

October 2009

HOMELAND DEFENSE

Planning, Resourcing, and Training Issues Challenge DOD's Response to Domestic Chemical, Biological, Radiological, Nuclear, and High-Yield Explosive Incidents



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Highlights of [GAO-10-123](#), a report to congressional requesters

Why GAO Did This Study

DOD plays a support role in managing Chemical, Biological, Radiological, Nuclear, and High-Yield Explosives (CBRNE) incidents, including providing capabilities to save lives, alleviate hardship or suffering, and minimize property damage. This report addresses the extent to which (1) DOD's CBRNE consequence management plans and capabilities are integrated with other federal plans; (2) DOD has planned for and structured its force to provide CBRNE consequence management assistance; (3) DOD's CBRNE Consequence Management Response Forces (CCMRF) are prepared for their mission; and (4) DOD has CCMRF funding plans that are linked to requirements for specialized CBRNE capabilities. GAO reviewed DOD's plans for CBRNE consequence management and documents from the Department of Homeland Security (DHS) and FEMA. GAO also met with officials from the Assistant Secretary of Defense for Homeland Defense, U.S. Northern Command, the military services, the National Guard Bureau, and some CCMRF units.

What GAO Recommends

GAO is making recommendations to DOD to improve the link between DOD and other federal plans, match capabilities with requirements, increase readiness, and improve oversight of CCMRF funding and resourcing. DOD agreed or partially agreed with the recommendations and cited ongoing or planned actions to implement them.

[View GAO-10-123 or key components.](#)
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HOMELAND DEFENSE

Planning, Resourcing, and Training Issues Challenge DOD's Response to Domestic Chemical, Biological, Radiological, Nuclear, and High-Yield Explosive Incidents

What GAO Found

DOD has its own CBRNE consequence management plans but has not integrated them with other federal plans because those federal entities have not completed all elements of the Integrated Planning System mandated by Presidential directive in December 2007. The system is to develop and link planning documents at the federal, state, and local levels. While the system's framework is established, the CBRNE concept and strategic plans that provide further guidance are incomplete. DOD has had operational plans in place and revises these plans regularly. However, until the Integrated Planning System and its associated plans are complete, DOD's plans and those of other federal and state entities will not be integrated, and it will remain unclear whether DOD's CCMRF will address potential gaps in capabilities. We previously recommended and DHS agreed that FEMA should develop a program management plan and schedule to complete the planning system.

With a goal to respond to multiple, near-simultaneous, catastrophic CBRNE incidents, DOD has plans to provide needed capabilities, but its response times may not meet incident requirements, it may lack sufficient capacity in some capabilities, and it faces challenges to its strategy for sourcing all three CCMRFs with available units. Without assigned units and plans that integrate the active and reserve portions of CCMRF, and agreements between DOD and the states on availability of National Guard units and the duty status in which they would respond to an incident requiring federal forces, DOD's ability to train and deploy forces in a timely manner is at risk.

DOD has taken a number of actions in the past year to improve the readiness of units assigned to the first CCMRF, increasing both individual and collective training focused on the mission and identifying the mission as high priority. However, the CCMRF has not conducted realistic full force field training to confirm units' readiness to assume the mission or to deploy rapidly. Competing demands of overseas missions may distract from a unit's focus on the domestic mission, and some CCMRF units rotate more frequently than stated goals. These training and force rotation problems have prevented DOD from providing the kind of stability to the force that would allow units to build cohesiveness.

DOD is making progress in identifying and providing funding and equipment to meet CCMRF mission requirements; however, its efforts to identify all requirements have not been completed, and funding responsibilities are spread across the department and are not subject to central oversight. When the CCMRF mission priority increased in the spring of 2008, more funding was provided. However, units did not have dedicated funding and thus purchased equipment with funding also used for other missions. DOD lacks visibility over total funding requirements. Without an overarching approach to requirements and funding and a centralized focal point to ensure that all requirements have been identified and funded, DOD's ability to ensure that its forces are prepared to carry out this high-priority mission remains challenged.

