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Report to Congressional Requesters

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COMBATING TERRORISM

Use of National Guard Response Teams Is Unclear

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National Security and
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The Honorable Christopher Shays
Chairman, Subcommittee on National Security,
Veterans' Affairs, and International Relations
Committee on Government Reform
House of Representatives

The Honorable Ike Skelton
Ranking Minority Member
Committee on Armed Services
House of Representatives

The Honorable Bob Barr
House of Representatives

In September 1997, we reported that many federal agencies had duplicative or overlapping capabilities and missions in combating acts of terrorism,[1] including incidents involving the use of weapons of mass destruction (WMD).[2] Recently, the Department of Defense (DOD) approved the creation of 10 National Guard Rapid Assessment and Initial Detection (RAID) teams to assist local and state authorities in assessing the situation surrounding a WMD emergency; advise these authorities regarding appropriate actions; and facilitate requests for assistance to expedite the arrival of additional state and federal military assets. As requested, we (1) obtained the views of federal, state, and local officials regarding the role of RAID teams in response plans; (2) determined whether there are other federal, state, or local government entities that can perform similar functions to the RAID teams; and (3) evaluated the RAID teams' roles and responsibilities and how the teams plan to meet these responsibilities.

[1]Combating Terrorism: Federal Agencies' Efforts to Implement National Policy and Strategy (GAO/NSIAD-97-254, Sept. 26, 1997).

[2]For purposes of this report, WMD are defined as biological, chemical, or radiological weapons.

Results in Brief

We have previously reported that the many and increasing number of participants and programs in the evolving terrorism area across the federal government pose a difficult management and coordination challenge to avoid program duplication, fragmentation, and gaps. While DOD has defined the specific mission for the RAID teams, the plans for the teams and their implementation continue to evolve. We found that there are differing views on the role and use of the RAID teams and how they will fit into state and federal plans to respond to weapons of mass destruction. Army officials believe the teams can be a valuable asset to federal authorities, if needed, as part of the federal response plan. They also believe that the teams will be a critical and integral part of the state and local response to such weapons. Officials with the two agencies responsible for managing the federal response to terrorist incidents—the Federal Bureau of Investigation and the Federal Emergency Management Agency—do not see a role for the RAID teams in the federal response. Instead, they see the National Guard, whether in state or federal status, providing its traditional assistance in emergencies. Differing views also exist at the state level. Officials in states without a RAID team do not see how the teams can benefit their states' response capabilities because of the time it takes the RAID teams to respond. However, one state official does see the RAID team bringing some expertise that could be useful. Officials in Pennsylvania, a state with a RAID team, plan not only to fully integrate its team into the state's weapons of mass destruction response plan, but also use it to respond to more common hazardous materials emergencies.

There are numerous local, state, and federal organizations that can perform similar functions to the RAID teams. For example, there are over 600 local and state hazardous materials teams in the United States that daily have to assess and take appropriate actions in incidents involving highly toxic industrial chemicals and other hazardous materials. In addition, there are numerous military and federal civilian organizations that can help local incident commanders deal with weapons of mass destruction incidents by providing advice, technical experts, and equipment.

Our discussions with local, state, and federal officials and our analysis surfaced a number of concerns that could impact the teams' abilities to meet their mission and responsibilities. These concerns centered on recruiting and retention, training, and operational issues.

These issues further point to the need for a more focused and coordinated approach to the U.S. response to attacks involving weapons of mass destruction—an approach that capitalizes on existing capabilities, minimizes unnecessary duplication of activities and programs, and focuses funding on the highest priority requirements. Because of the differing views on the role and use of the RAID teams, the numerous organizations that can perform similar functions, and the potential operational issues that could impact the teams, we are recommending that the appropriate federal agencies determine the need for the teams. If it is determined that the teams are needed, we further recommend that the RAID team concept be tested to determine how the teams can effectively perform their functions. If they are not needed, we recommend that they be inactivated. In light of differing views regarding a reassessment of the need for the RAID teams, Congress may wish to consider restricting the use of appropriated funds for any additional teams until the reassessment we recommended is complete. We have included a matter for congressional consideration in this report.

Background

Operationally, federal efforts to combat terrorism are organized along a lead agency concept. The Department of Justice, through the Federal Bureau of Investigation (FBI), is responsible for crisis management of domestic terrorist incidents and for pursuing, arresting, and prosecuting the terrorists. State governments have primary responsibility for managing the consequences of domestic disasters, including major terrorist incidents; however, the federal government can support state and local authorities if they lack the capabilities to respond adequately. The Federal Emergency Management Agency (FEMA) manages this federal support through a generic disaster contingency plan known as the Federal Response Plan, which outlines the roles, responsibilities, and emergency support functions of various federal agencies, including DOD, for consequence management. The National Security Council's National Coordinator for Security, Infrastructure Protection, and Counter-Terrorism, created in May 1998 by Presidential Decision Directive 62, oversees the broad variety of relevant policies and programs, including such areas as counter-terrorism, preparedness, and consequence management for WMD.

According to intelligence agencies, conventional explosives and firearms continue to be the weapons of choice for terrorists. Many familiar with industrial chemicals, such as officials from the FBI, the Environmental Protection Agency (EPA), the Coast Guard, and local hazardous materials (HAZMAT) teams, believe that industrial chemicals may also be a weapon of choice in terrorist attacks because they can be easily obtained and

dispersed. Terrorists are less likely to use chemical and biological weapons than conventional explosives, at least partly because these materials are more difficult to weaponize and the results are unpredictable. Agency officials have noted that terrorists' use of nuclear weapons is the least likely scenario, although the consequences could be disastrous. According to the FBI, the threat from chemical and biological weapons is low, but some groups and individuals of concern are beginning to show interest in such weapons.

Our September 1997 report stated that more than 40 federal departments, agencies, and bureaus have some role in combating terrorism and that many of these organizations have duplicative or overlapping capabilities and missions. In a December 1997 report[3] and an April 1998 testimony,[4] we reported that the many and increasing number of participants and programs in the terrorism area across the federal government pose a difficult management and coordination challenge to avoid program duplication, fragmentation, and gaps. We also discussed the need for threat and risk assessments to help the government make decisions about how to target investments and set priorities for combating terrorism.[5] We recommended that the National Security Council's National Coordinator for Security, Infrastructure Protection, and Counter-Terrorism, review and guide the growing number of federal terrorism response elements to ensure that agencies' separate efforts leverage existing state and local emergency management systems and are coordinated, unduplicated, and focused toward achieving a clearly defined end state.

In November 1997, the Deputy Secretary of Defense directed that DOD develop a plan to integrate the National Guard and Reserves into the DOD response to WMD attacks. The result was the Department of Defense Plan for Integrating National Guard and Reserve Component Support for Response to Attacks Using Weapons of Mass Destruction, issued January 1998. It outlined the capabilities the U.S. military might be called on to provide in support of civil authorities during a WMD attack, the capabilities

[3]Combating Terrorism: Spending on Government-wide Programs Requires Better Management and Coordination (GAO/NSIAD-98-39, Dec. 1, 1997).

[4]Combating Terrorism: Observations on Crosscutting Issues (GAO/T-NSIAD-98-164, Apr. 23, 1998).

[5]A threat and risk assessment would begin by identifying and evaluating each threat on the basis of various factors, such as its capability and intent to attack an asset, the likelihood of a successful attack, and its lethality. This information would be part of a deliberate process of understanding the risk, or likelihood, that a threat will harm an asset with some severity of consequences.

that existed in the military, and the gaps in DOD's capability to respond. The plan led to the creation of the RAID teams.

According to Army National Guard officials, the RAID team concept is a Secretary of Defense initiative. The Army Guard is responsible for implementing the concept and has developed the plans for organizing, staffing, training, and equipping the teams for their mission. Since this is a new concept, the plans and their implementation continue to evolve. Funding for the teams will be through the Army Guard and includes personnel costs for the full-time positions, as well as training, equipment, and maintenance costs. DOD allocated about $19.9 million from the fiscal year 1999 Defense Appropriations Act for the first year of the program, which covered the startup costs for the first 10 teams. An omnibus supplemental appropriation followed, from which DOD allocated an additional $19.2 million for RAID team equipment and $13 million to establish RAID (Light) teams in states that do not have a full RAID team. The DOD budget request for fiscal year 2000 includes about $37.2 million to support the 10 existing RAID teams and create 5 more. It also includes about $0.5 million to support the RAID (Light) teams.

According to Army officials, the Secretary of Defense plans that the RAID teams will be dedicated forces for domestic incidents. The initial 10 teams are located in Washington, California, Colorado, Texas, Illinois, Missouri, Georgia, Pennsylvania, New York, and Massachusetts. Each of these states is within a defined FEMA region and was selected based on demographics of the state, proximity to Air National Guard units that could provide airlift, presence of other federal/military assets, transportation networks, and other criteria. (See app. I for a map showing the FEMA regions and the RAID team locations.) Consideration was also given to the level of congressional interest in the locations of the teams. State National Guard organizations receiving the teams have started hiring and training personnel in their individual skills. The 10 RAID teams are scheduled to be operational in January 2000. Currently, the team is an asset of the state in which it is located, but can be deployed as a regional asset to other states. The DOD plan suggested that there eventually should be a RAID team in each state, territory, and the District of Columbia, for a total of 54 teams. Until this occurs, the Army Guard is establishing RAID (Light) teams in the other 44 locations to provide limited chemical/biological response capabilities.

Officials Have Differing Views on the Role and Use of National Guard Raid Teams in Response Plans

There are differing views on the role and use of the National Guard RAID teams and how they will fit into plans to respond to incidents involving WMD. Army officials believe the teams can be a valuable asset to federal authorities, if needed, as part of the Federal Response Plan. They also see the teams as a critical part of the local and state response to such incidents. Federal officials most involved in managing the Federal Response Plan during a WMD incident did not see a role for the National Guard RAID teams. Local and state officials also have differing views. Local officials with robust HAZMAT capabilities saw the RAID teams benefiting those jurisdictions with lesser HAZMAT capabilities. Officials from states without a RAID team do not see the use of the team in their WMD response efforts because of the time it takes the RAID team to respond. One state official does see the team bringing some useful expertise. Officials from Pennsylvania, one of the states to receive a RAID team, plan to fully integrate their team into the state's response plan.

