


KING COUNTY AUDITOR'S OFFICE

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Emergency Preparedness Limited by Planning Gaps

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Executive Summary

We found that the plans agencies use to continue their essential services during emergencies are of inconsistent quality and completeness across King County. These inconsistencies were driven by a lack of clear responsibilities around Continuity of Operations (COOP) Plan practices as well as limited guidance and review processes. To address these gaps, we recommend that the County clarify emergency planning roles, responsibilities, and practices.

King County

Acknowledgment

We would like to recognize the significant body of work that agencies have undergone to update emergency plans throughout the course of the COVID-19 pandemic and during this audit. Substantial efforts have been made since March 2020 to find ways to adapt operations to continue serving the public despite barriers. The Office of Emergency Management (OEM) has seen renewed interest and participation in continuity planning in recent months, which signals a level of resolve on behalf of agencies to ensure what they have learned during the pandemic is captured in plans and procedures for the future.

Agency representatives, leaders in Public Health – Seattle & King County (Public Health) and OEM have been very responsive and collaborative during the audit process. Despite significant demands on their time, due to their organization's normal functions and the additional impact of COVID-19, we were afforded time and access to work with representatives from every county agency we contacted as well as planning experts and leadership at Public Health and OEM. We deeply appreciate the responsiveness, flexibility, and collaborative engagement we experienced at all levels.

In addition to our review, the County is undergoing consecutive accreditation from the Emergency Management Accreditation Program, which extends beyond the scope of this audit. Many agencies who are part of Emergency Support Functions for the County's response to emergencies are conducting an extensive review of their plans, procedures, and actions in a comprehensive accreditation program that occurs every five years.

Many agencies excelled in specific areas of continuity plans. Although we identify a variety of gaps and needed improvements in continuity plans, we also found a great deal of promising consideration of important planning elements. We have called out particular agency Continuity of Operations (COOP) Plans that excel in specific areas, both to acknowledge the agency effort that went into creating quality COOP Plan elements as well as to provide examples for other agencies.

Public Health is innovating in equity consideration in emergencies. It does this while facing barriers in workload, staffing, and emerging challenges due to COVID-19. Public Health has identified new ways of engaging with communities to address health inequities throughout the pandemic. In conversations about integration of leading practices in equity and community involvement in its upcoming plan updates, Public Health has already made significant progress and outlined its specific actions for continuing to improve.

Emergency Preparedness Limited by Planning Gaps

REPORT HIGHLIGHTS

What We Found

Most, but not all, county agencies have up-to-date Continuity of Operations (COOP) Plans; however, some agencies do not update their plans regularly. In addition, most agencies do not detail the regular training, testing, and exercises needed to prepare for emergencies that could disrupt services. Gaps we saw in COOP Plan quality included weaknesses in identifying and prioritizing essential functions, naming alternate work sites and key records, and addressing emergency communication with staff. Many of these issues are likely driven by a lack of clear and appropriate responsibilities and authorities for coordinating and implementing COOP Plan practices, as we originally found in our 2016 audit of emergency management in King County.[1] Because resources are limited and authority for COOP Plans is shared between the Office of Emergency Management (OEM) and departments, OEM states that it has not regularly reviewed most COOP Plans for deficiencies and has not produced detailed guidance for some COOP elements.

Public Health – Seattle & King County (Public Health) is in the process of updating its collection of emergency plans, which includes an Infectious Disease Plan. Rather than reviewing the soon-to-be outdated pandemic plan, we identified leading practices for incorporation into the new plan update.

What We Recommend

We expand upon unresolved recommendations from our 2016 audit of emergency management to improve organizational structures for emergency management and clarify preparedness requirements for all county agencies. We recommend that OEM regularly review COOP Plans for completeness and quality and incorporate missing topics into its training and guidance. Lastly, we recommend that Public Health design the development of its Infectious Disease Plan to involve the needs and voices of communities that could be disproportionately impacted by future pandemics.

Why This Audit Is Important

In 2020, King County had to adapt quickly to unique emergency conditions due to the COVID-19 pandemic, prompting massive changes to operations as the County sought to fulfill its regular obligations and respond to the crisis. In response, the King County Council passed motion 15650 requiring OEM to work with county agencies to update emergency plans, including COOP Plans. COOP Plans are a key tool used to ensure that agencies continue their fundamental services during emergencies. This audit evaluates whether COOP Plans across the County are designed to help agencies continue to provide their essential services during an emergency.

The pandemic also revealed wide inequities in the County's ability to address the needs of all community members, with those who are Black, Hispanic, or American Indian or Alaskan Native more likely to be hospitalized by and die from COVID-19-related infections compared to Asian and White people. The County has a unique opportunity to learn from the lessons of the pandemic and ensure improvement for future emergency responses.

[1] "Emergency Management: Insufficient authority and communication hinder emergency preparedness and response in King County" can be found on the King County Auditor Website.

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County Continuity of Operations Plans Have Inconsistencies and Areas of Concern

SECTION SUMMARY

Continuity of Operations Plan (COOP) quality varies by agency,[2] and plans are often missing key elements, increasing the risk that agencies will not be prepared to provide essential services in the midst of emergencies. COOPs are tools that prepare agencies to deliver vital services when emergencies disrupt normal operations. Through our review of 25 county agency COOPs—against county and federal criteria—we found that COOP quality varied, some agencies do not maintain updated COOPs, and most do not detail the regular training, testing, and exercises needed to prepare for emergencies that disrupt normal services. Agencies also do not consistently identify and prioritize their essential functions, identify alternate sites or essential records needed during an emergency, or address how agencies will communicate with staff prior to and during emergencies in their COOPs. Many of these issues are driven by a lack of responsibility for coordinating and implementing COOP practices across King County.

COOP Plans are an essential emergency tool for agencies

Continuity of Operations (COOP) Plans are part of a larger COOP program and are important tools that help agencies provide essential services to the public during emergencies. The Federal Emergency Management Agency (FEMA) describes COOPs as essential tools that agencies should use to enable more rapid and effective response to emergencies. COOP Plans document how agencies will continue to provide services during emergencies by identifying and prioritizing functions that cannot be delayed, identifying the key resources needed to conduct these functions, and detailing how staff will be prepared and mobilized. In the event of an emergency, King County must both respond to the emergency by providing additional services, like regional coordination or public health services, and continue regular services that the community relies upon, like bus services or waste disposal. Without a plan to help guide an overall COOP program, governments could struggle to respond effectively to emergencies given a need for fast response or when resources are limited.

Agencies have the primary responsibility for writing their own COOP Plans while OEM serves as a resource for materials and guidance if asked. Because agencies have diverse needs and organizational functions, they are best positioned to develop their own continuity plans and programs. To support agencies, the Office of Emergency Management (OEM) serves in an advisory role, providing templates, channeling resources through a central point, and giving expert advice on emergency management upon request.

[2] In this report, the term "agency" means all executive departments and all agencies led by elected officials in all branches of King County government.

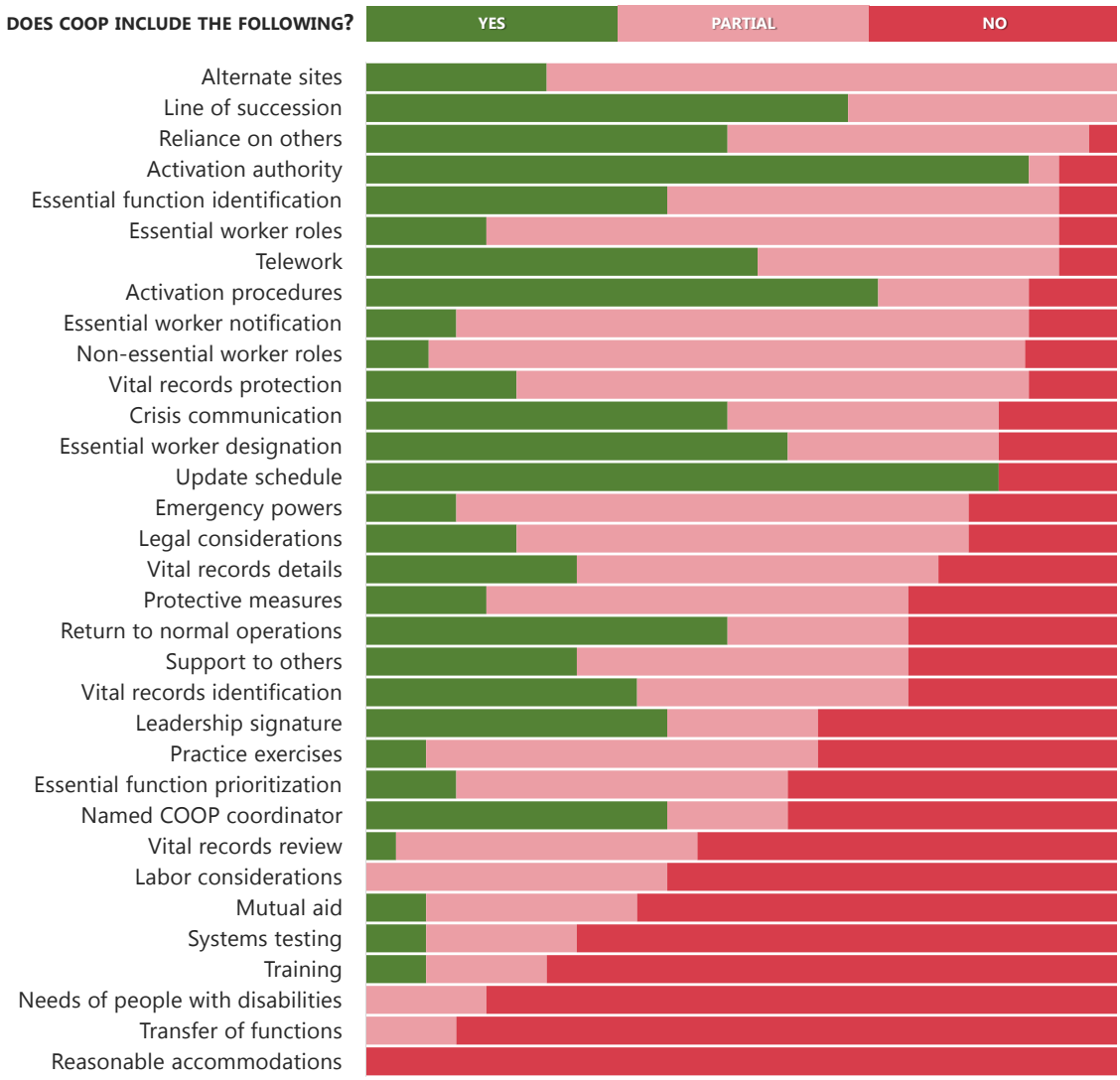
Note on Resources for Emergency Preparation
County leaders indicated that to be effective, a COOP Plan should be implemented as part of an overall COOP program. They suggest that this would require a dedicated staff who is ready and able to carry out the processes outlined in COOP Plans, which may require agency time and resources. We did not validate this assertion. In this audit, we highlight gaps in COOP planning and recommend pathways to help ensure that COOP Plans enable agencies to continue operations during emergencies. The extent to which agencies should prioritize current resources or add new resources is a policy decision, and as such is outside the scope of audit work. Redistributing or adding resources is a relevant consideration for the County Executive, the Department of Executive Services, and OEM as they make plans to address the recommendations.