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Abbreviations

CBIRF	Chemical Biological Incident, Response Force
CBRNE	chemical, biological, radiological, nuclear, and high-yield explosive
CCMRF	CBRNE Consequence Management Response Force
DHS	Department of Homeland Security
DOD	Department of Defense
FEMA	Federal Emergency Management Agency
HSPD	Homeland Security Presidential Directive
NORTHCOM	U.S. Northern Command

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United States Government Accountability Office
Washington, DC 20548

October 7, 2009

Congressional Requesters

The 2007 *National Strategy for Homeland Security* highlighted the continuing threat posed to the United States by the potential use of weapons of mass destruction by terrorist organizations.¹ In addition to efforts focused on preventing such attacks, the strategy highlights the need for a comprehensive capability to mitigate the consequences of an attack involving weapons of mass destruction. Such a capability is also a key pillar of the *National Strategy to Combat Weapons of Mass Destruction*.² The Department of Defense (DOD) characterizes weapons of mass destruction in terms of chemical, biological, radiological, nuclear, and high-yield explosive (CBRNE) materials. Incidents involving CBRNE could range in magnitude, from such things as accidents like chemical spills that likely could be addressed by local responders to catastrophic incidents such as terrorist attacks involving nuclear material that could result in extraordinary levels of casualties and property damage.

A catastrophic CBRNE-related incident occurring within the United States would require a unified, national response, including action by DOD. The Department of Homeland Security (DHS) is responsible for coordinating federal disaster response planning, with the Federal Emergency Management Agency (FEMA) serving as the primary federal agency under DHS for coordinating federal assistance in response to an incident. DOD would act in support of the primary federal agency. In addition to establishing CBRNE response units in the National Guard, including the Civil Support Teams and CBRNE Enhanced Response Force Packages, DOD is establishing CBRNE Consequence Management Response Forces (CCMRF). A CCMRF is roughly a brigade-sized force (approximately 4,500 troops) that provides federal military assistance when a CBRNE incident exceeds local and state capabilities. DOD relies on its existing force structure, which it refers to as “dual-capability forces,” to support the domestic CBRNE consequence management mission as well as overseas missions.

¹Homeland Security Council, *National Strategy for Homeland Security* (Washington, D.C.: Oct. 2007).

²White House, *National Strategy to Combat Weapons of Mass Destruction* (Washington, D.C.: Dec. 2002).

In May 2006, we reported that the National Guard Weapons of Mass Destruction Civil Support Teams were generally organized and prepared for their mission, and we highlighted management challenges that needed to be addressed.³ In response to your request that we assess DOD's federal role in CBRNE consequence management efforts, we initiated a review focusing on federal military planning and preparedness efforts and CCMRF. Our objectives for this report address the extent to which (1) DOD's plans and capabilities are integrated with other federal government plans to address capability requirements, (2) DOD has planned for and structured its force to provide CBRNE consequence management assistance, (3) DOD's CCMRF are prepared to perform their mission, and (4) DOD has funding plans for CCMRF that are linked to requirements for specialized CBRNE capabilities. As agreed with your offices, we will conduct a review of the operational effectiveness of the National Guard CBRNE Enhanced Response Force Packages (commonly referred to as CERFP) as a follow-on effort.

To determine the extent to which DOD has planned for CBRNE consequence management operations and has integrated its plans with other federal government plans, we reviewed and compared current DOD operational- and tactical-level plans for civil support and CBRNE consequence management with existing FEMA and DHS planning efforts. We also met with officials of DHS, the Office of the Assistant Secretary of Defense for Homeland Defense, and U.S. Northern Command (NORTHCOM). We reviewed our prior reports and worked with other GAO staff currently examining the overall domestic homeland security planning integration process. To determine how prepared CCMRF is to perform the mission, we compared existing DOD policy and practices on readiness with the current process used to prepare CCMRF units and report mission readiness. We also met with U.S. Joint Forces Command and U.S. Army Forces Command—which are responsible for providing ready forces to the combatant commands—to discuss the manpower sourcing process followed for CCMRF. We obtained readiness reports for CCMRF units from U.S. Northern Command and from judgmentally selected units that were part of task force operations—which contain most of the specialized capabilities. To determine CCMRF funding planning and the linkage of funding to mission requirements, we met with Army and

³GAO, *Homeland Defense: National Guard Bureau Needs to Clarify Civil Support Teams' Mission and Address Management Challenges*, [GAO-06-498](#) (Washington, D.C.: May 31, 2006).

