CITY AUDITOR'S OFFICE

# Emergency Management Services

June 16, 2023 AUDIT NO. 2307

**CITY COUNCIL**
Mayor David D. Ortega
Tammy Caputi
Tom Durham
Barry Graham
Betty Janik
Vice Mayor Kathy Littlefield
Solange Whitehead

June 16, 2023

Honorable Mayor and Members of the City Council:

Enclosed is the audit report for *Emergency Management Services*, which was included on the Council-approved FY 2022/23 Audit Plan. This audit was conducted to evaluate whether the City's emergency management program has processes in place to effectively plan and prepare for emergencies, including disaster identification, risk assessment, training, coordination and use of COVID or other emergency-related funding.

Our audit found that the City's Emergency Operation Plan and Continuity of Operations Plans have not been reviewed and updated. Emergency preparedness training should be expanded and monitoring of existing training requirements could be improved. Additionally, Emergency Management's role in special events planning can be better defined and processes should be standardized to allow the department to more efficiently guide special event teams.

If you need additional information or have any questions, please contact me at (480) 312-7851.

Sincerely,

Lai Cluff, CIA
Acting City Auditor

Audit Team:

Travis Attkisson, – Sr. Auditor
Elizabeth Brandt, CIA, CGAP, CPM – Sr. Auditor
Brad Hubert, CIA, CGAP, CGFM, CRMA – Sr. Auditor

# TABLE OF CONTENTS


AUDIT HIGHLIGHTS ..... 1

BACKGROUND ..... 3

Figure 1. Emergency Management Organization Chart ..... 4

Table 1. Overview of NIMS ..... 5

Table 2. Emergency Management Services Expenditures by Fiscal Year ..... 5

OBJECTIVES, SCOPE, AND METHODOLOGY ..... 7

FINDINGS AND ANALYSIS ..... 9

1. The City's Emergency Operation Plan and Continuity of Operations Plans have not been reviewed or updated timely and the Emergency Operations Center staffing roster was not updated. ..... 9

Figure 2. Most COOPs have not been reviewed in more than three years. ..... 11

2. Portions of the training program need to be expanded to align with emergency planning responsibilities and monitoring of existing training requirements could be improved ..... 12

Figure 3. National Incident Management System Required and Recommended Training. ..... 13

Table 3. NIMS Training Completion by Department. ..... 14

3. Emergency Management's role in special events planning needs to be better defined and processes standardized to allow the department to more efficiently guide the special event teams. ..... 15

MANAGEMENT ACTION PLAN ..... 17

# AUDIT HIGHLIGHTS

## Emergency Management Services

June 16, 2023 Audit No. 2307

### WHY WE DID THIS AUDIT

This audit was conducted to evaluate whether the City's emergency management program has processes in place to effectively plan and prepare for emergencies, including disaster identification, risk assessment, training, coordination and use of COVID or other emergency-related funding

### BACKGROUND

To ensure the City is adequately prepared, Scottsdale City Code requires the City Manager to supervise, and direct an emergency management program that includes: a) planning of emergency management functions during non-emergency periods; b) building readiness for coordinated operations; and c) managing an Emergency Operations Center (EOC) and essential support functions and equipment needed for emergency management

The Emergency Management department is staffed by an Emergency Manager, an Emergency Coordinator, and a part-time Community Wildfire Fuels Mitigation Coordinator. While functionally reporting to the City Manager, Emergency Management is located within the Fire Department and also reports to the Fire Chief.


**City Auditor's Office**

Acting City Auditor 480 312-7851
Integrity Line 480 312-8348
www.ScottsdaleAZ.gov


### WHAT WE FOUND

**The City's Emergency Operation Plan and Continuity of Operations Plans have not been reviewed or updated timely.**

Specifically, we found:

- The EOP has not been reviewed and approved every 5 years by City Council or annually by the City Manager, as required. It has not been updated to incorporate changes, such as re-assessment of risks and changes to critical facilities.
- Departmental COOPs contain outdated or missing information and have not been reviewed by Emergency Management. Additionally, testing, training, and exercising requirements have not been consistently performed.

**Portions of the training program need to be expanded to align with emergency planning responsibilities and monitoring of existing training requirements could be improved.**

- NIMS-related training is now required for all employees but monitoring of training completion needs to be improved.
- Plans for other emergency preparedness training could be further developed and the training program expanded to include educational programs for residents and business.

**Emergency Management's role in special events planning needs to be better defined and processes standardized to allow the department to more efficiently guide special event teams.**

Given its limited capacity, the department needs to evaluate its role and level of involvement with individual special events and develop standard guidance to assist special events teams with contingency planning.

### WHAT WE RECOMMEND

We recommend Emergency Management:

- Ensure emergency plans are reviewed and updated.
- Monitor completion of training requirements and further develop its training plan to align with program responsibilities.
- Evaluate and further define its role in the special event planning process, including developing standardized processes to help guide event teams.

### MANAGEMENT RESPONSE

Emergency Management agreed with the findings.

## BACKGROUND

In the event of a natural or man-made disaster, the City must be prepared to implement plans and procedures to protect lives and property as well as ensure continuation of critical City operations. To ensure the City is adequately prepared, Scottsdale City Code requires the City Manager to supervise, and direct an emergency management program that includes: a) planning of emergency management functions during non-emergency periods; b) building readiness for coordinated operations; and c) managing an Emergency Operations Center (EOC) and essential support functions and equipment needed for emergency management.[1]

The Emergency Management department is responsible for emergency preparedness training, the planning and coordination of emergency management functions, as well as:

- Implementation of the *Emergency Operations Plan (EOP),* including its development and maintenance – The EOP is the framework for emergency responders, city departments, and outside supporting agencies to effectively coordinate and collaborate, before, during, and after a disaster. With a goal to establish a comprehensive response to all emergencies, the EOP addresses communication and warning systems; rapid deployment and pre-deployment resources; evacuation and shelter operations; and post-disaster response and recovery activities.
- Oversight of the *Continuity of Operations Plans (COOPs)* – City departments are required to develop and maintain a COOP that enables them to preserve, maintain, and resume their functions in the event of a disaster or emergency that could disrupt operations and services. Emergency Management is responsible for conducting an annual review of all COOPs and providing direction and feedback for improvement.

**Emergency Management**

The preparedness, response, recovery and mitigation activities necessary to respond to and recover from any disasters or emergencies.

**Local Emergency**

The existence of conditions of disaster or of extreme peril to the safety of persons or property within the territorial limits of a county, city or town, which conditions are or are likely to be beyond the control of the services, personnel, equipment and facilities of such political subdivision… and which require the combined efforts of other political subdivisions.

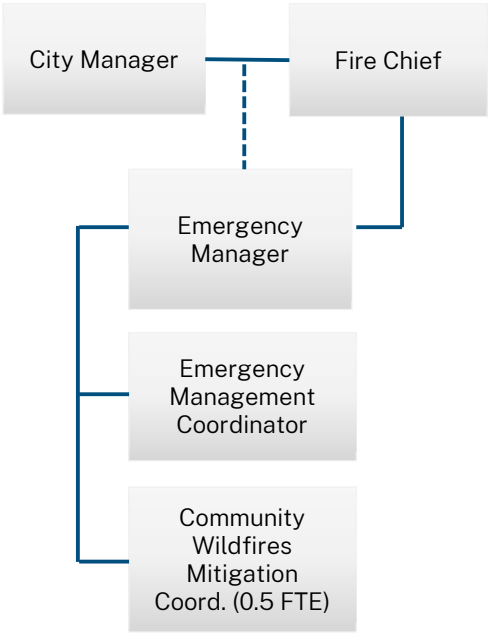
SOURCE: Scottsdale Revised Code Chapter 10 *Emergency Management*.

While functionally reporting to the City Manager, Emergency Management is located within the Fire Department and also reports to the Fire Chief. As shown in Figure 1 on page 4, the department is staffed by three positions: an Emergency Manager, an Emergency Coordinator (position added in FY 2022/23), and a Community Wildfire Fuels Mitigation Coordinator who coordinates efforts to identify and remove potential fuel hazards in parts of the City where wildfires pose the greatest risk to people and houses (part-time position, moved under Emergency Management in FY 2022/23).

*(continued on next page)*

[1] The Emergency Operations Center (EOC) is a centralized location where city officials monitor, coordinate and direct city-wide response efforts during an emergency.

### Figure 1. Emergency Management Organization Chart




SOURCE: Emergency Management section of Fire Department organization chart.