Army Officials See the RAID Teams as Critical to WMD Response Efforts

The DOD team that worked on the January 1998 plan reviewed the Federal Response Plan to determine the emergency support functions and vital tasks that DOD would likely be asked to support. The team requested the military services to assess their capabilities to perform these tasks and consolidated the responses to identify existing gaps in the DOD capability to respond to a WMD event. The team also reviewed other DOD-sanctioned studies on terrorism and command response plans. In designing the RAID teams, Army officials stated they tried to create a capability that would fill the greatest shortfall identified in the study—the ability to detect and identify WMD. This capability is critical to any effective response effort and, according to these officials, was missing from most local and state response units. The RAID team focus will be WMD and, as such, the team would be subject matter experts, instead of HAZMAT experts with an awareness of WMD. According to these officials, having the RAID team in the National Guard gives the state governor an asset that can be rapidly deployed to provide this initial WMD detection and identification support, as well as technical advice on handling WMD incidents, to the local incident commander. Also, according to these officials, it is less expensive to have one state asset trained and equipped to deploy with this capability than to train and equip every HAZMAT team in the state.

According to Army officials, the RAID teams will also provide advantages that are not presently available at the local, state, or federal levels. For example, the teams will serve as a model for state and local WMD response

organizations and will provide both DOD and industry a place to identify requirements and test new concepts and equipment in WMD detection and identification. The teams will also provide a liaison between the local and state responders and the manufacturers of equipment to ensure that the responders have knowledge of state-of-the-art equipment to manage WMD incidents. According to the officials, the RAID teams will also fill a very important force protection role for the National Guard. Once other Guard units are deployed to the incident, they will need to know which areas are not contaminated so they can carry out their duties safely. The RAID team will be able to communicate this information to other Guard units, as well as provide advice to the Guard commander regarding operating in a WMD environment.

Officials Question Role of RAID Teams in Federal Response Structure

Officials from the FBI and FEMA are concerned about the RAID team concept and how the teams would fit into any federal WMD response. They question the need for the RAID teams because of the federal structure already available to respond to WMD incidents. The FBI officials are concerned about a conflict between the RAID teams and their own Hazardous Materials Response Unit or other federal assets, if all arrive with the same capabilities and try to give advice to the incident commander. FEMA officials are also concerned about the duplication of capabilities between the RAID teams and the local and state HAZMAT teams. They can see the RAID teams perhaps disrupting the relationship that already exists between the local, state, and federal responders.

Federal, state, and local officials generally agree that a WMD incident involving chemical agents would look like a major HAZMAT emergency. In such scenarios, the local HAZMAT team would be the first to respond and the local fire chief would usually be the incident commander. If the local responders are unable to manage the situation or are overwhelmed, the protocol is for the incident commander to contact nearby communities and the state emergency management office for assistance. The RAID team could be requested at that point. However, the local commander also has access to federal assets through the National Response System hotline, discussed later in this report. According to officials from the International Association of Fire Chiefs, the hotline is well publicized and known within the first responder community.

If the incident commander suspects that the event is a WMD incident, a similar hotline can be used to get information or assistance. The Domestic Preparedness Program directed that the U.S. Army, as executive agent,

create this Chemical and Biological Hotline to report suspected or confirmed WMD incidents.[6] The Army contracted with the Coast Guard to manage this hotline through the same center the National Response System uses, which links the caller to both the Army's Soldier and Biological Chemical Command for advice and the FBI to begin the federal response. The incident commander can also call the local office of the FBI, which would trigger the federal response. According to FBI officials, the local FBI offices try to work with local and state emergency responders to plan responses for WMD incidents. The RAID teams are not part of the Federal Response Plan and would not be notified through the National Response System.

The Federal Response Plan provides for a Defense Coordinating Officer, who is the single point of contact for Federal Response Plan agencies regarding military assistance in a disaster.[7] The Officer is responsible for validating those agencies' requests for military assistance, identifying and deploying active and reserve units for the mission, and for operational control of the units that are deployed. According to the Defense Coordinating Officer we spoke with, the RAID team would duplicate the Officers' role of identifying the units that could provide military assistance in a WMD event. The request for assistance would have to be made through the Defense Coordinating Officers because they have call up and deployment authority for units (other than National Guard units in state status) and the RAID teams do not have that authority.

According to Army officials, the RAID team's WMD focus would be invaluable to the Defense Coordinating Officers in their responsibilities under the Federal Response Plan, because of the team's knowledge of other military assets with a WMD response capability. The incident commander may request assistance for a particular task without knowing what military units are available to accomplish the task. According to the officials, the RAID team could translate that request into a specific type of military unit that would provide the most effective assistance to meet the incident commander's needs and provide the Defense Coordinating Officer information regarding the type and locations of that type of unit.

[6]See our report Combating Terrorism: Opportunities to Improve Domestic Preparedness Program Focus and Efficiency (GAO/NSIAD-99-3, Nov. 12, 1998) for a discussion of this program.

[7]There are officers assigned to each state, territory, and the District of Columbia.

Differing Views of the RAID Team Role Exist at State and Local Levels

Because the RAID teams are just getting established, there is not much information about the teams at the state and local levels. Therefore, we contacted only a few states, including Pennsylvania, which has a RAID team, and local jurisdictions to obtain their opinion on the RAID team concept. Most local and state officials we spoke with do not see a role for the RAID teams in their response framework. However, officials from Pennsylvania, one of the states to receive a RAID team, are enthusiastic about the concept. Officials from larger jurisdictions usually have very robust HAZMAT capabilities. Many of the officials we spoke with stated that they see no use for the RAID teams because their own experienced technicians can not only perform sufficient detection and identification to begin to handle the situation, but also work in the stressful, dangerous environment. They also did not see the RAID team providing advice on situation assessment and management, which is another of the RAID team missions. These officials consider themselves very experienced in managing HAZMAT emergencies and did not believe the RAID team could suggest anything they did not already practice every day. However, some of the officials did state that perhaps the RAID teams could be a useful asset for those locations with little or no HAZMAT capability. One state official stated that the RAID team could bring certain capabilities to a WMD event, such as expertise on military agents.

Officials from Utah's Division of Comprehensive Emergency Management stated that a RAID team would not respond to a WMD emergency in time to be of much help. Since a detachment of the Army's Technical Escort Unit is already stationed in the state and the state emergency management officials have a relationship with the Unit, officials believe the RAID team capability would not be effective for their state.

An official from the Virginia Department of Emergency Services believes the RAID team, as a regional asset, would not arrive in time to be an effective response asset, especially since the RAID team would not operate routinely with Virginia's existing coordinated and integrated response program. Virginia has 13 HAZMAT response teams that operate as local teams until called upon to assist another jurisdiction under the state mutual aid agreement. It also has hundreds of highly trained technicians on other HAZMAT teams that can perform the basic detection and identification tasks that allow them to begin to handle a WMD emergency. The official also expressed concern about how the RAID team would interact with the HAZMAT teams already on the scene and what they would do to assist if they arrived too late to provide the expertise for which they were trained.

However, he does believe that the RAID teams could bring certain capabilities to a WMD event, such as specific expertise concerning military agents, and acting as liaison between the civilian response and the military assets brought in to assist. He also believes that a RAID team could add materially to Virginia's preparedness and response capabilities, if it was properly trained and equipped and had a well-defined mission consistent with and integrated into Virginia's overall Terrorism Consequence Management concept.

The state and federal officials stated that the National Guard, in its traditional assist role, would be necessary and invaluable in a WMD emergency as in natural disasters and other emergencies. They, as well as officials from the International Association of Fire Chiefs, agreed that the detection and identification capabilities in the RAID teams would be better placed in the local responder community, since the local responders will be on the scene first and need information quicker than the RAID team, or any federal assets, could get there to provide it. According to some officials, an investment in more sophisticated detection and identification equipment and advanced training for HAZMAT teams would benefit the teams' response to all HAZMAT emergencies, not just WMD incidents. As we discussed in our November 1998 report, the Domestic Preparedness Program is providing the largest 120 cities in the United States with the opportunity to expand their WMD capabilities; however, there are concerns about some aspects of the program.

Pennsylvania State Emergency Management Agency officials are very enthusiastic about the concept. Even though there are state certified HAZMAT teams in 42 of the 67 counties in the state, the officials are modifying their state response plans to include the RAID team as the primary state asset to deploy in a WMD chemical emergency. They also plan to have the RAID team operate in non-WMD HAZMAT emergencies. They believe this not only gives the team a chance to gain operational experience and learn to operate as a team in the stressful HAZMAT environment, it also gives the state an additional HAZMAT asset to deploy. The officials dismissed the idea of relying on federal assets because of concerns about their availability and responsiveness if the state ever needed them.

Similar Capabilities Exist at Local, State, and Federal Levels

The RAID teams are to assist local and state authorities in assessing a WMD event; advise these authorities regarding appropriate actions; and facilitate requests for assistance to expedite arrival of additional state and federal military assets. The January 1998 DOD plan that led to the creation of the RAID teams focused on some of the military assets with similar capabilities available to support local authorities in a WMD event. It did not consider over 600 state and local HAZMAT teams that have to assess and take appropriate actions in incidents involving highly toxic industrial chemicals and other hazardous materials. Some of these local teams are receiving training and equipment through the federal Domestic Preparedness Program that will give them the capability to respond to WMD events. The plan also did not discuss many of the civilian federal organizations that can provide advice or respond with personnel and equipment to help mitigate the effects of a WMD. Finally, the plan was developed without the benefit of an analytically sound threat and risk assessment. We have said in prior reports and testimonies that such assessments can help decisionmakers in targeting investments, setting priorities, and minimizing program duplication.

Local and State Governments Have Substantial HAZMAT Capabilities

According to local, state, and federal officials, a chemical terrorism event will likely look like any major HAZMAT emergency and HAZMAT teams will be the first to reach the scene. HAZMAT technicians are trained to detect the presence of highly toxic industrial chemicals and can use basic identification techniques and equipment to give them sufficient information to begin to assess and respond to the situation. For example, the chemical agent sarin is from the same organophosphate compound family of chemicals as pesticides. HAZMAT technicians can identify this chemical family using readily available kits. The technicians are trained and experienced in the protocols used to handle this chemical family and can begin to mitigate the chemical immediately. The identification of biological agents requires a complex process performed in a lab and cannot, as yet, be done on scene by any unit, including the RAID teams. However, it is likely that detecting and identifying an actual biological agent will involve the medical community over a period of days rather than the HAZMAT community or the RAID teams over a matter of hours.

According to the International Association of Fire Chiefs, there are over 600 local and state HAZMAT teams that will be the first to respond to an event involving hazardous materials, whether it is a WMD agent, industrial chemical, or other material. Although these teams vary in capability,

ranging from basic to robust, they all have the basic capability to detect and identify industrial chemicals and mitigate the effects of a chemical emergency, either on their own or with help from nearby jurisdictions, private contractors, or federal organizations.

