

EMERGENCY MANAGEMENT AND DISASTER RECOVERY



**MORE TRAINING, BETTER EXERCISES AND
CONSIDERABLE ATTENTION TO THE CLAIMS
RECOVERY PROCESS WILL ENSURE CONTINUED
SUCCESS IN RESPONDING TO EMERGENCIES**

AUGUST 2006



Miami-Dade County Public Schools

THE SCHOOL BOARD OF MIAMI-DADE COUNTY, FLORIDA

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Miami-Dade County Public Schools

giving our students the world

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August 22, 2006

Miami-Dade County School Board
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Members of The School Board of Miami-Dade County, Florida
Members of The School Board Audit Committee
Dr. Rudolph F. Crew, Superintendent of Schools

Ladies and Gentlemen:

In accordance with the approved Audit Plan for fiscal year 2005-2006, we audited the District's emergency management and disaster recovery functions. The objectives of the audit were to determine whether these activities are adequate and effective, and whether losses resulting from disasters are satisfactorily identified, quantified and appropriately claimed through disaster relief funds provided by the Federal Emergency Management Agency (FEMA) or through insurance coverage.

Our audit concluded that adequate emergency management and disaster recovery procedures are in place and periodic emergency response exercises and vulnerability assessments are conducted. The majority of employees surveyed provided positive feedback concerning training and knowledge in emergency management procedures. Communication and notification procedures and infrastructures are mostly adequate. Notwithstanding, additional resources, education and attention need to be devoted to the administration of post-disaster recovery. Improved systems and resources devoted to this activity will provide for timely, comprehensive and well supported claims. This will reduce the risk of lost opportunities to adequately fund recovery efforts and losses arising from damages to and cleanup of facilities and personal property from available funding sources.

Our findings and recommendations were discussed with management. We fully considered their responses and have included them herein. As always, we would like to thank staff for the cooperation and courtesies extended to our staff during the audit.

Sincerely

Allen M. Vann, CPA
Chief Auditor

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EXECUTIVE SUMMARY

Based on our audit, we concluded that the District has well written policies, procedures and guidelines to handle most emergencies. While somewhat dated, they are clear, concise, and free of conflicts. They identify key parties and their responsibilities, and delineate specific courses of action to be taken during emergency situations. Our policies and procedures also compared favorably with procedures of other agencies.

While District employees are trained in the District's emergency procedures, only 79% of school site staff and 67% of administrators surveyed indicated that they received training. Emergency response exercises are routinely conducted, and for the most part, successfully met their objectives. We believe that some improvements can be achieved, as some departures from established procedures were noted. Periodic vulnerability assessments are also conducted, but the emergency management system would benefit if tabletop exercises were periodically conducted.

Good communication and notification channels and infrastructures are in place, but should be more clearly outlined in our written procedures. Enhancements to the District Emergency Communication Network (DECON) radios and implementation of a new Employee Emergency Communication System have been slow in being realized, but are in progress.

The District's written Disaster Recovery Plan (DRP) is fairly comprehensive, but in practice the process of accounting for losses and claims reimbursement currently in place involves many manual processes, which require considerably more post-event manpower than is being applied. As a result, claims are not always completed and submitted in a timely manner. For example, we noted the submission of two claims for roof and building repairs from Hurricane Wilma was delayed.

Furthermore, claims are not necessarily accurate. This could result in lost dollars to the School District or, alternatively, in inflated claims. Review of documentation for claims and reconciliations are incomplete. Some of the underlying support for the \$11.6 million FEMA emergency wages claimed for Hurricanes Katrina and Wilma were not available for review in Property Loss Control and could not be reconciled to the FEMA Project Worksheet, which reflects only \$11.4 million in emergency overtime wages.

Reimbursement checks received for hurricane related claims were not always properly or promptly receipted or deposited. The status of claims in general

should be more conscientiously tracked. Tools to accomplish this were recently developed.

Finally, the School District should avoid unnecessarily paying employees non-emergency related double time costs, because hours worked which were not directly related to storms or emergencies are not reimbursable by FEMA. Better discretionary controls need to be in place to ensure that hours worked by faculty and clerical personnel during designated emergency periods are limited to storm related duties.

Based on our observations, we have made 16 recommendations. Our detailed findings and recommendations start on page 8.

INTERNAL CONTROLS

Our overall evaluation of internal controls for the emergency management and disaster recovery functions is summarized in the table below (“E” = the emergency management function and “D” = the disaster recovery (claims) function).

INTERNAL CONTROLS RATING			
CRITERIA	SATISFACTORY	NEEDS IMPROVEMENT	INADEQUATE
Process Controls	E	D	
Policy & Procedures Compliance		E/D	
Effect		E/D	
Information Risk	E	D	
External Risk	E	D	

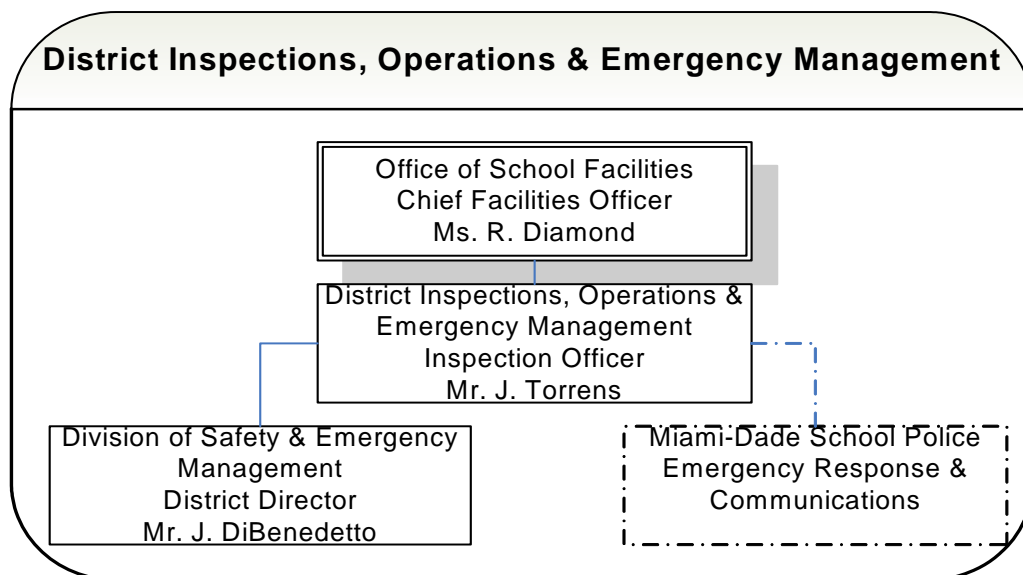
INTERNAL CONTROLS LEGEND			
CRITERIA	SATISFACTORY	NEEDS IMPROVEMENT	INADEQUATE
Process Controls	Effective	Opportunities exist to improve effectiveness.	Do not exist or are not reliable.
Policy & Procedures Compliance	In compliance	Non-Compliance Issues exist.	Non-compliance issues are pervasive, significant, or have severe consequences.
Effect	Not likely to impact operations or program outcomes.	Impact on outcomes contained.	Negative impact on outcomes.
Information Risk	Information systems are reliable.	Data systems are mostly accurate but can be improved.	Systems produce incomplete or inaccurate data which may cause inappropriate financial and operational decisions.
External Risk	None or low.	Potential for damage.	Severe risk of damage.

BACKGROUND

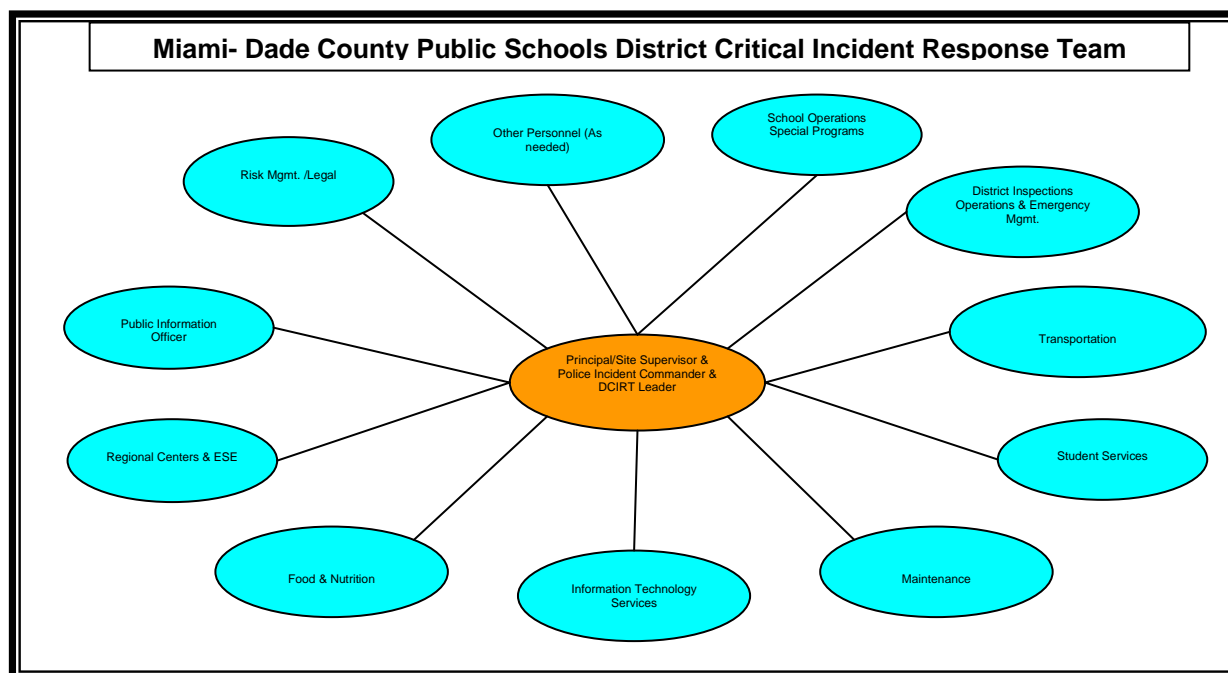
The District devotes discrete resources to emergency management. Awareness and preparation are common threads in managing potential disasters. By knowing our vulnerability and carefully planning what actions need to be taken, we have significantly reduced the negative impacts of emergencies. As we have all experienced, the likeliest threat to our School District are from seasonal hurricanes.



The Division of Safety and Emergency Management (the Division) is responsible for coordinating the District's resources during and after an emergency. When additional resources are needed the Division activates the District Critical Incident Response Team (DCIRT) Protocol. The DCIRT Team Leaders contact all team members to deploy appropriate resources and senior staff to inform them of the actions being taken. School Principals are guided by procedures outlined in the District Critical Incident Response Plan.



The Division oversees the activation of shelter schools upon approval by the Superintendent. Shelter school selection is coordinated with the American Red Cross. The schools are made available to those members of the community seeking shelter during emergencies. During an emergency, shelter school principals and DCIRT members use the District Emergency Communication Network (DECON) radios as the primary means to communicate with each other, Region Centers and senior staff for district-wide instructions and bulletins. The Chief Communication Officer, a DCIRT team member, is in constant communication with the Division to help coordinate announcements for the District's hotline and to communicate with the media and third party agencies.