COOP Plan reviews show gaps in preparedness

We reviewed the extent to which King County COOP Plans aligned with best practices defined by county, federal, and certification agency sources. We collected COOPs from 25 county agencies that were in use as of March–August 2021. Six of these COOP Plans were interim drafts and 19 were final. These agencies included all county departments that had COOP Plans, as well as divisions with COOP Plans that OEM was aware of. We then reviewed whether these COOP Plans aligned with best practices as defined by OEM, the Federal Emergency Management Agency (FEMA), and the Emergency Management Accreditation Program (EMAP).[3]

[3] For more details on our methodology, see "Statement of Compliance, Scope, Objective & Methodology" section.

EXHIBIT A: While most best practices in continuity planning are touched on by some King County agencies, significant gaps remain.



Note: Values represent proportion of planning element's coverage across all 25 COOP Plans under review.

Source: King County Auditor's Office review of COOP Plans provided by agency representatives.

Many of the issues we identified with COOP Plans and OEM's authority are likely caused by gaps originally identified in our 2016 OEM audit that have not been resolved. In 2016, we found incomplete COOP Plans and problems with COOP Plan review processes. While there have been some important improvements since 2016, many of the same problems persist today. This report highlights similar issues with the completion and maintenance of COOP Plans, regular review for quality, and OEM's authority to drive effective emergency management practices. In July 2020, the King County Council passed motion 15650 requiring OEM to work with county agencies to update emergency plans, including COOP Plans, with lessons learned from the COVID-19 pandemic by September 2022. As the County incorporates lessons learned from the COVID-19 pandemic, it can help to resolve the structural barriers to effective

emergency management and ensure the County is prepared for future emergencies. While well-crafted plans alone cannot address barriers to emergency response, they are an important step in doing so.

Future emergencies may require more instant response

The COVID-19 pandemic was an emergency with unique challenges. Other types of emergencies may require agencies to react more quickly with fewer opportunities for learning. Unlike many other emergency events, the pandemic shifted over time, giving agencies some time to plan and adapt. The pandemic also did not damage King County facilities, as events like earthquakes or tsunamis could, so preparation in this area was not tested. As the County prepares for future emergencies, it should incorporate lessons from the pandemic while ensuring that agencies are prepared to continue essential services even when events occur without notice and with severe impacts on infrastructure.

Not all agencies maintain or train on plans

Although some agencies have strong planning practices, out-of-date COOP Plans and incomplete training efforts could leave many agencies unprepared to continue their services during an emergency. OEM, FEMA, and EMAP all indicate that agencies should maintain up-to-date COOP Plans that reflect agencies' current operations and that staff be prepared to carry out roles as detailed in the COOP Plans. If a COOP Plan does not exist, does not reflect current circumstances or priorities, or staff is not trained to fulfill emergency roles, agencies will need to develop ad hoc processes quickly under extreme circumstances. This could delay an agency's ability to fulfill its essential functions in an emergency. While many of the 25 COOP Plans we reviewed were complete and updated in recent years, we identified several issues.

- **The Prosecuting Attorney's Office and the King County Council do not currently have COOP Plans and some division-level planning is incomplete.** Some agencies, such as the Department of Executive Services (DES) and the Department of Local Services (DLS) have COOP Plans for some of their divisions, but not all. DES's Airport and Fleet Services divisions, as well as DLS's Permitting Division, did not provide COOP Plans for our review and the divisions' services are not detailed at length in their departmental COOP Plans. While not all departments may choose to have COOP Plans for their divisions, departments should ensure their COOP Plans are comprehensive if they do not do so. In addition, the Department of Public Defense, Superior Court, and District Court provided documents they indicated were COOP Plans, but which did not contain most of the components that OEM, FEMA, and EMAP indicate should be present.
- **Agencies did not sign or otherwise document current leadership approval of six of the 19 COOP Plans in final draft.** FEMA and OEM indicate that organization leadership should approve of COOP Plans as part of their review cycle to ensure that the COOP Plans reflect leadership priorities. COOP Plans by King County Information Technology, King County Metro Transit, and the Department of Adult & Juvenile Detention were signed by previous directors, and COOP Plans by the Finance and Business Operations Division, Superior

Court, and District Court do not have any written indication of approval by leadership.

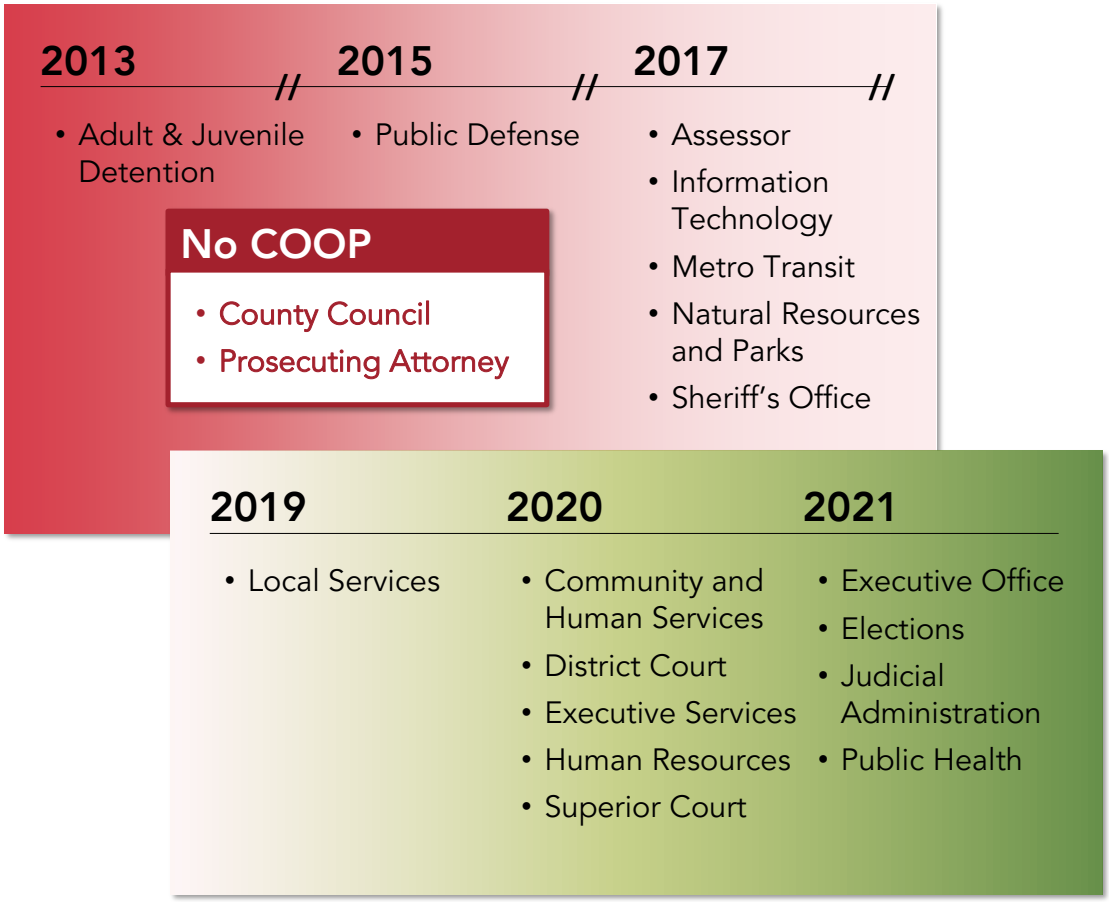
- **Nearly a third of agencies have not updated their COOP Plans in the last four years. The most outdated COOP Plan is eight years old, last updated in 2013**. FEMA and EMAP standards indicate that agencies should review and update COOP Plans according to a regular schedule to ensure the plan content is still relevant. Five of the seven COOP Plans we reviewed had not been updated since 2017, despite having a review schedule that indicated they should have been updated. Two others we reviewed did not articulate any review and update cycle within the COOP.