Some areas have small teams with little HAZMAT equipment. For example, Utah currently has five Utah Highway Patrol troopers trained to the level of HAZMAT technician who are responsible for managing hazardous material emergencies throughout the state. They have basic chemical identification kits and laptop computers in their patrol cars that allow them to identify the family of chemicals they are faced with and provide information on how to mitigate the effects. Beyond the troopers, the state relies on a network of amateur radio operators, city HAZMAT teams, volunteers with a level of awareness in chemicals, oil company teams, and a detachment of the Army's Technical Escort Unit stationed in the state to handle large emergencies. The state is planning to expand its HAZMAT capability with enough trained volunteers to staff six regional teams, available on an as-needed basis. According to officials from Utah's Division of Comprehensive Emergency Management, this capability, with some awareness training for those involved, will be sufficient to begin to manage the consequences of a WMD event involving chemical agents.

Local jurisdictions such as Chicago, Illinois; Fairfax County, Virginia; and Montgomery County, Maryland have more robust HAZMAT units. These units can handle large HAZMAT situations involving the most toxic industrial chemicals with little or no help because of investments in equipment, training, and staff. The units have more sophisticated detection and identification equipment that allows them to know what chemical is present. They are usually outfitted with a higher level of equipment, including personal protection suits with self-contained breathing mechanisms that allow them to enter the "hot zone" area of most intense contamination to quickly begin to manage the situation.

The largest cities in the United States, usually the ones with the more robust HAZMAT capabilities, are included in the 120 cities scheduled to receive WMD training, assistance, and equipment through the Domestic Preparedness Program. In our November 1998 report, we reported that the training and equipment that DOD is providing to cities through the program have clearly increased cities' awareness of and should better prepare them to deal with a chemical or biological terrorist incident. State, local, and federal officials agree that the capability for managing a WMD event should be in the hands of the people who will have to deal with the situation first

and who most need it—the first responder community. According to these officials, it would be far more effective to improve the capabilities in the first responder community than to create additional capabilities to assist them.

Military Assets Available to Assist First Responders

There are 89 Air National Guard civil engineering units spread throughout the 50 states, Guam, Puerto Rico, and the District of Columbia, that the state governors or federal officials can access to help in a WMD event. These civil engineering units—Prime Base Engineering Emergency Forces, known as "Prime BEEF" units—have the wartime mission of supporting sustained air operations with equipment and personnel to ensure capabilities for operating and surviving in a WMD attack and mitigating the consequences of an attack. Their functions include monitoring chemical plumes, detecting and identifying chemical agents and radioactivity, controlling contamination, decontaminating equipment and personnel, assessing the situation, and building temporary shelters. The Air Guard also has 78 Prime BEEF fire fighting units that are trained in handling hazardous materials, such as jet fuel and hydrazine, related to aircraft maintenance and operations and cleaning up spills. In addition, the Air Guard has 10 Explosive Ordnance Disposal units that are capable of handling WMD devices and plans to increase the number of these units to 44 in the next 5 years. According to Air Guard officials, these skilled units could be of great use to local incident commanders in a WMD attack on civilian targets, if their equipment and training were upgraded to allow "hot zone" entry and they trained with the local first responders. This would allow these units to be available to the states, not only in a WMD event, but also in a major HAZMAT emergency.

There are highly specialized military assets to deal with the full range of WMD. These include the Army's Technical Escort Unit, with three detachments stationed across the United States; the U.S. Marine Corps' Chemical/Biological Incident Response Force stationed at Camp Lejeune, North Carolina; the Army's 52nd Explosive Ordnance Disposal teams, stationed across the United States; military laboratories, such as the U.S. Army Medical Research Institute of Infectious Diseases; and other assets, such as the Mobile Analytical Response System from the Edgewood Research, Development and Engineering Center. Many of these units have the capability to detect and identify WMD as well as perform other WMD-related tasks, such as locate and render safe WMD devices or decontaminate victims. Many of these units have been positioned at large

events such as the Atlanta Summer Olympic Games, economic summits, and presidential inaugurations in case of a terrorist attack.

The military services, both active and reserve, have units that could be used in a WMD emergency. For example, the U.S. Army Reserve has 63 percent of the chemical units in the U.S. Army, including 100 chemical reconnaissance/decontamination elements stationed across the United States that can perform basic detection and identification of chemical agents as well as decontamination operations. The U.S. Army Reserve also has two chemical companies that are specifically designed for nuclear, chemical, and biological reconnaissance. The U.S. Army Reserve contains the only biological detection company in the Army today that is ready to deploy and also has many soldiers with command and control expertise and chemical specialties that can be deployed as individual experts to a WMD situation. Under the authority of Army Regulation 500-60, a Reserve commander can respond to an emergency in the local area when there is imminent danger of loss of life or critical infrastructure. Accordingly, the local authorities could request assistance from the local Reserve commander in a WMD emergency without an official deployment of the military.

Federal Civilian Assets Available to Assist First Responders

Some civilian federal agencies have assets that can assist first responders in a WMD emergency. This assistance can be in the form of information or response teams. The National Response System, which has been in operation for over 30 years, provides 24-hour telephone hotline access to federal agencies. Although the system is primarily to report emergencies involving chemical or oil spills, it could also alert federal authorities to what could turn out to be a WMD event.

EPA is responsible for preparing for and responding to emergencies involving oil and hazardous substances, including radiological substances, for all natural and manmade incidents, including those caused by terrorism. The U.S. Coast Guard is responsible for the same kinds of incidents as they impact the U.S. coastal waters. When a local or state responder calls via the National Response System for EPA or Coast Guard assistance, the call is immediately relayed to either agency's on-scene coordinator. These coordinators have the authority to manage all response efforts at the scene of an incident. The EPA has about 270 on-scene coordinators across the United States and the Coast Guard has 44 Marine Safety Officers, who are coordinators. Most coordinators try to deploy within a half-hour of notice. The coordinators have HAZMAT training, can assist with situational

assessment, and are the point of contact for the coordination of federal HAZMAT efforts with the local and state responders. If the state asks for assistance, the coordinator can bring both contractor and federal assets to the scene.

Both EPA and the Coast Guard have other assets that respond to HAZMAT emergencies. The EPA has two Environmental Response Teams, stationed in New Jersey and Ohio, that can respond to a HAZMAT emergency. These teams can bring to the scene analytical and monitoring equipment for detecting and identifying materials, including chemical weapons. They also have decontamination and risk assessment capability, as well as other expertise. The teams have the capability to perform "hot zone" entry with the highest level of personal protective equipment. EPA also has 10 Superfund Technical Assessment and Response Teams, 1 in each EPA region, that have similar HAZMAT capabilities and access to contractor support.[8] EPA's National Enforcement Investigations Center is the technical support center for EPA enforcement and compliance assurance programs, providing environmental forensic evidence collection, sampling, and analysis and can also assist the FBI with these activities. EPA has 12 labs that provide analytical support, field monitoring, and other environmental program support. Five of these labs have deployable mobile units that can provide chemical and biological analysis. Finally, the EPA has radiological response capabilities to handle some aspects of nuclear/radiological incidents.

The Coast Guard's National Strike Force has three teams, located in New Jersey, Alabama, and California. These teams each have 36 members trained to the HAZMAT technician level, as well as trained members in the Coast Guard Reserve, and are equipped to handle major oil and chemical spills in coastal waters, but can also respond to other environmental HAZMAT emergencies. These teams have the capability to perform the highest level "hot zone" entry to detect and identify materials, provide site assessments, perform site clean up, and provide other technical assistance. According to Coast Guard officials, it would take about $3 million to upgrade these strike teams' skills and equipment to respond to WMD incidents and give the federal government another asset to manage the consequences of a WMD.

[8]The EPA regions include the same states as the FEMA regions. See app. I for the FEMA regional structure.

As discussed previously, the FBI has the responsibility for crisis management in a WMD event. Its Hazardous Materials Response Unit is responsible for providing laboratory, scientific, and technical assistance to FBI investigations involving hazardous materials, including WMD, and environmental crimes. It also provides training, acts as an advisory group for HAZMAT crime scenes, and does WMD/HAZMAT research and development. The unit is trained and equipped to respond to all HAZMAT emergencies, including WMD, at the highest level of entry capability. It can detect and identify WMD or other hazardous materials using a mobile lab containing sophisticated, highly technical equipment that provides the level of evidence the FBI needs to apprehend and convict the perpetrator. In support of both the FBI and the local incident commander, the unit can also sample, package, and transport hazardous material to labs for further analysis, provide decontamination capability and situational assessment, and assist with technical scientific support and advice. The unit can mobilize within 4 hours and has access to FBI aircraft if the emergency is too far to drive to. The unit can be activated through the National Response System when it is thought that a crime has been committed in an environmental HAZMAT emergency or a HAZMAT emergency that may be a WMD event.

The FBI has a new initiative to put operational HAZMAT teams in 15 of its 56 field offices by June 1999. Each team will have 10 special agents trained at the HAZMAT technician level. Although these agents will not function as full-time HAZMAT technicians, they will be available as a quick response asset for gathering evidence in environmental crimes and WMD events. The team will be equipped to perform detection, monitoring, sampling, and decontamination. By the end of 1999, the FBI plans to have 4-person teams in the remainder of the field offices, trained to the HAZMAT technician level, but with very little equipment. Eight of the larger FBI teams will be in states that also have the National Guard RAID teams.

Concerns About RAID Teams' Ability to Fully Meet Their Responsibilities

Our discussions with local, state, and federal officials and our analysis of the information regarding the RAID teams surfaced a number of concerns that the teams may not be able to meet their mission and responsibilities because of recruiting and retention, training, and operational issues.

RAID Teams May Have Problems Recruiting and Retaining Specialized Personnel

In 1993, the Secretary of Defense announced a major restructuring of the Army National Guard and the Army Reserve. As a result of the restructuring, combat support and combat service support functions were concentrated in the Army Reserve and combat functions in the Army National Guard. According to the Army officer commanding one of the support brigades responsible for training and training evaluation of Army National Guard and Reserve units, most of the chemical and medical units are in the Army Reserve. As a result, there are few chemical and medical positions in the Army Guard outside the RAID teams for promotion opportunities. In his opinion, this would make it more difficult to retain team members once they had been trained and were looking for career advancement. He, as well as others, expressed concern that the Guard would not be able to maintain a "pipeline" of highly trained individuals to fill vacancies on the RAID teams, making it necessary for the teams to operate at less than full capability when vacancies occur. For example, it may be difficult to find the highly trained personnel with the necessary education and skills required to operate the sophisticated equipment planned for the RAID teams, such as the mass spectrometer.

Maintaining Proficiency Could Be a Problem

National Guard training plans for RAID team members include both individual and team training. Members will initially attend military training programs such as the U.S. Army Chemical School at Fort McClellan, Alabama, to give them basic specialty training in handling military nuclear, biological, and chemical weapons. They will also receive other military training, including operational radiation safety and chemical/biological countermeasures. The Guard also plans to send team members to the same types of civilian training programs that local responders from HAZMAT teams attend. In addition, team members will receive training on the highly technical equipment being purchased for detection and identification of WMD. Team training will include participating in exercises with other DOD response units, as well as local and state responders. The team will also plan and conduct training to learn how to operate as a RAID team. The National Guard plans to work with local responders to arrange for the RAID team to participate in their training programs and, at some future date, to respond to actual HAZMAT emergencies with the local teams.