## Emergency Management Framework

As a condition to receiving federal support for emergency management, federal regulations require adoption of fundamental principles, language and operational concepts that are part of Federal Emergency Management Agency's (FEMA) National Incident Management System (NIMS). To meet these requirements, the City has incorporated the NIMS framework into it Emergency Operations Plan and implemented a NIMS training program for staff.

NIMS is a framework for jurisdictions and organizations to work together to prevent, protect against, mitigate, respond to and recover from incidents.[2] It defines operational systems that guide how personnel work together during incidents, uniting on-scene respondents, Emergency Operations Centers and senior officials. Table 1 on page 5 provides an overview of NIMS.

*(continued on next page)*

[2] NIMS defines an incident as an occurrence, natural or manmade, that necessitates a response to protect life or property. The word "incident" includes planned events as well as emergencies and/or disasters of all kinds and sizes.

### Table 1. Overview of NIMS

| NIMS Is | NIMS Is Not |
|---|---|
| • A comprehensive, nationwide, systematic approach to incident management, including the command and coordination of incidents, resource management, and information management | • Only the Incident Command System (ICS)<br>• Only applicable to certain emergency/incident response personnel<br>• A static system |
| • A set of concepts and principles for all threats, hazards, and events across all mission areas (Prevention, Protection, Mitigation, Response, Recovery) | • A response plan |
| • Scalable, flexible, and adaptable; used for all incidents, from day-to-day to large-scale | • Used only during large-scale incidents |
| • Standard resource management procedures that enable coordination among different jurisdictions or organizations | • A resource-ordering system |
| • Essential principles for communications and information management | • A communications plan |

SOURCE: FEMA, National Incident Management System, Third Edition, October 2017.

Additionally, since July 2021, Emergency Management has developed a Citywide Vulnerability Infrastructure Taskforce made up of eight cross-functional teams staffed by both City employees and other support agencies. The teams are formed around operational areas with emergency response responsibilities and are designed to assess, identify and coordinate citywide resources and risks. The staff represent many City departments, such as Police, Fire, Water / Stormwater, Information Technology, Municipal Security, Parks and Recreation and Preserve Management. External groups include county and state agencies, public utilities and other support agencies.

## Operating Expenses

As summarized in Table 2, Emergency Management Services expenses ranged from approximately $157,000 to $267,000 from fiscal years 2018/19 through FY2021/22 and were budgeted for about $374,000 in FY 2022/23. Annual expenses primarily consist of personnel services.

### Table 2. Emergency Management Services Expenditures by Fiscal Year

| | FY 2018/19 | FY 2019/20 | FY 2020/21 | FY 2021/22 | FY 2022/23 Approved Budget |
|---|---|---|---|---|---|
| Personnel Services | $122,665 | $125,971 | $199,573 | $215,699 | $297,578 |
| Contractual Services | 33,665 | 35,176 | 35,631 | 43,900 | $68,498 |
| Commodities | 1,128 | 1,936 | 5,225 | 6,133 | $5,670 |
| Capital Outlays | - | - | 18,203[a] | 1,604[a] | $2,550 |
| **Total** | **$157,458** | **$163,083** | **$258,632** | **$267,336** | **$374,296** |

[a] Purchase of computer equipment for the Emergency Operations Center.

SOURCE: Auditor analysis of SmartStream reports from FY 2018/19 through FY 2021/22 and FY 2022/23 Budget.

## Pandemic Response and COVID Related Expenses

While the City has generally responded to localized events such as flooding or downed trees or property damage caused by monsoon storms, the COVID-19 pandemic was the first time the City declared a state of emergency. From March 18, 2020 to November 4, 2022 the City operated under an emergency proclamation due to the COVID-19 pandemic. During this time, the Emergency Manager coordinated the City's emergency response and held daily and weekly meetings with City management and with representatives from outside groups, including the State of Arizona, Maricopa County, and area healthcare providers.

Pandemic-related federal assistance provided to state and local governments are subject to the annual financial and compliance audits performed by an independent CPA firm in accordance with *Government Auditing Standards*. The City's FY 20219/20 through 2021/22 audits found no discrepancies regarding the use of pandemic-related funds. Additionally, because Emergency Management did not direct the use of these monies, further review of Covid-related expenses was not performed as part of this audit of Emergency Management Services.

## OBJECTIVES, SCOPE, AND METHODOLOGY

An audit of *Emergency Management Services* was included on the City Council-approved fiscal year (FY) 2022/23 Audit Plan. The audit objective was to evaluate whether the City's emergency management program has processes in place to effectively plan and prepare for emergencies, including disaster identification, risk assessment, training, coordination and use of COVID or other emergency-related funding.

To gain an understanding of Emergency Management Services' processes, controls and potential risks, auditors interviewed the Emergency Manager. We also reviewed:

- Prior related City Auditor's Audit Report No. 1511, *Disaster Recovery/Business Continuity,* as well as similar audits conducted by other local governments.
- Financial information for Emergency Management Services and COVID related funding, including the City Budget Book for FY 2022/23 and SmartStream reports for FY 2015/16 through FY 2021/22.
- Independent Auditor's Report on Compliance for Each Major Federal Program, Single Audit Report for the Years Ended June 30, 2020 through June 30, 2022.
- Applicable laws, regulations, and procedures, including:
    - Arizona Revised Statutes (ARS) Title 26, Chapter 2, *Emergency Management*.
    - The City's Administrative Regulation (AR) 137 – *Emergency Management Training and Emergency Contact System*.
    - Scottsdale Revised Code, Chapter 10, *Emergency Management*.
    - Maricopa County Multi-Jurisdictional Hazard Mitigation Plan.
    - Various publications from Federal Emergency Management Agency (FEMA) such as guides for developing emergency operation plans, risk identification, preparedness policy guidelines and relevant standards.

To evaluate processes and effectiveness of plans and preparation for disasters, we:

- Reviewed the City's Emergency Operation Plan, including the applicable contact rosters established to alert emergency responders and provide situational updates.
- Reviewed all 34 departmental Continuity of Operation Plans within the BOLD system and randomly selected six for a more detailed review of whether plans had been updated for staffing and organizational changes.
- Surveyed 32 city employees identified as continuity planners (or department management, if none was identified) to obtain input regarding the relevance and effectiveness of plans, training received and overall emergency management preparedness. Of 32 surveyed, 27 completed the survey for a response rate of 84%.
- Evaluated Emergency Management's training program and reviewed related training records.
- Assessed Emergency Management's role and responsibility for emergency planning and preparedness for special events.

The audit found that the City's Emergency Operation Plan and Continuity of Operations Plans have not been reviewed and updated timely. Additionally, portions of the training program should be expanded to align with emergency planning responsibilities and monitoring of existing training requirements could be improved. Finally, Emergency Management's role in

special events planning can be better defined and processes should be standardized to allow the department to more efficiently guide special event teams.

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. Audit work took place from November 2022 to May 2023.

## FINDINGS AND ANALYSIS

### 1. The City's Emergency Operation Plan and Continuity of Operations Plans have not been reviewed or updated timely and the Emergency Operations Center staffing roster was not updated.

The Emergency Operations Plan (EOP) provides an overview of Emergency Management's structure and the roles and responsibilities assigned to emergency responders, city departments, and outside supporting agencies during major emergencies and disasters. Additionally, within the EOP, all City departments are required to develop Continuity of Operations Plans (COOP) to maintain or resume critical functions in the event of a disaster or emergency. These plans have not been reviewed and updated regularly and information needed during an emergency may be outdated.

A. The Emergency Operations Plan (EOP) has not been regularly reviewed and updated.

City Code requires that Council review and approve the EOP every 5 years, but an updated EOP has not been approved since July 2016 and the required annual reviews by the City Manager and Emergency Manager have not been conducted. FEMA recommends that "planning teams should establish a process to review and revise the EOP on a recurring basis" and notes that organizations should consider reviewing and updating the plan after major incidents, changes in operational resources, changes in elected officials, or each time the plan is used. Without regular updates, the plan may contain outdated information or may not reflect lessons learned from recent emergency responses.

1. The EOP has not been updated with changes since 2016. Several significant changes have not been incorporated into the EOP:

    - Updates to the County's Multi-jurisdictional Hazard Mitigation Plan in 2021 are not included in the EOP. The county plan is designed to cover multi-jurisdictional incidents such as flooding, fires, and other natural hazards,
    - Recent events such as the COVID pandemic and increasing cybersecurity threats may impact the City's assessment of risk in these areas. Regular re-assessment of the City's risks and updating the plan after major incidents is needed to ensure that risk levels are appropriately identified.
    - City facilities have been added or moved. For example, one fire station location has been closed and moved to a new location, and one library, identified as a potential "Disaster Recovery Center" is no longer operated by the City. As a result, the listing of critical facilities is outdated.