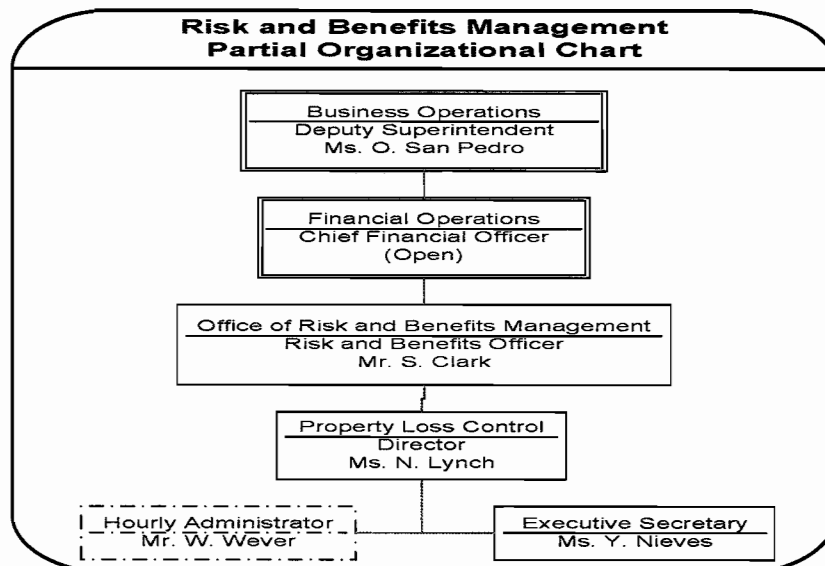


The District's Emergency Operations Command Center (EOCC) is activated to prepare for the re-opening of schools following an emergency. During such time, the EOCC convenes in the School Board Administration Building, Room 916. Divisions like Food and Nutrition, Information Technology Services, Maintenance, Risk and Benefits Management, Special Programs, Student Career Services and Transportation are participants. Preliminary Damage Assessments are reviewed with School Operations and resources are deployed by the appropriate division. In the event of an extended power outage or other limitations, the command team convenes at Information Technology Services (ITS). During the hours leading up to Hurricane Wilma on October 23, 2005, the District's EOCC operations were reported as consisting of a crew of six school police officers and two District Communications Management staff members at the command centers. These officers supported School Police patrol and shelter operations consisting of approximately 200 officers and supervisors, working 12-hour

Alpha/Bravo shifts. Staff members from the Division and various other departments work directly at the Miami-Dade County EOC to help facilitate communication with third party agencies, like the utility companies and Public Works. The EOC representative provides the Division with county-wide power, telephone and traffic signalization status reports. The Division communicates information to School Operations which in turn works with the school principals.

The Division is responsible for the Emergency Communication Plan provided to Board Members, the Superintendent and senior staff for use in the event of a natural disaster, civil disturbance or other significant incident that may affect the opening or closing of schools. The plan outlines the District's communication telephone tree, which includes staff members, Board members, DCIRT members, Command Center team members and alternates.

The disaster recovery function is under the auspices of Risk and Benefits Management, Property Loss Control (Risk Management). The function consists principally of two employees – a director and a secretary/clerk. When a major disaster, such as a hurricane occurs, staff from various departments assists with certain aspects of the disaster recovery function; primarily damage assessment and surveying. Disaster recovery activities and the related hurricane damages and claims submitted to the Federal Emergency Management Agency (FEMA) and insurance companies are integral parts of the recovery process. The team works closely with FEMA in accomplishing the disaster recovery function after a major disaster.



OBJECTIVES, SCOPE AND METHODOLOGY

We audited the District's emergency management and disaster recovery functions in place during and shortly after the 2005 hurricane season. The objectives of the audit were to determine whether:

- The District's emergency management and disaster recovery efforts are adequate, clearly delineated, current, effective and compare favorably with other agencies;
- Essential staff are adequately trained in emergency management procedures;
- Communication and notification procedures and infrastructures work;
- Periodic emergency response exercises and vulnerability assessments are conducted;
- Losses resulting from disasters are adequately and timely identified, documented and claimed; and
- Disaster-related claims are effectively monitored.

The procedures performed to satisfy the audit objectives were as follow:

- Reviewed related operating manuals, procedures, policies and rules.
- Reviewed the various communication plans used in carrying out this function and tested contact information contained therein.
- Surveyed District administrative and school site employees.
- Interviewed relevant District staff.
- Observed various emergency drills/exercises.
- Examined a sampled completed disaster-related claims.
- Obtained benchmarking information from other school districts and local government agencies.
- Performed other audit procedures deemed necessary.

In assessing the disaster recovery function, we reviewed 49 project worksheets and supporting estimates, damage reports, food spoilage reports, and emergency daily activity reports related to recent hurricanes.

Our audit was conducted in accordance with generally accepted government auditing standards applicable to performance audits contained in Government Auditing Standards issued by the Comptroller General of the United States of America. This audit included an assessment of applicable internal controls and compliance with requirements of policies, procedures and School Board Rules to satisfy the audit objectives.

FINDING AND RECOMMENDATIONS

GENERAL OBSERVATIONS

The District has comprehensive policies, procedures and guidelines for emergency management that are clear, concise and free of conflicts. They identify key parties and their responsibilities, and delineate specific courses of action to be taken during emergency situations. The current procedures, while dated, include most known and applicable emergencies and are available to all, including the public. However, the level of detail of procedures and information available to the public may in itself present some added risk to the District.

Evidential matters reviewed demonstrate clearly that adequate communication and notification channels are in place. Communication to students, parents, District staff and the community at large is adequate and effective. The efforts demonstrated during the 2005 hurricane season evidence the effectiveness of the communication and notification channels. We observed that emergency management staff exhibited selfless devotion to their mission.

Emergency response exercises, mainly in the way of evacuation drills are routinely conducted. For the most part, the exercises we observed successfully met their objectives.

The District's Emergency Operations Command Center (EOCC), located on the 9th floor of the School Board Administration Building, appears to be adequately equipped with communication infrastructure and equipment. Logistically, this is less than ideally located, being on the top floor of a building just outside the edge of an evacuation zone. However, the District also operates a satellite EOCC at the Information Technology Services (ITS) facilities.

Key team members from the District's emergency response team are part of the Miami-Dade County EOC team. During Hurricane Wilma, we observed this team in action at the County's EOC and were favorably impressed with the coordination, communication and participation of M-DCPS personnel, including School Board members, the Superintendent, and various staff members. As a best practice, and to achieve a similar level of readiness, the District should consider conducting tabletop exercises at least once each year.

The Division of Safety and Emergency Management has conducted a vulnerability assessment for the 2005 hurricane season. Moreover, we commend them for the outstanding comprehensive vulnerability assessment report entitled *A Review of the 2005 Hurricane Season Report* produced in December 2005, covering Hurricanes Dennis, Katrina, Rita and Wilma. We support and

encourage execution of the report's recommendations, including performing annual vulnerability assessments following the hurricane season and correcting deficiencies noted. Assessments of this kind should be performed after all major emergency response action, not only hurricanes.

Details of our findings and recommendations follow.

1. UPDATE EMERGENCY PROCEDURES MANUAL

Site administrators depend on the Emergency Management Procedures manual to provide guidance in dealing with various types of emergencies. The manual prepared by the Division of Safety and Emergency Management is publicly available and is effectively communicated to site administrators, staff, applicable third-party agencies and parents. The manual clearly and concisely delineates specific courses of action to take during an emergency. It is comprehensive in that it considers most known emergencies, risks and crises. Key parties and their responsibilities are identified. Back-up, recovery and continuity plans for essential resources and functions are outlined in the manual. It compares favorably with similar manuals prepared by Broward County, Broward County Public Schools and Orange County Public Schools.

Notwithstanding, the Emergency Management Procedures manual was last revised in June 1999 and does not include the most up-to-date information. Because the manual is a bound document, and is included as an official School Board Rule (6Gx13- 6A-1.06), it necessitates rule making whenever a change is needed. While maintaining an updated manual is desirable, the aforementioned characteristic diminishes staff's inclination to propose more frequent updates.¹ Additionally, communication channels are not cataloged in the current manual.²

In order to verify that the emergency contact telephone numbers listed in both the manual and the Emergency Communication Plan are accurate, we sampled 33 telephone numbers. Nine (9) or 27% of the numbers tested were incorrect. For example, the telephone number for Miami-Dade School Police was incorrect and the number for an employee who retired two years ago was still listed. Having up-to-date information during emergency situations is essential to enabling emergency managers to do an effective job.

After 9/11 (September 11, 2001) Florida schools heightened safety and security. On October 10, 2003, the Florida Department of Education (FDOE) approved the Statewide Policy for Strengthening Domestic Security in Florida's Public Schools. This policy provides guidance to Florida Public Schools helpful in preventing, preparing for, and responding to possible terror attacks. Unlike other districts, M-

¹ During the course of the audit, staff from the Division provided a draft Emergency Management Procedures manual dated August 2005. The revised draft contained updated information; including updated telephone numbers. However, the draft manual has not been submitted to the School Board for approval.

² The revised draft includes communication channels. Subsequently, we were provided a revised Emergency Communication Plan dated October 21, 2005.

DCPS prudently does not lists detailed terrorism procedures in its public record manual. However, the manual does contain various threats and incidences, which could be perpetrated as acts of terror.

RECOMMENDATIONS

1.1 Finalize the revision of the Emergency Management Procedures manual and revise the bound format to facilitate easier updating.

Responsible Department: **The Division of Safety and Emergency Management**

Management Response:

We concur with this recommendation. During 2005 the district Emergency Management Procedures manual was sent to police and fire departments throughout Miami-Dade County and selected district staff members for their review and comments. Based on comments received and staff research a comprehensive revision was produced. As discussed in audit response 1.2 below, revising the manual currently requires lengthy Board Rule hearings and proceedings. The most expeditious path to implement this recommendation will require staff to finalize the revision of the Emergency Management Procedures concurrent with implementation of audit recommendation 1.2, which will exclude the document from the existing Board Rule.

Contingent on School Board approval, the revised Emergency Management Procedures manual should be available to schools no later than January 2007. The next version of the Emergency Management Procedures manual will be unbound and three-holed punched to allow the user to insert and replace revised procedures, as necessary. Additionally, a restricted and password protected version of the manual will be made available via the M-DCPS Intranet.

URGENCY OF CORRECTIVE ACTION

- ☐ Critical
- ☒ Important
- ☐ Desirable

IMPLEMENTATION SCHEDULE

- ☐ Immediately (Short Term)
- ☒ By January 2007
- ☐ Contingent upon Funding

1.2 Consider proposing excluding the Emergency Management Procedures manual from the School Board Rule.

Responsible Department: **The Division of Safety and Emergency Management**

Management Response:

We concur with this recommendation. The Emergency Management Procedures manual is incorporated into Board Rule 6Gx13- 6A-1.06. As a result, any change to the manual requires that it be submitted to the School Board to initiate a rule change. The rule change is a lengthy process that requires an initial and final reading.

The Emergency Management Procedures manual is provided to all school and administrative sites for use in response to emergencies. Recent world events related to terrorism, potential flu pandemic, Sudden Acute Respiratory Syndrome as well as the frequent need to update and refine existing procedures requires the ability to revise the manual in an expeditious manner.

Additionally, last year's active hurricane season and post storm recovery efforts have revealed areas in the district plan that requires enhancement and revision. It is essential that the District's emergency plan be fluid, flexible and adapt to changing conditions as opposed to the current static plan constrained by the rulemaking process.

Staff will pursue a revision of Board Rule 6Gx13- 6A-1.06 to require that an Emergency Management Procedures manual be maintained but allow it to be revised as needed without Board action. Preliminary discussions with the Board Attorney indicate that this is feasible and reasonable. Staff will formalize a request via the Board Attorney and initiate rule change procedures. Concurrent with the rule change process, staff will update the draft 2005 version of the Emergency Management Procedures manual and deliver to school sites no later than January 2007.

URGENCY OF CORRECTIVE ACTION

- ☐ Critical
- ☒ Important
- ☐ Desirable

IMPLEMENTATION SCHEDULE

- ☐ Immediately (Short Term)
- ☒ By January 2007
- ☐ Contingent upon Funding

2. COMPLETE RADIO REPEATER INSTALLATION

An essential element of our emergency communication and notification procedures is the District Emergency Communication Network (DECON) radios. In the event of interruptions in normal communication channels, the Facilities and Region Center staff, as well as emergency shelter principals and Emergency Operation Center staff use these radios for communicating with each other and for monitoring district-wide instructions and bulletins.

We tested the functionality of the DECON radios by calling 18 sampled employees, who were assigned DECON radios, according to the Emergency Communication Plan. From these, 16 responded, which indicate an 89% success rate. The DECON radio test revealed that some locations experienced poor reception, which could result in either delayed or no response. For example, during the test, one school principal called back 18 minutes later because of reception difficulties. She explained that there was no reception in the school and that she had to exit the building to obtain clear reception. During an actual emergency, stepping out of the building may be impractical.