According to local and federal HAZMAT team leaders, it may be difficult for the RAID team members to maintain their proficiency after they receive their training. For example, the teams will have a mobile lab with very sophisticated, technical identification equipment. Many local HAZMAT team leaders stated that they would not have some of this equipment in

their inventory, particularly the mass spectrometer, because it requires highly trained personnel to use and maintain it effectively. The federal HAZMAT team leaders stated that, while some of them have a mass spectrometer, it takes almost daily use to maintain competency and accuracy, which the RAID team may not get. All of the HAZMAT team leaders expressed concern that the RAID team members would lose their HAZMAT expertise and become bored if they did not have opportunities to continually practice their skills in more than just a simulated environment. All of the leaders stated that this on-the-job training is also critical to effective team operation. The stressful situation of an actual HAZMAT emergency cannot be replicated in a classroom or exercise, and team members need to know that everyone on the team can operate in that environment. The Pennsylvania Guard officer responsible for developing that state's RAID team stated that the Guard was concerned about this and realized the need to create these on-the-job opportunities, not only to maintain proficiency but to keep the team members from leaving to work on local HAZMAT teams. He added that the Guard was working with local HAZMAT teams so that the RAID team could participate in local training exercises and, at some later point, perhaps respond with the local teams on actual HAZMAT emergencies.

RAID Teams May Not Be Available if Needed

The goal for the RAID team, either in part or as a whole, is to be able to deploy to a WMD incident within 4 hours of notice. All local, state, and federal officials we met with expressed concern that this time frame would get the team there too late to be useful. They stated that, for the incident commander to benefit from the information they could produce, the RAID team would be needed at the scene within the first 1 to 2 hours. After that time, the local/state HAZMAT teams could have the basic detection and identification information that would allow them to begin to handle the situation. Then, the incident commander would either be in control of the situation and not need additional assessment input from the RAID team or so completely overwhelmed by the enormity of the situation that the FBI and FEMA already would have been notified, and in coordination with the state, federal assets already would be on their way to the scene.

The RAID teams will have dedicated vehicles to transport them and their equipment to the incident. The teams will also have access to Army National Guard helicopters and small, fixed-wing aircraft that could carry some team members with hand-held equipment. The remainder of the team and equipment would then follow in the vehicles. To transport the entire team to a distant location within the state or region, with all its equipment

and vehicles, would require military airlift, like C-130 aircraft. However, there are no plans to dedicate ground crews, flight crews, or aircraft for on-call, immediate response to a RAID team deployment. If Air National Guard or Air Force aircraft were required to transport the RAID teams, authorization would have to be obtained from the U.S. Transportation Command.

The lack of dedicated airlift for the RAID teams adds to the concern about the delayed arrival. Some federal assets, including the FBI's Hazardous Materials Response Unit, have immediate access to aircraft and flight crews. The EPA and Coast Guard On-Scene Coordinators have the ability to contract for civilian aircraft to get their assets, as well as contractor assets, to a scene quickly.

Each RAID team is to be staffed with 22 full-time National Guard members organized into 6 functions: command, operations, administration and logistics, communication, medical, and survey. (See app. II for an organization and staffing chart.) Members are to be on call 24 hours a day, 365 days a year. All but the survey function have a primary mission of RAID team support. For example, the medical unit provides medical support to RAID personnel, as well as guidance to the incident commander on the medical implications of a WMD event and coordination with health care facilities for follow-on support requirements. Each function will have personnel trained to perform their particular mission. The two survey units have the mission of conducting search, survey, surveillance, and sampling of a WMD incident site and advising the incident commander of appropriate response protocols. The survey units are to be capable of working in the "hot zone" at the highest HAZMAT level of entry. Members are to be cross-trained so that a full unit can be fielded at any one time.

All of the HAZMAT team leaders discussed the need to have sufficient team members cross trained in each position to be able to field a complete team when an emergency arises. For example, the Army's Technical Escort Unit; the FBI's Hazardous Materials Response Unit; and the Fairfax County, Virginia, HAZMAT team have sufficient personnel to field multiple units. This allows the units to rotate between on duty, off duty, and training status. If members from the unit on duty are unable to make their shift, the unit leader can call on an equivalent replacement from training or off duty to fill the void. This process also alleviates the concern of having the entire team on call 24 hours a day, 365 days a year, which could cause significant hardships for the team members as they try to maintain normal lives. The RAID team survey function is the only part of the team that has multiple

individuals performing the same job. All other members of the RAID team who could not respond to a deployment call would create a loss of capability for the team. Also, the RAID team will have only one set of equipment for both training and deployment, which could make it difficult to both train on the equipment and be operationally ready to deploy.

Conclusions

The FBI and FEMA are the lead federal agencies for WMD crisis management and consequence management, respectively. The National Security Council position of National Coordinator for Security, Infrastructure Protection, and Counter-Terrorism oversees the broad variety of policies and programs related to counterterrorism, preparedness, and consequence management. We believe that the National Coordinator, in conjunction with the lead federal agencies and DOD, should determine whether the National Guard RAID teams are needed. Local, state, and federal officials responsible for implementing emergency response plans have differing views regarding the role for the RAID teams in those plans. The RAID teams have capabilities similar to those found in local, state, and federal emergency response teams. Many of these teams were not considered when the RAID team concept was created, which may have led to an unnecessary duplication of assets. Concerns about recruiting and retention, training, and operational issues may impact the RAID teams in their ability to meet their responsibilities and mission.

Recommendations

We recommend that the National Coordinator for Security, Infrastructure Protection, and Counter-Terrorism, in consultation with the Attorney General, the Director, FEMA, and the Secretary of Defense, reassess the need for the RAID teams in light of the numerous local, state, and federal organizations that can provide similar functions and submit the results of this reassessment to Congress. If the teams are needed, we recommend that the National Coordinator direct a test of the RAID team concept in the initial 10 states to determine how the teams can best fit into coordinated state and federal response plans and whether the teams can effectively perform their functions. If the RAID teams are not needed, we further recommend that they be inactivated.

Matter for Congressional Consideration

Congress may wish to consider restricting the use of appropriated funds for additional RAID teams until the National Coordinator for Security, Infrastructure Protection, and Counter-Terrorism completes the reassessment we have recommended.

Agency Comments and Our Evaluation

DOD and FEMA provided written comments on a draft of this report. The FBI and other Department of Justice organizations provided oral comments. DOD stated that some of our findings and recommendations are useful as it establishes the RAID teams; however, many are not because much of our information was not current nor was it gathered from knowledgeable sources. FEMA and the FBI are the two lead federal agencies for WMD management. FEMA concurred with the thrust of the report and its recommendations. The Department of Justice, including the FBI, concurred with the substance of the report. Comments by DOD and FEMA are included as appendix III and IV, respectively. We also provided a draft of this report to the National Security Council, which did not provide comments. We revised the report to reflect technical comments provided by DOD, FEMA, Department of Justice, and other organizations, as appropriate.

FEMA stated that the report makes three important points. First, and foremost, for an incident of chemical terrorism, local responders—not a National Guard or federal team that arrives hours later—will perform the most immediate life-saving response tasks. Second, there are federal assets that can assist state and local officials with follow-on response tasks for chemical terrorism. New chemical capabilities for the Guard may not be necessary to support federal operations. Third, apparently there also is a difference of opinion among states regarding the need for new National Guard teams to support state operations.

DOD stated that many of our findings are not useful because they are based on data, opinions, and analysis that preceded the October 17, 1998, congressional direction to create 10 RAID teams. DOD also said that our report and the views expressed therein are based on the Department's plans, not on its implementation of the RAID team concept. Moreover, it stated that the report takes into account only a select portion of DOD's capacity to respond to terrorist use of WMD on domestic targets and makes reference to interviews with both civilian and military responders who have neither the knowledge of the DOD program nor of the ongoing coordination between DOD and other organizations. Also, DOD said that

several states have submitted a request for or expressed interest in fielding their own RAID teams, including Virginia and Utah. In commenting on our first recommendation, DOD said that the FBI, FEMA, the National Security Council, and the Office of Management and Budget had reviewed and concurred with its plan to create the RAID teams. DOD said that it is already implementing our second recommendation, which calls for a test of the RAID concept in the first 10 states. DOD's position on the third recommendation is that the RAID teams are needed and should not be inactivated.

With respect to the scope of our work, we conducted our review through March 1999 and included the most up-to-date information available at that time. We reviewed DOD's plans for the RAID teams and the implementation of those plans. For example, we discussed Pennsylvania's progress in fielding its RAID team and incorporating the team's capabilities into the state's WMD response plan. Although DOD states that the RAID teams were created by congressional direction on October 17, 1998, the teams were a DOD initiative and Congress, in passing the fiscal year 1999 Defense Appropriations Act on that date, funded DOD's initiative. Our focus was on the RAID teams and not DOD's total capacity to respond to WMD incidents. We assessed the teams against their stated roles and responsibilities, not against DOD's total support requirements. Therefore, we believe our assessment is valid. While we agree that the FBI, FEMA, the National Security Council, and the Office of Management and Budget reviewed the plans for the RAID teams, our discussions with officials from the FBI and FEMA and these agencies' comments on our report show that differing views continue to exist.

With respect to DOD's list of states requesting RAID teams, it is reasonable to expect that many states might express an interest in receiving a trained and equipped RAID team that could respond both to WMD events and HAZMAT emergencies since its cost would be borne by the federal government. The officials with whom we discussed the RAID teams' roles and responsibilities were recommended by their federal agencies or state and local entities as being most knowledgeable of WMD response plans and the implementation of those plans. All of these were aware of the RAID team concept, most had been briefed on the concept, and many had provided comments to DOD on it.

We continue to believe that our recommendations are valid and that the need for the RAID teams should be reassessed. We do not believe that the RAID teams were created based on careful consideration of

governmentwide priorities, an analysis of the program in relation to those priorities, and an allocation of resources based on priorities and an analytical assessment of the threat and risk of a WMD attack. A reassessment at this juncture is important because DOD has requested funds for five additional RAID teams in the fiscal year 2000 budget request. If it is determined that the RAID teams are needed, as DOD states in its comments, we believe it is premature to expand the RAID concept beyond the original 10 locations until it is determined how the teams can best fit into coordinated state and federal response plans, and whether the teams can effectively perform their functions. In light of differing views among DOD, FEMA, and the FBI regarding whether a reassessment of the RAID teams is needed and the fact that the National Coordinator did not provide comments on our report, Congress may wish to consider restricting the use of appropriated funds for any additional RAID teams until the reassessment we recommended is complete. Accordingly, we have included a matter for congressional consideration in our report.

