



# United States Department of the Interior

OFFICE OF EMERGENCY MANAGEMENT  
Washington, D.C. 20240

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## Memorandum

To: Bureau/Office Emergency Coordinators

From: Laurence I. Broun /s/  
Director, Office of Emergency Management

Subject: Emergency Management Policy Guidance Bulletin 2009-1:  
Department of the Interior (DOI) Emergency Management Corrective  
Action Program

### **PURPOSE:**

This memorandum provides policy guidance to assist bureaus and offices in establishing corrective action programs to document observations, develop corrective action recommendations from response operations and emergency preparedness exercises, and to manage improvement plans to remedy shortfalls. This memorandum also describes the Departmental Corrective Action Program which manages and tracks corrective action recommendations that impact multiple bureaus or offices or those that require interagency coordination.

### **BACKGROUND:**

Homeland Security Presidential Directive 8 (HSPD-8), *National Preparedness*, establishes policies to strengthen the preparedness of the United States to prevent and respond to threatened or actual domestic terrorist attacks, major disasters, and other emergencies. HSPD-8 states that the Secretary of the Department of Homeland Security (DHS) shall develop and maintain a system to collect, analyze, and disseminate lessons learned, best practices, and information from exercises, training events, research, and other sources, including actual incidents.

HSPD-8 also states that the head of each Federal department or agency shall undertake actions to support the national preparedness goal, including adoption of quantifiable performance measurements in the areas of training, planning, equipment, and exercises for Federal incident management and asset preparedness, to the extent permitted by law. DHS guidance for identifying and tracking shortfalls found during exercises is provided in the Homeland Security Exercise Evaluation Program (HSEEP).

The Departmental Corrective Action Program implements the requirements of HSPD-8 and the HSEEP to identify and track shortfalls found during Interior's exercises and response operations. Each Department of the Interior (DOI) bureau and office is responsible for developing, implementing, and managing an HSPD-8-compliant corrective action program for use in their respective organizations. Bureau implementation of a corrective action program is monitored by the Interior Readiness (I-READ) Index, as required by the *Department of the Interior Strategic Plan*.

## **POLICY GUIDANCE:**

### **1. Bureaus and Offices**

Bureaus and offices are required to capture observations during exercises, training, and emergency events in order to track and manage corrective actions when deficiencies are found. To support this task, bureaus and offices may utilize a copy of the Departmental Corrective Action Program (CAP) software housed on Safetalk. Alternatively, bureaus/offices may use other methods for capturing observations, recommendations, and corrective actions. Issues which have a department-wide impact should be forwarded to the Office of Emergency Management (OEM) for inclusion in the Departmental CAP.

Bureaus and offices will submit observations which have a department-wide impact, affect multiple organizations, and/or those observations that cannot be resolved at the bureau/office level to OEM for inclusion in the Departmental CAP. All observations submitted to OEM for inclusion in the Departmental CAP must contain the following information to ensure proper entry into CAMS on Safetalk.

- a. Name of Event/Exercise
- b. Date of Observation
- c. Submitting bureau/office
- d. Problem Statement
- e. Discussion
- f. Recommendation.

### **2. Departmental Corrective Action Program (CAP)**

OEM will capture observations from bureaus and offices, DOI after action reports, Government Accountability Office (GAO) reports, DOI Inspector General findings, interagency reports or other sources for inclusion in the Departmental CAP. OEM will analyze each observation to determine its disposition within the CAP. A sub-committee of the Emergency Management Council (EMC) may be convened to assist in the process. Once analyzed, observations will be categorized as follows:

- a. Lesson Learned;
- b. Roll Into (Existing Recommendation);
- c. Single Agency Action;
- d. Noted Observation; or
- e. Corrective Action Recommendation.