The Division of Safety and Emergency Management staff stated that “repeaters” were purchased by the Miami-Dade School Police for selected schools to assist with radio reception. The selection of the schools was based on how the schools were constructed. In total 67 “repeaters” were purchased; 59 were purchased on August 31, 2005 from granted funds³, but as of April 2006, only 18 “repeaters” had been installed. The remaining ones are awaiting installation from the Maintenance Department. The installation will enhance radio communication with departments of public safety, law enforcement, fire and other first responders during emergencies; specifically hurricanes.

RECOMMENDATIONS

2.1 Accelerate the installation of radio repeaters.

Responsible Department: Maintenance Operations

³ The United States Department of Homeland Security provided \$129,000 to purchase communication enhancement equipment such as the repeaters, radios and other equipment.

Management Response:

We concur with this recommendation. School Police officers have reported experiencing poor radio reception at some school sites. The reception problems are related to the construction of the buildings and the inability of the radio signals to penetrate the building envelope. To address this matter, School Police applied for and received a grant to fund, among other things, repeaters at previously identified school sites. The list of 67 school sites identified to receive repeater installations is provided in Appendix A. [See Appendix I – Management Responses, page 49.] As of July 31, 2006, 34 installations were completed and two were in progress.

It is anticipated that installations at the remaining schools will be completed by December 2006.

URGENCY OF CORRECTIVE ACTION

- ☒ Critical
- ☐ Important
- ☐ Desirable

**IMPLEMENTATION
SCHEDULE**

- ☐ Immediately (Short Term)
- ☒ By December 2006
- ☐ Contingent upon Funding

3. WIDEN THE NUMBER OF EMPLOYEES TRAINED IN EMERGENCY PROCEDURES

Knowledge in emergency management procedures obtained through experience and training is paramount to effectively managing threats and crises. The Division provides emergency response orientation/training for principals, assistant principals and administrators. Principals and assistant principals received an initial orientation/training before the start of the school year. All orientation/training sessions are conducted prior to November 1. However, advantages could be realized if training of employees is completed before the hurricane season has almost ended. The principals at school used as Hurricane Shelters and two designees are trained by the American Red Cross before the start of the hurricane season. Each school location minimally has a primary and alternate contact for emergencies.

Leading up to the 2005 hurricane season, the Division provided the following emergency response orientation/training to principals and assistant principals:

- District Critical Incident Response Team Principals/Assistant Principals Training (summer 2005)
- District Critical Incident Response Team Emergency Response and Crisis Management Training (fall 2005)
- District Critical Response Team Member Training (fall 2005)
- The Annual American Red Cross Training for Shelter Principals (May 19, 2005)
- The Department of Education Emergency Response and Crisis Management Training (January 20, 1006)

The subject matter included in these training sessions were weapons of mass destruction, crisis management, terrorism, fire and lockdown drills, hurricane-related issues and other emergency evacuation drills.

To determine employee awareness and training, we surveyed 416 school and region office employees, including both instructional and non-instructional staff. We received 163 responses or 40%. Of those, 159 or 99% felt comfortably knowledgeable about how to respond in an emergency situation. One hundred fifty-four (154) or 94% indicated that they were familiar with the emergency response exercises and 129 or 79% indicated that they received training from the

Office of Districts Inspections and Emergency Management and School Operations.⁴ The following table summarizes our survey results:

Analysis of Response From School Personnel & Region Office to Survey			
Survey Question	Criteria Met	Criteria Not Met	Exception Rate
Employee is aware of District's Emergency Management Procedures.	154	9	6%
Employee has received training on Emergency Management Procedures.	129	34	21%
Employee has written evidence of training provided.	56	73	57%
Employee is knows where to find written emergency procedures.	155	4	3%
Employee is aware of emergency routes and procedures to follow during evacuations.	162	1	1%
Emergency response exercises are conducted at employee's location.	158	4	2%
Employee is a participant of emergency exercises conducted at location.	116	0	0
Employee location is designated as an emergency shelter.	26	0	0
Employee has a copy of location's emergency contact list readily available.	151	11	7%
Employee feels comfortably knowledgeable about how to respond in an emergency situation.	159	2	1%

The following comments or suggestions were received from personnel at schools and region offices and are summarized as follow:

- "The District has done an outstanding job informing and training schools."
- "The plan in place is very organized and clear."
- Most employees suggested that more training is needed for teachers and principals, especially new personnel.
- Some employees would like exercises dealing with real-life scenarios and details regarding the appropriate response actions. They indicated that these are always useful and serve as a refresher.
- "Simplify process by having one number to call in the District for help."
- "Evaluations after every drill/emergency situation will assist the crisis team and school to make adjustments/revisions as needed."

⁴ Some employees indicated training took place at the beginning of the school year at the Opening of Schools meeting. Of those that received training, the number of times that training was received ranged from 1 to 4.

- “Students and parents should be briefed and made aware of procedures and their importance.”
- “Some schools selected for shelters should not be designated shelters.”
- Principals are concerned with the schools being an open campus.
- More security should be provided in our schools.
- “Employees assigned to present task do not have keys or materials to handle emergency situations.”

Similarly, we surveyed 61 administrators listed in the Emergency Communication Plan. Of the 61 employees surveyed, only 15 responded. All the respondents indicated that they were aware of the Emergency Management Procedures and have a copy of their location’s emergency contact list readily available. However, only $\frac{2}{3}$ of the respondents acknowledged that they have been trained on these procedures and only half of those indicated that they had written documentation evidencing the training they received. Regarding emergency response exercises, only $\frac{2}{3}$ of the respondents indicated that such exercises are conducted at their location. Thirteen (13) or 87% of the respondents felt comfortably knowledgeable about how to respond in an emergency situation. The table below summarizes our survey results:

Analysis of Responses From District Administrators to Survey			
Survey Question	Criteria Met	Criteria Not Met	Exception Rate
Employee is aware of District’s Emergency Management Procedures.	15	0	0
Employee has received training on Emergency Management Procedures.	10	5	33%
Employee has written evidence of training provided.	5	5	50%
Employee knows where written emergency procedures are located.	14	1	7%
Employee is aware of emergency routes and procedures to follow during evacuations.	14	1	7%
Emergency response exercises are conducted at employee location.	10	5	33%
Employee has a copy of location’s emergency contact list readily available.	15	0	0
Employee feels comfortably knowledgeable about how to respond in an emergency situation.	13	2	13%

The following suggestions and comments were received from District administrators and are summarized as follow:

- “Continue to provide resources and training time for schools staff.”

- “Better radios for more efficient/effective communication are needed.”
- “Provide training and drills for emergency situations.”
- “Depending on the personnel’s physical condition, the freight elevator should be used for those unable to use the stairs. A list should be updated regularly to the building manager to assist with ensuring that the elevator can be used as an alternate.”
- “Keep our office in loop relative to the operation of charter schools.”

The survey responses highlight both a high level of confidence among applicable staff regarding emergency management and related opportunities for improvement.

RECOMMENDATIONS

- 3.1 Prior to hurricane season all school principals, assistant principals, and critical District administrators should receive training in the District’s emergency procedures. Additionally, location administrators should be encouraged to brief staff on procedures.**

Responsible Department: The Division of Safety and Emergency Management

Management Response:

We concur with this recommendation. The District provided emergency preparedness training for all school principals and assistant principals on June 1 & 2, 2006. The purpose of the half-day workshop was to ensure these key site administrators received up-to-date information regarding topics such as shelter operations, security, emergency communications and post-storm disaster assessment. The training presenters were comprised of staff members from the District Inspections, Operations and Emergency Management, School Operations, School Police, Food and Nutrition and the American Red Cross. A copy of the handout provided to each attendee and the PowerPoint presentation is included in Appendix B of this document.

Non-school site administrators will be directed to brief their staff regarding the relevant sections of the District’s Emergency Management Procedures manual on an annual basis.

URGENCY OF CORRECTIVE ACTION

- ☒ Critical
☐ Important
☐ Desirable

**IMPLEMENTATION
SCHEDULE**

- ☒ Immediately (Short Term)
☐ By _____
☐ Contingent upon Funding

- 3.2 Employees should receive certificates of completion for emergency management and related training or ensure there is a system in place to document employees' participation in such training.

Responsible Department: The Division of Safety and Emergency Management

Management Response:

We concur with this recommendation. In the future, participants in emergency preparedness training programs will be issued certificates of completion. Additionally a database documenting the training received by M-DCPS staff members will be created and updated.

URGENCY OF CORRECTIVE ACTION

- ☐ Critical
☒ Important
☐ Desirable

**IMPLEMENTATION
SCHEDULE**

- ☒ Immediately (Short Term)
☐ By _____
☐ Contingent upon Funding

4. IMPROVE ON THE CONDUCT OF EMERGENCY EVACUATION DRILLS

One of the factors contributing to the District's success in managing emergencies is emergency response exercises conducted periodically. The District routinely conducts fire drills, lockdown exercises, tornado drills and bomb threat exercises at schools. Emergency response exercises for administrators are limited to fire drills. We found that the vast majority of emergency exercise drills are conducted as required and in accordance with established procedures. However, evacuation drills can be improved.

According to the Emergency Management Procedures manual, an evacuation drill must be performed in K through 12 educational facilities at least 10 times during the school year. If summer school is held at an educational facility, an additional drill must be performed at that facility during the summer session. The first drill should take place during the first week of school; the second drill – during the second week of school; and drills 3-10 between October 1 and the last day of school. Schools should not perform more than one drill each month to fulfill this requirement. Required drills should be unannounced to staff and students. Roll should be taken at all assembly areas to ensure that all persons are accounted for. Missing persons should be reported to the principal or assistant principal. Fire alarms should be tested during each fire drill. Each facility should maintain an internal log of fire alarm test on FM-0390 (Fire Alarm and Emergency Lights System Test Log) and submit one copy of the test log to the Division at the end of each school year. Emergency evacuation drill information must be entered on-line utilizing the Fire Alarm Safety Inquiry (FASI) system on the same day the drill is performed.

Schedules of planned emergency evacuation drills were requested from 49 schools including, elementary, secondary, adult and alternative education centers. Of those, we observed 15 evacuation drills and found that at 8 of the 15 schools visited, there were departures from the District's Emergency Management Procedures. Exceptions noted are as follow:

- In three cases, one or both of the required fire drills were not conducted during the first two weeks of school.
- In one case, the fire drill for the month of October was not conducted. The Principal indicated a make-up drill was conducted; but there was no documentation to verify his assertion.

- One fire drill report for October was not recorded in the Fire Alarm Safety Inquiry (FASI) system.
- In two cases, advanced notices of the drills were announced over the public address (PA) system.
- An administrator was unaware of the requirements to maintain a Fire Alarm and Emergency Lights System Test Log (FM-0390), which consequently was not being submitted to the Division of Safety and Emergency Management.
- In two cases, 90% or more of the teachers neglected to take their grade book or class roll with them upon exiting the building during the evacuation drills. This reduces the likelihood that attendance can be taken and children accounted for after exiting the building.
- In three cases, attendance was not taken upon exiting the building during the evacuation drills.
- At one school, a required evacuation map was not posted in the media center.

In addition to emergency evacuation drills, tabletop exercise is a best practice, which could enable the District to achieve a desired level of readiness. While emergency staff from the Division stated that they participate in tabletop exercises of other agencies, tabletop exercises specific to the School Board's management of emergencies are not conducted.

RECOMMENDATIONS

4.1 Improve compliance with the District's Emergency Management Procedures relative to evacuation drills through enhanced training and monitoring. Schools, Region Offices and School Operations should be notified of non-compliance issues.

Responsible Department: **The Division of Safety and Emergency Management**

Management Response:

We concur with this recommendation. At the beginning of each school year principals receive notification from the Division of Safety and Emergency Management concerning the evacuation and lockdown drill schedule for the school year (Appendix C). Each principal is directed to comply and is reminded of the importance of performing emergency evacuation drills.

District evacuation drills are documented via the Fire Alarm System Inquiry (FASI) application. FASI is a mainframe application that can be accessed via CICS. School principals are directed to input the information regarding their completed evacuation drills on the same day they are performed.