2. Emergency Operations Center (EOC) rosters and emergency communications plan need to be updated.

    In the event of an emergency, City response would be managed from the EOC. Representatives from various City departments such as the City Manager's office, Police, Fire, Public Works, and City Treasurer would meet at this central location to coordinate response efforts. Our review of the EOC roster on the Emergency Services internal webpage found that the list of employees has not been kept updated and includes staff members who are no longer with the City. The

Emergency Manager explained that because of social distancing restrictions, the response to the COVID-19 pandemic was managed using Microsoft Teams and so he had not updated the list of employees needed during an EOC activation. However, should an emergency impact the City's access to computer systems, Teams may not be available and a current EOC roster would still be needed.

Also, while the City's emergency contact system is used to contact required personnel via phone or text during an emergency, the system did not have pre-established lists of employees for notification. When time is of the essence, selecting individual employees to notify would not be efficient and key staff could be missed.

B. Departmental *Continuity of Operations Plans* (COOP) have not been updated and reviewed on an annual basis.

To ensure the City is prepared to continue critical operations in the event of an emergency, COOPs should be kept up-to-date and reviewed on an annual basis, as required by the City's Emergency Operations Plan.

2. Departmental COOPs contain outdated information— All 6 of 34 departmental COOPs reviewed contained outdated personnel and contact information. While two had minimal outdated information, primarily due to more recent changes in personnel, the remaining four had multiple instances of outdated personnel/contact information. Also, in preparing to send an emergency management survey, we determined that 14 out of 34 COOPs either did not list the primary contact for the COOP, or the primary contact was no longer employed with the City.

3. COOPs have not been reviewed by Emergency Management on an annual basis— The emergency planning system (BOLDplanning) showed that 4 of the 34 COOPs had not been reviewed, and only 4 of the remaining 30 had a review date within the last 2 years. [3] As shown in Figure 2 on page 12, the majority of COOPs have not been reviewed in more than three years.

Also, of those with a documented review, 4 were given a score of below 70%, indicating the plan was missing data or information. For these COOPs we found that the plans were still labeled "DRAFT", with three of them last reviewed in 2018 or 2019 and one in 2023.

**Continuity of Operations:**

Capability to continue essential program functions and to preserve essential processes and functions, positions, lines of succession, applications, and records, communications, and facilities across a broad range of potential emergencies/disasters

**Primary Continuity Planner:**

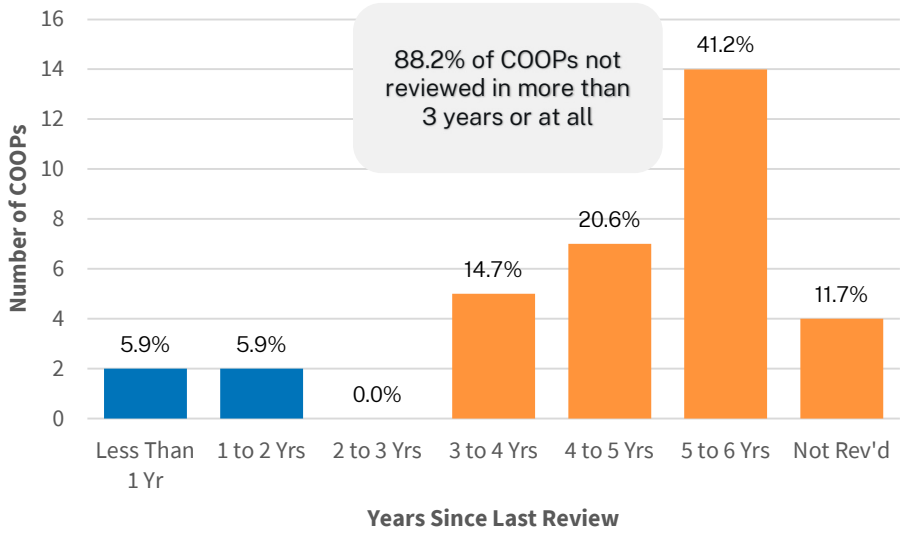
Acts as the primary point of contact and is responsible for developing and maintaining the planning process.

SOURCE: Emergency Management Accreditation Program - ANSI/EMAP EMS 5-2019 and Bold Planning Continuity Plan User Guide.

[3] The BOLDplanning system, or BOLD, is managed by Maricopa County and used to develop and document emergency operations plans, including the EOP and COOPs. Should also be used to document/record training, testing, exercises, and plan maintenance.

The BOLD system does not identify the reviewer, but according to Emergency Management, it has not reviewed the COOPs in several years. Therefore, reviews recorded in recent years were likely performed internally by the departments. Since reviews and updates are not being consistently conducted, it is likely that additional missing or outdated information would be noted once reviewed by Emergency Management.

Figure 2. Most COOPs have not been reviewed in more than three years.




SOURCE: Auditor analysis of COOP reviews in the BOLD system.

3. Testing, training, and exercising requirements for COOPs have not been consistently performed—According to the COOP procedures, each department should be training its staff on key aspects of their plan, testing backup equipment and procedures, and performing tabletop or field exercises of their COOP each year. Based on review of recorded activities in the emergency planning system, most departments have not been consistently performing these activities. Specifically, for the 6 COOPs we reviewed in detail, the most recent training recorded occurred more than 5 years ago and there was no record of testing or exercises being conducted.

   In response to our survey, 19 of 27 respondents stated their knowledge of the departmental COOP was "good" or "excellent", 6 responded "fair", and the remaining 2 responded "poor". Also, 13 of the 27 respondents did not remember being contacted within the last year to update their departmental COOPs (this may include system-generated reminders). Overall, 21 of the 27 respondents felt their department/agency was adequately prepared for an emergency, with 1 responding they felt unprepared and the remaining 5 answering "not sure" due to being new to the position or feeling they needed additional hands-on training and equipment.

Following our March 2015 audit of *Disaster Recovery / Business Continuity,* Emergency Management prioritized the completion of COOPs, implemented an annual review

schedule and validation of departmental plans, and detailed its plans in its COOP / Continuity of Government Program 2017-2018 Strategic Plan. However, ongoing efforts to keep COOP plans updated have not been continued and the annual review process is no longer occurring.

### Recommendations:

The Emergency Manager should:

A. Provide the Emergency Operations Plan for City Council review and approval at least every five years, as specified in City Code. Additionally, the EOP should be reviewed annually by the Emergency Manager and the City Manager to ensure the plan, including EOC roster and other details, are up to date.

B. Conduct an annual review of all departmental COOPs to ensure that they have been completed and/or updated and to provide direction and feedback to assist with process improvements. As well, Emergency Management should ensure departments are training staff on their COOP and testing and exercising the plan.

## 2. Portions of the training program need to be expanded to align with emergency planning responsibilities and monitoring of existing training requirements could be improved.