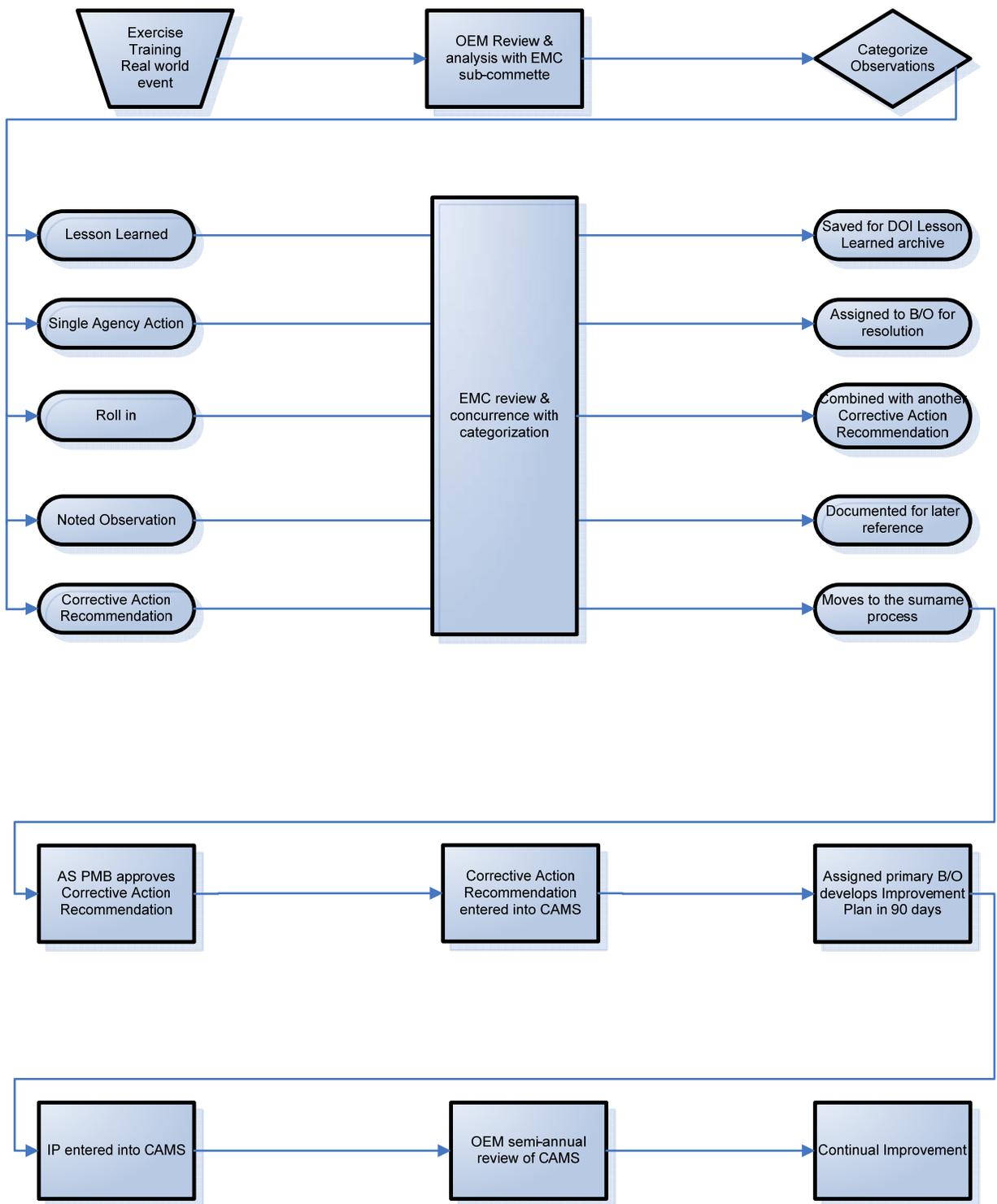
For each Corrective Action Recommendation, a primary bureau/office will be identified by the Corrective Action sub-committee of the EMC to lead resolution of the issue. Following EMC review, OEM will submit Corrective Action Recommendations to the Assistant Secretary – Policy, Management, and Budget (AS PMB) utilizing the surname process to obtain concurrence from all applicable bureaus and offices.