U.S. Northern Command officials to obtain guidance on the topic and to discuss mission requirements, funding needs, and sources. We compared funding sources to known CBRNE consequence management requirements and highlighted areas where funding was not identified for key activities or areas relevant to unit preparedness. We also met with the National Guard Bureau to discuss their current capabilities, identified shortfalls, and approach to mitigating any identified shortfalls.

We conducted this performance audit from February 2008 to October 2009 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Results in Brief

DOD has its own operational plans for CBRNE consequence management but is unable to fully integrate them with other federal government plans because other federal departments and agencies have not completed all elements of the Integrated Planning System mandated by Presidential directive in December 2007. The Integrated Planning System is intended to provide a framework to link the family of related U.S. preparedness planning documents at the federal, regional, state, and local levels and is to include strategic guidance statements, strategic plans, concepts of operations, and operations plans related to the 15 National Planning Scenarios.⁴ The Integrated Planning System's framework is in place. However, many federal plans that would link with DOD's plans are incomplete. DOD and NORTHCOM have had operational plans in place and continue to review and revise these plans as part of DOD's well-established joint planning process. However, until all federal plans are complete and specific national guidance is issued, DOD plans and those of other federal and state entities will not be integrated, and it will remain unclear whether DOD's CCMRF will address potential gaps in capabilities. While there are a number of efforts to develop capability assessments at local, state, and federal levels, these efforts are not yet sufficiently mature to provide DOD with complete data to shape its CBRNE response.

⁴The 15 National Planning Scenarios have been grouped in 8 scenario sets of similar characteristics. For example, the 4 National Planning Scenarios related to chemical incidents have been grouped together. Concept and operation plans are being developed for the 8 scenario sets.

Additionally, DHS and FEMA face challenges in obtaining complete and consistent data from the states. We previously recommended and DHS agreed that FEMA should develop a program management plan and schedule for completing the Integrated Planning System process. We are recommending that in the absence of completed and integrated plans, DOD work with DHS, FEMA, and other interagency partners to agree on (1) interim goals, objectives, and assumptions for DOD's role in responding to one or more simultaneously occurring CBRNE incidents in the United States and (2) the specific types and quantities of capabilities DOD is expected to contribute and the time frames in which those capabilities are to be provided.

DOD has plans for providing the needed capabilities for CBRNE consequence management, but its response may be insufficient because (1) its planned time frames for responding may not meet incident requirements, (2) the quantity of some key capabilities included in CCMRF may be inadequate, and (3) challenges remain in force structure plans and sourcing CCMRF. First, DOD's goal is to source three CCMRFs and be able to respond to multiple, near-simultaneous CBRNE incidents. Its plans call for the first force to be capable of providing consequence management support within 48-96 hours of being notified of a CBRNE incident. However, multiple DOD estimates for some of the more catastrophic scenarios, such as a nuclear detonation, suggest that planned response times may not meet incident requirements. Second, even after its arrival, DOD's planned force has limited quantities of some needed life-saving capabilities, such as medical and decontamination assets that can contribute to meeting incident requirements. DOD recognizes it may need additional units to augment this force, but specific units that would be needed to augment CCMRF have not been identified. Unless these units are identified in advance and trained for the mission, they may be unable to deploy rapidly. Finally, the demands of overseas military operations and DOD's approach to aligning units to the command responsible for carrying out CBRNE operations present challenges for training, assembling, and deploying CCMRFs. Whereas DOD originally intended CCMRFs to be composed entirely of federal active military forces, it now plans to form the second and third CCMRFs primarily with National Guard and Army Reserve units due to the unavailability of sufficient number of active forces to meet requirements. DOD and the governors are developing agreements to address how to ensure that National Guard units will be available to meet the federal requirements of CCMRF, but those agreements are not all in place. DOD also recently reversed its previous decision and will only place CCMRF units under NORTHCOM's direct authority in the event of an incident or for specified training events, rather

