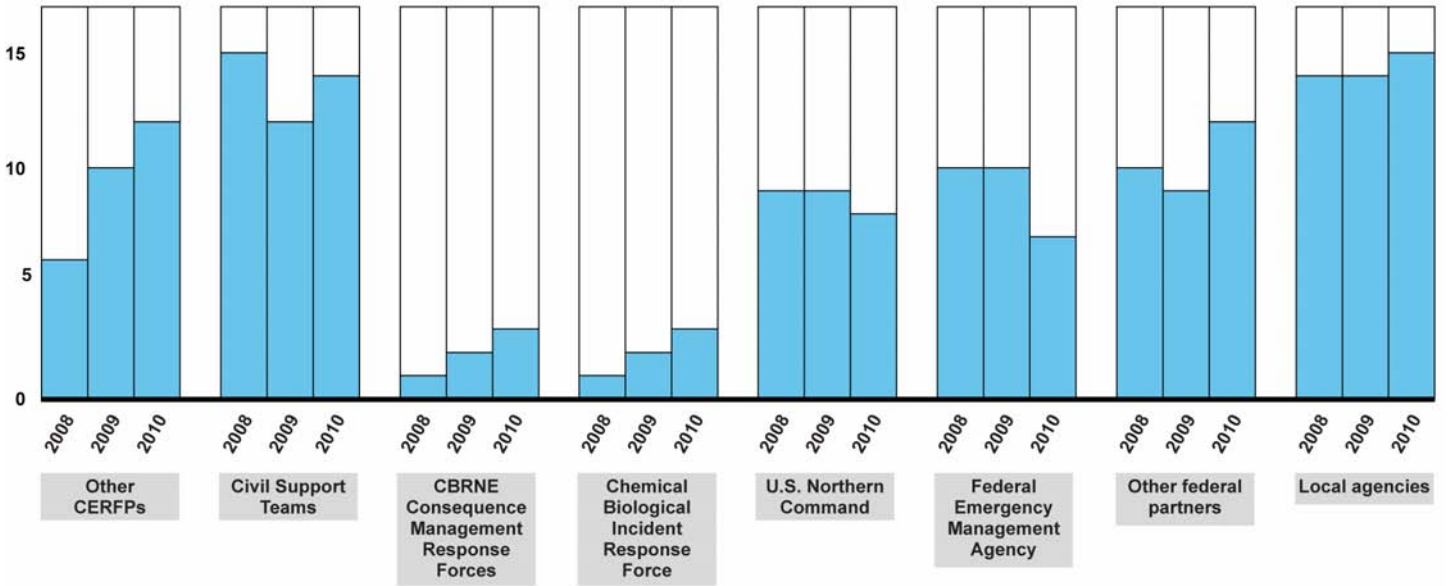
Our surveys show that most CERFPs have trained with some key response partners over the last 3 years, but have had limited opportunities to train with other key response partners, such as DOD response organizations and state emergency management agencies. For example, in each of the last 3 years, three or fewer CERFPs had trained with DOD's federal CBRNE Consequence Management Response Forces or Marine Corps Chemical Biological Incident Response Force, and only around half trained with U.S. Northern Command—DOD's federal response lead for most domestic CBRNE incidents. Additionally, the state-level emergency managers we surveyed reported high levels of training with CSTs, but only about half or less from those states with CERFPs had trained with a CERFP in each of the last 3 years and only one from a state without a CERFP had trained with a CERFP in 2009 and 2010.

¹ This guidance did not articulate specific interagency training goals for fiscal year 2010.

Figure 8: CERFP Joint Field Training with Select Potential Response Partners, 2008-2010

Survey response

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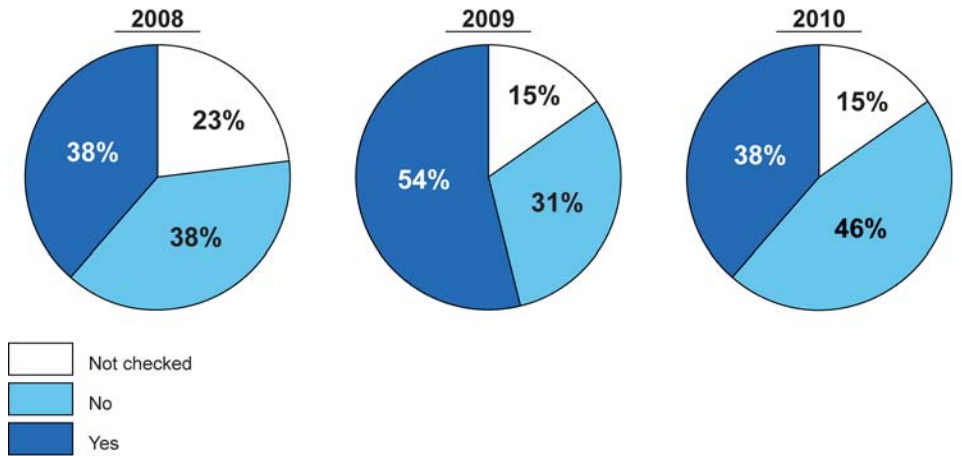