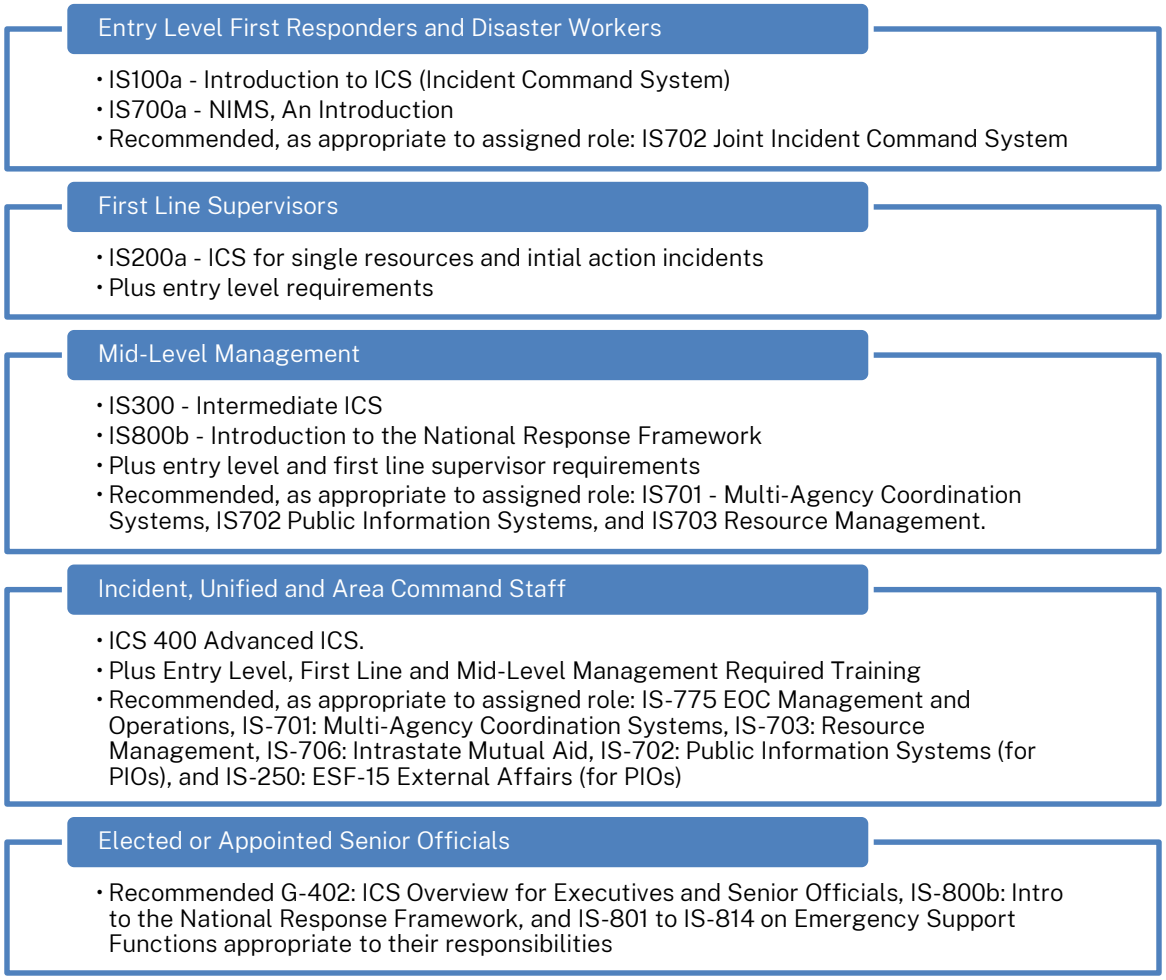
Within the roles and responsibilities outlined in the EOP, one of Emergency Management's objectives is to build emergency preparedness by training City staff and providing educational programs to residents and businesses. The department's training plan contains detailed requirements for FEMA NIMS training and phased plans for other city training. However, compliance with these requirements has not been effectively monitored and plans for other training areas could be expanded, including adding education programs for residents and businesses.

A. NIMS-related training is now required for all City employees, but monitoring of training completion could be improved.

Federal regulations require local jurisdictions to adopt the National Incident Management System (NIMS) to qualify for federal funding, grants, training, and reimbursement of disaster recovery costs. As shown in Figure X on page 13, the NIMS recommends key personnel receive training based on their role.

To meet this condition, Emergency Management has implemented a training requirement that all City employees complete NIMS training. As of December 2021, City Administrative Regulation (AR) 137 requires all employees to complete the IS100 and IS700 courses and all public safety employees to also take the IS200 and IS800 courses. New employees are assigned these courses as part of new employee training. Although not all employees are first responders or disaster workers, the department believes having every employee trained is the foundation of emergency management. However, the department has not fully monitored compliance with this requirement.

Figure 3. National Incident Management System Required and Recommended Training.




SOURCE: FEMA, National Incident Management System Required and Recommended Training, Updated December 18, 2008.

The NIMS trainings required for all employees are completed through the FEMA website and upon completion, employees upload completion certificates to the City's learning management system. Emergency Management staff reviews and retains a copy of the certificates. However, the department does not monitor employee training completion. Our review found that of the 394 employees who started work with the City between January 2022 and January 2023, only 109 (28%) completed the assigned training as of March 2023. Additionally, departments with employees requiring more advanced training, such as public safety, maintain their own separate records and are not verified by Emergency Management.

After combining training records from Emergency Management, Police, Fire, and Water departments, and Scottsdale University records, we found that as of March 31, 2023, only 45% of current City employees have taken at least one NIMS training

course. As shown in Table 3, certain departments, such as City Court, Fire, Police, and Water had much higher rates of training completion than the rest of the City.

Individual employee's role-based requirements are not monitored by Emergency Management; however, Police and Fire keep more detailed internal records based on the employee's job responsibilities.

Table 3. NIMS Training Completion by Department.

| | Total Employees | 1 or more Completed Courses | Percentage |
|---|---|---|---|
| City Court | 80 | 80 | 100% |
| Fire Department | 328 | 317 | 97% |
| Police Department | 598 | 412 | 69% |
| Water Services | 191 | 115 | 60% |
| All other departments | 1,448 | 255 | 18% |
| **All City Staff** | **2,645** | **1,179** | **45%** |

SOURCE: Auditor analysis of training certificates collected by Emergency Management, individual City departments, or recorded in Scottsdale University. Certificates were compared to active employees as of March 30, 2023.

B. Plans for other emergency preparedness training could be further developed and the training program expanded to include educational programs for residents and business.

In its *Emergency Preparedness NIMS/ICS Compliance Training Plan,* dated April 2022, Emergency Management outlined a phased training plan for City employees:

*Phase 0: Minimum Online FEMA Training Courses*

*Phase 1: Emergency Operations Center (EOC) 101, for essential personnel*

*Phase 2: COOP/ Continuity of Gov't (COG), for COOP managers*

*Phase 3: WebEOC software training, for system users*

*Phase 4: Tabletop exercises with multiple integrated departments*

*Phase 5: No notice exercises*

*Phase 6: Ongoing semi-annual refresher training*

Based on training information reviewed, the department has progressed through Phases 0 and 1, but the training plan lacks details for how the remaining phases will be implemented. As discussed in Finding 1, many departmental COOPs have not been reviewed, contain missing information, and activities relating to training, testing, and exercising have not been consistently performed. As such, Phase 2 training is needed to assist departments in developing and maintaining effective COOPs.

Additionally, within its roles and responsibilities outlined in the EOP, Emergency Management is also responsible for training residents and businesses in emergency preparedness through appropriate educational programs. The department makes emergency preparedness information and resource links available on the City website, training courses are offered through the Fire Department, and information about specific issues, such as sandbag filling locations, are provided by the City's Office of Communications as they are needed. Creating a training plan for its public education program, including identifying goals and strategies, could help make the program more effective.

### Recommendations:

The Emergency Manager should:

A. Establish procedures to more effectively monitor that training program requirements are being met.

B. Further develop plans for implementing other phases of its training plan. Additionally, the department should create a training plan for educating residents and businesses on emergency preparedness.

## 3. Emergency Management's role in special events planning needs to be better defined and processes standardized to allow the department to more efficiently guide the special event teams.

According to the department, a significant portion of Emergency Management's work involves special events and working with the events to integrate NIMS standards into the planning process. The Emergency Manager believes they should be involved in the planning process for all special events within the City. However, the department's responsibilities for special events is not well defined within City Code or the Emergency Operations Plan, and processes have not been formalized, requiring more time and effort.

- Emergency Management's role in managing special event-related risks needs to be better defined — City Code requires that Emergency Management "build readiness for coordinated operations in emergencies", and although emergencies may occur at special events, the extent of their role in the special event planning process needs to be better defined. The City's special event guidelines already require Fire and Police involvement, including review and approval of event permit applications, security plans, and other safety related requirements. Some events also require Fire and Police staffing. Given the department's limited capacity, Emergency Management should evaluate and further define its role in this process to better accomplish its overall program goals. As well, it should consider whether the level of direct involvement should be based on event size and/or complexity or other risk exposures.
- Providing standardized guidance and streamlining processes could facilitate special event contingency planning — According to Emergency Management, its goal related to special events is to integrate NIMS standards in the planning process. This is primarily done by communicating information during planning meetings for the events in which Emergency Management is involved. However, the department has not yet developed standard guidance, such as outlining required emergency management considerations or planning forms, and made them available to all event producers and

City employees involved with special event management. Creating standard guidance and forms for special event contingency planning can help more efficiently guide teams through the planning process, as well as allow the department to communicate consistently to all event stakeholders.

### Recommendation:

The Emergency Manager should evaluate and further define its role in the special event planning process, including basing level of involvement on the event's risk exposures. Additionally, the department should develop standardized guidance and/or forms for special event contingency planning to help guide the event teams.