Most agencies do not provide details on the conduct or frequency of continuity-specific training, exercises, or system tests in their COOP Plans. FEMA and OEM standards indicate that agencies should organize regular trainings, exercises, and testing of equipment needed to fulfill mission-critical responsibilities during an emergency, ideally on a yearly basis. Most COOP Plans mentioned continuity plan testing, training, and exercises, but typically did not describe what these should include, how often these should occur, or who was responsible for ensuring that they occurred. When we asked agencies about their practices regarding training, exercises, and testing, about half indicated they conduct these regularly.

HIGHLIGHT

The Department of Community and Human Services (DCHS) COOP Plan was up-to-date and approved by leadership. It also detailed plans for continuity related testing, training, and exercises. Last updated in February of 2020, the COOP Plan included a plan for review by leadership every three years, in addition to regular reviews by the internal COOP Plan team. The DCHS COOP Plan includes a training plan attachment which describes the subjects that trainings will cover and indicates DCHS will conduct annual COOP Plan exercises and weekly tests of emergency radios.

EXHIBIT B: Many King County departments and offices lead by separately elected leaders regularly update their COOP Plans, but over a third of these departments and offices have not updated their COOP Plans since 2017 and some agencies do not have a COOP Plan in place.



Note: COOP Plan status represents documents submitted to the King County Auditor's Office for review as of August 2021 and does not address more recent drafts that may have undergone review by time of publication. This graphic reflects COOP Plans provided by departments and separately elected agencies, but not the department divisions, as not all departments have chosen to develop division-level COOP Plans.

Source: King County Auditor's Office review of COOP Plans provided by agency representatives.

Agencies rarely prioritize essential functions

Most agencies identify essential functions in their COOP Plans, but few prioritize those functions so they could be triaged if time or resources were limited. Essential functions are operational activities that cannot be deferred for an extended period during an emergency. For example, wastewater treatment and 9-1-1 response are functions that must be restored as quickly as possible for the health and safety of the community. While county agencies have many important functions, some can be temporarily delayed during an emergency, such as entering day-to-day records into databases or training personnel. Without prioritizing essential functions, agencies risk allocating scarce time and resources to less time-sensitive functions at the cost of the most urgent operational needs. By identifying essential functions and prioritizing them relative to each other, agencies can help ensure that limited resources go

toward activities that would have the most negative impact if delayed. While most of the 25 COOP Plans we reviewed identify essential functions, we noted several gaps.

- **Some agencies do not identify essential functions in their COOP Plans, while others define them inconsistently or too broadly to be useful.**[4] FEMA, EMAP, and OEM all indicate that COOP Plans should clearly identify essential functions to ensure that functions that cannot be deferred are performed during an emergency. Two of the COOP Plans we reviewed include sections titled "Essential Functions," but do not identify any essential functions in the text of these sections. Five COOP Plans we reviewed had inconsistencies regarding identified essential functions in their attachments in comparison to the COOP Plan itself. Five COOP Plans we reviewed identify a broad set of functions that characterize a large amount of the agency's regular services, rather than a selection of those functions that cannot be delayed during an emergency.
- **Most agencies do not prioritize essential functions relative to each other in their COOP Plans, including those that identify broad lists of functions as being essential.** FEMA, EMAP, and OEM all indicate that that COOP Plans should prioritize their essential functions relative to each other so that the most time-sensitive essential functions can be performed when resources are limited. This could be done by giving each function a specific priority (first, second, etc.) or by articulating how long each function can be delayed. However, 19 of the 25 COOP Plans we reviewed do not prioritize essential functions relative to each other, including the COOP Plans that include highly expansive sets of functions.

HIGHLIGHT

The Business Resource Center (BRC) within DES clearly identifies several essential functions in its COOP Plan, along with contingencies and special requirements that would impact its ability to provide those functions during emergencies. BRC's plan goes on to prioritize those essential functions by designating the priority for recovery of these systems relative to each other. In addition to articulating the priority for essential functions, BRC documents more detailed action items that guide where the BRC should focus its attention following an emergency.

[4] We did not assess whether the essential functions agencies selected were adequate or appropriate.

Agencies did not complete fundamental planning processes

Agencies did not conduct analyses meant to inform key elements of the COOP Plans, increasing the risk that agencies will not have the information they need to prioritize activities and prepare for emergency impacts. FEMA recommends that agencies conduct a Business Process Analysis (BPA) and Business Impact Analysis (BIA) as early steps in the continuity planning process. A BPA is a systematic process that documents the organization's activities, along with associated systems, resources, controls, facilities, and other related elements. A BIA is a method of identifying and evaluating threats that may impact the organization's ability to fulfill those activities. Agencies can then use both analyses to identify and prioritize essential functions and develop strategies to mitigate the impacts of emergencies on those functions.

Few staff responsible for COOPs were aware of any past BPA or BIA processes at their agencies. Some said that this may have been performed when the COOP was developed, but that it would have been before their time as the COOP coordinator, and they did not have any associated records. OEM indicates it has tried to circulate this concept through the departments in the past, but this has not been a topic of training recently.

Agencies do not identify alternate sites and essential records

Agencies did not consistently identify alternate work sites or essential records needed to fulfill essential functions in their COOPs, increasing the risk that they may not have the resources needed to continue their work in the midst of an emergency. During an emergency, agencies may have limited access to the spaces, records, and other resources they use to operate. By identifying resources they will need and ways to mitigate resource disruptions ahead of time, agencies can help ensure they can do their jobs during an emergency. For this reason, FEMA, OEM, and EMAP recommend that COOP Plans detail how alternate working sites and telework will be used to fulfill essential functions when the agency's primary worksite is unavailable. FEMA also recommends identifying the essential staff, technology, and records needed to fulfill essential functions. Agency COOP Plans we reviewed generally addressed the use of telework, which the County used extensively throughout the COVID-19 pandemic. However, telework may not be viable in all emergencies or for all functions. We also observed that agency COOP Plans often provided limited information on alternate sites and essential records to which they may need access during emergencies.

- **Mirroring our 2016 findings, only half of agencies we reviewed had a viable plan for alternative work sites.** The other half of agencies either did not identify specific alternate work sites or stated they will rely on the Facilities Management Division (FMD) to do this during an emergency. FEMA, OEM, and EMAP standards all emphasize the importance of identifying and detailing alternative work sites to continue essential functions if primary sites are compromised. While some agencies identified sites they plan to use, nine stated that FMD maintains a database of sites for emergency relocation. However, FMD indicates that the information in these COOP Plans is out of date and that King County does not own spare facilities for housing all the agencies with unique operational needs.

- **Most agencies do not identify or describe specific essential records in their COOP Plans, often stating they will be identified at the time of the emergency.** FEMA and OEM standards both indicate that COOP Plans should identify and describe essential records that the agency would rely upon to provide essential functions during emergencies. These could include records such as employee and community partner contacts or documents necessary for payroll. When referring to essential records, six COOP Plans we reviewed use nearly identical, vague language, which suggests they may have copied language from a template instead of identifying their own unique records. Nine of the COOP Plans we reviewed, including most of those using identical language, indicate that the agency will identify essential records at the time of an emergency, which does not align with OEM and FEMA standards.

HIGHLIGHT

DLS identifies secondary work locations for the agency in a COOP Plan appendix and division-level COOP. The appendix to the DLS COOP Plan also identifies alternate sites to be used for specific essential functions, as well as whether telecommuting can be used to fulfill that function during an emergency.

Public Health identifies the essential records needed to fulfill essential functions in division-level COOP Plans. The Environmental Health Services Division COOP Plan, for instance, includes several pages of vital records, the program each record supports, the form of the record, where the record is stored, and back-ups and protections for the record. Other agencies, like DCHS, indicate which essential function each essential record is needed for.

Some agencies do not detail emergency communication

Not all agencies address how they will communicate with their staff prior to and during emergencies in their COOP Plans, increasing the risk that staff will not be aware of key information or responsibilities during an emergency. FEMA, OEM, and other King County emergency standards all indicate that COOP Plans should clearly articulate how agencies will communicate with staff during emergencies. Agencies may follow a common standard for communication if this standard is identified within the COOP Plan. If agencies do not have processes for informing staff of their emergency roles and responsibilities, both prior to and during an emergency, those agencies may have to delay their essential services as they try to find ways to reach staff in the moment.

- **Many COOP Plans do not detail how agencies will communicate with employees during emergencies, sometimes referring to communications plans that do not exist.** Both FEMA and OEM indicate that COOP Plans

should describe how agencies will communicate with their employees during an emergency so they can account for their staff's safety and provide reporting instructions and operating status to staff in real-time. While most COOP Plans we reviewed did address communication at some level, only half include details such as the modes of communication they intend to use or who is responsible for notification. Eleven out of the 25 COOP Plans we reviewed used language that referenced another "communications plan." However, only one department and one division were able to provide these communication plans upon request.