Exercises



Source: GAO Survey of CERFP State Adjutants General on State CBRNE Response Capabilities.

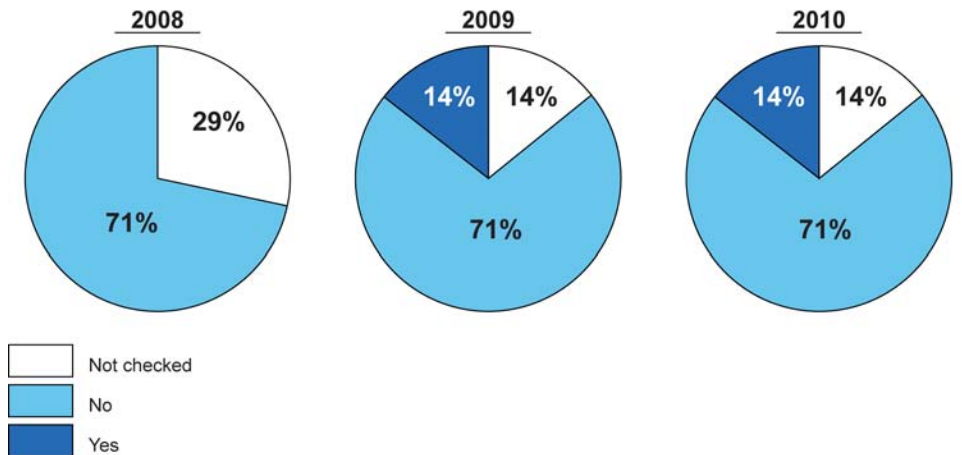
Figure 9: CERFP Joint Field Training with Emergency Management Agencies from States with CERFPs, 2008-2010



Source: GAO Survey of CERFP State Emergency Managers on State CBRNE Response Capabilities.

Note: Numbers may not add to 100 percent due to rounding

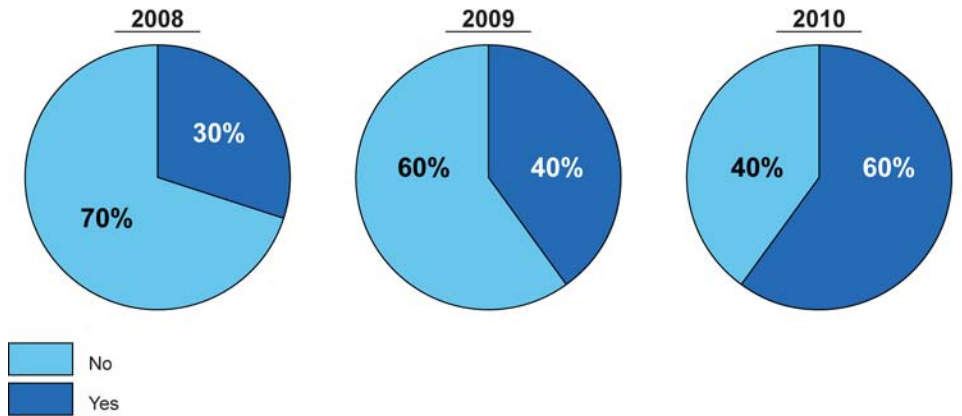
Figure 10: CERFP Joint Field Training with Emergency Management Agencies from States without CERFPs, 2008-2010



Source: GAO Survey of non-CERFP State Emergency Managers on State CBRNE Response Capabilities.

Note: Numbers may not add to 100 percent due to rounding.

Figure 11: CERFP Joint Field Training with State National Guards from States without CERFPs, 2008-2010



Source: GAO Survey of non-CERFP State Adjutants General on State CBRNE Response Capabilities.