# MANAGEMENT ACTION PLAN

### 1. The City's Emergency Operation Plan and Continuity of Operations Plans have not been reviewed or updated timely and the Emergency Operations Center staffing roster was not updated.

### Recommendations:

The Emergency Manager should:

A. Provide the Emergency Operations Plan for City Council review and approval at least every five years, as specified in City Code. Additionally, the EOP should be reviewed annually by the Emergency Manager and the City Manager to ensure the plan, including EOC roster and other details, are up to date.

B. Conduct an annual review of all departmental COOPs to ensure that they have been completed and/or updated and to provide direction and feedback to assist with process improvements. As well, Emergency Management should ensure departments are training staff on their COOP and testing and exercising the plan.

### MANAGEMENT RESPONSE:

I do not disagree with the assessment of the status of the current EOP and COOP projects; however, the time since my arrival at Scottsdale has been exceptionally unique and disruptive and requires the following significant context as background and explanation to the impacts of delays.

It is important to recognize that from the date of my hire late summer 2019 until October of 2022, I served as a one-person emergency management department, and nearly all the accomplishments below were achieved without trained assistants. Although Scottsdale avoids the typical "FEMA disasters", our city has unique potential and risk's such as high-profile international tourism involving special events, high-threat Wildland Urban Interface (WUI) risk, and significant flood risk factors that traverse nearly the entire span of the city and the surrounding communities.

Opening Statement:

Emergency Management is an often misunderstood intricate yet broad scope profession which aims to, identify, assess, and ideally mitigate potential consequence proactively. This is best accomplished using standardized, reproducible, and defendable, methods, training, and procedures.

The U.S. Dept of Homeland Security (USDHS) and FEMA's National Incident Management System (NIMS), and major subpart Incident Command System (ICS), are the cornerstone to all things emergency management related. This is the national standard and professional reference which all Emergency Managers observe. An interesting fact, the USDHS did not exist prior to 9/11/2001, and was born by President Bush in 2002 after those happenings. However, FEMA has been the leading emergency management agency since the 1970's originally under the U.S. Urban Housing and Development agency.

From an emergency management perspective, each of this audit's findings and the management responses below point back towards and are foundationally weaved through from the same overall National Response Plan (NRP) which contains all of the NIMS/ICS terminology, standards, forms, training requirements, recommendations, and doctrine.

Prior to my arrival in the City of Scottsdale, the previous Emergency Manager was reportedly evaluating the transition of the City EOP from a "paper copy", which almost immediately fails to remain contemporary, to an electronic/virtual option using the county-wide Bold Planning software system. This system populates with current points of contact and current data. Also at that time, this topic was a regional emergency management process in transition which had previously been completed with the Scottsdale electronic COOP plans. The transition of COOP away from paper documents to electronic (Bold Planning) regionally occurred across a several year implementations beginning about 5-6 years ago, and the consensus was that municipal EOP's were next. I began working for Scottsdale during the period between these two related but separate regional process transformations.

Upon my hire in late summer 2019, my original intent was to further explore the current standards, operational training gaps, and assess the overall emergency management needs for Scottsdale, and then lead the EOP electronic transition process based on those findings. The most critical part of developing a valid EOP is first evaluating how efficient and effective the current EOP is now. Also key to this information gathering process, it was most important that I first introduce myself to internal staff and assess EOP-like priorities from their perspective. It quickly became clear, like most municipal organizations, that leadership was not adequately familiar with the existing 600-page EOP and was just beginning its brand-new implementation of electronic COOP plans through Bold Planning. Crafting documents that are not inclusive of the people which it directly requires to act, is grossly ineffective, and does not coincide with my professional mantra, Process over Product.

In my previous experience, this process requires approximately two years completing a full assessment, research, evaluation, writing, testing and completing the cumbersome paper to electronic transition; and requires a team of three people, while hosting numerous and necessary in-person meetings.

I had begun the process learning about Scottsdale, evaluating the current EOP and assessing the existing application of its practical application in the real world. After a few months, Chief Shannon (Fire Chief) changed the reporting structure, and I became a direct report to him. He instructed me that our biggest risk and highest priorities would be wildfire mitigation, special event planning, and flood control planning and response. While these types of potential emergencies are mentioned in the current EOP, they are not practically understood, prevented, responded to, exercised, or mitigated by the documents themselves. Additionally, prevention and response to any type of emergency is significantly more efficient with proper intelligence gathering, proper basic and advanced NIMS/ICS training and then exercising the plans. Unfortunately, this could not happen due to unanticipated barriers and lack of staff in the Office of Emergency Management (OEM).

From my review of existing archive records, inconsistent and insufficient staffing, reporting structure fluctuations, lack of authority, loss of budget, and reprioritization of risks, have historically existed and impaired the OEM's ability to conduct standard business, inclusive of the findings of this audit.

COVID-19 impact:

January 2020, four months after I arrived in Scottsdale, COVID began overseas, and was quickly expected to impact the US. As anticipated less than 60 days later, in early March, patient #1 and #2 impacted Scottsdale directly as both patients were transported to Scottsdale Osborn Hospital. The next day, I immediately stood up a City-wide All-Hazards Incident Management Team (IMT), also previously called "EOC Team". During the next 722 days, as the only known employee with the necessary training and qualifications to lead this complex effort, I served as the Incident Commander of the Scottsdale COVID-19 IMT team which included approximately 50 city employees, and numerous external stakeholders and critical healthcare partners. Meeting twice per day in the beginning, and then daily, weekly, and eventually monthly, our COVID IMT tackled the largest most complex incident in the history of Scottsdale and this country. The declaration of emergency was just recently retracted, although today Arizona leads the COVID-19 death rate per 100,000 people, in comparison to all other states. To this day, the City of Scottsdale remains in the Recovery Phase of the emergency with a much smaller team continuing to meet approximately once per month.

At the direction of state and county public health officials, because of my known incident management qualifications and expertise, in July of 2020 I was appointed to be the Maricopa County Northeast Region COVID coordinator. This responsibility led to five custom designed COVID testing and vaccination Points of Distribution (POD), serving first our Healthcare and Fire Dept. personnel, and then evolving to our non-healthcare employees and our citizens. These POD's culminated more than 44 consecutive weeks of work, seven days a week, ultimately providing more than 100,000 vaccinations. Simultaneously, I was trained and certified by public health to vaccinate our employees under my Paramedic certification, because the city does not employ a dedicated public health entity. Daily, I was coordinating the POD's and providing vaccines to city employees, both in my office and occasionally in their offices when they could not go to a POD. I am still attending regional COVID update meetings, while we now discuss other new potential pandemics such as, multi-prong influenzas, monkey pox, measles, Ebola, Zika virus, and others.

Staffing & Resources

The COVID IMT was primarily managed using Microsoft Teams due to requirements for social distancing. During this time Scottsdale was awarded approximately 30-million dollars in COVID grant funding, and the City Manager designated approximately $300,000 dollars to modernize old technology inside the City Emergency Operations Center (EOC), as it was not serviceable within social distancing parameters. However, this grant did not permit for any additional OEM staff and added to my workload in designing and managing this technical construction project.

Along with the inability to meet in-person due to COVID restrictions much of this time, EOC specific training and meetings were not an option. I had little involvement or official orientation to existing city processes or people unless they were part of the COVID IMT. There are many significant personnel who I never met in person until late last year. This made it very difficult to establish the importance of not only the pandemic response but overall emergency management goals and objectives.

Until late 2021, I was a department of one, without administrative, analytical, or operational support, except for a short period of time when a part time library employee was temporarily reassigned, while the libraries were closed for COVID.

January of 2021, the city funded an hourly temp-contract wildfire fuels mitigation coordinator who was an expert in that field but had no public health or emergency management

background. Although his wildfire expertise was critically important, he was unable to assist me with anything outside of wildfire fuels-management projects. This burden was a brand-new high priority effort in Scottsdale and required additional work on my part, on top of the COVID IMT process. I tried unique solutions to find help by bringing on two ASU emergency management interns and two lightly trained volunteers, however, this proved to be less productive and more work than anticipated due to their unavailability, training requirements and other personal limitations.

In October of 2022, the city authorized a new FTE Emergency Management Coordinator position, and since that point we have been rapidly diversifying and reprioritizing the dozens of emergency management projects at various stages as necessary. At that same time the Wildfire Fuels Coordinator was authorized as a half-time permanent PTE (1040 hours) but remains solely focused on wildfire fuels mitigation city-wide and is a highly successful program. The EOP and COOP projects are high on the list and in process but will require an extended period to maintain and update. As previously mentioned, the task of rewriting a document of this nature is not a simple task, and without proper information and inclusion for problem identification any practical solution development would not be contemporary or defendable.