than assigning them to NORTHCOM throughout the period that units are on the mission. As a result, NORTHCOM will have less direct authority to control domestic deployment availability, manage day-to-day training, and monitor the readiness of the units responsible for carrying out the CBRNE mission. The combination of these factors place DOD's ability to organize, train, and deploy adequate forces to assist civil authorities in the event of one or more major CBRNE incidents at risk. We are recommending that (1) DOD align plans for all CCMRFs with stated objectives, to include the extent to which existing CCMRF capabilities contribute to identified response requirements and mission goals and (2) DOD work with the state governors through the adjutants general and the National Guard Bureau to create a long-term plan for sourcing CCMRF and ensure that the agreements being established between DOD and state governors include specific terms on National Guard force availability and duty and response status.

In the last year, DOD has taken a number of actions to improve the readiness of units that were assigned to the first CCMRF, including increased training and priority for additional personnel and equipment. Nevertheless, our review showed that CCMRF could be limited in its ability to successfully conduct consequence management operations because (1) it does not conduct realistic full-force field training to confirm units' readiness to assume the mission or to deploy rapidly, and (2) conflicting priorities between the CCMRF mission and overseas deployments affect some units' mission preparation and unit cohesion. First, before designated units assume the CBRNE mission, they must be certified that they are trained to perform that mission, but there is no requirement to provide these units with a full-force tactical field training exercise or to demonstrate that they will be able to meet the required response times once they are assigned to the mission. Although units generally conduct this type of training prior to an overseas deployment and some elements of CCMRF have participated in field exercises, these exercises often did not include some critical units or were conducted several months after units had already been certified. Without requirements to provide field training for the full CCMRF that include an assessment of the ability to deploy on no-notice, as may be the case for an actual CBRNE incident, DOD cannot be assured that individual units that do not normally operate together will be able to operate as a unified force. In addition, the shift away from assigning CCMRF units directly to NORTHCOM exacerbates this problem, since the NORTHCOM commander will have less direct oversight of the training and readiness of the forces he will command in a CBRNE incident. Second, while DOD has identified CCMRF as a high priority, competing demands associated with

follow-on overseas missions may distract from a unit's focus on the domestic mission. For example, Army units are frequently given the CCMRF mission when they return from an overseas deployment. Because these units are in the "reset" or reconstitution phase of the Army force generation model, they often lack personnel and equipment. Other critical CCMRF units have been unable to meet the first CCMRF's rotation goal, that is, remain on the mission for at least 12 months. As a result, the replacement units that have finished out these rotations have missed important joint training opportunities. These training and force rotation problems have prevented DOD from providing the kind of stability to the force that would allow units to build cohesiveness. We are recommending that DOD (1) include in the CCMRF training program requirements to ensure that the entire CCMRF conducts a joint field training exercise as part of its mission validation and that the entire CCMRF conduct at least one no-notice deployment readiness exercise annually and (2) determine the time needed by units to perform the necessary pre-mission CCMRF training and examine sourcing options that would ensure that units have adequate time to train prior to mission assumption.

DOD is making progress in identifying and providing funding and equipment to meet CCMRF mission requirements; however, its efforts to identify total program requirements have not been completed, and its approach to providing program funding has been fragmented and is not subject to central oversight. In the spring of 2008, sourcing priority for the CCMRF mission increased substantially within the department, and more funding was provided. For example, NORTHCOM plans more than \$33 million for two major exercises in its fiscal year 2010 training program, and the Army Reserve has planned over \$37 million for fiscal years 2009 and 2010 to fund additional full-time personnel and training days that have been authorized to support the CCMRF mission. However, the initial CCMRF established on October 1, 2008, did not have fully defined funding requirements or the necessary dedicated resources to effectively carry out the CCMRF mission in an integrated and consistent manner. Moreover, other important requirements for this mission, such as essential equipment requirements for unique nonstandard equipment, have not been fully identified and funded. DOD officials told us they are in the process of developing these requirements and hope to have them for the next rotation that begins in October 2009. While the military services have not always budgeted funds specifically for the CCMRF mission, units have purchased mission equipment with funding from other sources that may not be available in the future. Moreover, units also fund their CCMRF-related training activities from their operations and maintenance accounts, which are developed without considering the CCMRF mission. As a result, unit