Appendix III: Comments from the Department of Defense



RESERVE AFFAIRS

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
1500 DEFENSE PENTAGON
WASHINGTON, DC 20301-1500

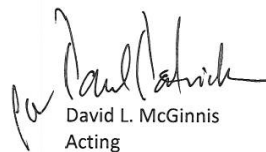
Nov 15 2011

MEMORANDUM FOR Mr. Joseph Kirschbaum Assistant Director, Defense Capabilities and Management U.S. Government Accountability Office

SUBJECT: GAO draft report, GAO-12-1148, HOMELAND DEFENSE AND WEAPONS OF MASS DESTRUCTION

Thank you for the opportunity to coordinate on the Department of Defense (DoD) response to the GAO draft report, GAO-12-114 , HOMELAND DEFENSE AND WEAPONS OF MASS DESTRUCTION: Additional Steps Could Enhance the Effectiveness of the National Guard's Life-Saving Response Forces, dated November 2011 (GAO Code 351401).

The DoD concurs with the recommendations. Detailed responses to each recommendation are attached. Additionally, we reviewed the entire report for accuracy and clarity of content. The attachment also provides recommended editorial changes. The point of contact for this matter is COL John M. Fruge at 571-256-4579 or e-mail john.fruge@osd.


David L. McGinnis
Acting

USP006330-11



GAO DRAFT REPORT DATED NOVEMBER 2011
GAO-12-114 (GAO CODE 351401)

"HOMELAND DEFENSE AND WEAPONS OF MASS DESTRUCTION:
ADDITIONAL STEPS COULD ENHANCE THE EFFECTIVENESS OF
THE NATIONAL GUARD'S LIFE-SAVING RESPONSE FORCES"

DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATIONS AND REPORT

DOD COMMENTS TO THE RECOMMENDATIONS

RECOMMENDATION 1: To increase assurance that CERFPs can effectively conduct CBRNE consequence management in support of civil authorities, we recommend that the Secretary of Defense direct the National Guard Bureau, in coordination with the Secretaries of the military services, the states' Adjutants General, and the Under Secretary of Defense for Personnel and Readiness, as appropriate, to

- Implement a well-defined process to systematically examine and validate total resources and capabilities necessary to successfully conduct the CERFP mission including personnel, training, and equipment requirements;
- Develop a training strategy linked to specified goals to guide CERFPs participation in the range of field collective training exercises and systematically track progress that CERFPs are making in achieving the specified training goals; and
- Develop and implement a plan-with timelines-to complete the implementation of the standardized mechanism for capturing and reporting readiness data within DOD's centralized readiness reporting system.

DoD RESPONSE: Concur with comment. NORTHCOM and NGB are resourced for and provide approximately 8 full-scale exercise opportunities per year which allow National Guard CBRN units to train with the full spectrum of military and inter-agency partners. (4 VIGILANT GUARD REGIONAL exercises, NORTHCOM's ARDENT SENTRY, VIGILANT SHIELD and VIBRANT RESPONSE, and NGB's PATRIOT exercise)

Additional resources in the form of National Guard Man-days, transportation and funding for exercise support (Trainers, facility use, simulation and consumables) are required to exercise the 17 CERF-P's and 10 HRF's each year or each time a new force assumes the mission.

Attachment

With these additional resources, the 8 existing exercises can accommodate additional CBRN units participation, training and evaluation. In order to provide such an opportunity for every unit, at the above frequency, additional exercises would have to be established.

Given the large amount of individual, collective, unit (C2 and sustainment) and inter-agency training required for this complex mission, stabilization of the assigned CBRN forces for a period 3 years or more is needed and most cost effective.

RECOMMENDATION 2: To enhance regional CBRNE preparedness and facilitate the CERFPs' ability to respond to regional events, we recommend that the Secretary of Defense direct the Chief of NGB, in concert with the Secretaries of the Army and Air Force and the state Adjutants General, where appropriate, to

- Strengthen existing guidance related to interagency coordination by specifying, for example, the key types of response organizations that CERFPs should coordinate with in their geographical areas of responsibility;
- Increase awareness and understanding of coordination guidance within the CERFPs;
- Establish agreed-upon coordination evaluation standards by incorporating updated coordination guidance in the Standardization, Evaluation, and Assistance Team checklist(s) or another coordination evaluation tool
- Take steps to encourage states to develop state-to-state compacts regarding CERFP interstate deployment and coordination to supplement EMAC

DoD RESPONSE: Concur.