- **Most COOP Plans do not address how personnel will be informed of their mission-critical status or put the responsibility on employees for knowing their status themselves.** FEMA, OEM, and King County's emergency workforce guidelines all state that agencies should inform their staff in writing of their emergency roles and responsibilities prior to emergencies to ensure that they are prepared to fulfill their roles. Nearly half of the COOP Plans we reviewed either do not address how the agency will notify employees of their role or place the responsibility for knowing on the employee themselves.

HIGHLIGHT

The Department of Natural Resources and Parks (DNRP) COOP Plan assigns responsibility to specific positions for notifying employees about their emergency designations, both upon hire and annually thereafter. DNRP uses division-specific notification letter templates to inform essential employees of their status and maintains current lists of personnel by their emergency designation.

Agencies should address the needs of staff with disabilities in continuity plans

Given King County's commitment to equity, agencies should address the needs of personnel with disabilities in their COOP Plans. King County has committed to ensure equitable work experiences for all employees, including those with disabilities, through the Equity and Social Justice Strategic Plan. In alignment with King County's priorities, FEMA standards indicate that agencies should plan for the needs of employees with disabilities in their COOP Plans. This means that agencies should include both processes for making requests for reasonable accommodations as well as any commonly requested accommodations in their COOP Plans. These could include considerations like providing paratransit options, choosing an accessible alternate site, or including Text Telephone (TTY) options for emergency communications. This does not require that individual employees disclose their disabilities or that agencies maintain a list of employees with disabilities. Rather, it requires that agencies have processes in place to address reasonable accommodations when they are requested.

No county COOP Plans we reviewed address the needs of employees with disabilities or how they may request accommodations related to continuity plans. While a few

COOP Plans reference the Americans with Disabilities Act (ADA), this is only in relation to whether county buildings were ADA-compliant rather than the details of the plan itself.

Structural barriers drive COOP Plan issues

Many of the issues we found in this audit may be driven by a lack of assigned responsibilities for coordinating and implementing COOP Plan practices, as we originally found in 2016 (see appendix 1). In our 2016 audit, we noted that the emergency planning structure placed the responsibility for continuity planning at the agency level and that there were not specific requirements for all agencies to complete COOP Plans. The result was significant variation in preparedness activities across agencies.[5] The relevant section from the 2016 audit is included in appendix 1 of this report. Emergency efforts were dependent on each agency prioritizing the activity and voluntarily working with OEM as the subject matter expert to ensure quality processes and plans.

In addition to gaps in responsibility, agencies have indicated that they have difficulty prioritizing emergency planning work in the context of their day-to-day responsibilities. Agency participation is essential to effective continuity planning, but some agency-level COOP coordinators cite competing agency priorities and lack of familiarity with emergency management as barriers to continuity planning. This could contribute to our findings that many COOP Plans are out of date, missing key elements, or are missing leadership approval. Our audit of emergency management in 2016 found issues with missing COOP Plans and COOP Plans that were not reviewed for quality, which led to our recommendations that the County increase the authority of OEM in order to provide structure, expertise, and momentum for preparedness.

Five years after our original audit of OEM, there are still no formal requirements for agencies to engage in continuity planning. As part of our 2016 audit, we recommended that that King County code be updated to clarify requirements for all county agencies—including separately elected offices—related to COOP Plans, training, and exercises. Although some positive actions have been implemented in the past five years, the overall outcome has remained the same: critical gaps exist in county emergency planning. Because the actions taken since 2016 have not achieved the desired outcomes, we make a new recommendation that combines the intent from two recommendations from 2016.

[5] The 2016 audit of OEM titled "Emergency Management: Insufficient authority and communication hinder emergency preparedness and response in King County" can be found on the King County Auditor's Office website.

Recommendation 1

The County Executive should develop and propose revisions to King County Code to the County Council, including:

a. **defining a structure that provides the Office of Emergency Management with the responsibility to effectively drive the County's emergency preparedness and response activities**
b. **requiring the development of complete continuity of operations plans for all agencies**
c. **developing a schedule for all agencies to regularly review, update, and conduct training and exercises for continuity plans.**

OEM does not review all COOP Plans for issues

OEM does not regularly review COOP Plans for comprehensiveness and quality as part of its current responsibilities, which allows issues to continue without resolution. As described earlier in this report, significant gaps remain in continuity planning regarding completeness, quality, and coordination across agencies. OEM could address many gaps by regularly reviewing agency COOP Plans for problem areas and working with agencies to correct them. For example, OEM is in the best position to identify issues across COOP Plans, such as the problem discussed earlier with dependency on FMD for identifying alternate sites. OEM currently reviews COOP Plans for agencies that are the leads for Emergency Support Functions as part of EMAP accreditation, but this review only occurs every five years and only includes nine agencies. OEM notes that it does not have the resources needed to review all COOP Plans, but it acknowledges the value of doing such reviews if it had the capacity to do so. By applying its expertise and a countywide lens to the COOP Plans, OEM could help identify and address recurring gaps in COOP Plans both by commenting on individual COOP Plans and adapting OEM training and guidance to address common deficiencies.

Recommendation 2

The Office of Emergency Management should conduct and document regular reviews of agency continuity of operations plans on an established schedule and work with agencies to ensure completeness and quality, and that dependencies across agencies are aligned.

Many COOP Plans shared the same deficiencies

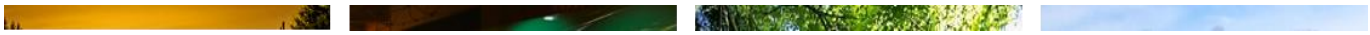
Several issues were common in COOP Plans across King County. Detailed OEM guidance could assist agencies with meeting best practices. We identified several areas where guidance related to COOP Plan development would benefit from additional depth. These areas include

- instructions for addressing the needs of employees with disabilities, including processes for requesting reasonable accommodations. No agency COOP Plans included this information.
- information from OEM about how essential records should be defined and what information should be collected for these records, which would support improved essential record details in agency COOP Plans.
- details on what kind of information should be included in COOP Plans for real-time emergency communication or communicating mission-critical status to employees, which could support agency communication improvements.
- guidance on how to conduct a BPA and BIA to identify essential functions. Only a few continuity plan coordinators were aware of these analyses having been done for their agencies.

Recommendation 3

The Office of Emergency Management should coordinate with county subject matter experts to update training and guidance on continuity of operations planning for agencies, including:

a. **how to address the needs of employees with disabilities and reasonable accommodations**
b. **how to define, analyze, and document essential records**
c. **how to analyze, document, and implement real-time emergency communication and communicate mission-critical status to employees**
d. **how to use Business Process Analysis and Business Impact Analysis to define, analyze, and document essential functions.**



Opportunities to Make Pandemic Response More Inclusive and Equitable

SECTION SUMMARY

Public Health – Seattle King County (Public Health) has the opportunity to improve future pandemic responses and ensure they are more equitable. As Public Health conducts a required update of its Pandemic Response Plan, it has the opportunity to address some of the inequities that resulted from the COVID-19 pandemic, namely the disproportionate impact on people who are Black, Hispanic, or American Indian or Alaskan Native.

An updated plan can improve emergency response

An updated pandemic influenza response plan can be used to guide more effective King County responses to future public health emergencies. The County's pandemic flu response plan is an annex to the County's Comprehensive Emergency Management Plan and is a guiding document for pandemic disease response activities, particularly influenza. Public Health is changing the name of this plan to the Infectious Disease Plan as it engages in updates. On July 7, 2020, King County Council Motion 15650 mandated that Public Health, in coordination with OEM, update the Pandemic Response Plan to expand upon the existing 2013 pandemic flu response plan by September 1, 2022. Public Health states that it has begun updating its collection of core planning documents, including outlining a new infectious disease response annex. As it develops this work, it has the opportunity to incorporate lessons from the COVID-19 pandemic and equity considerations not previously included or addressed in the last plan.

One crucial lesson from COVID-19 was that some communities were harmed by the pandemic more than others. People who are Black, Hispanic, or American Indian or Alaskan Native were disproportionately likely to hospitalized by and die from COVID-19-related infections compared to Asian and White people. While the issues that contributed to these disparities are complex, these differences emphasize the importance of considering the causes of these disparities when designing King County's response to the next pandemic.

Federal agencies recommend inclusive emergency planning

FEMA, the Centers for Disease Control (CDC), and other federal agencies recommend that emergency plans incorporate the needs of populations that are at higher risk of negative outcomes during emergencies. The CDC also emphasizes the importance of addressing persistent health disparities for racial and ethnic groups and other population groups that have borne a disproportionate burden of COVID-19. By identifying people who may have unique needs during an emergency, Public Health can better design its plans to ensure that uneven outcomes in residents' well-being are addressed. The first step in doing so is to identify populations who are at higher risk of negative health outcomes. Federal agencies and other experts on inclusive emergency planning specifically call out the following groups, among others, who may have unique needs that need to be considered in emergency planning efforts:

- residents from diverse racial/ethnic groups
- immigrant residents
- residents with limited-English proficiency
- residents who are undocumented
- residents who have disabilities or other functional limitations
- residents who are experiencing homelessness
- residents who are experiencing geographic or social isolation
- other at-risk residents.

Public Health updated its Equity Response Annex in 2019 and developed a data platform during COVID to integrate equity considerations into emergency response priorities and strategies. Public Health has been nationally recognized for its Equity Response Annex, which identifies intersectional groups that face greater barriers to health, and which includes greater inequities during emergencies. Public Health also developed the Socioeconomic Risk Index (SERI) data platform to identify those communities most impacted by the COVID-19 pandemic due to social and economic factors in King County. Public Health states it plans to continue revising the Equity Response Annex to include more specific information for groups impacted by inequities, such as geographic dispersal, population estimates, and the community-based organizations that serve them.