Regarding maintaining an EOC staff roster in the EOP. This is not how the previous emergency manager, nor I would notify staff or leadership to respond to the EOC during an emergency. Since approximately 2016, this notification occurs through an external electronic software platform called Alert Sense/Konexus, and that system is intentionally hosted outside of the city network so that when a cyber incident occurs inside the city this does not hamper emergency notifications. This system is relatively inexpensive, but not sophisticated enough to be a contemporary internal emergency notification system. A newer solution has been identified and beginning this next fiscal year it will be replaced by a new system and vendor that will provide additional capabilities.

Additionally, in 2020, I was informed the internal city webpage system containing Emergency Management information was being replaced. I was informed that I would not have direct access to make updates, but I may have that capability in the future. This information is out of date and needs refreshment, and that will be addressed. However, the external public-facing webpage information is current, and this is where OEM directs the public for timely information and relative guidance. Routinely, OEM designs and distributes public facing materials, webinars, and podcasts including information relative to monsoon storm preparedness, pandemic preparedness, alternative sandbagging, wildfire risk mitigation, Ready Set Go, Summer heat awareness, and other subjects.

As to posting a list of proper forms, until an employee has completed proper NIMS/ICS training courses, they would not begin to understand the required NIMS/ICS planning process or required relative forms. The process is not intuitive, although once understood is straightforward to reproduce. I have made it a habit in my emails and meetings to welcome direct contact anytime from city employees on these matters should they have any questions or require additional guidance. Proper training and practice are key concepts.

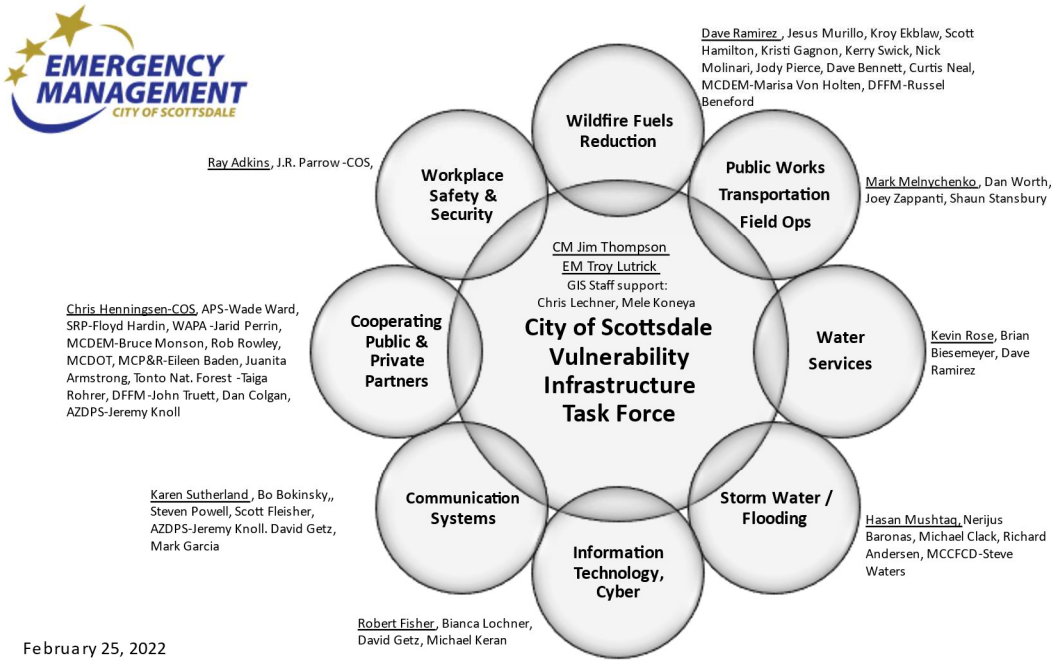
For these reasons, and others not fully discussed, I temporarily prioritized the update of the EOP to a lower priority as it really provides poor operational clarity for employees needing practical, reproducible, direction, before, during, and after an emergency.

The Continuity of Operations Plan (COOP) transition process began prior to my arrival in Scottsdale, and some departments/divisions have still not completed any of the training or COOP process. With limited staff, time, authority, and other operational high priorities, I was forced to allot my time outside the findings of this audit.

Although the COOP plans are considered a high priority, I hold no authority to require anyone to complete the planning process. It is not practical for OEM to provide the required basic COOP system training for assigned planners, although it is needed to navigate the system accurately. This training is offered and advertised to the City COOP planning team members quarterly, although provided exclusively by Maricopa County's Bold Planning trainers. I regularly communicate with the known COOP planners across the city and reiterate that they must be accountable for their own COOP plan(s) based on their subject matter expertise. It is impossible for me, or any other EM to know when any part of a specific COOP plan needs to be updated or when personnel identified in the individual plan's change. It is important to note that the COOP (Bold Planning) system automatically reminds every user to monitor and update their COOP plan every 90 days, therefore it cannot be forgotten, although it can be ignored. An Emergency Manager cannot write COOP plans, but rather should facilitate and assist the process for individual department COOP planners, and that I have done to the best of my ability and time.

## PROPOSED RESOLUTION:

A separate success, during the summer of 2021 and mid-pandemic, City Manager Thompson, Fire Chief Shannon and I crafted a unique idea to commission a City-Wide Vulnerability Taskforce, which now contains eight subcommittees seen on the figure below. This taskforce was originally designed with wildfire risk in mind but almost immediately expanded to several overlapping functional areas, and then quickly expanded to identify and tackle other city-wide issues, gaps, risks, and inefficiencies, and then communicate potential solution opportunities both known and unknown. These subcommittees now meet regularly and are charged to biannually develop a summary of actions and needs, which I then collaborate into one document and share with the City Manager. This process has proven to be quite eye opening, even for personnel that have worked for the city a long time, and especially in cross-collaboration areas between departments and divisions that did not know of similar projects and issues being tackled by other each other simultaneously.




Lastly, also occurring during this period and mid-pandemic, the mandatory federal five-year update of the Maricopa County Multi-jurisdiction Hazard Mitigation Plan MCMJHMP was completed with extensive personnel help from Maricopa County Department of Emergency Management (MCDEM) and their engineering firm contractor. This project primarily impacts and informs our Stormwater department projects and their federal funding, but also informs many of the projects and documents we work on daily. This project alone required hundreds of hours of intense coordination from OEM across nearly ten months and culminated with a Scottsdale Jurisdictional Summary report inclusive of 23-pages of information and data. Additionally, this plan must and has been reviewed annually since as required.

**EOP:** The proposed EOP resolution is already underway and requires more resources to restart the efforts and begin a proper update and transition of the City EOP into Bold Planning over approximately the next 12-18 months.

**COOP**: The proposed resolution for COOP is also underway. Our new Emergency Management Coordinator has begun to further assist with the necessary processes and coordinating with the people who need to be involved. A regular cadence of meetings and correspondence to entice and encourage COOP planners to update their files will continue. Marking them insufficient now without proper authority, training, or support would be counterproductive.

All of these projects could be more rapidly accomplished with more trained and dedicated OEM staff, funding, and stated authority.

**RESPONSIBLE PARTY: Troy Lutrick, Emergency Manager**

**COMPLETED BY: COOP-ONGOING EVERGREEN, EOP- REWRITE APPROXIMATELY 12-18 MONTHS THEN REVIEWED ANNUALLY-ELIMINATING THE 5-YEAR STATIC TIMELINE**

### 2. Portions of the training program need to be expanded to align with emergency planning responsibilities; monitoring of existing training requirements could be improved.

#### Recommendations:

The Emergency Manager should:

A. Establish procedures to more effectively monitor that training program requirements are being met.

B. Further develop plans for implementing other phases of its training plan. Additionally, the department should create a training plan for educating residents and businesses on emergency preparedness.

MANAGEMENT RESPONSE: This assessment is partially accurate regarding the need for more effective monitoring of training requirements and continual attempt to implement additional phases of NIMS/ICS training. Training and certification of internal city staff is in my opinion the highest priority and serves as the foundation in providing city emergency planning and services, because providing emergency services to those we serve must be collaborated, standardized, predictable, and reproducible, using NIMS/ICS, and not just after the emergency has occurred. Emergency Management is most effective following the 90/10 rule. Ninety percent of the work should occur proactively prior to an emergency, once the emergency has commenced it becomes a consequence management issue.