The Division of Safety and Emergency Management has provided periodic FASI reports via e-mail to non-compliant schools. Staff has also provided non-compliance reports to the Regional Centers for their follow-up.

Staff will formalize the process to alert the Regional Center and School Operations regarding non-complaint schools on a monthly basis. As part of the process the Regional Center will be asked to confirm contacting the school principal advising them to comply with all drill requirements, in particular, the need for drills to be unannounced and conducted in accordance with established procedures.

URGENCY OF CORRECTIVE ACTION

**IMPLEMENTATION
SCHEDULE**

- ☐ Critical
- ☒ Important
- ☐ Desirable

- ☒ Immediately (Short Term)
- ☐ By _____
- ☐ Contingent upon Funding

4.2 Consider conducting tabletop exercises at least once each year.

Responsible Department: **The Division of Safety and Emergency Management**

Management Response:

We concur with this recommendation. Staff from District Inspections, Operations and Emergency Management, School Operations and School Police will develop scenario based tabletop exercises for DCIRT and selected district administrators. The tabletop exercise will be utilized to provide simulated emergency situations to allow staff the opportunity to react and evaluate their response in a non-threatening group setting. We are also exploring different methods to deliver training including adding a staff member dedicated to emergency planning and training.

Additionally, plans for exercises directly involving schools are being finalized with School Operations. It is anticipated that these exercises will begin later this year and be repeated periodically on an ongoing basis.

URGENCY OF CORRECTIVE ACTION

- ☐ Critical
- ☒ Important
- ☐ Desirable

**IMPLEMENTATION
SCHEDULE**

- ☒ Immediately (Short Term)
- ☐ By _____
- ☐ Contingent upon Funding

5. CLAIMS DATA COLLECTION FUNCTION IS INEFFICIENT AND UNDERSTAFFED

The District's written Disaster Recovery Plan (DRP) is comprehensive, complete, and establishes good internal controls. However, in practice, data collection functions in the claims reimbursement process are overly cumbersome. The many manual processes currently in place (some necessitated by FEMA's claims reporting guidelines) require considerably more post-event manpower than is now provided to attain satisfactory results in a timely manner. This could result in lost dollars to the School District or, alternatively, in inflated claims.

The Property Loss Control unit under Risk Management is responsible for ensuring that losses are accounted for and that claims for financial losses are accurate and timely. However, this unit consists principally of two employees – a director and a secretary/clerk. While this staff level might be adequate under normal, non-emergency conditions, it is wholly inadequate in accomplishing its mission after a major event, where losses and costs incurred are significant. Temporarily augmenting this staff during the recovery period to a level sufficient to thoroughly account for all of the School District's losses is a necessity. A team could be identified and trained so that they can step in without delay to help process claims. These assignments could automatically take effect during a post-recovery period.

The Property Loss Control unit also had unmet space needs resulting in their currently operating at a school location away from the financial departments and other integral staff. This causes logistical difficulties in interacting with and obtaining support from other staff. The school location is also in an evacuation zone in Miami Beach.

FEMA has established time limits during which disaster recovery claims must be filed and work be completed, to be eligible for reimbursement. Small claims (i.e., \$57,500 or less) must be filed within 60 days from the FEMA kickoff meeting, and all claims filed after the first 30 days are subject to FEMA validation. Debris removal and emergency work must be completed within six months and permanent work must be completed within 18 months. FEMA is also actively involved in the claims process, particularly involving large claims. The timeliness of claims submission is of paramount importance. The need for improvement in the methodology used for capturing and documenting loss claims is heightened considering the District raised its minimum insurance deductible from \$1 million to \$25 million per loss. Therefore, FEMA is the primary avenue for financial recovery of losses from major events.

There is a disconnection between the requirements delineated in the DRP for filing post-storm furniture, fixture and equipment losses and actual practice. Loss

claims are documented on a variety of forms. After a hurricane, school sites and departments are asked to prepare and forward Damage Survey forms (DSF)⁵ to the Property Loss Control unit and their regional offices. Schools and departments must include documentary evidence of the damage sustained at their location. We found that while the schools and departments complete the DSF, Risk Management does not necessarily receive or use them to develop hurricane loss claims. Instead, hurricane loss claims are documented and filed on Project Worksheets prepared by either District staff or a FEMA representative. Risk Management stated that after Hurricane Katrina, they requested that departments discontinue forwarding completed DSF to Risk Management. The information in the FEMA Project Worksheet is not compared to the information documented on the DSF to ensure that all reported losses are claimed.

Emergency labor records are not fully reviewed for completeness and accuracy. The Property Loss Control unit receives and organizes various documents, such as Emergency Daily Activity Record (EDAR) and Food Spoilage/Loss Reports to be used as support for FEMA and insurance claims. However, we were unable to substantiate the propriety of reported wages amounting to \$11.6 million, which were used to support various FEMA claims amounting to \$11.2 million. Of 1,518 employees included in our sample for Hurricane Katrina emergency labor claim, Emergency Daily Activity Records for 1,138 or 75% were unavailable in Property Loss Control for review. Property Loss Control, however, stated that those forms were maintained at the originating locations.

According to the Disaster Recovery Plan every employee working emergency-related overtime must complete and forward the EDAR's to the Property Loss Control unit on a daily basis. The EDAR's are to be kept with time sheets to maintain an audit trail. In addition to the EDAR's, the Payroll Department prepared a special form that it distributed to schools and departments for reporting the time employees worked during an emergency period. These forms were returned to the Payroll Department and used to pay employees, as well as for developing the "FEMA Employee Tracking Reports". While these Payroll Department forms helped facilitated processing payroll, they otherwise did not indicate what activities the employees were performing and represented duplicate data reporting to what is already captured in the EDAR's.

Moreover, the FEMA Employee Tracking Reports totaling \$11.6 million, used to support the emergency labor claims for Hurricanes Katrina, Rita and Wilma did

⁵ These forms provide for a room-by-room survey report of damages as required in Section III. A., of the District's Disaster Recovery Plan.

⁶ FEMA requires that the Emergency Pay Roster be certified as true and accurate. According to staff, the EDAR was used to verify the underlying work claimed in the Emergency Pay Roster.

not reconcile to either the general ledger or the Project Worksheets (claim forms), which reflects \$11.7 million and \$11.4 million in overtime payroll expenditures during the period, respectively. Efforts made by Risk and Benefits staff to reconcile these differences conclude that the difference (\$93,000) between the FEMA Employee Tracking Reports and the general ledger is likely due to overtime wages earned by employees that were posted to the general ledger after the FEMA Employee Tracking Reports were generated. On the other hand, staff was unable to reconcile the \$262,000 difference between the FEMA Employee Tracking Reports and the Project Worksheets. The majority of the difference appears to be related to Hurricane Katrina. Moreover, the EDAR forms from Hurricane Wilma have not been reviewed by Property Loss Control as of April 2006.⁶ While Property Loss Control may not be responsible for or necessarily equipped to review and reconcile 100% of the documentation substantiating Project Worksheet amounts, in four (4) instances, we found Food Spoilage/Loss reports that did not agree to the claim amount submitted.

Finally, claims for repair costs are not always submitted on a timely basis. Two of the FEMA project worksheets sampled were submitted for reimbursement in March 2006, even though the amounts claimed were for Hurricane Wilma-related roof and building repairs completed at several schools during November and December 2005. Property Loss Control stated that the submission of those claims was delayed because complete repair cost data were not timely received from the originating department.

RECOMMENDATIONS

- 5.1 Property Loss Control should be adequately supported by a sufficient number of staff from other departments after major disasters to assist in timely and accurate submission of claims to recover losses.**

Responsible Department: Risk Management

Management Response:

Following Hurricane Andrew, the district created a department of Hurricane Andrew Recovery which was staffed by district employees who were brought together from district offices, based upon their expertise. Employees from offices including Facilities, Accounting, Transportation, Food Service, Budget, Procurement and Management Audits staffed the Office of Andrew Recovery Management which worked closely with the Office of Risk and Benefits Management on disaster recovery operations. This office remained

in tact until the Board approved the final proof of loss approximately three years after the storm.

This model was very successful because in order to properly handle property claims, the raw loss information is best assembled by the staff closest to the loss itself. Once this raw loss information is assembled, it needs to be reviewed by staff familiar with FEMA's claiming process and explained to the FEMA inspectors.

To maximize FEMA reimbursements for uninsurable expenses such as emergency payroll and debris removal, Property Loss staff must have the opportunity to work with appropriate district staff to assemble the expenditures and submit them in the manner required by FEMA, while making sure that the information is properly accounted for within the financial infrastructure.

Presently, the Property Loss Control Section has increased its staff by one part-time administrator, which occurred in March, 2006. This addition has proven valuable from the standpoint of expediting the FEMA claiming process, but has also added needed depth and computer expertise in the section. Staff is recommending that the part time administrator position be added as permanent staff.

All losses from Hurricanes Katrina and Rita have been submitted to FEMA for reimbursements. The vast majority of the Hurricane Wilma losses has been submitted to FEMA for reimbursement, however because of FEMA's lack of continuous staffing in South Florida, additional PW's are forthcoming. Once staff from the Property Loss Section begins to ask for reimbursement on the large items such as debris, roofing and emergency payroll, which will require final inspections, staff from those areas will be called upon to assist in documenting the loss information which has been compiled and submitted to FEMA.

The Office of Risk and Benefits Management has created a list of recommended positions which will be needed to temporarily augment staff in the Property Loss Control Section to handle disaster recovery. The number of positions required will be dependent upon the size of the storm.

URGENCY OF CORRECTIVE ACTION

- ☒ Critical
- ☐ Important
- ☐ Desirable

IMPLEMENTATION SCHEDULE

- ☒ Immediately (Short Term)
- ☐ By _____
- ☐ Contingent upon Funding

5.2 Reengineer work flow processes and existing information system applications to efficiently and accurately accumulate and track damage and claims information.

Responsible Department: Risk Management

Management Response:

For the past several years, the Property Loss Control Section of the Office of Risk and Benefits Management has relied upon the State of Florida's Public Assistance web-site in conjunction with copies of the actual FEMA-written PW's as the control function over monitoring of pending claims.

Following Hurricane Wilma, and the hiring of the part-time administrator, staff felt that due to the number of PW's which were being written for the loss, that an additional tool was needed to monitor the information flow between the district and the Department of Community Affairs (DCA). As such, a comprehensive spreadsheet was developed to track all loss information by catastrophe number and by type of reimbursement from FEMA.

This spreadsheet has now been instituted as a control mechanism to monitor all accepted PW's and tracks those which have been accepted (obligated) by FEMA versus those which are still pending obligation status. Additionally, this spreadsheet will track reimbursements from FEMA, delineated by FEMA funding category whose funds are matched by the State of Florida. This form will be able to be expanded on an as-needed basis to include additional categories such as district costs and insurance reimbursements.

Specific workflow procedures will be developed including roles and responsibilities so that staff brought in to augment the operation of disaster recovery will be assigned tasks of compiling and reviewing district claims for reimbursement. This will expedite the ability for FEMA inspectors to write Project Worksheets (PW) with accurate estimates in order to have them obligated by FEMA as soon as possible.

While FEMA does have procedures to extend filing deadlines without penalties to the sub-grantees, having adequate staff working within the Property Loss Control Section will ensure that the information needed to have FEMA create the PW's is provided in a timely manner.

Capturing accurate data on Furniture Fixture and Equipment (FFE) losses is best done by staff that possesses the technical capabilities determining the extent of damage for both FEMA and insurance purposes. In keeping with the recommendation from 5.1, staff from the Office of Management and Compliance Audits could be used to capture FFE losses, as is contemplated in the Disaster Recovery Plan (DRP).