Scope and Methodology

To determine what federal entities have capabilities similar to the RAID teams, we interviewed officials and reviewed documents from the FBI; FEMA; EPA; U.S. Coast Guard; U.S. Army Soldier and Biological Chemical Command; U.S. Air National Guard; U.S. Army 15th Support Brigade; and U.S. Army Reserve. To determine what local and state assets have similar capabilities, we interviewed officials from Fairfax County, Virginia; Montgomery County, Maryland; Chicago, Illinois; and the states of Utah, Virginia, and Pennsylvania. We also reviewed documents from Utah, Virginia, and Pennsylvania. These locations were selected to provide a range of perspectives, which includes states with and without a RAID team, states with major population centers and with more rural areas, and states with robust HAZMAT capabilities at the state level and those with less capability.

To determine how the RAID teams would be integrated into local, state, and federal response plans, we interviewed officials and reviewed documents from the FBI; FEMA; U.S. Army 15th Support Brigade; Fairfax County, Virginia; Montgomery County, Maryland; Chicago, Illinois; the states of Utah, Virginia, and Pennsylvania; and the International Association of Fire Chiefs.

We reviewed the Department of Defense Plan for Integrating National Guard and Reserve Component Support for Response to Attacks Using Weapons of Mass Destruction to determine how the concept of the RAID

teams was developed. We also reviewed pertinent legislation and funding for the RAID teams. We interviewed officials and reviewed documents from DOD's Consequence Management Program Integration Office, the Army National Guard, Pennsylvania, and the Pennsylvania National Guard to determine design, implementation, and planned use of the RAID teams. We also discussed the RAID team concept and the implementation of that concept with all of the officials listed above.

We conducted our work from July 1998 through March 1999 in accordance with generally accepted government auditing standards.

Unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from its issue date. At that time, we will send copies of this report to appropriate congressional committees; the Honorable William Cohen, Secretary of Defense; the Honorable Janet Reno, Attorney General; the Honorable Rodney Slater, Secretary of Transportation; the Honorable James Lee Witt, Director, Federal Emergency Management Agency; and the Honorable Carol Browner, Administrator, Environmental Protection Agency. We will make copies available to other interested parties upon request.

If you have any questions about this report, please contact me at (202) 512-5140. Robert Pelletier and Ann Borseth were major contributors to this report.

Mark E. Gebicke

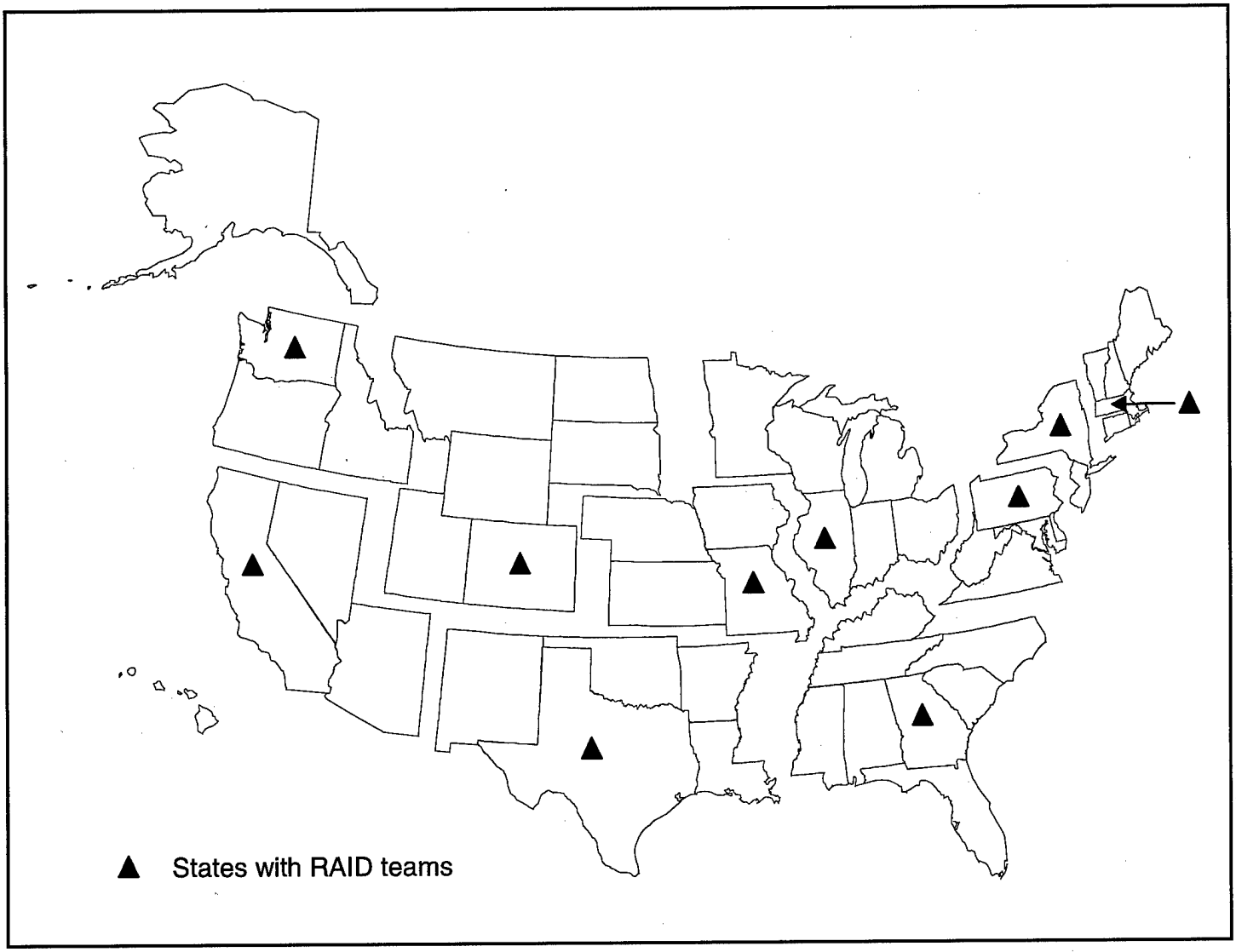
Director, National Security
Preparedness Issues

Contents

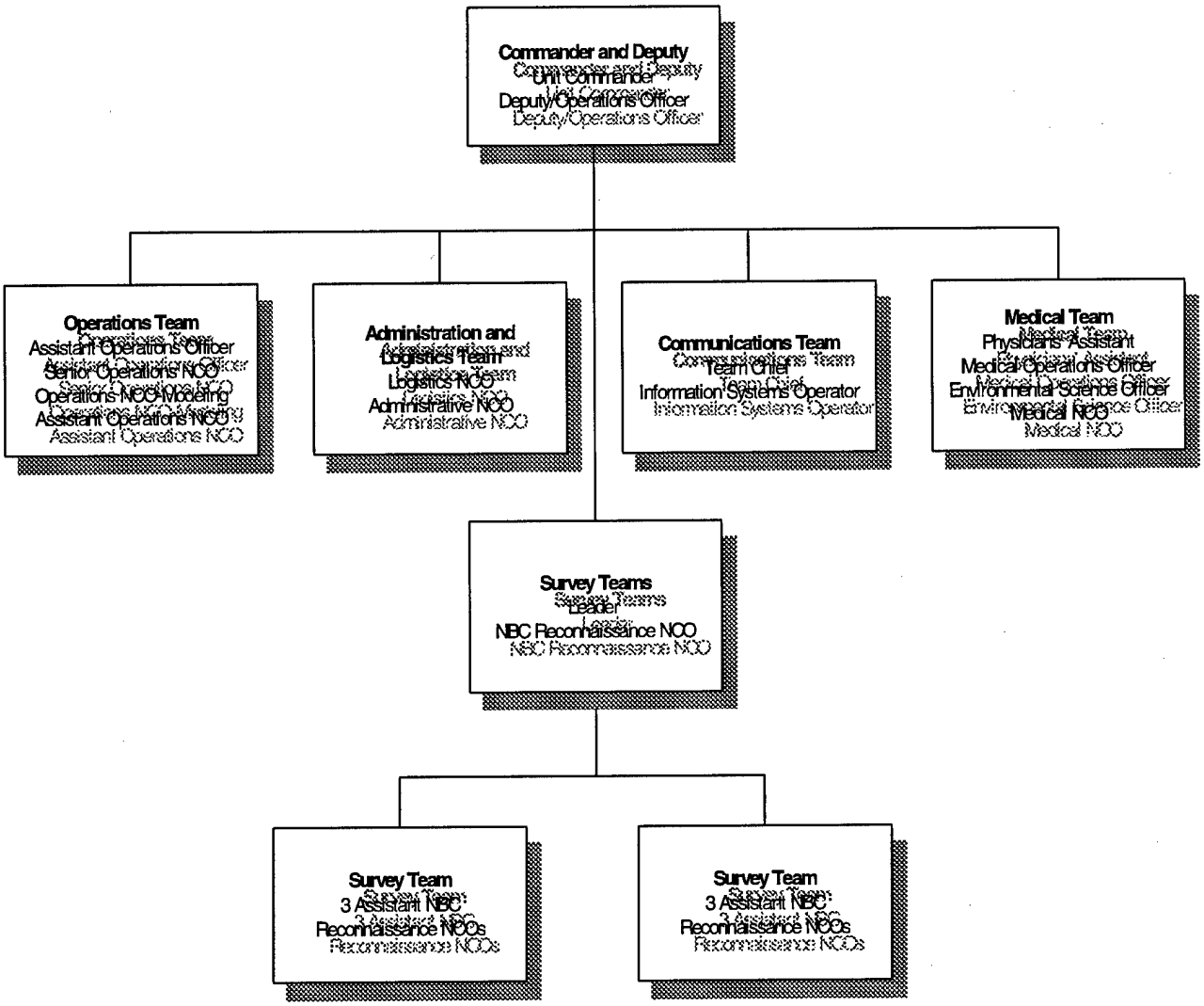
Abbreviations

DOD	Department of Defense
EPA	Environmental Protection Agency
FBI	Federal Bureau of Investigation
FEMA	Federal Emergency Management Agency
HMRU	Hazardous Materials Response Unit
HAZMAT	hazardous materials
RAID	Rapid Assessment and Initial Detection
WMD	weapons of mass destruction

RAID Team Locations Within FEMA Regions



RAID Team Organization and Staffing



Legend
NCO=Noncommissioned officer
NBC=Nuclear, biological, chemical

Comments From the Department of Defense

Note: GAO's comments supplementing those in the report text appear at the end of this appendix.

ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, DC 20301-1500

30 APR 1999

RESERVE AFFAIRS

Mr. Henry L. Hinton, Jr.
Assistant Comptroller General
National Security and International Affairs Division
U.S. General Accounting Office
Washington, DC 20548

Dear Mr. Hinton:

This is the Department of Defense (DoD) response to the General Accounting Office (GAO) draft report, "COMBATING TERRORISM: Role of National Guard Response Teams Is Unclear," dated March 26, 1999 (GAO Code 701146/OSD Case 1774).

The Department appreciates the opportunity to comment on GAO's draft report on the role and utility of the Rapid Assessment and Initial Detection (RAID) teams, how they relate to other organizations' functions, and issues concerning RAID recruiting, retention, training, and operations. An extended discussion of the Department's key issues, concerns and comments regarding this draft report is enclosed.

See comment 1.

While some of the findings and recommendations are useful as we establish RAID teams, many are not because they are based on data, opinions and analysis that preceded the October 17, 1998 congressional direction to create 10 RAID teams. Further, on October 21, 1998, Congress directed the Department to establish 44 RAID (Light) teams, so that all 54 states and territories will have some capability to mitigate the aftereffects of a domestic incident resulting from the use of weapons of mass destruction (WMD). As of this writing, personnel for the 10 RAID teams have been hired and are being trained, although the RAID teams will not be operational until certified as ready by the Secretary of Defense.

The GAO's draft report and the views expressed therein are based on the Department's original plans, not on its implementation of the RAID team concept. Moreover, GAO inquiries with individuals from other Federal agencies, the states, and local responder organizations about the role and utility of RAID teams yielded mixed opinions and erroneous perceptions. Individuals interviewed had limited knowledge of DoD plans and of its coordination with representatives from their organizations. The report's statement that the Commonwealth of Virginia sees no need for a RAID team is particularly disconcerting. Virginia Governor James Gilmore is the chairman of the recently established advisory panel on domestic WMD emergency preparedness. He and Senator Warner have written to the Secretary of Defense requesting that a RAID team be established in Virginia. As you know, Senator Warner chairs the Senate Armed Services Committee, has been briefed extensively on the Department's role in the national WMD response plan, and is well positioned to know both the value of RAID teams and what is good for Virginia. It is disturbing that GAO's report contains assertions that are so clearly at odds with the facts.

See comment 2.

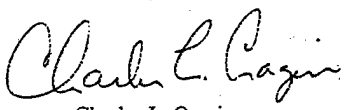
Since the GAO undertook this study last July, the federal government, at the President's direction, has increased its effort to coordinate and streamline its WMD preparedness and response programs. The report's conclusions do not reflect this commitment to interagency cooperation and coordination. Further, the findings demonstrate a lack of understanding of the complex federal response system and its requirements, and of the magnitude of support that likely will be required to mitigate the catastrophic effects of a domestic WMD attack.

See comment 3.

The draft report takes into account only a select portion of DoD's capacity to respond to terrorist use of weapons of mass destruction on domestic targets. It makes reference to interviews with both civilian and military responders who do not have current knowledge of the DoD program or of the ongoing coordination between DoD and other organizations. A complete, current and accurate assessment of the roles and missions of the RAID teams, when considered in the broader context of the federal government's sophisticated WMD response system, will validate the requirement for these teams and the contributions they can make in support of the nation's first responder community.

Thank you for your attention to these comments. Specific comments for technical accuracy and clarification have been forwarded separately.

Sincerely,



Charles L. Cragin
Acting

Encl.

See comment 4.

DoD Key Issues of Concern And Comments on Recommendations

1) GAO believes that DoD has not clearly articulated the specific role of the National Guard RAID teams and its approach for integrating them into federal and state response plans.

The Department of Defense has consistently articulated the specific roles and missions of the Rapid Assessment and Initial Detection (RAID) teams. These units are specifically designed to provide support to first responders by rapidly deploying to a suspected nuclear, biological, chemical, or radiological terrorist incident to:

- Conduct a comprehensive assessment of the situation,
- Advise the Incident Commander on appropriate response measures, and
- Facilitate access to any required follow-on military response assets.

The National Guard has consistently and aggressively articulated the specific roles and missions of the RAID team to Federal agencies, states and territories (through State Adjutants General), and the first responder community in support of the DOD plan. This is an on-going process. The National Guard has conducted conferences with more than 100 representatives from local, State, and Federal agencies, along with corresponding private associations, where the RAID team roles and missions were briefed and openly discussed. The State Adjutants General of the states within which a RAID team is located are actively involved in ensuring that their RAID team is fully integrated into state emergency response plans. Similarly, the ten states are assisting other non-RAID team states in the integration of the RAID team into their emergency response plans. DoD representatives routinely attend state and regional conferences where the concerns of many state and local officials and the first responder community regarding the RAID teams are addressed.

These elements serve as the "tip of the military response spear." They are designed to operate in either a state or Federal status and serve as the eyes and ears of the military Response Task Forces that may be required. They are designed to serve as a critical communications link between the first responders, the technical and scientific experts in DoD, and the follow on military forces that may be called on to assist.

Governors consistently view the RAID team as another important asset for use in any Weapon of Mass Destruction (WMD) incident. This point is supported by the fact that more than 15 states have expressed an interest in or requested a RAID team for their states.

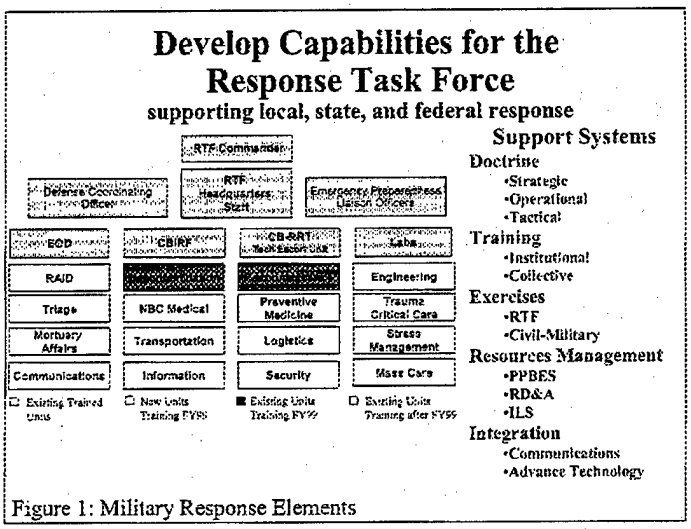


Figure 1: Military Response Elements

See comment 5.

By focusing solely on the RAID teams, the GAO report does not recognize that the DoD program takes a comprehensive approach to assisting first responders. The DoD Plan identified the critical areas where DoD has been or can expect to be called upon to provide support. These "elements" along with the required support systems are depicted in Figure 1.

These required capabilities were identified through a comprehensive process that took into account a number of studies, interviews with Federal, state, and local responders, and lessons learned from previous Military Support to Civil Authorities (MSCA) missions. These include:

- The 1997 Report to the President: "An Assessment of Federal Consequence Management Capabilities for Response to NBC Terrorism"
- The May 1997 National Security Strategy
- The September 1997 National Military Strategy
- The 1998 Defense Science Board Summer Study
- The 1998 National Defense Panel Report

The RAID team is a single component of this plan that can not be evaluated in a vacuum. By itself, it clearly can not meet all of the support requirements that the Federal, state, and local responders expect from the Department of Defense. Rather, it serves as the first critical step in a comprehensive, multi-year program to create an enhanced capability to assist civil authorities in the event of a catastrophic national disaster.

See comment 6.

In general terms today, the Department is not prepared for a domestic WMD response. The plan addresses the areas requiring DoD attention and isolates in some detail the response options the Department may be asked to perform. In the end, the solution to the WMD response mission requires a partnership - military and civilian.

The key to the DoD program is leveraging the capabilities of existing units. For many of the response tasks that the plan identifies, simply focusing existing units on the missions they may be asked to perform and developing their awareness of the Incident Command System (ICS) is all that may be necessary.

For others, specific tasks will require training. In a WMD scenario, selected members may be tasked to deploy to the Hot Zone and operate for extended periods of time, quite different from our wartime practices. The tasks, though different, can be performed by the forces that have been trained and organized to perform similar functions during times of war.

The value of training to the same standards, using common terminology and exercising with first responders provides the opportunity to prepare for this most demanding mission while leveraging the nation's investment in its military force.

The Response Task Force Commanders, Defense Coordinating Officers, and Emergency Preparedness Liaison Officers from all Services are identified and trained to work in the interagency environment. The task force commanders, however, have only a limited number of specifically focused response assets to call on - and their capacity for large events may not be sufficient.

This program will dramatically increase those elements that are prepared to respond quickly but may still not prepare a sufficient number of response units to meet the requirements of responding to a WMD attack. The Consequence Management Program Integration Office has been charged with developing these capabilities. They have adopted an incremental approach that will focus on the establishment of different capabilities or "elements" over the next several years.

In 1999 and 2000, the program is focusing on the RAID teams as well as on training and equipping existing chemical units in the Army National Guard and Army Reserve, and Medical Patient Decontamination Teams in the Air National Guard and Air Force Reserve to support civil authorities with casualty decontamination and NBC reconnaissance.

See comment 7.

2) GAO found that there are differing views on the role and utility of the RAID teams and how they will fit into plans to respond to weapons of mass destruction.

As has been pointed out in several previous GAO reports, there is a great deal of confusion within the Federal interagency community, as well as between the various Federal, state, and local jurisdictions. Responsibilities of individual organizations are evolving. DoD remains engaged with these local, state, and Federal response organizations to understand their requirements and determine how to best meet their requests for military support.

It has become clear, through a number of efforts and studies, that the local response communities do not have, and are not likely to ever get, a capability to respond to a WMD incident without outside assistance. The Federal component of this assistance will be conducted primarily in accordance with the Federal Response Plan.

Under the Federal Response Plan, the Department of Defense is tasked to provide support under every Emergency Support Function. Most, if not all, of the Emergency Support Function lead agencies have determined that they do not have the full capacity to respond to a major WMD incident and would call upon the Department of Defense to assist.

DoD clearly has a significant support role in domestic WMD response, and the RAID team is a critical component of the DoD plan to execute this support. The assessment conducted by the RAID team not only provides valuable information and support to the civil responders, it also provides the leadership within DoD with an assessment of military support requirements, and has the ability to facilitate the employment of military assets at the request of civil authorities. This technically competent unit has the capability to rapidly deploy to an incident site. They have an understanding of DoD's complex structure, organizations, and capabilities. This knowledge, which does not exist among civil responders, can be critical to a timely and effective response.

3) GAO asserts that there are numerous local, state, and Federal organizations that can perform similar functions to the RAID teams.

See comment 8.