It is important to recognize that the original requirement deadline for federal NIMS compliance by any organization which requests or receives homeland security funding, was in 2006. Also, NIMS/ICS-Training is only one of the six major compliance tenets integrated across several updates and revisions across federal documents.

Prior to my hire in Scottsdale, from a review of available documentation, it appears almost no consistent organized effort existed for standardized, escalating NIMS/ICS training, except to some degree in public safety, and even there it was inconsistent and improperly tracked and documented. Other than public safety, I could find no certificated records of NIMS/ICS employee training for any other department or division or plans for such activity. In my assessment OEM was starting nearly from scratch in this area.

Despite the sudden and rapidly expanding impacts of COVID described earlier, in March 2020 I contacted the Human Resources division to inquire the ability to assign, track, and store the required NIMS/ICS training in Scottsdale University (SU) for all employees. My request was to automatically assign the two primary FEMA online courses to all employees, and two additional online courses (200 and 800) to sworn and civilian public safety employees, as a minimum foundation for the employee training records. This process was seriously delayed for more than two years for several reasons.

First, I was told that the current Learning Management System (LMS) could not store external agency certificates, however the city was planning a transition to a new LMS system that could accommodate this requirement. That transition took more than a year including install, implementation, training, and rollout for the LMS administrators.

I was able to make some progress with public safety working diligently with their training supervisors to assign the required four (4) online training courses to much of their personnel. The problem was storage of the certificates. A significant challenge was, older public safety training records had been stored in a document system no longer supported by the city and

which was being abandoned. It still contained 8000 old uncategorized and untitled training records. At about that time, I had just been assigned an intelligent but untrained library employee temporarily while the libraries were closed for COVID. After some initial training for her, we began opening every single document in the system, to determine if it was a current employee's old NIMS training record, and if so, renamed, and extracted each document. This process alone took hundreds of hours but recovered some certificates.

Once the new LMS was implemented, it was also suggested that Administrative Regulation 137 be reworked so that it clarified this "new" requirement for all employees. The update process for AR137 took several months to implement due to COVID response and the approval process.

The design, testing, and implementation of the new assignments in the LMS, took a few more months, because this type of training includes unique design requirements not typically used in Scottsdale University. Meanwhile, I captured and stored individual NIMS/ICS certificates as much as possible in another folder during those two-plus years.

In August 2022, we finally launched the first two courses (100 and 700) for all employees, and back dated those requirements for anyone hired after January 1, 2022. Prior to this launch, I was confident we had about 800 public safety personnel certificates on file, but nearly zero certificates from any other department across the city. Employees hired since January 1, 2022, equals approximately 300 people, and they have all been assigned 100 and 700 with a 90-day deadline, but unfortunately without more authority, OEM has little ability to force them to comply. Over the past two-plus years I had also communicated with each of the department SP3's, and many manager/supervisors, requesting their assistance to prompt their personnel to get this completed. Additionally, SU sends reminder assignment emails to each employee and their supervisor.

As mentioned, the most difficult group to mandate will be those employees that are not public safety and have been employed prior to January 1, 2022. Collaterally, OEM has proactively established relationships with individual city departments and divisions such as, City Courts, Libraries, Parks & Recreation, Giants Stadium, WestWorld and others to plead for internal self-compliance. We have recently begun having some limited success with these efforts.

Shortly after the first launch, OEM hired a fulltime EM Coordinator and now we are finalizing a second mandatory NIMS/ICS training, phase two, which will automatically assigns the two additional courses (200 & 800) required for all public safety members, sworn and civilian. This will be back dated to January 1, 2023.

Short of the City Manager mandating this effort for all by a certain date, OEM's plan is to continue to surgically entice the basic foundational online training in ways that capture the largest groups through various methods.

OEM's best assessment would be, the noted limited city-wide progress (45%) in this audit report, is likely greater than any untracked progress previously.

Regarding additional training phases and more advanced training, it must be understood that per FEMA NIMS design and doctrine, these courses must be completed in a specific order, and each serves as a prerequisite to the next course. The system, training requirements, processes, and ICS forms already exist within the training courses themselves and are integral throughout all the basic and advanced NIMS/ICS training curricula. Additionally, these common courses are considered minimum training thresholds and do not account for situations requiring advanced training.

Included below is the latest version of OEM's NIMS/ICS training plan describing the minimum training courses needed, based on organizational responsibility, and matched approximately to rank where applicable. Note, a consistent statement within FEMA NIMS/ICS doctrine, "rank is not a consideration in NIMS/ICS operation, a Chief one day may not be the most qualified or appropriate person to fill the position when using ICS".

The phases and courses below are consecutive, continual, and require planning and forethought. Each time an employee leaves the city or promotes, this likely creates a new training and education requirement both up and down. Succession planning is a necessary training component because this is not training via pass-along or attrition methods, but rather planned successive training with document proof via physical certificate.

# City of Scottsdale
# Emergency Preparedness NIMS/ICS Compliance Training Plan

Below is a schedule of progressive phased training of all City employees.

**Phase 0: Minimum required Online FEMA training courses (**See Category 1, Page 2)

**Phase 1: EOC 101 (1.5 hours), for all essential personnel**

This phase will be an introductory tour, training and discussion of the basic functions and terminology of an EOC. We will review the financial and paperwork connections between the local agency (Scottsdale), to the County, State and Federal emergency management departments and how our performance and processes can help or hinder the City's recovery process.

*Essential personnel include: All Department Heads and Division Managers, plus anyone who does or could act in their absence as a primary or secondary decision maker for the department or division during a City emergency.*

**Phase 2: COOP COG (2 hours), department specific one on one, ongoing**

This training phase will focus on the importance and integration of the Continuity of Operations Plan and its rollup to the Continuity of Government process for each department. This will be with designated COOP managers and will review their specific COOP and address specific concepts and plans in relation to each of the other departmental COOP's.

**Phase 3: WebEOC training (2-3 hours), non-department specific**

This phase will train individuals on the use of WebEOC and how to use the system during a City emergency. We will also address how this becomes critical for recovery documentation to the County, State and FEMA. Maricopa County Dept. of Emergency Management WebEOC experts will assist. This session will not need to be department specific.

**Phase 4: Tabletop exercises with multiple integrated departments (4 hours)**

This phase will begin to integrate the first four phases of training and challenge individuals to cooperate and collaborate to respond to a City-wide issue. These will be a slow walk-through designated scenarios in a non-attribution, no-failure environment.

**Phase 5: No-notice exercises (TBD timeframe)**

Future full-scale no-notice exercises to include primary and backup response to the EOC to work as an integrated team while managing realistic City emergencies.

**Phase 6:** Ongoing semi-annual refresher training (TBD)

## Foundational Required NIMS Compliance Training Courses

April 2022

| *Level 1* | *Level 2* | *Level 3* | *Level 4* | *Level 5* |
|---|---|---|---|---|
| **All COS Employees**<br><br>**All City new Hires**<br>**IS-100.c**<br>**IS-700.b**<br><br>**All** Public Safety (sworn & non-sworn) personnel must complete:<br>**IS-100.c**<br>**IS-200.c**<br>**IS-700.b**<br>**IS-800.d** | **Incident Response Personnel Designated as Leaders / Supervisors**<br>**COS First-Line Supervisors**<br><br>Fire Captains, Police Sergeants, Field Crew Leads, Field Supervisors Move-ups, Acting out of class at this level | **Mid-Level Response Supervisors**<br><br>All Field and Division/Unit Supervisors & Managers<br>Battalion/Deputy Chiefs<br>PD Lieutenants<br>Move-ups, Acting out of class | **Senior-Level Response Managers**<br>**Emergency Operations Center (EOC)**<br>**Multi- Agency Coordination System (MACS) Personnel**<br>City Managers, E-Team, Department Heads & Deputies/Assistants, PD Commanders, Asst. Chiefs, Acting Senior Staff personnel | **Elected Officials (responsible for below courses only)**<br><br>Mayor & Council & Charter Officers |
| | | **EOC 101 (2.0 hours)** | **WebEOC (2.0 hours)** | |
| | | **COOP Planning → COOP Development and Use (6 hrs)** | | |
| **IS-100.c** (2hrs) Introduction to the Incident Command System | Category 1 plus | Category 2 plus | Category 3 plus | **IS-100.c** (2hrs) Introduction to the Incident Command System |
| **IS-700.b** (2hrs) An introduction to NIMS | **E/L/G/K-300** (18 hrs) Intermediate ICS for Expanding Incidents | **O-305** (40 hours) All Hazards Incident Management Team Course (Capstone) USFA / NFA | **IS-2200** (4 hrs) Basic EOC Management and Functions | **IS-700.b** (2hrs) NIMS, An introduction to NIMS |
| **IS-200.c** (3hrs) ICS for Single Resources & Initial Action Incidents | **E/L/G/K-400** (12 hrs) Advanced ICS, Command and General Staff- Complex Incidents | | **G-O191** (8hrs) ICS/EOC Interface | **G-0402** (4 hours) Overview for Executives/Senior Officials **OR** |
| **IS-800.d** (3hrs) National Response Framework (NRF), an Introduction | | **Now eligible for Position Specific IMT Track: See Page 5** | **E/L/G 2300** (24 hours) Intermediate EOC Functions | **IS-908** (1 hour) Emergency Management for Senior Officials |
| | | | **IS-2900.a** (3 hours) National Disaster Recovery Framework (NDRF) | |
| | | | **IS-706** (2.5hrs) NIMS Intrastate Mutual Aid-an Introduction | |
| | | | **E/L/G IEMC: Integrated Emergency Management Course** (32 hours) | |