URGENCY OF CORRECTIVE ACTION

- ☒ Critical
- ☐ Important
- ☐ Desirable

**IMPLEMENTATION
SCHEDULE**

- ☒ Immediately (Short Term)
- ☐ By _____
- ☐ Contingent upon Funding

- 5.3 Damage Survey Forms prepared by School and District staff should be used in verifying completeness of FEMA Project Worksheets for losses at each location; and other supporting documentation should be filed with corresponding worksheets.**

Responsible Department: Risk Management

Management Response:

The district's Damage Survey Form (DSF) which is referenced in the District Recovery Plan (DRP) was originally developed to obtain baseline physical damages to facilities following a storm. This form could also be used to identify a scope of damage on a campus by campus basis to determine early eligibility for either insurance or FEMA reimbursement, including debris removal.

Because of the need to determine the district's ability to re-open facilities soon after a storm passes, use of the DSF to determine baseline physical damage information, including the availability of power, has been useful. Subsequent to that determination, a more detailed damage survey must be completed in order to begin to determine the actual scope of loss, if any.

Staff recommends that use of a baseline document to determine the viability of opening facilities soon after a storm be continued, and a more comprehensive DSF form be created to determine a scope of loss which can be used as a source document when FEMA creates the PW. This two step approach will provide district staff necessary information so that the “disconnect” between the two is eliminated.

URGENCY OF CORRECTIVE ACTION

- ☐ Critical
- ☒ Important
- ☐ Desirable

IMPLEMENTATION

SCHEDULE

- ☒ Immediately (Short Term)
- ☐ By _____
- ☐ Contingent upon Funding

- 5.4 Automate the overtime hours worked data collection process and use the Emergency Daily Activity Record to capture and document emergency labor costs for both FEMA claims and payroll purposes, eliminating the extra payroll forms. Emergency labor costs claimed in the EDAR and general ledger should be reconciled to ensure the completeness and accuracy of the amount claimed.

Responsible Department: Risk Management and Office of the Controller

Management Response:

All Emergency Daily Activity Records (EDAR's) for last year's hurricanes are at individual work locations with the payroll documents which correspond with the dates that work was performed. These reports will be reviewed by FEMA as part of their final inspection processes. Prior to last year's hurricane seasons, work had begun, and is continuing with the Office of the Controller, and Information Technology Services to automate documents needed to capture emergency payroll information, track anticipated and actual expenditures, maximize reimbursement requests, and tie the information back to the district's financial documents.

Once finalized, this form will incorporate the information which is needed by Payroll to support the emergency overtime pay, as well as capturing all needed information on the Emergency Daily Activity Report (EDAR) as required by FEMA. Because the district can also seek reimbursement from FEMA for equipment and materials usage based upon a pre-determined formula, the report is being designed to capture that data as well.

With regard to last year's storms, emergency overtime payrolls incurred as a result of Hurricane Wilma match the expenditures reflected in the FEMA Employee Tracking Reports as well as the FEMA PW's. Emergency payroll amounts reflected in the FEMA Employee Tracking Reports for Hurricanes Katrina and Rita are approximately \$262,000 higher than the amounts on the FEMA PW's for these storms due to the fact that FEMA changed the fringe benefit rate for which the district can be reimbursed subsequent to the running of the FEMA Employee Tracking Reports. The vast majority of the \$262,000 difference is attributable to emergency payroll incurred for Hurricane Katrina and is isolated to one of the three PW's written for reimbursement of overtime for that storm. Rather than re-running the district reports with the FEMA-required fringe rate, the decision was made to document the issue and discuss it with FEMA during its final inspections. That is why there were no issues soon thereafter when Hurricane Wilma hit, as the new FEMA rate had been programmed into the FEMA Employee Tracking Report.

URGENCY OF CORRECTIVE ACTION

- ☐ Critical
- ☒ Important
- ☐ Desirable

**IMPLEMENTATION
SCHEDULE**

- ☒ Immediately (Short Term)
- ☐ By _____
- ☐ Contingent upon Funding

5.5 Provide Property Loss Control staff with adequate facilities outside the first line evacuation zone.

Responsible Department: Risk Management

Management Response:

When the Property Loss staff is not working on a disaster recovery project such as Hurricanes Katrina, Rita and Wilma, the office space needs to handle routine theft, vandalism and fire/windstorm losses is not as great as it is when a major disaster occurs. Following Hurricane Andrew, the Office of Hurricane Andrew Recovery was housed in rented office space in the 1444 office building. Following Hurricane Wilma, the Property Loss Control staff relocated to an available classroom at Feinberg Fisher Elementary, due to the fact that there was not adequate space within the Office of Risk and Benefits Management which is housed in the Annex.

District damages from Hurricane Wilma, which was a Category 1 storm, were minimal when compared to what could occur if South Florida is hit by a Category 3, 4 or 5 storm. In the event of such a storm, adequate office

space for the Hurricane Recovery Office will be needed immediately to begin its operations and house the individuals who will be augmenting staff in Property Loss Control.

It is recommended that a “needs survey” be conducted within the administrative complex including SBAB and Annex to ascertain what space may or may not exist. Prior to finding permanent office space for the Property Loss Section within the administrative complex, the Director will re-occupy office space within the Office of Risk and Benefits Management and begin transitioning the operations back to the administrative complex.

URGENCY OF CORRECTIVE ACTION

- ☐ Critical
- ☒ Important
- ☐ Desirable

**IMPLEMENTATION
SCHEDULE**

- ☒ Immediately (Short Term)
- ☐ By _____
- ☐ Contingent upon Funding

6. IMPROVE MONITORING OF CLAIMS AND PROCESSING CHECKS RECEIVED

During the course of the audit, processes or systems to effectively monitor claims for hurricane losses were not in place. We found no evidence of a system, e.g., database or control log, to monitor the status of claims (i.e., pending, filed, rejected, being processed for payment and paid). Property Loss Control relied instead, on the State's Public Assistance web-based listing to track claims. However, the State's Public Assistance web-based listing shows only claims that have been approved and individual disbursements to the District. For example, as of May 12, 2006, a maintenance work order cost report showed that the District had incurred more than \$820,000 for debris removal from Hurricane Wilma pending submission to FEMA; however, we were unable to identify any reporting of this as a pending claim in the State's Public Assistance web-based portal due to the already stated limitation of the system.

At different intervals subsequent to the conclusion of our audit fieldwork, Property Loss Control provided us two spreadsheets containing essentially all of the information required to properly monitor loss claims for Hurricanes Wilma and Katrina. We were not provided a similar spreadsheet for Hurricane Rita's loss claims.

Further, reimbursement checks received for hurricane-related claims were not always properly receipted or deposited in a timely manner. Treasury Management's receipt procedures require that receipts be remitted for deposit in a timely manner (i.e., within one week). Good business practice would require that those personnel receiving checks adequately document their receipt and be knowledgeable about the nature of the receipt and the claim being satisfied so that proper tracking can be achieved.

We reviewed 18 of the most recent receipts and noted 12 instances (67%) where checks were received by locations (Division of Life Skills and Payroll's Deduction Control) other than Risk Management. For 16 of the 18 checks reviewed, a comparison of draft and deposit dates inexplicably reflected a delay of one to two months before payments were turned over to Treasury Management for deposit. A review of remittance datasheets received along with the checks from the Department of Community Affairs list the Director of Property Loss Control as the primary contact; therefore, enabling proper routing and processing of checks for deposit. We did note, however, that the addresses printed on the checks were different from that in those remittance datasheets. Some payments are still being received by offices and departments that have no involvement or knowledge of the hurricane claims filed.

RECOMMENDATIONS

Please see recommendation 5.2 on page 28 as it relates to monitoring of claims.

6.1 Work with the Office of the Controller and Office of Treasury Management in developing a process for accountability and prompt deposit of claim receipts.

Responsible Department: Risk Management

Management Response:

All disaster grants from FEMA are paid through the State of Florida Department of Community Affairs (DCA) to the district as a sub-grantee. When funds are sent, specific paperwork reflecting the disaster number accompany the payment with detailed explanations of the individual PW which is being addressed and the scope of work with the reimbursement amounts detailed by the percentages addressed earlier. The actual money is remitted to the district from the State of Florida Department of Financial Services (DFS) and is recorded in an on-line payment report within the State of Florida Office of Public Assistance.

The Office of Risk and Benefits Management has created a payment report which is monitored weekly to compare payments received by the Office of Risk and Benefits Management to the State of Florida Public Assistance web-based report so that any missing checks can be tracked down and deposited in the correct district financial structure(s). All funds sent by the state according to the Public Assistance web-based report have been accounted for and deposited into appropriate accounting structures.

The Risk Management payment report will be shared weekly with both the Office of the Controller as well as the Office of Treasury Management to assure proper accounting of disaster recovery funds from FEMA.

All of the checks reviewed by the Office of Management and Compliance Audits were mailed to addresses other than that of the Office of Risk and Benefits Management. Once these checks were received by Risk Management, they were deposited according to office guidelines which comply with the deposit procedures pursuant to Section II.F. of the Internal Funds Accounting Manual requiring collections of funds be remitted for deposit daily. To remedy this, a district wide notification will be sent with

instructions to forward all disaster recovery funds to the Office of Risk and Benefits Management to assure timely deposits of disaster recovery funds.

URGENCY OF CORRECTIVE ACTION

- ☐ Critical
☒ Important
☐ Desirable

**IMPLEMENTATION
SCHEDULE**

- ☒ Immediately (Short Term)
☐ By _____
☐ Contingent upon Funding

6.2 Formally communicate District's receipt procedures to all locations.

Responsible Department: Financial Operations

Management Response:

Deposit procedures are outlined in the E-Handbook entitled Deposit and Investment Policies for School Board Funds. A memorandum from the Superintendent of Schools will be sent to all work locations reminding them of the requirements found in School Board Rule 6Gx13- 3B-1.01, Deposit and Investment Policies for School Board Funds, which incorporates the E-Handbook by reference.

URGENCY OF CORRECTIVE ACTION

- ☐ Critical
☒ Important
☐ Desirable

**IMPLEMENTATION
SCHEDULE**

- ☒ Immediately (Short Term)
☐ By _____
☐ Contingent upon Funding

6.3 Contact the Department of Community Affairs and resolve mailing address and contacts conflicts.

Responsible Department: Risk Management

Management Response:

The challenge with the State of Florida has been that regardless of the information in the disaster funding agreement, funding occurs from the Department of Community Affairs (DCA) through the Department of Financial Services (DFS). The DFS database only has the ability to use a maximum two addresses per recipient (employer), which at present includes

two addresses which are not the same as what appears in the Disaster Funding Agreement.

Staff has been in contact with DCA who has agreed to instruct DFS to have all future funds sent to the Office of Risk and Benefits Management.

URGENCY OF CORRECTIVE ACTION

- ☐ Critical
- ☒ Important
- ☐ Desirable

**IMPLEMENTATION
SCHEDULE**

- ☒ Immediately (Short Term)
- ☐ By _____
- ☐ Contingent upon Funding

7. LIMIT EMERGENCY OVERTIME TO ESSENTIAL PERSONNEL AND STORM-RELATED WORK

Eligible emergency overtime costs are typically reimbursed by FEMA. District prepared FEMA Employee Tracking Reports of emergency payroll costs for Hurricanes Katrina and Wilma reflect that a number of clerical and faculty employees worked during the emergency period. These employees were paid double time for the days worked. However, the work performed by some of these employees was not directly related to the storms. Consequently, the labor costs incurred are ineligible for FEMA reimbursement.

Eligible expenses encompass the cost of certain direct storm-related activities performed 72 hours prior to the storm making landfall or passing by; or performed after the storm has passed by. M-DCPS Disaster Recovery Plan provides guidance on identifying and reporting eligible overtime activities and states that overtime incurred by administrators is not eligible.

As mentioned previously, we sampled emergency overtime labor for 1,518 employees costing \$514,743. We found 39 non-essential employees who performed non-storm related duties for which \$9,543 of ineligible double time wages were paid during Hurricane Katrina.

FEMA's Emergency Management Guide For Businesses and Industry recommends defining personnel, assigned roles, and procedures for each position.

RECOMMENDATIONS

7.1 Establish controls to limit work during declared emergency periods to essential employees and others performing direct storm-related work, unless otherwise approved by the Superintendent or his designees.