Federal agencies and other experts on inclusive emergency planning recommend involving members of some communities in the emergency planning process. They recommend including multiple options for participation, such as community advisory committees, outreach to grassroots community leaders, or even direct community design of aspects of the plan. By including members of the community in the planning process, emergency planners can ensure that the needs and unique skills and insights of diverse communities are incorporated in all phases of emergency response, from mitigation and preparedness to response and recovery. Representatives from special needs populations can also add credibility to emergency activities for groups that may have limited trust in government agencies.

During the pandemic, Public Health undertook several efforts to collaborate with the community on emergency efforts. Public Health created a group called the Pandemic and Racism Community Advisory Group (PARCAG) comprised of representatives from communities, businesses, and the public sector. The group originally served to help slow the spread of the novel coronavirus through community mitigation strategies, but later expanded to address regional racial inequities. Public Health says it is exploring how to integrate PARCAG and other community groups into the planning process and hopes the process itself will serve to strengthen relationships and build trust with communities. Additionally, Public Health indicated that it implemented Community Navigators and an Equity Response Team to help ensure that the community played a central role in informing public health strategies.

Recommendation 4

Public Health – Seattle and King County should identify communities that are likely to be disproportionately impacted by future pandemics and include them in the Infectious Disease Plan development process.

Recommendation 5

Public Health – Seattle and King County should incorporate the results of the process in Recommendation 4 in its Infectious Disease Plan.

Appendix

Excerpt from 2016 Audit of Office of Emergency Management

The following is an excerpt from our 2016 audit, "Emergency Management: Insufficient authority and communication hinder emergency preparedness and response in King County." This audit can be found in full on the King County Auditor Website.

1. Lack of Influence and Authority

Section Summary

The Office of Emergency Management (OEM) does not have sufficient influence and authority to accomplish its mission. OEM sits much lower in the King County organizational chart and has less statutory authority than comparable high-performing offices of emergency management in other counties. These factors hamper OEM's ability to build the relationships and influence it needs to ensure smooth coordination with stakeholders in disaster response. In addition, the agency has not succeeded in its efforts to encourage all King County government agencies to prepare to continue essential government functions in the event of a disaster.

OEM does not have sufficient authority to compel preparedness actions

Unlike in some other jurisdictions, OEM does not have authority within King County Code to compel emergency preparedness, resulting in varied levels of preparedness across county agencies. Lacking authority in code, OEM must instead persuade agencies to dedicate resources to preparedness actions like planning for continuity of operations, training, and participating in exercises. It has had inconsistent success, as discussed on pages 3 and 4 of this report. King County Code directs OEM to "ensure cooperation and coordination" among county agencies to provide adequate emergency preparedness, but does not require executive departments or separately elected agencies to participate in emergency management activities. Further, code does not provide a means for accountability or performance measurement. As a result, OEM does not have the authority needed to efficiently and effectively administer its emergency management program.

The Emergency Management Accreditation Program considers this type of authority a national best practice standard. [1] In order to achieve accreditation as meeting national standards, an emergency management office "should have legal statutes and regulations establishing authority for development and maintenance of the Emergency Management Program." For example, Miami-Dade County is accredited, and its code requires all departments and independent agencies to prepare and periodically revise emergency preparedness contingency plans pursuant to directions and guidelines from the Office of Emergency Management. The Miami-Dade emergency management director also has the statutory authority to mandate training of county employees.

[1] King County is planning to undergo evaluation for Emergency Management Accreditation Program certification in 2017.

King County Auditor's Office – Emergency Management: Barriers Impede Preparedness and Response 1

1. Lack of Influence and Authority

OEM's lack of statutory authority and influence resulted in varying levels of emergency preparedness across the county

OEM's process for developing emergency preparedness within King County government is hampered by its lack of statutory authority and influence. For instance, even though OEM dedicated a staff member to work with King County agencies, it took three years for OEM to get King County executive agencies to develop and transmit emergency continuity of operations plans, which describe how essential functions will be continued and recovered in an emergency or disaster.[2] According to OEM, some agencies conducted extensive efforts to prepare for continuity of operations, including King County's Department of Information Technology, which proactively worked to identify software and network applications critical for county operations. However, other county agencies did not complete continuity plans.

Part of the problem is that while the early part of the planning effort was conducted through the Department of Executive Services, the follow-up work was done through the county's Emergency Management Coordination Committee (the committee), which is poorly attended and has not yet matured into an effective body. [3] The committee was intended to be a cohort of agency staff who are responsible for emergency management coordination in their departments and divisions and who work actively with OEM to coordinate activities across the county.

However, OEM lacks the influence and political credibility to develop the Emergency Management Coordination Committee into an effective body. For instance, only two of the 13 directors we spoke with indicated that their emergency management staff person reported to them on committee activities and engaged the department on committee tasks, such as continuity planning. County emergency managers indicated that the committee has not produced useful outputs and needs accountability from leaders. OEM managers stated that the committee could be made more effective, and it has taken steps in early 2016 to make a measurable contribution to emergency preparedness in King County. According to OEM, the committee is currently working on several important tasks, such as providing input on the:

- process to designate and communicate county employees' responsibilities in emergency situations
- development of a framework for alert and warning emergency notifications within the county

[2] The Emergency Management Accreditation Program states "continuity of operations plans (COOP) shall identify and describe how essential functions will be continued and recovered in an emergency or disaster. The plan(s) shall identify essential positions and lines of succession, and provide for the protection or safeguarding of critical applications, communications resources, vital records/databases, process and functions that must be maintained during response activities and identify and prioritize applications, records, processes and functions to be recovered if lost…The plans address alternate operating capability and facilities."

[3] There are 25 agencies on Emergency Management Coordination Committee's attendance roster: 10 executive departments, eight divisions (of executive departments), and seven separately elected agencies. Appendix 1 has greater detail on attendance over the three-year period.

1. Lack of Influence and Authority

- King County priorities for allocating federal grant funding.

Perhaps as a result of its past ineffectiveness, the group is poorly attended. For example, only three out of 25 agencies sent representatives to at least three-quarters of committee meetings between 2013 and 2015. Further, ten agencies sent representatives to less than 20 percent of meetings. See Appendix 1 for attendance details. The committee's lack of defined outputs combined with insufficient statutory authority to require county agencies to plan for emergencies made it difficult for OEM to ensure that the essential functions of the county will be maintained in a disaster.

Recommendation 1

The County Executive should recommend legislation to the County Council to formalize the role of the Emergency Management Coordination Committee, defining it as the emergency management coordinating body for King County, led by the Office of Emergency Management and requiring participation by the emergency manager or designee from each county department and separately-elected office.

OEM has not evaluated emergency plans; some agencies have not tested them

OEM has not reviewed continuity of operations plans submitted in 2012 and 2013 for quality or checked to make sure they are not depending on the same resources, such as alternate work locations. OEM managers indicated that this work has been delayed due to limited resources. OEM has assigned a staff member to evaluate agencies' plans according to national standards.[4]

Agencies are supposed to train staff and test their plan in the form of a tabletop exercise each year, according to King County's Comprehensive Emergency Management Plan.[5] Plans are also supposed to be updated annually to make sure information such as line of succession is current, as well as incorporate any improvement identified through tabletop exercises. Some departments conducted exercises in 2014; however, OEM is not aware of any having updated their plans with lessons learned. Furthermore, one plan was developed in 1998; it is nearing 20 years old. See Exhibit A for more information. If not practiced and refined, plans are of limited value in emergency situations.

[4] Nationally recognized Emergency Management Accreditation Program standards mandate that plans identify essential positions and lines of succession. They also require safeguarding and recovery of critical applications, communications resources, vital records, processes, and functions that must be maintained during response activities.
[5] The Comprehensive Emergency Management Plan is required by state law. It provides a framework for Emergency Support Functions covering detailed information for conduct of the county emergency mitigation and preparedness program and the county's response and recovery efforts.

1. Lack of Influence and Authority

Exhibit A: Some King County agencies are not prepared to continue operations in an emergency and none of the plans meet expectations for annual exercising and update.

Agency	Continuity of Operations Plan Provided to OEM	Required Annual Update Completed	Most Recent Tabletop Exercise Conducted
Adult and Juvenile Detention	✓	✗	✗
Community and Human Services	✓	✗	2014
Economic and Financial Analysis	✓	✗	✗
Executive Services	✓	✗	2015
Information Technology	✓	✗	2015
Judicial Administration	✓	✗	2014
Natural Resources and Parks	✓	✗	2014
Permitting and Environmental Review	✓	✗	2014
Public Defense	✗ [a]	-	-
Public Health	✓	✗	✗
Transportation	✓	✗	2014
Assessor	✓	✗	✗
Council	✗	-	-
Elections	✓	✗	✗
Prosecuting Attorney	✗	-	-
District Court	✓	✗	✗
Superior Court	✓	✗	✗
Sheriff	✗	-	-

[a] The document the Department of Public Defense (DPD) submitted to OEM was not a continuity of operations plan. DPD has not responded to OEM's or our requests for its actual continuity of operations plan.
Source: King County Auditor's Office and OEM.