RECOMMENDATION 3: To ensure the effective command and control of consequence management operations involving CERFPs and to make certain that CERFPs are able to integrate effectively with military and civilian response partners, we recommend that the Secretary of Defense direct the Chief of the National Guard Bureau, in concert with the Secretaries of the Army and Air Force and the state Adjutants General, where appropriate to

- Formalize an interim solutions-as NGB conducts its long-term review-to ensure that CERFPs responding to an event will have access to equipment providing key communications capabilities-including interoperability with military and first responder equipment, long-range connectivity, and technical reach back
- Foster the development of memoranda of agreement between states that host CERFPs and states that provide out-of-state elements such as Fatality, Search, and Recovery terms;

Attachment

- Develop a strategy to ensure that all CERFPs are able to practice and be evaluated on command control relationships within realistic environments that include the range of interagency partners that CERFPs are likely to encounter; and
- Issue interim guidance to clarify the new command and control relationships resulting from the changes to DOD's consequence management strategy prior to the operationalization of the HRFs and the new CERFPs.

DoD RESPONSE: Concur with comment. NORTHCOM and NGB are resourced for and provide approximately 8 full –scale exercise opportunities per year which allow National Guard CBRN units to train with the full spectrum of military and inter-agency partners. (4 VIGILANT GUARD REGIONAL exercises, NORTHCOM's ARDENT SENTRY, VIGILANT SHIELD and VIBRANT RESPONSE, and NGB's PATRIOT exercise)

Additional resources in the form of National Guard Man-days, transportation and funding for exercise support (Trainers, facility use, simulation and consumables) are required to exercise the 17 CERF-P's and 10 HRF's each year or each time a new force assumes the mission.

With these additional resources, the 8 existing exercises can accommodate additional CBRN units participation, training and evaluation. In order to provide such an opportunity for every unit, at the above frequency, additional exercises would have to be established.

Given the large amount of individual, collective, unit (C2 and sustainment) and inter-agency training required for this complex mission, stabilization of the assigned CBRN forces for a period 3 years or more is needed and most cost effective.

Attachment

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact:

Janet A. St. Laurent, (202) 512-4300 or stlaurentj@gao.gov.

Acknowledgments:

In addition to the contact named above, Davi M. D'Agostino, Joseph Kirschbaum (Assistant Director), Rodell Anderson, Yecenia Camarillo, Jennifer Cheung, Grace Coleman, Ryan D'Amore, Pamela Davidson, Joanne Landesman, Katherine Lenane, Katie Mauldin, K. Nicole Harms, and Amie Steele made key contributions to this report.

Related GAO Products

Homeland Defense: DOD Needs to Take Actions to Enhance Interagency Coordination for Its Homeland Defense and Civil Support Missions.

[GAO-10-364](#). Washington, D.C.: Mar 30, 2010

Homeland Defense: DOD Can Enhance Efforts to Identify Capabilities to Support Civil Authorities during Disasters. [GAO-10-386](#). Washington, D.C.: Mar 30, 2010.

Homeland Defense: Planning, Resourcing, and Training Issues Challenge DOD's Response to Domestic Chemical, Biological, Radiological, Nuclear and High-Yield Explosive Incidents. [GAO-10-123](#). Washington, D.C.: October 7, 2009.

National Preparedness: FEMA Has Made Progress, but Needs to Complete and Integrate Planning, Exercise, and Assessment Efforts.

[GAO-09-369](#). Washington, D.C.: April 30, 2009.

Emergency Management: Observations on DHS' Preparedness for Catastrophic Disasters. [GAO-08-868T](#). Washington, D.C.: June 11, 2008.

National Response Framework: FEMA Needs Policies and Procedures to Better Integrate Non-Federal Stakeholders in the Revision Process.

[GAO-08-768](#). Washington, D.C.: June 11, 2008.

Homeland Defense: Steps Have Been Taken to Improve U.S. Northern Command's Coordination with States and the National Guards Bureau, but Gaps Remain. [GAO-08-252](#). Washington, D.C.: April 16, 2008.

Homeland Defense: U.S. Northern Command Has Made Progress but Needs to Address Force Allocation, Readiness Tracking Gaps, and Other Issues. [GAO-08-251](#). Washington, D.C.: April 16, 2008.

Continuity of Operations: Selected Agencies Tested Various Capabilities during 2006 Governmentwide Exercise. [GAO-08-185](#). Washington, D.C.: November 19, 2007.

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