Responsible Department: Risk Management

Management Response:

FEMA has very specific rules regarding which emergency overtime pay is eligible for reimbursement and which is not. The district's attempts to organize this information in the past has been hampered by using two forms on a parallel basis which included the reporting of overtime payroll through the Payroll Department, and the reporting of the actual work being performed which was reported to the Property Loss Control Section on the Emergency Daily Activities Report (EDAR), with both forms being completed manually.

Staff will assemble a listing of appropriate job codes by work location category which would typically fall within the definition of “essential personnel” and expected to report to work following a disaster. Once the automated reporting mechanism for emergency payroll is established, these job codes will be monitored with work location supervisors asked to specifically address the need for employees who may have worked during the emergency, but whose job codes are not part of the listing of essential personnel. The automation of this report will also allow for the EDAR to be tied in as well.

URGENCY OF CORRECTIVE ACTION

- ☐ Critical
- ☒ Important
- ☐ Desirable

**IMPLEMENTATION
SCHEDULE**

- ☒ Immediately (Short Term)
- ☐ By _____
- ☐ Contingent upon Funding

Appendix I – Management’s Responses

MEMORANDUM

RD/2006-07#022

August 9, 2006

305-995-1401

TO: Mr. Allen Vann, Chief Auditor
Office of Management and Compliance Audits

FROM: Rose Diamond, Chief Facilities Officer *RD*
Office of School Facilities

**SUBJECT: RESPONSE TO THE DRAFT OF INTERNAL AUDIT REPORT REGARDING
EMERGENCY MANAGEMENT AND DISASTER RECOVERY**

Attached, is the administrative response to the findings and recommendations outlined in the June 2006 Internal Audit Report of Emergency Management and Disaster Recovery.

If you have any questions, please feel free to call me at 305-995-1401, or Mr. Jaime G. Torrens, Inspections Officer at 305-995-1560.

RD:av

Attachments

cc: Mr. Jaime G. Torrens
Mr. John DiBenedetto

2006 AUG -8 PM 1:12
OFFICE OF MANAGEMENT AND COMPLIANCE AUDITS
2006 AUG -9 PM 3:1

**INTERNAL AUDIT REPORT
EMERGENCY MANAGEMENT PRACTICES AND
DISASTER RECOVERY**

JUNE 2006

**AUDIT RESPONSE AND IMPLEMENTATION OF RECOMMENDATIONS
DISTRICT INSPECTIONS, OPERATIONS AND EMERGENCY MANAGEMENT**

August 1, 2006

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ATTACHMENTS

Appendix A: Listing of 800MHz Repeater Installations

Appendix B: 2006 Hurricane Preparedness Meeting Materials

Appendix C: Emergency Evacuation Drills – Memorandum

Appendix D: District Emergency Operations Command Center Pictures

EXECUTIVE SUMMARY

Recent hurricanes, growing concerns regarding influenza pandemic and the continued threat of terrorism have heightened the importance of maintaining up-to-date, coordinated emergency response protocols. Specific procedures must be documented and followed to ensure effective and consistent responses to foreseeable emergencies. Successful emergency planning must, however, be a fluid process that adapts to the dynamics of different situations.

For some time, staff has pursued excluding the Miami-Dade County Public Schools Emergency Management Procedures document from Board Rule. The effectiveness of this document would be greatly enhanced if it could be revised and updated quickly to meet evolving needs. As District procedures are enhanced, the training and exercise components of emergency preparedness programs will be expanded commensurately. This year the District expanded its hurricane training to include all principals and assistant principals; additional training and exercises are also being planned. Through regular training, exercises and drills, Miami-Dade County Public Schools can maintain a state of readiness to effectively respond to diverse emergency situations.

Emergency evacuation drills are mandated by the National Fire Protection Association Code 101 for Educational Occupancies and lockdown drills are a required by District policy. School principals are provided a drill schedule at the beginning of each school year and are regularly reminded regarding the importance of performing these drills. At the conclusion of each drill, school personnel are required to document the drill in the District Fire Alarm Inquiry System (FASI). Regional Centers were periodically provided FASI information to follow-up on non-compliant schools. Compliance monitoring and training in this area can be improved. Staff from the Division of Safety and Emergency Management will formalize the monitoring process to emphasize the notification of Regional Centers and School Operations regarding non-compliant schools.

District Inspections, Operations and Emergency Management staff are tasked with continually enhancing emergency plans and procedures to facilitate effective responses and assist the Superintendent in making informed decisions regarding emergencies. Many departments and functions have contributed to the development and effective execution of District emergency procedures. Among these, School Operations, School Police, Public Information and Information Technology Services play key roles in the planning process and disseminating information to students, staff and the community.

During the very active 2005 hurricane season, District emergency plans were exercised on multiple occasions. At the conclusion of the hurricane season, the Superintendent directed that information be compiled from key departments and specific guideposts and recommendations be formulated to improve the District's readiness and ability to respond in future hurricanes. A report titled A Review of the 2005 Hurricane Season was produced by

the Office of School Facilities and many of its recommendations are in various phases of implementation. During the 2006 hurricane season – and beyond – staff will continue to review and enhance District hurricane procedures on an annual basis.

The District Emergency Communication Network (DECON) is utilized as the primary means for the Superintendent, District and regional center staff and emergency shelter principals to communicate during emergencies. DECON is integrated with the Miami-Dade County government radio system and has proven more reliable than most commercial wireless communications services. The dense construction materials used in school buildings, however, sometimes interferes with normal DECON reception. Consequently, installation of amplifiers to enhance signal strength is being accelerated by Maintenance staff.

A new and very important component of the District emergency management program was first implemented for the 2005-06 school year. The District Critical Response Team (DCIRT), launched in September 2005, was designed to provide specific resources for principals and site administrators to support them in managing emergencies at their schools and locations.

DCIRT is comprised of senior administrators from key departments throughout the District that are simultaneously notified via BlackBerry of emergency situations and are responsible for providing immediate assistance from their respective departments. The team has been activated on various occasions in response to emergencies and has successfully provided critical resources in a timely manner.

Although, it is not possible to create a unique procedure or manual for every possible occurrence, it is possible to build and create an organizational structure to effectively deploy available resources in most emergency situations. It is important to provide principals and site administrators with the information and practical training that will enable them to consistently apply sound emergency management methods to ensure the safety of students, teachers and staff.

ADMINISTRATIVE RESPONSE TO RECOMMENDATIONS

1. UPDATE EMERGENCY MANAGEMENT PROCEDURES MANUAL

RECOMMENDATION NO. 1.1 **Finalize the revision of the Emergency Management Procedures manual and revise the bound format to facilitate easier updating.**

ADMINISTRATIVE RESPONSE:

- 1.1 We concur with this recommendation. During 2005 the district Emergency Management Procedures manual was sent to police and fire departments throughout Miami-Dade County and selected district staff members for their review and comments. Based on comments received and staff research a comprehensive revision was produced. As discussed in audit response 1.2 below, revising the manual currently requires lengthy Board Rule hearings and proceedings. The most expeditious path to implement this recommendation will require staff to finalize the revision of the Emergency Management Procedures concurrent with implementation of audit recommendation 1.2, which will exclude the document from the existing Board Rule.

Contingent on School Board approval, the revised Emergency Management Procedures manual should be available to schools no later than January 2007. The next version of the Emergency Management Procedures manual will be unbound and three-holed punched to allow the user to insert and replace revised procedures, as necessary. Additionally, a restricted and password protected version of the manual will be made available via the M-DCPS Intranet.

RECOMMENDATION NO. 1.2 **Consider proposing excluding the Emergency Management Procedures manual from the School Board Rule.**

ADMINISTRATIVE RESPONSE:

- 1.2 We concur with this recommendation. The Emergency Management Procedures manual is incorporated into Board Rule 6Gx13- 6A-1.06. As a result, any change to the manual requires that it be submitted to the School Board to initiate a rule change. The rule change is a lengthy process that requires an initial and final reading.

The Emergency Management Procedures manual is provided to all school and administrative sites for use in response to emergencies. Recent world events related to terrorism, potential flu pandemic, Sudden Acute Respiratory Syndrome as well as the frequent need to update and refine existing procedures requires the ability to

revise the manual in an expeditious manner.

Additionally, last year's active hurricane season and post storm recovery efforts have revealed areas in the district plan that require enhancement and revision. It is essential that the District's emergency plan be fluid, flexible and adapt to changing conditions as opposed to the current static plan constrained by the rulemaking process.

Staff will pursue a revision of Board Rule 6Gx13- 6A-1.06 to require that an Emergency Management Procedures manual be maintained but allow it to be revised as needed without Board action. Preliminary discussions with the Board Attorney indicate that this is feasible and reasonable. Staff will formalize a request via the Board Attorney and initiate rule change procedures. Concurrent with the rule change process, staff will update the draft 2005 version of the Emergency Management Procedures manual and deliver to school sites no later than January 2007.

2. COMPLETE RADIO REPEATER INSTALLATION

RECOMMENDATION NO. 2.1 Accelerate the installations of radio repeaters

ADMINISTRATIVE RESPONSE:

2.1 We concur with this recommendation. School Police officers have reported experiencing poor radio reception at some school sites. The reception problems are related to the construction of the buildings and the inability of the radio signals to penetrate the building envelope. To address this matter, School Police applied for and received a grant to fund, among other things, repeaters at previously identified school sites. The list of 67 school sites identified to receive repeater installations is provided in Appendix A. As of July 31, 2006, 34 installations were completed and two were in progress.

It is anticipated that installations at the remaining schools will be completed by December 2006.

3. WIDEN THE NUMBER OF EMPLOYEES TRAINED IN EMERGENCY PROCEDURES

RECOMMENDATION NO. 3.1 Prior to hurricane season all school principals, assistant principals and critical District administrators should receive training in the District's emergency procedures. Additionally, location administrators should be encouraged to brief staff on procedures.

ADMINISTRATIVE RESPONSE:

- 3.1 We concur with this recommendation. The District provided emergency preparedness training for all school principals and assistant principals on June 1 & 2, 2006. The purpose of the half-day workshop was to ensure these key site administrators received up-to-date information regarding topics such as shelter operations, security, emergency communications and post-storm disaster assessment. The training presenters were comprised of staff members from the District Inspections, Operations and Emergency Management, School Operations, School Police, Food and Nutrition and the American Red Cross. A copy of the handout provided to each attendee and the PowerPoint presentation is included in Appendix B of this document.

Non-school site administrators will be directed to brief their staff regarding the relevant sections of the District's Emergency Management Procedures manual on an annual basis.

- RECOMMENDATION NO. 3.2 Employees should receive certificates of completion for emergency management and related training or ensure there is a system in place to document employee's participation in such training.**

ADMINISTRATIVE RESPONSE:

- 3.2 We concur with this recommendation. In the future, participants in emergency preparedness training programs will be issued certificates of completion. Additionally a database documenting the training received by M-DCPS staff members will be created and updated.

4. IMPROVE ON THE CONDUCT OF EMERGENCY EVACUATION DRILLS

- RECOMMENDATION NO. 4.1 Improve compliance with the District's Emergency Management Procedures manual relative to evacuation drills through enhanced training and monitoring. Schools, Regional Offices and School Operations should be notified of non-compliance issues.**

ADMINISTRATIVE RESPONSE:

- 4.1 We concur with this recommendation. At the beginning of each school year principals receive notification from the Division of Safety and Emergency Management concerning the evacuation and lockdown drill schedule for the school

year (Appendix C). Each principal is directed to comply and is reminded of the importance of performing emergency evacuation drills.

District evacuation drills are documented via the Fire Alarm System Inquiry (FASI) application. FASI is a mainframe application that can be accessed via CICS. School principals are directed to input the information regarding their completed evacuation drills on the same day they are performed.

The Division of Safety and Emergency Management has provided periodic FASI reports via e-mail to non-compliant schools. Staff has also provided non-compliance reports to the Regional Centers for their follow-up.

Staff will formalize the process to alert the Regional Center and School Operations regarding non-complaint schools on a monthly basis. As part of the process the Regional Center will be asked to confirm contacting the school principal advising them to comply with all drill requirements, in particular, the need for drills to be unannounced and conducted in accordance with established procedures.

RECOMMENDATION NO. 4.2 Consider conducting tabletop exercises at least once each year.

