



Audit of Emergency Operations Center Activation

June 18, 2024

Mark S. Swann, City Auditor

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Executive Summary

Objective and Scope

The objectives of this audit are as follows:

- Is the Emergency Operations Center activating timely, at the correct activation levels, and with communication to its partners as outlined in Office of Emergency Management procedures?
- Are procedures for activation current?

The scope of this audit will include all Emergency Operations Center activations from June 1, 2021, to May 31, 2023.

Recommendations

Management should improve its procedures for emergency response and activation and documentation of those efforts.

Background

The City of Dallas Office of Emergency Management's mission is to provide a resilient emergency management structure dedicated to public safety and welfare through the preservation of life, health, property, and the environment. The Emergency Operations Center is required to activate during large, planned events with an estimated attendance of 30,000 or more people. The Emergency Operations Center is activated and helps to monitor and manage resources during unplanned events when an emergency response is needed, such as during severe weather or terrorism activities.

This audit was planned after an Office of Emergency Management after action report identified that the Emergency Operations Center did not activate timely, to determine if activation procedures were current and being followed.

Observed Conditions

Overall, the Emergency Operations Center had 16 events during the audit scope.

The Emergency Operations Center is activating timely in most instances, but lack of clarity about its operating procedures and limited documentation impedes monitoring the timeliness and effectiveness of all activations.

The Office of Emergency Management updated the activation procedures in August 2023, shortly after the audit period ended.

Objectives and Conclusions

1. Is the Emergency Operations Center activating timely, at the correct activation levels, and with communication to partners as outlined in Office of Emergency Management procedures?

Generally, yes. Most activations were performed timely, at the correct activation levels, and included documented communication to partners. Uncertainty about the procedures and limited documentation contributed to instances where activations were late or not at the correct activation levels. (See [Observation A](#).)

2. Are procedures for activation current?

Generally, yes. The procedures were updated soon after the audit scope in August 2023 to better reflect operations. The procedures were reviewed biennially but were not updated to reflect recommendations for two 2022 storms until after the audit scope had ended in May 2023. (See [Observation A](#).)

Audit Results

Both *City Council Resolution 88-3428* and Administrative Directive 4-09, *Internal Control* prescribe policy for the City to establish and maintain an internal control system. The audit observations listed are offered to assist management in fulfilling their internal control responsibilities.

Observation A: Emergency Operations Center Activation Guidance, Communication, and Documentation

The Office of Emergency Management procedures for activating the Emergency Operations Center may lead to uncertainty regarding when an activation is required and the labeled level of the activation. Also, there is not consistent and timely documentation of activations. As a result, Emergency Operations Center activations may not be consistent, and it is difficult for the Office of Emergency Management to be able to tell how many activations occurred and whether activations were timely.

An issue with the timeliness of the activation, labeled level of activation, or determination of an activation was identified for three of the nine sampled activations, all for unplanned events.

- One storm activation was labeled a level 2 activation despite Citywide coordination typical of an activation at the highest level – level 1.
- One storm activation was late. (This was known before the audit.)
- A fire/explosion response was not considered an activation despite activity consistent with an activation, including response by the Office of Emergency Management, use of

the Emergency Operations Center, and deployment of a mobile command. Because this event was not initially considered an activation, there was no documentation of when the Emergency Operations Center operations began and ended and who was notified.

In addition, other activations for large events were considered responses instead of activations and no activation levels were listed. This included cases where command posts were used, and the operations center was active.

While Office of Emergency Management prepared summaries for each activation in coordination with the audit, timely documentation of each activation was limited, was not consistent across activations, and no log was maintained of Emergency Operations Center activations.

Comprehensive after-action reports were performed of two Emergency Operations Center activations where the Office of Emergency Management identified areas for improvement, including addressing timely activations.

Criteria

- ❖ Office of Emergency Management Activation and Operations protocols
- ❖ Administrative Directive 4-09, Internal Control, Section 5.1.1 *Control Environment*
- ❖ Standards for Internal Control in the Federal Government:
 - *Principle 10 – Design Control Activities*
 - *Principle 14 – Communicate Internally*

Assessed Risk Rating:

Moderate

We recommend the **Director of Office of Emergency Management:**

A.1: Monitor the Standard Operating Procedures to ensure they are updated to reflect implemented changes in practices within 90 days and that the documents include a dated acknowledgment of management approval.

A.2: Develop consistent documentation requirements for Emergency Operations Center activations and the Office of Emergency Management responses, including an annual log of all activations and responses.

A.3: Develop a definition for Office of Emergency Management responses if those are to be considered differently than Emergency Operation Center activations.

Appendix A: Background and Methodology

Background

One of the Office of Emergency Management's core responsibilities is operating and maintaining the Emergency Operations Center. The Emergency Operations Center is a multi-departmental multi-functional facility used to monitor events and respond to emergencies. Activations can be for large planned and unplanned events and operated virtually during the COVID-19 Pandemic.

Activations can run for a few hours to a week or more, depending on the type of event. In 2021, for example, there were unplanned events for Winter Storm Uri and the Highland Hills Apartment explosion and planned events for Día De Los Muertos, the Dallas Holiday Parade, and large running races.