OEM stated that it is working to increase cooperation with the Sheriff's Office, which is a key player in emergency response. Despite requirements in its own General Orders Manual, the Sheriff has not developed continuity of operations plans for any of its sections or precincts.[6] In addition, the Sheriff's deputy who was assigned to emergency management was primarily reassigned to support patrol operations in fall 2014. Now the deputy spends 15-20 percent of his time on emergency management work. He reports that his other duties interfere with his ability to attend Emergency Management Coordination Committee meetings. This could indicate vulnerabilities in the Sheriff's ability to coordinate with OEM and other county agencies while responding to other emergencies. The

[6] The Sheriff's General Orders Manual requires continuity of operations plans for the Patrol Operations, Criminal Investigations, Technical Services, Special Ops, and Communications sections, as well as each of the three precincts and 16 contract cities. Sheriff's Office staff indicated that none of these documents had been developed as of the time of our review.

1. Lack of Influence and Authority

Sheriff has a significant number of responsibilities in disaster situations.[7] As shown in Exhibit A, some of the other separately elected agencies in King County also lack continuity of operations plans.

The Sheriff's Office is the only agency with prime responsibility for essential emergency functions that does not have a continuity of operations plan. While the Sheriff's Office has a plan that outlines response activities, OEM acknowledges that it lacks critical elements of a continuity of operations plan, such as when to activate the plan and alternate locations for command posts. Both OEM and the Sheriff's Office staff state that the Sheriff's Office is well practiced in responding to emergencies; however, a continuity of operations plan is essential to full preparedness.

Recommendation 2

The County Executive should develop and propose to the County Council specific emergency preparedness-related requirements for King County Code and/or Executive Orders for all county departments and separately-elected offices, related to:

a. development of continuity of operations plans
b. annual plan reviews, exercises, and updates
c. designation of a departmental emergency management liaison (with emergency management as an express function in its job description) as the employee responsible for leading compliance with continuity of operations plan requirements and coordination between the department and the Office of Emergency Management and other county functions.

Recommendation 3

As a key player in emergency response, the King County Sheriff's Office should work with the Office of Emergency Management (OEM) to develop a continuity of operations plan that meets requirements determined by OEM, and provide it to OEM by November 15, 2016.

OEM lacks a means to hold county agencies accountable for lax preparedness

OEM does not have a mechanism to motivate county agencies to engage in preparedness activities or to hold them accountable for their lack of preparedness. Best practices in emergency management state that motivation is important to encourage agencies to participate in emergency management planning, training, and exercises. For example, Miami-Dade County Code requires an annual emergency preparedness report to its board of commissioners and mayor. The report provides an avenue for

[7] King County's Comprehensive Emergency Management Plan assigns the Sheriff's Office responsibilities such as providing evacuations, crowd control, search and rescue, aerial reconnaissance, Emergency Coordination Center security, protecting vital resources, and controlling restricted areas.

1. Lack of Influence and Authority

accountability to inform policy-makers on the status of the ability of Miami-Dade County to prepare for, respond to, and manage disasters and emergencies.

An annual report would provide such a mechanism by communicating to the County Council, the County Executive, and the public an evaluation of the status of preparedness efforts across the county. Specifically, it could indicate which agencies have completed continuity of operations plans, and trained, exercised, and updated them with lessons learned. As shown in Exhibit A above, separately elected agencies have done comparatively little emergency planning, so the transparency and accountability afforded by an annual report could potentially motivate them to participate.

Recommendation 4

The Office of Emergency Management (OEM) should develop and present an annual report to the County Council and County Executive on the status of emergency management in King County prior to budget proposals, including the status of continuity of operations plan development, updates, training, and exercises across all county agencies, and any other elements OEM deems appropriate, especially those that can be quantitatively assessed over time, such as participation in trainings and exercises.

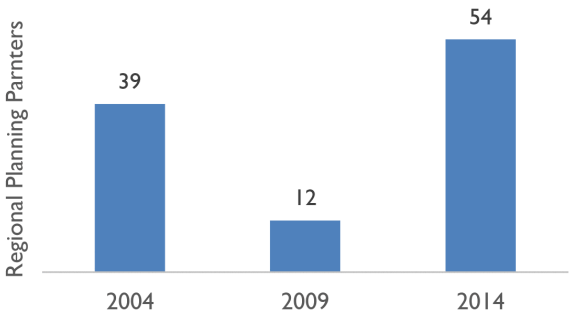
OEM quadrupled regional stakeholder partipation in key planning effort since 2009

In contrast to the challenges OEM has experienced motivating county agencies to participate in emergency planning activities, it has seen success in its efforts to convene stakeholders in regional planning. For example, OEM worked with 54 local governments, including King County, 26 city and town governments, and 27 special purpose districts to update the Regional Hazard Mitigation Plan as of July 2014.[8] The plan states that the 2009 update process was truncated after back-to-back flooding and snow storm disasters and the emergence of a significant flooding threat due to problems at Howard Hanson Dam. The truncated process resulted in a significant decrease in the number of planning partners covered by the regional plan (12 local governments). Many of the original planning partners developed their own plans or let their plans expire, marking a decline in OEM's influence and credibility in the region. As shown in Exhibit B, current OEM leaders have worked hard to build back relationships with local governments and restore regional commitment toward collaborative emergency preparedness and resilience.

[8] King County and a partnership of local governments within the county developed and maintained a regional hazard mitigation plan to reduce risks from natural disasters. The plan complies with hazard mitigation planning requirements to maintain eligibility for funding under Federal Emergency Management Agency grant programs.

1. Lack of Influence and Authority

Exhibit B: OEM renewed stakeholder participation in regional hazard mitigation planning between 2009 and 2014.



Source: King County Auditor's Office

OEM's organizational placement hinders relationship-building and influence over county agencies

OEM's organizational placement within the Department of Executive Services diminishes its visibility and influence, making it difficult for OEM to create and maintain relationships with King County agencies. Exhibit D depicts OEM's organizational placement and reporting structure. Research by the International City/County Management Association (ICMA) found that the emergency management function must have sufficient status and authority to obtain the attention, cooperation, and respect of other agency personnel, see Exhibit C.[9] Training by the Federal Emergency Management Agency indicates that an effective emergency management organization should report directly to the county executive and have a horizontal linkage with other departments such as public works. OEM does not have a horizontal relationship with other departments and does not have sufficient status and authority to be effective.

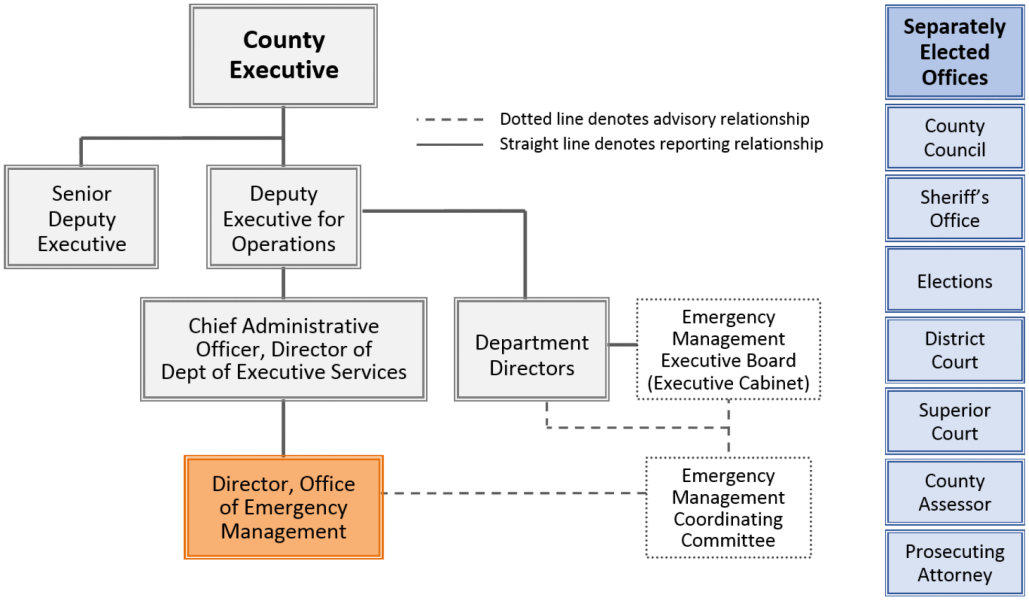
Exhibit C: ICMA Key Characteristics of Effective Emergency Management Programs

- Emergency management function has status and authority
- Manager is a strong leader and has respect of key officials
- Manager meets regularly with department heads
- Motivation is provided for participation in program
- Emergency preparedness is an ongoing activity

[9] The International City/County Management Association (ICMA) identified key characteristics that contribute to effective emergency management after reviewing the operations of more than 300 local government emergency management agencies. The Public Entity Risk Institute compiled them in its 2009 publication *Characteristics of Effective Emergency Management Organizational Structures*. Selected characteristics are listed in Exhibit C.

1. Lack of Influence and Authority

Exhibit D: Several organizational layers separate the Office of Emergency Management from County Executive.