The RAID team is not designed to take the place of a traditional Hazardous Materials Team, a Metro Medical Strike Team (MMST), or other specialized organizations such at the Federal Bureau of Investigation (FBI) Hazardous Materials Response Unit (HMRU) or the Army Technical Escort Unit (TEU).

The report specifically expressed concerns about a conflict between the RAID team and HMRU missions. While somewhat similar in structure and capabilities,

these two organizations have very different roles and functions at a WMD incident site. The FBI HMRU performs a law enforcement function with a primary goal of conducting a criminal investigation. The RAID team is primarily focused on providing consequence management support. In addition, the FBI HMRU is a unique national asset located in Quantico, VA. It does not have the capability to regularly participate in local and state planning efforts, and while it is rapidly deployable, it does not possess the regional dispersion that allows a RAID team to rapidly deploy to an incident site.

Local HAZMAT teams possess great knowledge and capability in responding to toxic industrial chemicals. They do not typically have experience dealing with militarized chemical agents, and have little training or experience dealing with biological or nuclear agents. Neither do they typically have the sophisticated laboratory analysis tools that the RAID team can bring to the site. They also do not typically possess a capability to deal with the non-HAZMAT requirements for responding to a WMD incident such as medical expertise.

The US Army Reserve chemical companies addressed in the report, are used on the military battlefield to detect biological agents. This unit is designed for wartime conditions and is not a real-time, point detector type of unit. A WMD scenario in a domestic city environment is not consistent with this unit's mission, especially after an attack has occurred.

The RAID teams, the Army's Chemical-Biological Rapid Response Team (CB-RRT), and the Marine Corps Chemical-Biological Incident Response Force (CBIRF) are the only organizations specifically designed to provide a multi-disciplined response capability for WMD incidents. All other response organizations are specifically tailored to perform missions within a specific specialty (i.e. HAZMAT, Medical, or Law Enforcement).

4) The GAO asserts that states without RAID teams see "no use for the RAID teams because their own experienced technicians can not only perform sufficient detection and identification to begin to handle the situation, but also work in the stressful, dangerous environment."

See comment 9.

The report specifically quotes officials from Virginia and Utah regarding the utility of a RAID team.

Utah officials are quoted as saying that they would not request support from the Colorado team due to the proximity of the Technical Escort Unit within the state. The stationing plan for the initial ten RAID teams takes this into account. Teams were not stationed in locations which already possess a significant response capability. Furthermore, while the officials quoted in the study may not see the utility of the RAID teams, others in the region have already begun coordinating with the Colorado RAID team to provide support during the 2002 Olympic games

in Salt Lake City. Governor Leavitt of Utah has asked that the state "be given priority consideration" for a RAID team.

The Virginia "official" quoted in the report is apparently unaware of the expressed desire of the Governor and senior senator of the Commonwealth of Virginia to have a RAID team assigned in Virginia. This request is only one among many. The following states have submitted requests for or expressed an interest in fielding their own RAID team:

- Wyoming
- Connecticut
- Kansas
- Missouri
- Indiana
- Utah
- New York
- West Virginia
- New Mexico
- Illinois
- Washington
- Maryland
- Virginia
- Alabama
- Alaska
- Hawaii
- Puerto Rico

The GAO report also quotes an unnamed representative of the International Association of Fire Chiefs as stating that over 600 local and state HAZMAT teams all "have the basic capability to detect and identify industrial chemicals and mitigate the effects of a chemical emergency, either on their own or with help from nearby jurisdictions, private contractors, or federal organizations."

When Chief Richard Marinucci, the president of the International Association of Fire Chiefs, testified before the Research and Development Subcommittee of the House National Security Committee last March, he outlined significant shortfalls in both equipment and training. Indeed, this has been a long-standing complaint from the first responder community. They do not, in fact, have the capability expressed by the GAO in the paragraph above. The Federal Government is proposing to spend hundreds of millions of dollars to provide additional training and equipment to first responders, yet they will still require outside support to mitigate the effects of a catastrophic WMD event.

According to Chief John Eversole, the Chair of The International Association of Fire Chiefs HAZMAT committee, and Chief of Hazardous Materials for the Chicago Fire Department testified before the Research and Development Subcommittee of the House National Security Committee last March:

> *"[when] we learned that the National Guard will take on a larger role in preparedness and response. We in Chicago applaud that decision because we have had nothing but*

eager cooperation and great success in our dealing with the local Illinois National Guard. They have responded to our call and shown us that they can produce, if just given a chance.

We, the local first responder, must work closely with the Guard to determine how they can best assist us. We need a conduit which will bring from the Federal Government a regular support system to ensure that we are always prepared."

See comment 10.

5) GAO raised concerns related to recruiting and retention of RAID team personnel:

Maintaining the strength of the full-time Active Guard and Reserve force is not a problem. The Army National Guard has not had, nor is it expected to have, any difficulty in maintaining the strength of the full-time force.

Furthermore, the team is jointly staffed, drawing personnel from the Air National Guard as well as the Army Guard. This allows the states to hire the most qualified personnel and expands the pool of qualified candidates. Similarly, the National Guard is looking for and will continue to seek qualified applicants from other active and Reserve components. The National Guard has never had trouble maintaining the strength of its full-time Active Guard and Reserve force within a state.

Finally, while it is true that most of the Army's Reserve component's chemical and medical expertise is currently in the Army Reserve, there is no prohibition against cross-fertilization among the components. A significant initiative has been undertaken within the Army to increase opportunities for active duty, Army Reserve, and National Guard soldiers to cross between components of the total force.

Finally, a significant number of chemical units are being fielded in the National Guard (company-level, battalion and brigade headquarters). These units are scheduled to begin forming between FY00-05. This will create future promotion opportunities for the RAID team personnel and will serve as another important pool of qualified applicants.

The National Guard will use its extensive distance learning program to provide sustainment training to RAID team personnel. This same system will also support local first responder training and thereby promote further 'integration', knowledge and support of the RAID team into emergency response plans.

Finally, the implementation of 44 RAID (Light) units, a unit based on the RAID team organization and equipment, will provide another source of trained

personnel, if necessary, for RAID teams to maintain day-to-day response missions.

No 'show-stopping' training or operational issues have been identified to date. Because the RAID team implementation is an on-going process, it is accepted that future questions or issues may arise that will require immediate attention.

6) The GAO expressed concern about how the teams can maintain proficiency without performing day to day response missions.

See comment 11.

These challenges are not unique to the RAID teams. A similar concern could be expressed about any of our combat units maintaining proficiency without a war. The RAID teams will have a much easier time than these other military units. They are light forces that can operate without a large support tail and high OPTEMPO costs; they are dispersed throughout the nation and can train at or near their local facilities; and they can work closely with the civilians they support. The RAID team commanders are already working with state and local response organizations to create training opportunities. There are a significant number of exercises being conducted by DoD, Federal Emergency Management Agency, the Environmental Protection Agency, and state and local communities. These will provide ample opportunity for these teams to exercise their skills.

Our experience with other specialized units such as the CBIRF, the CB-RRT, and the Technical Escort Unit (TEU) adequately demonstrates a capability to maintain proficiency.

Furthermore, we are developing distance learning programs and working with organizations developing constructive simulations to better provide an ongoing training program for the individuals on the teams to maintain and improve their proficiency.

GAO Recommendations:

Recommendation 1: We recommend that the National Coordinator for Security, Infrastructure Protection, and Counter-Terrorism, in consultation with the Attorney General, the Director, FEMA, and the Secretary of Defense, determine if RAID teams are needed in light of the numerous local, state, and Federal organizations that can provide similar functions.

See pp. 22-23.

DoD Response:
The DoD Plan has already undergone review by other Federal agencies including the FBI and FEMA who both reviewed and concurred with it prior to it's release. Furthermore, implementation of the plan was approved by both the National Security Council and the Office of Management and Budget for inclusion in the FY99 and FY00 President's budget.

Specific direction was provided to the Department of Defense by the President to establish these units. Presidential Decision Directive 62 tasks DoD to provide this type of support, and the October 1998 National Security Strategy specifically directs the establishment of the ten RAID teams.

Recommendation 2: If the teams are needed, we recommend that the National Coordinator direct a test of the RAID team concept in the initial 10 states to determine how the teams can best fit into coordinated state and federal response plans and whether the teams can effectively perform their functions.

See pp. 22-23.

DoD Response:
DoD concurs with and is already implementing this recommendation. In fact, it is at the heart of the entire effort. This program is being implemented as a part of Secretary Cohen's Defense Reform Initiative. According to Deputy Secretary of Defense John Hamre:

> *"The Defense Reform Initiative is an effort to reshape the organization to better reflect the department mission and the complicated security environment that has emerged since the end of the Cold War, particularly with respect to the threat posed by weapons of mass destruction." (March 11, 1998)*

Each of the ten teams currently being fielded has been assigned a particular area of emphasis in training, equipment, doctrine, or exercises. Designated teams will serve as the testbed in each of these areas. The best practices determined by the teams will be incorporated into the doctrinal development process. Equipment will be tested and evaluated. If a team identifies a shortfall, a rapid development process will be used through the Technical Support Working Group to fulfill the need.

Sophisticated collaboration tools are being employed to rapidly share information between the operators on the ground, the scientists and technical experts in our labs, the materiel developers, and the schoolhouses developing the tactics, techniques, and procedures. This approach incorporates state of the art commercial technology such as Microsoft's NetMeeting system as well as the Mitre Collaborative Virtual Workspace initiative.

A key goal of this program is to use private sector best practices such as rapid prototyping and the flexibility to quickly adapt to meet changing requirements to develop a response capability within DoD. Traditionally, DoD has designed force structure based on a five to ten year experimentation and development cycle. The fielding of the RAID teams breaks this paradigm, and we are accomplishing in months what has traditionally taken years to achieve.

In addition to this, we are working closely with the rest of the Federal Government to adopt standardized procedures and equipment for WMD response. DoD, along with the Department of Justice, co-chairs an Interagency Board for Equipment Standardization to determine the best equipment and procedures for responding to WMD incidents.

These ongoing efforts demonstrate a public-private partnership that is already bearing fruit. For example, this partnership has led to the publication of a tentative interim amendment of existing standards to allow civil responders to use military equipment for WMD response by the National Fire Protection Association (NFPA) Technical Committee on Hazardous Materials Protective Clothing and Equipment. The NFPA is also currently drafting a new standard, NFPA 1994, Protective Clothing for Chemical and Biological Terrorism Agents which will be available for review and public comment in late January 2000.

The GAO study should reflect the many successes that the DoD program has accomplished and should celebrate its future potential. The program exemplifies the principles of the Defense Reform Initiative and the National Partnership for Reinventing (NPR) Government, Acquisition, Financial Management and Quality of Life Reforms by adopting the best practices from the private sector, streamlining operations and employing public/private partnerships.