Upon approval by the AS PMB, Corrective Action Recommendations will be entered in the Corrective Action Management System (CAMS) on Safetalk for tracking and follow up. Once a Corrective Action Recommendation is entered in CAMS, the primary bureau/office responsible for resolution will submit a Corrective Action Improvement Plan (IP) within 90 days. The IP will include a timeline for resolution of the approved Corrective Action Recommendation, report projected resource needs, and be tracked in CAMS. The following information must be captured in the IP and should be submitted to OEM for inclusion in the CAMS.

- a. Name of Event/Exercise
- b. Date of Observation
- c. Submitting bureau/office
- d. Problem Statement
- e. Discussion
- f. Recommendation
- g. Milestones
- h. Point of Contact (POC) for each milestone, as needed
- i. Timeline
- j. Due Date

As part of the CAP continual improvement process, OEM will periodically review all entries in CAMS. This will include a review of IPs with the primary bureau or office to determine implementation progress. The review will also include an administrative reassessment of CAMS data which may be obsolete or require adjustment. OEM will report the status of IPs in the CAMS to the AS PMB on a semi-annual basis. Figure 1 illustrates the business process for the Departmental CAP.

# DOI Emergency Management Corrective Action Program



**Figure 1. Departmental CAP Business Process**

## **ANNEX A: Acronyms**

AS PMB	DOI Assistant Secretary, Policy, Management, and Budget
CAMS	Corrective Action Management System
CAP	Corrective Action Program
HSPD	Homeland Security Presidential Directive
HSEEP	Homeland Security Exercise and Evaluation Program
I-READ	Interior Readiness Index
IP	Improvement Plan
OEM	Office of Emergency Management

## **ANNEX B: Definitions**

### **Corrective Action Management System (CAMS)**

Software system used as part of the Departmental Corrective Action Program to track Corrective Action Recommendations approved by the AS PMB and maintain the corresponding Improvement Plans.

### **Corrective Action Program (CAP)**

Program to collect and categorize emergency management observations, derive Corrective Action Recommendations, and manage Improvement Plans.

### **Corrective Action Recommendation**

At the Department level, recommendations developed based on a single—or combination of—observation(s) which may have department-wide consequences or cannot be resolved at the bureau level that require corrective action. They are deliberately tracked and managed by OEM to resolve deficiencies and improve procedures. At the bureau/office level, these are recommendations developed based on a single—or combination of—observation(s), which require corrective action within the bureau/office.

### **Improvement Plan (IP)**

Plan developed by the assigned primary bureau/office to detail the corrective action steps, timeline, resources required, and progress to address the Corrective Action Recommendation. Improvement Plans are attached to the Corrective Action Recommendation housed in the Corrective Action Management System and are reviewed semi-annually for progress.

### **Lesson Learned**

Knowledge and experience, positive or negative, derived from actual incidents, as well as those derived from observations and historical study of operations, training, and exercises. Within the Departmental Corrective Action Program, the disposition of an observation which should be retained for educational purposes, but requires no further corrective action.

### **Noted Observation**

Disposition of observation which requires no further corrective action, but is retained for recording purposes.

### **Observation**

Concise description of an issue, problem, or suggestion from exercises, trainings, or emergency events.

### **Primary Agency**

DOI bureau or office assigned primary responsibility to resolve an AS PMB-approved Corrective Action Recommendation.

### **Roll Into**

Disposition of new observation which is included in an existing Corrective Action Recommendation for resolution.

### **Single Agency Action**

Disposition of observation which affects, and may be resolved by, an individual bureau or office.

**Surnaming Process**

Process which indicates concurrence with the content of a written document by a designated official.