PROPOSED RESOLUTION: The proposed resolution is partially integrated and underway within the management response described above, and already exists in policy, but without practical authority. Without the proper technological support tools and city-wide mandate authority this plan will continue to be slowly implemented.

RESPONSIBLE PARTY: Troy Lutrick

COMPLETED BY: ONGOING. GOAL OF 30% EMPLOYEE BASIC TRAINING (LEVEL-1) COMPLIANCE INCREASE PER YEAR

### 3. Emergency Management's role in special events planning needs to be better defined and processes standardized to allow the department to more efficiently guide the special event teams.

#### Recommendation:

The Emergency Manager should evaluate and further define its role in the special event planning process, including basing level of involvement on the event's risk exposures. Additionally, the department should develop standardized guidance and/or forms for special event contingency planning to help guide the event teams.

MANAGEMENT RESPONSE:

We fully agree with this statement. Unfortunately, this has not been the common practice in Scottsdale, and Emergency Management is not included consistently when planning for known special events. Intentional and accidental disasters happen infrequently, although they can be devastating in several ways, and more severe anywhere large groups gather. Untrained event promoter's, agents, and sales representatives are often focused on their individual success, through the use of the City facilities and brand recognition, but therefore typically have no direct vested interest in our risk or processes. Well trained emergency management personnel are typically the resident subject matter experts regarding the most proficient methods for NIMS/ICS integration in special event planning. This is a common practice in other similar organizations.

The NIMS/ICS process defined by USDHS FEMA:

> NIMS is applicable to all stakeholders with incident management and support responsibilities. The audience for NIMS includes emergency responders and other emergency management personnel, NGOs (e.g., faith-based and community-based groups), the private sector, and elected and appointed officials responsible for making decisions regarding incidents. All incident management efforts, regardless of the incident or location, should fully incorporate people with disabilities and other people who have access and functional needs. 4 The scope of NIMS includes all incidents, regardless of size, complexity, or scope, and planned events (e.g., sporting events).

> Local, state, territorial, and tribal nation jurisdictions are required to adopt NIMS in order to receive federal Preparedness grants.

It is important to recognize the two general types of emergency categories, Planned Events and Unplanned Incidents, which both fall under the intent of the National Incident Management System / Incident Command System (NIMS/ICS). Planned Events are known and pre-scheduled, therefore they afford discretionary planning-process time, whereas Unplanned Incidents are without notice (No-Notice Incidents), and they occur without any warning. Fortunately, the exact same planning process can and should be used for either situation. When something unexpected occurs during a Planned Event this is referred to as an Incident Within an Event (IWE), and these are why we use the NIMS/ICS planning cycle standards, to respond to an evolving situation quickly and safely in a manner that is predictable, scalable, and efficient, no matter how large or small the Incident may be.

Planned events can use the same planning process as Incident response, although I have learned during my time in Scottsdale that the hundreds of Special Events (SE) that are proposed/recruited, planned, and operated are done so by several separate entities, without a standardized planning process. For example. SE's occurring at WestWorld are a separate group from the Waste Management Phoenix Open (WMPO), and separate from the Scottsdale Stadium, and separate from the Downtown event permitting group. This makes it nearly impossible for OEM to integrate in a standardized method, and improbable to adequately guide, advise or appropriately train all those separated players.

We all recognize that Public Safety (Police, Fire, OEM) have typical roles and heavy operational response type skills in the very large events, however smaller events are softer targets, whether intentionally or accidentally interrupted, and this makes it even more important for comprehensive and standardized planning processes for all special events. Regardless, a standardized NIMS/ICS compliant special event planning process/team will enhance safety and the City's ability to better prepare proactively.

Sizing up potential response measures for Planned Events and Incidents is termed Incident Complexity evaluation, and each requires a distinctive assessment, however a standardized application of NIMS/ICS for each location and occasion. Unfortunately, until June 2021, FEMA's version of incident complexity measurement was ambiguous, thus innumerable theoretical and inaccurate concepts had been employed over the years. Now, the FEMA Incident Complexity Guide exists and can serve as a guide which integrates with the entire NIMS/ICS training curriculum and planning processes. The primary goal being to standardize the planning process so an Authority Having Jurisdiction (AHJ) can universally prepare for those issues they know will need to be addressed, while also creating capacity for the designated IMT to efficiently address issues that are unknown until they occur.

FEMA Incident Complexity Guide Purpose described:

> The Incident Complexity Guide is intended for use during planning, preparedness and training efforts to help organizations and jurisdictions improve their readiness to respond to real-world events. This guide can help those involved in preparedness make more fully informed planning, preparedness and training decisions. Jurisdictions can use this guide to develop learning materials to identify the complexity level of each operational incident, planned event, training or exercise ("incident" for short).
>
> FEMA encourages AHJs to incorporate the concept of incident complexity levels into planning and training, whether by instruction, scenario exercises or building their

own tools for implementation. This guide is not designed for use as a complexity analysis or decision-making tool during incident response — though by supporting planning and training, this guide may help users as they respond to real-world incidents in their jurisdictions. In addition, identifying complexity level also supports incident/emergency management personnel as they manage additional, deployable resources.

The term complexity level quantifies the level of difficulty or resistance an incident presents to those working to successfully manage or mitigate it. As incidents may vary in their difficulty or resistance to mitigation or management, FEMA measures complexity level on a scale of 5 to 1, where Type 5 is the least complex incident and the least resistant to management or mitigation.

Considering that our largest special events such as WMPO and events at WestWorld occur on or adjacent to federal property, we fully endorse all appropriate efforts to become entirely NIMS/ICS compliant by following the official planning processes and including necessary advanced training for decision makers and early OEM integration.

There is plenty of necessary work to be done in this area and OEM should be considered subject matter experts regarding NIMS/ICS guidance. This will require universal commitment, personnel, time, and unified command authority to accomplish, although any alternative can be more impactful.

PROPOSED RESOLUTION:

Mandate, with the endorsement and enforcement of the City Manager, to develop a standard operating procedure for special event planning, and formally adopt and follow the National Incident Management System planning and operational process for all special events, regardless of size, location, or complexity.

RESPONSIBLE PARTY: Troy Lutrick

COMPLETED BY: ONGOING, CONTINUOUS, AND MULTI-LEVEL TRAINING DEPENDENT. GOAL OF 18-36 MONTHS

## City Auditor's Office
7447 E. Indian School Rd., Suite 205
Scottsdale, Arizona 85251

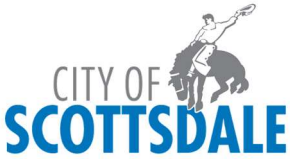
OFFICE (480) 312-7756
INTEGRITY LINE (480) 312-8348

www.ScottsdaleAZ.gov/auditor



## Audit Committee
Vice Mayor Kathy Littlefield, Chair
Councilmember Barry Graham
Councilwoman Solange Whitehead

## City Auditor's Office
Travis Attkisson, Senior Auditor
Elizabeth Brandt, Senior Auditor
Brad Hubert, Senior Auditor
Shelby Trimaloff, Exec Asst to City Auditor
Lai Cluff, Acting City Auditor


The City Auditor's Office conducts audits to promote operational efficiency, effectiveness, accountability and integrity.