ADMINISTRATIVE RESPONSE:

- 4.2 We concur with this recommendation. Staff from District Inspections, Operations and Emergency Management, School Operations and School Police will develop scenario based tabletop exercises for DCIRT and selected district administrators. The tabletop exercise will be utilized to provide simulated emergency situations to allow staff the opportunity to react and evaluate their response in a non-threatening group setting. We are also exploring different methods to deliver training including adding a staff member dedicated to emergency planning and training.

Additionally, plans for exercises directly involving schools are being finalized with School Operations. It is anticipated that these exercises will begin later this year and be repeated periodically on an ongoing basis.

APPENDIX A

Listing of 800 MHz “Repeater” Installations

Listing of 800 MHZ "Repeater" Installations

Senior High	Middle	Elementary
American *	North Dade *	Opa-Locka *
Miami Lakes Educational *	Renick Educational Center *	Rainbow Park
Miami Carol City *	Hialeah	Bunche Park
Hialeah	Miami Lakes *	Joella Good
Miami Beach	Carol City *	Charles D. Wyche
North Miami Beach	Lawton Chiles	North County
Michael Krop	Lake Stevens	Brentwood
Miami Northwestern *	Highland Oaks *	Lake Stevens
Miami Central *	Nautilus	E. W. F. Stirrup *
Miami Springs *	Ruben Dario *	Miami Springs *
B. T. Washington	Doral *	Comstock *
Miami Jackson (on-hold)	Everglades K-8 *	Phyllis Miller *
Miami Edison *	Miami Springs *	Maya Angelou *
Holmes Braddock *	Arvida	Zora N. Hurston *
South Miami	McMillian	Bowman Foster Ashe
Miami Killian	Southwood *	Oliver Hoover *
Felix Varela *	JRE Lee	Claude Pepper *
Miami Sunset *	Howard A. Doolin *	Redondo
Coral Reef	Mays	William A. Chapman
Homestead *	Campbell Drive *	Dante B. Fascell
	Richmond Heights	Christina M. Eve
	Centennial	
	Hammocks *	
	Redland *	

Key:

* Completed Installation

Source:

M-DCPS Maintenance Operations

APPENDIX B

2006 Hurricane Preparedness Workshop Materials

2006 HURRICANE PREPAREDNESS MEETING

Selected Principals
May 22, 2006 at 11:00a.m.
Conference Room 559/SBAB

AGENDA

Welcome and Introduction Mr. Freddie Woodson, Associate Superintendent
School Operations

Purpose of Meeting Mr. Freddie Woodson

Items for Discussion

- Post – Storm Assessment
 1. Immediate Assessment Form
 2. Web Interactive Product
 3. Blackberry
 4. Other Alternatives
 5. Utilizing MEP employees closest to schools
 6. FEMA Form
- Shelter principal Pre-storm Checklist
- Shelter Relief Administrator Checklist

- DECON Radios
 1. All Principals
 2. Vehicle charger
 3. Channel for each Region
 4. Training
 5. Drills

- School Operations Command Center

- Hurricane Preparedness Kit
 1. Digital Camera
 2. CD with current photos
 3. Paper copies of necessary forms
 4. All manual grade books
 5. Property inventory
 6. Media Center Inventory

- Hurricane Preparedness Drill

- Employee Hotline and Website

APPENDIX C

Emergency Evacuation Drills Memorandum

Appendix C

MEMORANDUM

DOS#7-1
August 1, 2005
JSD305-995-4900

TO: All Principals

FROM: 
John S. DiBenedetto, District Director
Division of Safety and Emergency Management

SUBJECT: EMERGENCY EVACUATION DRILLS

In accordance with Florida Department of Education requirements as prescribed by the National Fire Protection Association Life Safety Code, each school must conduct emergency evacuation drills at a rate of one per month while classes are in session. An additional drill, except for year-round schools, shall be performed within the first 30 days of school. Schools open during the summer shall perform one drill during the summer session. Please adhere to the following schedule for the 2005-06 school year:

<u>Month</u>	<u>Drill Number Performed</u>
August	1&2
September	3
October	4
November	5
December	6
January	7
February	8
March	9
April	10
May	11

All emergency drills must be reported on the day they are performed, as described in the District Emergency Management Procedures manual, pages 7 and 8. Without exception, principals must perform the required emergency evacuation drills.

Adult education centers and ancillary facilities should continue to perform four evacuation drills per year, one during each calendar quarter. If you require additional information, please call me at 305-995-4900.


JSD:gr

cc: Freddie Woodson, Associate Superintendent
Chief Gerald Darling
Dr. Alberto Rodriguez, Associate Superintendent
Dr. Kamela Patton, Assistant Superintendent
Jaime G. Torrens, Inspection Officer
Regional Superintendents
Mark Zaher, Director
Michael Webb, Coordinator

MEMORANDUM

DOS#7-2
August 1, 2005
JSD-305-995-4900

TO: All Principals

FROM: 
John S. DiBenedetto, District Director
Division of Safety and Emergency Management

SUBJECT: LOCKDOWN DRILLS

At the start of each school year and periodically thereafter, principals should discuss and review the Critical Incident Response Plan with teachers and school staff. Please ensure that staff members are made aware of their roles and responsibilities in the event of school site emergencies.

School administrators are required to perform two lockdown drills each school year, as described in the District Critical Incident Response Plan. The first drill shall be performed during the month of October and the second during the month of February. You should perform one yellow and one red. Each principal or designee is required to report the lockdown drill utilizing the FASI online system on the same day the drill is performed.

If you require additional information, please call me at 305-995-4900.

JSD:gr

cc: Freddie Woodson, Associate Superintendent
Chief Gerald Darling
Dr. Alberto Rodriguez, Associate Superintendent
Dr. Kamela Patton, Assistant Superintendent
Jaime G. Torrens, Inspection Officer
Regional Superintendents
Mark Zaher, Director
Michael Webb, Coordinator

APPENDIX D

District Emergency Operations Command Center Pictures ***Hurricane Wilma***



MEMORANDUM

MANAGEMENT AND COMPLIANCE AUDIT

2006 AUG 22 AM 8:1

OSP:11

August 21, 2006

OSP: 305-995-1225

TO: Mr. Allen M. Vann, Chief Auditor
Office of Management & Compliance Audits

FROM: Ms. Ofelia San Pedro, Deputy Superintendent
Business Operations

BY: Scott B. Clark, Risk and Benefits Officer
Office of Risk and Benefits Management

**SUBJECT: RESPONSE TO AUDIT OF EMERGENCY MANAGEMENT AND
DISASTER RECOVERY**

Please accept this memorandum as a response to the audit of the district's Emergency Management and Disaster Recovery, specifically as it relates to Disaster Recovery. Recommendations regarding Disaster Recovery fall under the responsibility of the Property Loss Control Section of The Office of Risk and Benefits Management.

The Property Loss Control function consisting of a Director I and a Confidential Exempt was established in September, 2000. The responsibility of that section is as follows:

- Handles self insured claims for losses to district property involving fire, water, and windstorm perils
- Handles self insured claims for losses to district property involving vandalism and theft occurrences
- Coordinates first party losses to district property in which recovery is possible from district insurers and Federal Emergency Management Agency (FEMA)
- Initiates applications for mitigation grants being offered through the Federal Emergency Management Agency (FEMA)

Since the operation was established, numerous self insured claims have been successfully handled involving loss to district-owned property stemming from fire and windstorm losses, as well as theft and vandalism losses. A well organized procedure has been established to document losses of these types from the various work locations where the losses actually occur. Proofs of Loss must be completed with all appropriate back-up documentation and only when the loss has been successfully "proven" to the Property Loss Section, does the actual budget transfer occur to repair/replace the damaged/missing property.

MEMORANDUM

August 21, 2006

Page 2

In addition to this on-going function, storm recoveries have been handled by the Property Loss Section for storms over the past few years including George, Irene, Frances, Jeanne, Katrina, Rita and Wilma.

Of the seven storms to have resulted in damages to district-owned property, Hurricane Wilma was the largest, most destructive storm which will result in recoveries from both district insurers and FEMA. As a result of the widespread damage from Wilma which resulted because of the size of the storm, as opposed to the intensity of the storm, the Property Loss Section has been challenged as never before. The Office of Risk and Benefits Management is welcoming of the observations and recommendations being put forth from the Office of Management and Compliance Audits, so that proper resources can be allocated to this very important function which tends to be somewhat forgotten after an emergency subsides and children return to the classroom.

It is in the district's best interest to expedite the claims process; however it should not be rushed at the expense of accuracy. While FEMA does have stated timelines in their regulations, staff's vast experience with FEMA, including the Director of Property Losses prior employment with the State of Florida, Department of Community Affairs (DCA), which actually acts as the liaison between the federal government and the school district (sub-grantee), is that sub-grantees can request needed timeline extensions and usually obtain them without any problems. Frankly, much of the ability to put the claim together adequately has as much to do with the quality of the assigned FEMA inspection team as it does with the depth and quality of the district's staff.

Claims for emergency labor costs have up to this point been collected by procedures involving two parallel tracks which are not integrated. The result of this current procedure is that needed information is in two places and is not identical, and is not available electronically. Staff fully concurs that these processes must be combined into one so that all emergency labor reimbursement requests are collected using one form, which can be reviewed for accuracy via electronic means prior to being submitted to FEMA. This would also provide a needed link to tie anticipated and actual expenditures back into the district's financial systems.

Overtime expenditures tracked by the FEMA Employee Tracking Reports for Hurricane Wilma have been completely reconciled with the general ledger and the Project Worksheets for Hurricane Wilma in the amount of \$9.8 million, which is by far the largest expenditure of the three storms. The challenge in reconciliation for Hurricane Katrina expenditures is due to FEMA's decision to change the benefits rate used in the Project Worksheet (PW), as well as inaccuracies in FEMA's completion of the Project Worksheets. Additionally, to date \$37,606,241 in Project Worksheets for Hurricanes Katrina, Rita and Wilma have been submitted to FEMA for reimbursement for all reimbursable losses.

MEMORANDUM

August 21, 2006

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Finally, claims handling is an art of estimating and negotiating. One of the most crucial components of disaster recovery is creating an accurate scope of loss which will be the basis for which all subsequent estimating and negotiating will hinge. The Project Worksheet (PW) created by FEMA is an estimating document. The fact that the PW does not "reconcile" with the district's general ledger and/or specific reports generated by the district to capture raw data is to be expected because of the nature of the PW's estimate. Staff's goals will always be to have these amounts match to the extent possible, however due to the fact that a claim is a moving target, and the fact that FEMA often changes their rules during the course of the work, there are times when the PW, the general ledger and the source reports will not absolutely "reconcile".

RECOMMENDATIONS

5.1 STAFF CONCURS WITH THIS RECOMMENDATION

Following Hurricane Andrew, the district created a department of Hurricane Andrew Recovery which was staffed by district employees who were brought together from district offices, based upon their expertise. Employees from offices including Facilities, Accounting, Transportation, Food Service, Budget, Procurement and Management Audits staffed the Office of Andrew Recovery Management which worked closely with the Office of Risk and Benefits Management on disaster recovery operations. This office remained in tact until the Board approved the final proof of loss approximately three years after the storm.

This model was very successful because in order to properly handle property claims, the raw loss information is best assembled by the staff closest to the loss itself. Once this raw loss information is assembled, it needs to be reviewed by staff familiar with FEMA's claiming process and explained to the FEMA inspectors.

To maximize FEMA reimbursements for uninsurable expenses such as emergency payroll and debris removal, Property Loss staff must have the opportunity to work with appropriate district staff to assemble the expenditures and submit them in the manner required by FEMA, while making sure that the information is properly accounted for within the financial infrastructure.

Presently, the Property Loss Control Section has increased its staff by one part-time administrator, which occurred in March, 2006. This addition has proven valuable from the standpoint of expediting the FEMA claiming process, but has also added needed depth and computer expertise in the section. Staff is recommending that the part time administrator position be added as permanent staff.