Recommendation 3: If the RAID teams are not needed, we further recommend that they be inactivated.

DoD Response:
In light of our response to Recommendation 1, DoD's position on Recommendation 3 is that the RAID teams are needed and should not be inactivated.

Following are our comments on the Department of Defense's (DOD) April 30, 1999, letter.

GAO Comments

1. During the time of our review, the plans for the Rapid Assessment and Initial Detection (RAID) teams evolved and we continuously met with Army officials to obtain the most up-to-date information on those plans. As we met with various organizations, we discussed our latest understanding of those plans. Although the plans for the teams have changed over time, the mission has not. As stated in the report, the various officials we met with expressed concerns with the mission and the time it would take the RAID team to respond to a weapons of mass destruction (WMD) event.

2. We have done extensive work in the area of WMD consequence management, which involves the complex federal response system and its requirements, and have gained considerable understanding of that system. We have included a partial list of our recent products on WMD consequence management at the end of this report. For this assignment, we have also discussed the federal response system and its requirements to mitigate the effects of a WMD attack with the Federal Emergency Management Agency (FEMA) and the Federal Bureau of Investigation (FBI), which are the lead agencies for the federal response system, and other agencies intimately involved as part of the federal response system.

3. Our focus was on the RAID teams and not DOD's total capacity to respond to WMD. We discussed the RAID teams' roles and responsibilities with officials who were recommended by their federal agencies or state and local entities as being most knowledgeable of WMD response plans and the implementation of those plans. All of these officials were aware of the RAID team concept, most had been briefed on the concept, and several had provided comments to DOD on that concept. We agree with DOD that a complete, current, and accurate assessment of the roles and mission of the RAID teams is needed to validate the requirement for these teams and the contributions they can make in support of the nation's first responder community. DOD's position is consistent with our recommendations.

4. We have clarified the report to reflect that DOD has articulated the specific mission of the RAID teams. However, officials from FEMA and the FBI, as well as other federal officials who are intimately involved in the complex WMD federal response system, questioned the need for the RAID teams because of the federal structure already available to respond to WMD incidents. They also expressed concern about the RAID teams'

impact on first responders, if the teams do not arrive for several hours after the incident occurs. As we state in the report, we found differing views of the RAID team role at the state and local levels. For example, Pennsylvania Emergency Management Agency officials are integrating the state's RAID team into the state's WMD response plans. However, the other states we talked to without RAID teams did not mention any efforts to include the regional team into their plans.

5. As mentioned in comment 3, our focus was on the RAID teams, not DOD's total response capability. We did not portray the RAID teams as meeting all the support requirements expected from DOD as DOD implies in its comments. We assessed the teams against their stated roles and responsibilities and not against DOD's total support requirements. Therefore, we believe our assessment is valid.

6. We agree that the solution to the WMD response mission requires a military and civilian partnership and existing capabilities must be leveraged. However, it appears that DOD is not taking full advantage of leveraging existing capabilities. For example, DOD is creating RAID teams in the Army National Guard when considerable capability already exists in the Air National Guard and, with some upgrading of skills and equipment, could perform comparable missions. Also, DOD is creating teams to perform functions that can be performed by numerous local, state, and federal organizations. As stated in our report, if governmentwide priorities have not been established and funding requirements have not been validated based on an analytically sound threat and risk assessment, there is no reasonable assurance that funds are being spent on the right programs in the right amounts and that unnecessary program and funding duplication, overlap, misallocation, fragmentation, and gaps have not occurred.

7. DOD has a significant support role in domestic WMD response. If a WMD event occurs, DOD will likely be called on to support the federal response just as it has done in other national emergencies. As we state in the report, both the FBI and FEMA questioned the use of the RAID teams in a federal response, and there are differing views on how the teams can be used in a state role. Therefore, we suggest that the key federal agencies determine if the RAID teams are needed for the numerous reasons cited in the report. The DOD response did not address one of the major issues surrounding the role and use of the RAID teams—that of response time. Many of the concerns expressed by federal, state, and local officials center on the length of time it may take the RAID team to arrive at a WMD

emergency. According to these officials, there are other federal assets with similar capabilities or access to contractors with similar capabilities that could respond as quickly or quicker than the RAID team.

8. According to FBI officials, the primary role of the FBI's Hazardous Materials Response Unit (HMRU) is to support criminal investigations. However, it can assist incident commanders with the same types of information that the RAID teams would provide. Also, although it is a unique national asset, it can respond quickly by air or ground to wherever it is needed. Moreover, there are many federal units beyond the FBI's HMRU that can provide similar capabilities to the RAID team, but were not considered when the RAID teams were created and not mentioned in DOD's comments on this report.

Local hazardous materials (HAZMAT) teams do not routinely deal with militarized chemical agents, but as we state in the report, they can use basic identification techniques and equipment to begin to assess and respond to the incident. Federal, state, and local HAZMAT teams are experienced in identifying and handling very toxic industrial chemicals in the same family as the military agents. DOD does not address the statements made by HAZMAT officials that their teams do not need the type of sophisticated equipment that the RAID team will have to begin to handle the event.

According to local, state, and federal officials, a biological incident would likely play out through the medical community, not the HAZMAT response system, unless the terrorists immediately announced the action. Even with knowledge of a possible biological agent present, someone operating the sophisticated equipment the RAID team brings to a scene will be able to detect that a biological agent has been released, but will not be able to positively identify the agent.

According to Army officials, the primary mission of the RAID team's medical unit is to provide medical assistance to the RAID team members and, secondarily, to provide medical advice to first responders. There are many other federal entities that can also provide this advice, either on scene or by telephone, to the incident commander.

Army Reserve chemical companies can detect chemical and biological agents. According to U.S. Army Reserve officials, the units discussed in the report can be used in more than a wartime situation and, in fact, can be prepositioned at events, such as the Olympic games, or used in a WMD emergency along with other federal and military assets.

9. We discuss the states' requests for RAID teams on page 22 of this report. Although DOD said that HAZMAT teams do not have the "basic capability to detect and identify industrial chemicals and mitigate the effects of a chemical emergency", this is exactly what they are trained to do. The statement by the president of the International Association of Fire Chiefs before the Research and Development Subcommittee of the House National Security Committee in March 1998 cited in DOD's comments must be considered in context. In outlining first responder shortfalls in equipment and training, he was referring to the handling of WMD incidents, not industrial chemicals, which the Domestic Preparedness Program is set up to overcome. And, even though some first responders may lack WMD response capabilities, International Association of Fire Chiefs officials, as well as the local HAZMAT team members and federal response team officials we spoke with, reinforced the fact that many HAZMAT teams have the basic skills to begin to mitigate a chemical WMD attack. We do not state that these teams may not need outside support to mitigate the effects of a catastrophic WMD event.

The individuals we spoke with, including the Chief of Hazardous Materials for the Chicago Fire Department, recognized that the National Guard is invaluable in its traditional role, providing support such as transportation and area security. However, he and others reinforced the fact that the capability for initial detection and identification of a WMD needs to be in the first responder community, not in a team that may not respond for hours.

10. We do not state or imply in the report that maintaining the strength of Active Guard and Reserve positions is a "problem." Our report discussed the potential problem of finding and retaining people with the high level of skill or education needed to handle the sophisticated equipment the RAID teams will have and those with the appropriate skills to staff the medical team. Specifically, the RAID teams are to receive highly specialized training, which is well beyond the training received by individuals in military chemical units and the National Guard RAID (Light) units. Also, some functions will require individuals with the necessary education and skills to operate sophisticated equipment. Replacing these individuals when vacancies occur might take time, which could affect the teams' capabilities.

11. Both Army and Pennsylvania National Guard officials stated their concerns to us regarding the need for RAID team members to maintain skill proficiency. Our report recognizes that the National Guard plans to work with local responders to arrange for the RAID teams to participate in their training programs and that the Pennsylvania National Guard is working with local and state HAZMAT teams to create training opportunities.

Comments From the Federal Emergency Management Agency

Note: GAO's comment supplementing those in the report text appear at the end of this appendix.

Federal Emergency Management Agency
Washington, D.C. 20472

APR 30 1999

Henry L. Hinton, Jr.
Assistant Comptroller General
National Security and International
Affairs Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Hinton

Thank you for the opportunity to review the draft report, "Combating Terrorism: Role of National Guard Response Teams Is Unclear" (GAO Job Code 701146).

The Federal Emergency Management Agency (FEMA) concurs with the thrust of the report and its recommendations.

The report makes three important points. First and foremost, for an incident of chemical terrorism, local responders--not a National Guard or Federal team that arrives hours later--will perform the most immediate life-saving response tasks. Second, as your report indicates, there are Federal assets that can assist State and local officials with follow-on response tasks for chemical terrorism. New chemical capabilities for the Guard may not be necessary to support Federal operations. Third, apparently there also is a difference of opinion among States--the link between the immediate local response and any Federal consequence management assistance that may be provided--regarding the need for new National Guard teams to support State operations. On these last two points, the report must distinguish carefully between the Guard in its State status and the Guard when federalized.

See comment 1.

Enclosed are suggested technical corrections and clarifications. Thank you again for the opportunity to review the report.

Sincerely,

Stephen F. Hood

for Catherine H. Light
Director
Office of National Security Affairs

Enclosure

The following is GAO's comment on FEMA's letter dated April 30, 1999.

GAO Comment

1. Based upon the written technical comments supplied by FEMA, we have revised the report as appropriate.

Related GAO Products

Combating Terrorism: Observations on Biological Terrorism and Public Health Initiatives (GAO/T-NSIAD-99-112, Mar. 16, 1999).

Combating Terrorism: Observations on Federal Spending to Combat Terrorism (GAO/T-NSIAD/GGD-99-107, Mar. 11, 1999).

Combating Terrorism: FBI's Use of Federal Funds for Counterterrorism-Related Activities (Fiscal years 1995-98) (GAO/GGD-99-7, Nov. 20, 1998).

Combating Terrorism: Opportunities to Improve Domestic Preparedness Program Focus and Efficiency (GAO/NSIAD-99-3, Nov. 12, 1998).

Combating Terrorism: Observations on the Nunn-Lugar-Domenici Domestic Preparedness Program (GAO/T-NSIAD-99-16, Oct. 2, 1998).

Combating Terrorism: Observations on Crosscutting Issues (GAO/T-NSIAD-98-164, Apr. 23, 1998).

Combating Terrorism: Threat and Risk Assessments Can Help Prioritize and Target Program Investments (GAO/NSIAD-98-74, Apr. 9, 1998).

Combating Terrorism: Spending on Governmentwide Programs Requires Better Management and Coordination (GAO/NSIAD-98-39, Dec. 1, 1997).

Combating Terrorism: Federal Agencies' Efforts to Implement National Policy and Strategy (GAO/NSIAD-97-254, Sept. 26, 1997).

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