This audit was added to the Fiscal Year 2023 Audit Plan when reporting by the Office of Emergency Management determined the Emergency Operations Center did not activate timely for the August 2022 flood.

The Emergency Operations Center is a coordinated effort to respond to emergencies. The following individuals have the authority to activate the City of Dallas Emergency Operations Center in accordance with the Department's Master Emergency Operations Plan: Mayor, City Manager, Deputy or Assistant City Manager, Fire Chief, Police Chief, Emergency Management Coordinator and Assistant Emergency Management Coordinator, Office of Emergency Management Duty Officer, and Incident Commander. It is run and managed by the Office of Emergency Management with involvement from other City departments and City leadership.

The Office of Emergency Management's mission is to provide a resilient emergency management structure dedicated to public safety and welfare through the preservation of life, health, property, and the environment. Its vision is to establish and grow a community-centric approach to mitigation, preparedness, prevention, response, and recovery activities.

Activations from June 2021 to May 2023

Refer to [Exhibit 1](#) on page 5 for a complete listing of activations from June 2021 to May 2023.

Exhibit 1:

Timeline of Activations September 2021 to May 2023



Methodology

The audit methodology included: (1) interviewing personnel from the Office of Emergency Management and other City departments; (2) reviewing policies and procedures, the *Texas Local Government Code*, applicable Administrative Directives, and best practices; and (3) performing various analyses, including review of the timeliness, communications, and activation level of a sample of activations in the scope period. In addition, all five components of *Standards for Internal Control in the Federal Government* were considered.

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 upon our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Major Contributors to the Report

Denise Bryson, CFE – In-Charge Auditor
Frank Mayhew, CIA, CISA, CFE – Engagement Manager
Dan Genz, CIA, CISA, CFE – Auditor

Appendix B: Management's Response

Memorandum



DATE: June 14, 2024

TO: Mark S. Swann – City Auditor

SUBJECT: Response to Audit of Emergency Operations Center Activation

This letter acknowledges the City Manager's Office received the *Audit of Emergency Operations Center Activation* and submitted responses to the recommendations in consultation with the Office of Emergency Management.

The Office of Emergency Management is committed to its mission of providing a resilient emergency management structure dedicated to public safety and welfare through the preservation of life, health, property, and the environment. The Office of Emergency Management's Emergency Operations Center is a critical tool in achieving the department's mission and is vital to the city's ability to effectively respond to disasters. In the last five years, the Emergency Operations Center served as the central coordinating point for nearly every disaster the city has faced. A few examples include:

- The June 2019 windstorm, which generated over 650,000 cubic yards of debris and caused a crane to collapse, destroying an apartment building;
- The October 2019 EF-3 tornado, which impacted over 900 homes and businesses and caused an estimated \$1.5 billion in damage, making it the costliest tornado event in Texas history;
- The COVID-19 pandemic, in which the city coordinated Community Based Testing Sites and vaccination sites for thousands of residents;
- The August 2022 flood, which brought upwards of 15" of rain in some areas and caused widespread flooding; and
- The May 2024 windstorm, which caused extended power outages for over 250,000 residents and required extensive cross-departmental collaboration for debris removal.

In between these events, many smaller activations occurred and the Office of Emergency Management responded directly to the needs of residents for food, water, and shelter.

The Office of Emergency Management recognizes there are opportunities to further improve its processes.

Specifically, the Office of Emergency Management will:

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- Ensure departmental Standard Operating procedures are updated to reflect process enhancements within 90 days and include a dated acknowledgment of management approval;
- Develop an annual log and associated guidance to document Office of Emergency Management responses and Emergency Operations Center activations; and
- Define Office of Emergency Management responses and Emergency Operations Center activations.

Sincerely,



Kimberly Bizer-Tolbert (Jun 14, 2024 14:26 CDT)

Kimberly Bizer-Tolbert
City Manager (I)

C: Jack Ireland, Chief Financial Officer
Dominique Artis, Chief of Public Safety (I)
Travis Houston, Director, Office of Emergency
Management

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Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
Moderate	We recommend the Director of Office of Emergency Management:				
	<p>A.1 Monitor the Standard Operating Procedures to ensure they are updated to reflect implemented changes in practices within 90 days and that the documents include a dated acknowledgment of management approval.</p>	Agree	<p>The Office of Emergency Management (OEM) will monitor their Standard Operating Procedures and revise as needed, within 90 days. The revision will include a dated acknowledgment of management approval and communication of the revision to applicable staff.</p>	03/31/2025	9/30/2025
	<p>A.2: Develop consistent documentation requirements for Emergency Operations Center activations, including an annual log of all activations and Office of Emergency Management responses.</p>	Agree	<p>OEM will develop an annual log and associated guidance to document OEM responses and Emergency Operations Center activations.</p>	3/31/2025	9/30/2025
	<p>A.3: Develop a definition for Office of Emergency Management responses, if responses are to be considered differently than Emergency Operations Center activations.</p>	Agree	<p>OEM will revise their Standard Operating Procedures or other department guidance to define OEM responses and Emergency Operations Center activations.</p>	12/31/2025	3/31/2025