MEMORANDUM

August 21, 2006

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All losses from Hurricanes Katrina and Rita have been submitted to FEMA for reimbursements. The vast majority of the Hurricane Wilma losses has been submitted to FEMA for reimbursement, however because of FEMA's lack of continuous staffing in South Florida, additional PW's are forthcoming. Once staff from the Property Loss Section begins to ask for reimbursement on the large items such as debris, roofing and emergency payroll, which will require final inspections, staff from those areas will be called upon to assist in documenting the loss information which has been compiled and submitted to FEMA.

The Office of Risk and Benefits Management has created a list of recommended positions which will be needed to temporarily augment staff in the Property Loss Control Section to handle disaster recovery. The number of positions required will be dependent upon the size of the storm.

5.2 STAFF CONCURS WITH THIS RECOMMENDATION

For the past several years, the Property Loss Control Section of the Office of Risk and Benefits Management has relied upon the State of Florida's Public Assistance web-site in conjunction with copies of the actual FEMA-written PW's as the control function over monitoring of pending claims.

Following Hurricane Wilma, and the hiring of the part-time administrator, staff felt that due to the number of PW's which were being written for the loss, that an additional tool was needed to monitor the information flow between the district and the Department of Community Affairs (DCA). As such, a comprehensive spreadsheet was developed to track all loss information by catastrophe number and by type of reimbursement from FEMA.

This spreadsheet has now been instituted as a control mechanism to monitor all accepted PW's and tracks those which have been accepted (obligated) by FEMA versus those which are still pending obligation status. Additionally, this spreadsheet will track reimbursements from FEMA, delineated by FEMA funding category whose funds are matched by the State of Florida. This form will be able to be expanded on an as-needed basis to include additional categories such as district costs and insurance reimbursements.

Specific workflow procedures will be developed including roles and responsibilities so that staff brought in to augment the operation of disaster recovery will be assigned tasks of compiling and reviewing district claims for reimbursement. This will expedite the ability for FEMA inspectors to write Project Worksheets (PW) with accurate estimates in order to have them obligated by FEMA as soon as possible.

While FEMA does have procedures to extend filing deadlines without penalties to the sub-grantees, having adequate staff working within the Property Loss Control Section will ensure that the information needed to have FEMA create the PW's is provided in a timely manner.

Capturing accurate data on Furniture Fixture and Equipment (FFE) losses is best done by staff that possesses the technical capabilities determining the extent of damage for both FEMA and insurance purposes. In keeping with the recommendation from 5.1, staff from the Office of Management and Compliance Audits could be used to capture FFE losses, as is contemplated in the Disaster Recovery Plan (DRP).

5.3 STAFF CONCURS WITH THIS RECOMMENDATION

The district's Damage Survey Form (DSF) which is referenced in the District Recovery Plan (DRP) was originally developed to obtain baseline physical damages to facilities following a storm. This form could also be used to identify a scope of damage on a campus by campus basis to determine early eligibility for either insurance or FEMA reimbursement, including debris removal.

Because of the need to determine the district's ability to re-open facilities soon after a storm passes, use of the DSF to determine baseline physical damage information, including the availability of power, has been useful. Subsequent to that determination, a more detailed damage survey must be completed in order to begin to determine the actual scope of loss, if any.

Staff recommends that use of a baseline document to determine the viability of opening facilities soon after a storm be continued, and a more comprehensive DSF form be created to determine a scope of loss which can be used as a source document when FEMA creates the PW. This two step approach will provide district staff necessary information so that the "disconnect" between the two is eliminated.

5.4 STAFF CONCURS WITH THIS RECOMMENDATION

All Emergency Daily Activity Records (EDAR's) for last year's hurricanes are at individual work locations with the payroll documents which correspond with the dates that work was performed. These reports will be reviewed by FEMA as part of their final inspection processes. Prior to last year's hurricane seasons, work had begun, and is continuing with the Office of the Controller, and Information Technology Services to automate documents needed to capture emergency payroll information, track anticipated and actual expenditures, maximize reimbursement requests, and tie the information back to the district's financial documents.

MEMORANDUM

August 21, 2006

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Once finalized, this form will incorporate the information which is needed by Payroll to support the emergency overtime pay, as well as capturing all needed information on the Emergency Daily Activity Report (EDAR) as required by FEMA. Because the district can also seek reimbursement from FEMA for equipment and materials usage based upon a pre-determined formula, the report is being designed to capture that data as well.

With regard to last year's storms, emergency overtime payrolls incurred as a result of Hurricane Wilma match the expenditures reflected in the FEMA Employee Tracking Reports as well as the FEMA PW's. Emergency payroll amounts reflected in the FEMA Employee Tracking Reports for Hurricanes Katrina and Rita are approximately \$262,000 higher than the amounts on the FEMA PW's for these storms due to the fact that FEMA changed the fringe benefit rate for which the district can be reimbursed subsequent to the running of the FEMA Employee Tracking Reports. The vast majority of the \$262,000 difference is attributable to emergency payroll incurred for Hurricane Katrina and is isolated to one of the three PW's written for reimbursement of overtime for that storm. Rather than re-running the district reports with the FEMA-required fringe rate, the decision was made to document the issue and discuss it with FEMA during its final inspections. That is why there were no issues soon thereafter when Hurricane Wilma hit, as the new FEMA rate had been programmed into the FEMA Employee Tracking Report.

5.5 STAFF CONCURS WITH THIS RECOMMENDATION

When the Property Loss staff is not working on a disaster recovery project such as Hurricanes Katrina, Rita and Wilma, the office space needs to handle routine theft, vandalism and fire/windstorm losses is not as great as it is when a major disaster occurs. Following Hurricane Andrew, the Office of Hurricane Andrew Recovery was housed in rented office space in the 1444 office building. Following Hurricane Wilma, the Property Loss Control staff relocated to an available classroom at Feinberg Fisher Elementary, due to the fact that there was not adequate space within the Office of Risk and Benefits Management which is housed in the Annex.

District damages from Hurricane Wilma, which was a Category 1 storm, were minimal when compared to what could occur if South Florida is hit by a Category 3, 4 or 5 storm. In the event of such a storm, adequate office space for the Hurricane Recovery Office will be needed immediately to begin its operations and house the individuals who will be augmenting staff in Property Loss Control.

MEMORANDUM

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It is recommended that a "needs survey" be conducted within the administrative complex including SBAB and Annex to ascertain what space may or may not exist. Prior to finding permanent office space for the Property Loss Section within the administrative complex, the Director will re-occupy office space within the Office of Risk and Benefits Management and begin transitioning the operations back to the administrative complex.

6.1 STAFF CONCURS WITH THIS RECOMMENDATION

All disaster grants from FEMA are paid through the State of Florida Department of Community Affairs (DCA) to the district as a sub-grantee. When funds are sent, specific paperwork reflecting the disaster number accompany the payment with detailed explanations of the individual PW which is being addressed and the scope of work with the reimbursement amounts detailed by the percentages addressed earlier. The actual money is remitted to the district from the State of Florida Department of Financial Services (DFS) and is recorded in an on-line payment report within the State of Florida Office of Public Assistance.

The Office of Risk and Benefits Management has created a payment report which is monitored weekly to compare payments received by the Office of Risk and Benefits Management to the State of Florida Public Assistance web-based report so that any missing checks can be tracked down and deposited in the correct district financial structure(s). All funds sent by the state according to the Public Assistance web-based report have been accounted for and deposited into appropriate accounting structures.

The Risk Management payment report will be shared weekly with both the Office of the Controller as well as the Office of Treasury Management to assure proper accounting of disaster recovery funds from FEMA.

All of the checks reviewed by the Office of Management and Compliance Audits were mailed to addresses other than that of the Office of Risk and Benefits Management. Once these checks were received by Risk Management, they were deposited according to office guidelines which comply with the deposit procedures pursuant to Section II.F. of the Internal Funds Accounting Manual requiring collections of funds be remitted for deposit daily. To remedy this, a district wide notification will be sent with instructions to forward all disaster recovery funds to the Office of Risk and Benefits Management to assure timely deposits of disaster recovery funds.

MEMORANDUM

August 21, 2006

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6.2 STAFF CONCURS WITH THIS RECOMMENDATION

Deposit procedures are outlined in the E-Handbook entitled Deposit and Investment Policies for School Board Funds. A memorandum from the Superintendent of Schools will be sent to all work locations reminding them of the requirements found in School Board Rule 6Gx13- 3B-1.01, Deposit and Investment Policies for School Board Funds, which incorporates the E-Handbook by reference.

6.3 STAFF CONCURS WITH THIS RECOMMENDATION

The challenge with the State of Florida has been that regardless of the information in the disaster funding agreement, funding occurs from the Department of Community Affairs (DCA) through the Department of Financial Services (DFS). The DFS database only has the ability to use a maximum two addresses per recipient (employer), which at present includes two addresses which are not the same as what appears in the Disaster Funding Agreement.

Staff has been in contact with DCA who has agreed to instruct DFS to have all future funds sent to the Office of Risk and Benefits Management.

7.1 STAFF CONCURS WITH THIS RECOMMENDATION

FEMA has very specific rules regarding which emergency overtime pay is eligible for reimbursement and which is not. The district's attempts to organize this information in the past has been hampered by using two forms on a parallel basis which included the reporting of overtime payroll through the Payroll Department, and the reporting of the actual work being performed which was reported to the Property Loss Control Section on the Emergency Daily Activities Report (EDAR), with both forms being completed manually.

Staff will assemble a listing of appropriate job codes by work location category which would typically fall within the definition of "essential personnel" and expected to report to work following a disaster. Once the automated reporting mechanism for emergency payroll is established, these job codes will be monitored with work location supervisors asked to specifically address the need for employees who may have worked during the emergency, but whose job codes are not part of the listing of essential personnel. The automation of this report will also allow for the EDAR to be tied in as well.

Please let me know should you require any further information.

OSP/SBC:mgr

MEMORANDUM

August 21, 2006

Page 8

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Please let me know should you require any further information.

OSP/SBC:mgr

The School Board of Miami-Dade County, Florida, adheres to a policy of nondiscrimination in employment and educational programs/activities and programs/activities receiving Federal financial assistance from the Department of Education, and strives affirmatively to provide equal opportunity for all as required by:

Title VI of the Civil Rights Act of 1964 - prohibits discrimination on the basis of race, color, religion, or national origin.

Title VII of the Civil Rights Act of 1964, as amended - prohibits discrimination in employment on the basis of race, color, religion, gender, or national origin.

Title IX of the Education Amendments of 1972 - prohibits discrimination on the basis of gender.

Age Discrimination in Employment Act of 1967 (ADEA), as amended - prohibits discrimination on the basis of age with respect to individuals who are at least 40.

The Equal Pay Act of 1963, as amended - prohibits sex discrimination in payment of wages to women and men performing substantially equal work in the same establishment.

Section 504 of the Rehabilitation Act of 1973 - prohibits discrimination against the disabled.

Americans with Disabilities Act of 1990 (ADA) - prohibits discrimination against individuals with disabilities in employment, public service, public accommodations and telecommunications.

The Family and Medical Leave Act of 1993 (FMLA) - requires covered employers to provide up to 12 weeks of unpaid, job-protected leave to "eligible" employees for certain family and medical reasons.

The Pregnancy Discrimination Act of 1978 - prohibits discrimination in employment on the basis of pregnancy, childbirth, or related medical conditions.

Florida Educational Equity Act (FEEA) - prohibits discrimination on the basis of race, gender, national origin, marital status, or handicap against a student or employee.

Florida Civil Rights Act of 1992 - secures for all individuals within the state freedom from discrimination because of race, color, religion, sex, national origin, age, handicap, or marital status.

School Board Rules 6Gx13- 4A-1.01, 6Gx13- 4A-1.32, and 6Gx13- 5D-1.10 - prohibit harassment and/or discrimination against a student or employee on the basis of gender, race, color, religion, ethnic or national origin, political beliefs, marital status, age, sexual orientation, social and family background, linguistic preference, pregnancy, or disability.

Veterans are provided re-employment rights in accordance with P.L. 93-508 (Federal Law) and Section 295.07 (Florida Statutes), which stipulate categorical preferences for employment.



Miami-Dade County Public Schools
giving our students the world