Note: Until a reorganization in February 2016, OEM was four layers removed from the County Executive.
Source: King County Auditor's Office

OEM lacks the influence and political credibility to make the county's internal emergency management work group an effective body

OEM is unable to reliably advance countywide emergency planning efforts through the Emergency Management Coordination Committee. The committee was intended to be a cohort of agency staff responsible for emergency management coordination in their departments and divisions that works actively with OEM to coordinate activities across the county. However, OEM staff indicated that many representatives view the committee as a place where OEM informs them about emergency management information, not as a working group. OEM staff and active committee representatives depend on voluntary collaboration from participants who have other primary job duties. Consequently, other than participating in efforts to develop continuity of operation plans, the committee has had few defined outputs. Important projects related to its continuity of government work—such as Facility Management Division's alternate workspace identification effort—depend entirely on the interest and willingness of committee representatives to participate, requiring OEM's time and resources in championing innovative efforts.[10]

[10] The Facilities Management Division, through the Emergency Management Coordination Committee, is piloting a process to obtain specific space-related needs information for alternative worksites for selected Department of Executive Services divisions and executive departments, thereby allowing for coordination among entities regarding locations. The work completed to date is the information request form, not an alternative worksite plan.

1. Lack of Influence and Authority

Many department and division directors we interviewed believed that the person within their department or division designated as being responsible for their agency's emergency management was coordinating with OEM via the committee. In some cases that was true, but in others we found that the key department- and division-level emergency managers did not engage with OEM via the committee. Some directors indicated that they did not think the structures OEM had in place to facilitate intra-government collaboration were effective.

Additional layers of command between emergency management professionals and executives can diminish effectiveness

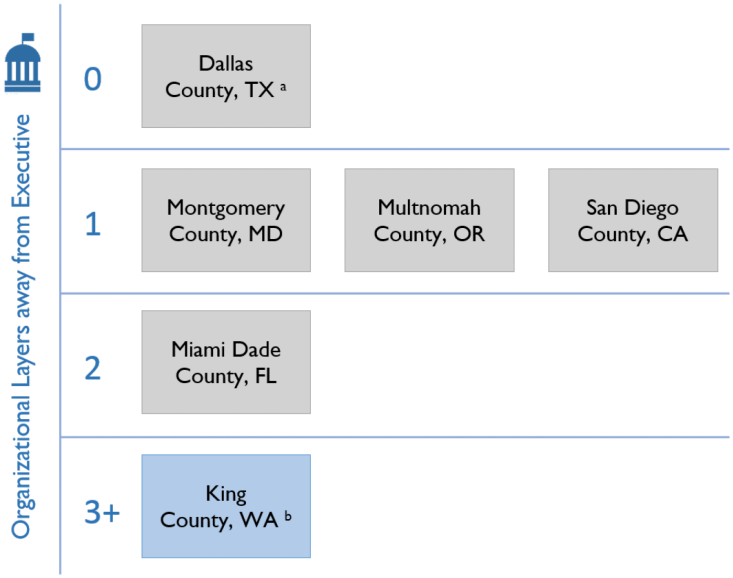
Directors from high-performing emergency management jurisdictions agreed that the closer the emergency management function is placed to the county executive, the more efficiently the office can operate. The King County OEM director does not have regular access to the County Executive, and therefore cannot borrow that authority to push emergency management activities as a priority for county agencies. OEM has struggled through these structural barriers presented by its low organizational placement to try to build relationships and lead the county toward a position of readiness and resilience. In contrast, emergency management directors in comparable jurisdictions identified their organizational placement at the department level as a factor in their success. For instance, they indicated their peer relationships with department directors were helpful in ensuring preparedness and response actions were completed. As one high-performing emergency management director articulated, "without visibility, access to top leadership, and delegated authority, the work of the emergency manager will not be as effective."

High-performing offices of emergency management in comparable jurisdictions have fewer organizational layers separating the emergency management office from top county executives.[11] Exhibit E compares King County's organizational placement with comparable jurisdictions in terms of number of reporting layers separating the emergency management function from the top executive.

[11] We interviewed emergency management directors from five counties comparable to King County in terms of their population, number of cities and unincorporated areas, number of federally declared disasters, and whether they were in a home rule state: San Diego County, Calif., Miami Dade County, Fla., Montgomery County, Md., Multnomah County, Ore., and Dallas County, Texas. Most were identified as high-performing by local emergency management professionals, and three are certified by the Emergency Management Accreditation Program.

1. Lack of Influence and Authority

Exhibit E: King County's Office of Emergency Management is lower in the organization than comparable counties.



[a] Dallas County's emergency management agency is placed in the Office of the Executive.
[b] King County had four organizational layers between OEM and the County Executive until February 2016.
Source: Comparison jurisdictions and King County Auditor's Office

More than one director indicated that they would be disinclined to apply for a job at King County OEM, because the organizational structure would make it difficult to be successful. This indicates that in addition to creating challenges for OEM to operate effectively, the organizational placement could act as a deterrent to recruiting talented emergency management professionals.

Recommendation 5	The County Executive should develop, document, and implement a plan to provide the Office of Emergency Management (OEM) with the visibility, leadership, and relationships necessary to effectively and efficiently drive the county's emergency preparedness and response activities. The plan should include implementation timeframes and consideration of making OEM an executive-level department or incorporating it into the Office of the Executive if other strategies do not achieve the desired outcomes.

1. Lack of Influence and Authority

King County's designated emergency manager is not a trained emergency management professional

Not only is the OEM director too far removed from the County Executive to provide timely professional expertise, but also he is not the county's designated emergency manager. According to the county's Comprehensive Emergency Management Plan, the designated emergency manager is tasked with providing emergency management functions. In an emergency, the person in charge of managing the situation should have extensive knowledge, experience, and expertise in the emergency management discipline. But in King County, the designated emergency manager is the director of the Department of Executive Services, not the OEM director. The director of the Department of Executive Services is not an emergency management professional, and because of numerous other duties associated with the nine other agencies she manages, cannot devote a consistently high level of attention to emergency management issues. As a result, emergency management professionals in OEM have to work through another organizational layer, introducing inefficiencies that could have negative outcomes, especially in time-sensitive situations.

Recommendation 6	The County Executive should amend the Comprehensive Emergency Management Plan to designate the director of the Office of Emergency Management as the County Emergency Manager and propose related revisions for County Code section 2.56.030 to the County Council.
Recommendation 7	The County Executive should require that the designated County Emergency Manager be a certified emergency manager or have comparably significant emergency management experience and sufficient capacity to dedicate a consistent and substantial percentage of work time to emergency management activities.

OEM's use of term-limited temporary employees may be inconsistent with county policy

OEM relies on term-limited temporary (TLT) employees to fulfill core mission work, which is not in compliance with county contingent worker policy and may hurt recruitment and retention. Over a quarter of OEM's staff are TLTs (5 out of 19). Of these five employees, four are performing ongoing core programmatic work: the training and exercise manager, the public educator, the point person for all operational planning efforts, and the finance manager, who supervises a staff of three people. This may conflict with the county's contingent worker policy. Furthermore, two of these key employees are nearing the time limit for temporary positions. Losing these key employees would be a major setback for OEM, because they are highly valued and embody a large amount of specific knowledge gained through experience working in King County.

1. Lack of Influence and Authority

Recommendation 8	The Office of Emergency Management and the Human Resources Division of the Department of Executive Services should reclassify Office of Emergency Management employees performing ongoing program functions from term-limited temporary to career service employees.

Executive Response

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January 5, 2022

Kymber Waltmunson
King County Auditor
Room 1033
C O U R T H O U S E

Dear Ms. Waltmunson:

Thank you for the opportunity to review and comment on the proposed final report *"Emergency Preparedness Limited by Planning Gaps."* I appreciate the work your office has done on this subject as we seek collectively as a government to build ever-more resilient communities.

We concur with the audit recommendations and appreciate the acknowledgement in your report of the numerous steps that have been taken to implement improvements in line with recognized best practices, the most notable of which is the Emergency Management Accreditation Program (EMAP). It is important to note that effective implementation of several of the recommendations will require additional resources which will be contemplated in future budget deliberations.

Throughout the COVID-19 response, Public Health centered equity and community. Prior to COVID-19, Public Health was one of the first health departments in the country to embed equity into emergency response, including adding an equity officer in the incident command system structure.

Knowing the importance of two-way community with community and faith-based organizations, a framework for information sharing was developed in February 2020 which later became the Pandemic and Racism Community Advisory Group (PARCAG). The Advisory Group helps share information and urge action within their respective networks and informs Public Health on what they are seeing in community – both challenges and opportunities. Community Navigators, Priority Population Workgroups, and the Equity Response Team were critical centering community and intentionally co-creating response strategies with them. Public Health continued to adapt strategies based on lessons learned and input from community and these groups. We know that our residents have solutions and experiences that enrich our ability to respond to COVID-19 and we are grateful to our community partners for sharing their time and expertise.

The implementation of these partnerships and strategies led to some of the highest vaccination rates in the United States. The Principles for Equitable Vaccine Delivery had a goal to equitably, efficiently, and quickly vaccinate a minimum of 70 percent of all eligible adults across all racial and ethnic groups and regions of the county. Community vaccination events (CVE) were a core vaccine delivery mechanism, focusing on the highest risk and most impacted and making vaccine as available and accessible as possible.

King County led the nation on how to respond to this unprecedented event, despite being the location of the first known outbreak in the United States and despite the limited information available early in the pandemic about this novel coronavirus, COVID-19. Public Health's prior pandemic and emergency response planning, including the equity response annex and the continuity of operations plan, enabled Public Health to quickly pivot and stand up systems and operations that continue to be used in the COVID-19 response.

Public Health acknowledges that much more is necessary to address "Racism as a Public Health Crisis." Public Health is conducting a thorough after-action review, which will inform the infectious disease response annex and work with community during emergencies. This includes identifying communities that are likely to be disproportionately impacted as referenced in Recommendation 4. As a part of Recommendation 4, Public Health will identify populations that are higher risk for negative health outcomes in a disaster because of historical and ongoing systemic racism including less access to care, crowded housing, higher burden of chronic health conditions, shorter life expectancy, and discriminatory practices.

For Recommendation 5, the revision to the Infectious Disease Plan will include more specific information for groups impacted by inequities to inform future place-based, integrated strategies that would address and overcome barriers to information, resources, and services. Building on the COVID-19 partnerships, Public Health will continue to mindfully co-create response strategies with community and focus resources where communities believe they would be most beneficial, acknowledging traumas from the past and present and being intentionally anti-racist.

Related to the Continuity of Operations Plan (COOP) recommendations 1-3 of the report, Public Health was working with each division on more extensive updates to the COOP plans as a part of the 2020 workplan when COVID struck. Divisional COOP training plans were put on pause in 2020-21 due to COVID-19 staff deployments. The Department did leverage COOP plans in COVID and for other real incidents such as the February 2021 snowstorm and June 2021 heatwave. Plans to resume training exercises in 2022 align with the updated Integrated Preparedness Plan (IPP).

Kymber Waltmunson
January 5, 2022
Page 3

Thank you again for your important work on behalf of King County. If you have any questions regarding our audit response, please contact Dwight Dively, Chief Operating Officer and Director, Office of Performance, Strategy and Budget at 206-263-9687.

Sincerely,

Dwight Dively
Chief Operating Officer

Enclosure

cc: King County Councilmembers
ATTN: Janine Weihe, Acting Chief of Staff
Melani Pedroza, Clerk of the Council
April Putney, Deputy Executive
Shannon Braddock, Chief of Staff, Office of the Executive
Karan Gill, Deputy Chief of Staff, Office of the Executive
Caroline Whalen, Director, Department of Executive Services (DES)
Dennis E. Worsham, Interim Director, Public Health – Seattle and King County
Brendan McCluskey, Office of Emergency Management (OEM), DES

Recommendation 1

The County Executive should develop and propose revisions to King County Code to the County Council, including:

a. **defining a structure that provides the Office of Emergency Management with the responsibility to effectively drive the County's emergency preparedness and response activities**

b. **requiring the development of complete continuity of operations plans for all agencies**

c. **developing a schedule for all agencies to regularly review, update, and conduct training and exercises for continuity plans.**

Agency Response	
Concurrence	**CONCUR**
Implementation date	Develop proposed code by September 30, 2022
Responsible agency	DES/OEM
Comment	

Recommendation 2

The Office of Emergency Management should conduct and document regular reviews of agency continuity of operations plans on an established schedule and work with agencies to ensure completeness and quality, and that dependencies across agencies are aligned.

Agency Response	
Concurrence	**CONCUR**
Implementation date	TBD
Responsible agency	OEM/PSB
Comment	This would require additional resources that will be considered in the 2023-2024 budget.

Recommendation 3

The Office of Emergency Management should coordinate with county subject matter experts to update training and guidance on continuity of operations planning for agencies, including:

a. **how to address the needs of employees with disabilities and reasonable accommodations**
b. **how to define, analyze, and document essential records**
c. **how to analyze, document, and implement real-time emergency communication and communicate mission-critical status to employees**
d. **how to use Business Process Analysis and Business Impact Analysis to define, analyze, and document essential functions.**

Agency Response	
Concurrence	**CONCUR**
Implementation date	TBD
Responsible agency	OEM/PSB
Comment	This would require additional resources that will be considered in the 2023-2024 budget.

Recommendation 4

Public Health – Seattle and King County should identify communities that are likely to be disproportionately impacted by future pandemics and include them in the Infectious Disease Plan development process.

Agency Response	
Concurrence	**CONCUR**
Implementation date	Q2 2022
Responsible agency	Public Health
Comment	It is hard to predict what disease and mode of transmission will create the next pandemic but science, public health surveillance, and a commitment to equity and anti-racism will guide future responses.

Recommendation 5

Public Health – Seattle and King County should incorporate the results of the process in Recommendation 4 in its Infectious Disease Plan.

Agency Response	
Concurrence	**CONCUR**
Implementation date	Q3 2023
Responsible agency	Public Health
Comment	Timeline will depend on availability of staff who are currently dedicated to the COVID-19 response effort; community priorities given direction of COVID-19 pandemic; and funding available for partners.

Statement of Compliance, Scope, Objective & Methodology

Statement of Compliance with Government Auditing Standards

We conducted this performance audit 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.

Scope of Work on Internal Controls

This audit assessed the extent to which King County has designed and implemented internal controls related to agencies' ability to continue providing essential services to the community during emergencies. We reviewed internal controls documented in continuity plans, leadership approval of these plans, and coordination across agencies in the planning process.

Scope

This audit includes continuity of operations plans (COOPs) and related documentation for all county agencies in use as of March–August 2021, the current Pandemic Response Plan, and plans for updates to the Pandemic Response Plan.

Objectives

1. To what extent do King County agency Continuity of Operations Plans (COOP Plans) align with best practices?
2. What principles and practices should guide updates to the County's Pandemic Response Plan, including those designed to address county equity and social justice priorities?

Methodology

For the objective related to continuity plans, we gathered and reviewed continuity plans and all associated documentation from 25 county agencies. While this primarily includes each county department and separately elected office (with two exceptions as noted in exhibit B), some divisions also have COOP Plans in place due to the unique nature of their work. We refer to these collectively as agencies. We assessed the extent to which the contents of COOP Plans and other documents, taken as a whole, compare to best practices in continuity planning from the Office of Emergency Management (OEM), the Federal Emergency Management Agency (FEMA), and the Emergency Management Accreditation Program (EMAP). Our analysis included 39 discrete elements against which we evaluated each agency's plans. In cases where additional documents or plans were referenced in the COOP Plan but not included, we interviewed agency continuity coordinators to ensure our review considered the entire collection of the agency's plans. The collection of plans we reviewed is limited in time to the period in which we made our requests. The Emergency Management Coordination Committee (EMCC) indicates that agencies have

continued to update and revise their COOP Plans, particularly those in draft form, during our review process.

For the pandemic planning objective, we conducted a review of best practices in plan updates as they relate to King County's equity and social justice priorities. This included interviews with another audit shop doing similar work and the Institute for Diversity and Inclusion in Emergency Management (I-DIEM), as well as document reviews of related planning considerations from the World Health Organization (WHO), the National Association for the Advancement of Colored People (NAACP), the Federal Emergency Management Agency (FEMA), the Centers for Disease Control and Prevention (CDC), and others. Considering our review took place during the period in which Public Health – Seattle & King County was in the middle of updating its emergency plans to meet the September 2022 deadline in motion 15650, we chose to report only on the best practices for their inclusion rather than to evaluate the old pandemic plan.

List of Recommendations

Recommendation 1

The County Executive should develop and propose revisions to King County Code to the County Council, including:

a. **defining a structure that provides the Office of Emergency Management with the responsibility to effectively drive the County's emergency preparedness and response activities**

b. **requiring the development of complete continuity of operations plans for all agencies**

c. **developing a schedule for all agencies to regularly review, update, and conduct training and exercises for continuity plans.**

Recommendation 2

The Office of Emergency Management should conduct and document regular reviews of agency continuity of operations plans on an established schedule and work with agencies to ensure completeness and quality, and that dependencies across agencies are aligned.

Recommendation 3

The Office of Emergency Management should coordinate with county subject matter experts to update training and guidance on continuity of operations planning for agencies, including:

a. **how to address the needs of employees with disabilities and reasonable accommodations**

b. **how to define, analyze, and document essential records**

c. **how to analyze, document, and implement real-time emergency communication and communicate mission-critical status to employees**

d. **how to use Business Process Analysis and Business Impact Analysis to define, analyze, and document essential functions.**

Recommendation 4

Public Health – Seattle and King County should identify communities that are likely to be disproportionately impacted by future pandemics and include them in the Infectious Disease Plan development process.

Recommendation 5

Public Health – Seattle and King County should incorporate the results of the process in Recommendation 4 in its Infectious Disease Plan.

Advancing Performance & Accountability

KYMBER WALTMUNSON, KING COUNTY AUDITOR

MISSION Promote improved performance, accountability, and transparency in King County government through objective and independent audits and studies.

VALUES INDEPENDENCE • CREDIBILITY • IMPACT

The King County Auditor's Office is committed to equity, social justice, and ensuring that King County is an accountable, inclusive, and anti-racist government. While planning our work, we develop research questions that aim to improve the efficiency and effectiveness of King County government and to identify and help dismantle systemic racism. In analysis we strive to ensure that communities referenced are seen, not erased. We promote aligning King County data collection, storage, and categorization with just practices. We endeavor to use terms that are respectful, representative, and people- and community-centered recognizing that inclusive language continues to evolve. For more information, see the King County Equity and Social Justice Strategic Plan, King County's statement on racial justice, and the King County Auditor's Office Strategic Plan.

ABOUT US The King County Auditor's Office was created by charter in 1969 as an independent agency within the legislative branch of county government. The office conducts oversight of county government through independent audits, capital projects oversight, and other studies. The results of this work are presented to the Metropolitan King County Council and are communicated to the King County Executive and the public. The King County Auditor's Office performs its work in accordance with Government Auditing Standards.

AUDIT

This audit product conforms to the GAGAS for independence, objectivity, and quality.