officials sometimes reallocate funding initially intended for other purposes to meet the CCMRF mission. Because DOD has assigned funding responsibilities across the department and much of the funding is being provided from existing operations and maintenance accounts, DOD lacks visibility across the department for the total funding requirements for this mission. Without an overarching approach and funding strategy for linking requirements to funding and a centralized focal point to ensure that all requirements have been identified and fully funded, DOD's ability to ensure in advance that its forces are prepared to carry out this high-priority mission efficiently and effectively could be challenged. We are recommending that DOD (1) determine the total requirements for CCMRF, including unique nonstandard equipment requirements, and develop a plan on how those requirements will be filled and (2) develop an overall funding strategy for establishing, fielding, and exercising CCMRF and designate a single focal point for coordinating this strategy.

DOD provided written comments on a draft of this report and provided technical comments, which we incorporated into the final report as appropriate. DOD agreed or partially agreed with all our recommendations and described actions it is taking or plans to take to implement them. A summary of DOD's comments and a summary of our response to these comments follow the Recommendations for Executive Action section of this report. DOD's written comments are reprinted in appendix II. DHS also reviewed a draft of this report and provided technical comments, which we incorporated into the final report as appropriate.

Background

DOD plays a support role in CBRNE consequence management, including providing those capabilities needed to save lives, alleviate hardship or suffering, and minimize property damage caused by the incident. DOD generally provides defense support of civil authorities only when (1) state, local, and other federal resources are overwhelmed or unique military capabilities are required; (2) assistance is requested by the primary federal agency; or (3) NORTHCOM is directed to do so by the President or the Secretary of Defense.⁵ DOD has designated NORTHCOM⁶ to lead the

⁵DHS, *National Response Framework* (Washington, D.C.: Jan. 2008), and Joint Chiefs of Staff, Joint Pub. 3-28, *Civil Support* (Washington, D.C.: Sept. 14, 2007).

federal military⁷ portion of such a support operation in direct support of another federal agency—most often FEMA. DOD could be the lead federal agency for CBRNE consequence management or any other civil support mission only if so designated by the President.⁸ To be effective, NORTHCOM's efforts must support a wide range of federal departments and agencies—including FEMA and the Departments of Health and Human Services and Justice—in order to support 50 states, the District of Columbia, six territories, and hundreds of city and county governments.

The *National Response Framework* establishes the principles that guide all response partners in preparing for and providing a unified national response to disasters.⁹ Under the Framework, disaster response is tiered; local governments and agencies typically respond immediately following an incident. When additional resources are required, states may provide assistance with their own resources or may request assistance from other states through interstate mutual agreements or the Emergency Management Assistance Compact.¹⁰ Localities and states usually respond within the first several hours of a major incident. The federal government provides assistance to states if they require additional capabilities and they request assistance. In the event of a catastrophic incident, such as one

⁶United States Northern Command, established in 2002, has the dual mission of homeland defense and support of civil authorities. NORTHCOM leads efforts in its area of responsibility which includes the continental United States and Alaska. The United States Pacific Command leads DOD's civil support efforts in Hawaii and other U.S. Pacific territories.

⁷This does not include U.S. Coast Guard forces, which are under DHS, or the National Guard, which, unless federalized by the President, would remain under the authority of the respective state and territory governors.

⁸Under DOD's immediate response provision, local commanders are authorized to take the necessary actions to respond to local civil authorities without higher headquarter approval when a civil emergency may require immediate action to save lives, prevent human suffering, or mitigate property damage.

⁹DHS, *National Response Framework* (Washington, D.C.: Jan. 2008). The *National Response Framework*—previously known as the *National Response Plan*—is the plan that guides how federal, state, local, and tribal governments, along with nongovernmental and private sector entities, will collectively respond to and recover from all hazards, including catastrophic disasters, such as Hurricane Katrina.

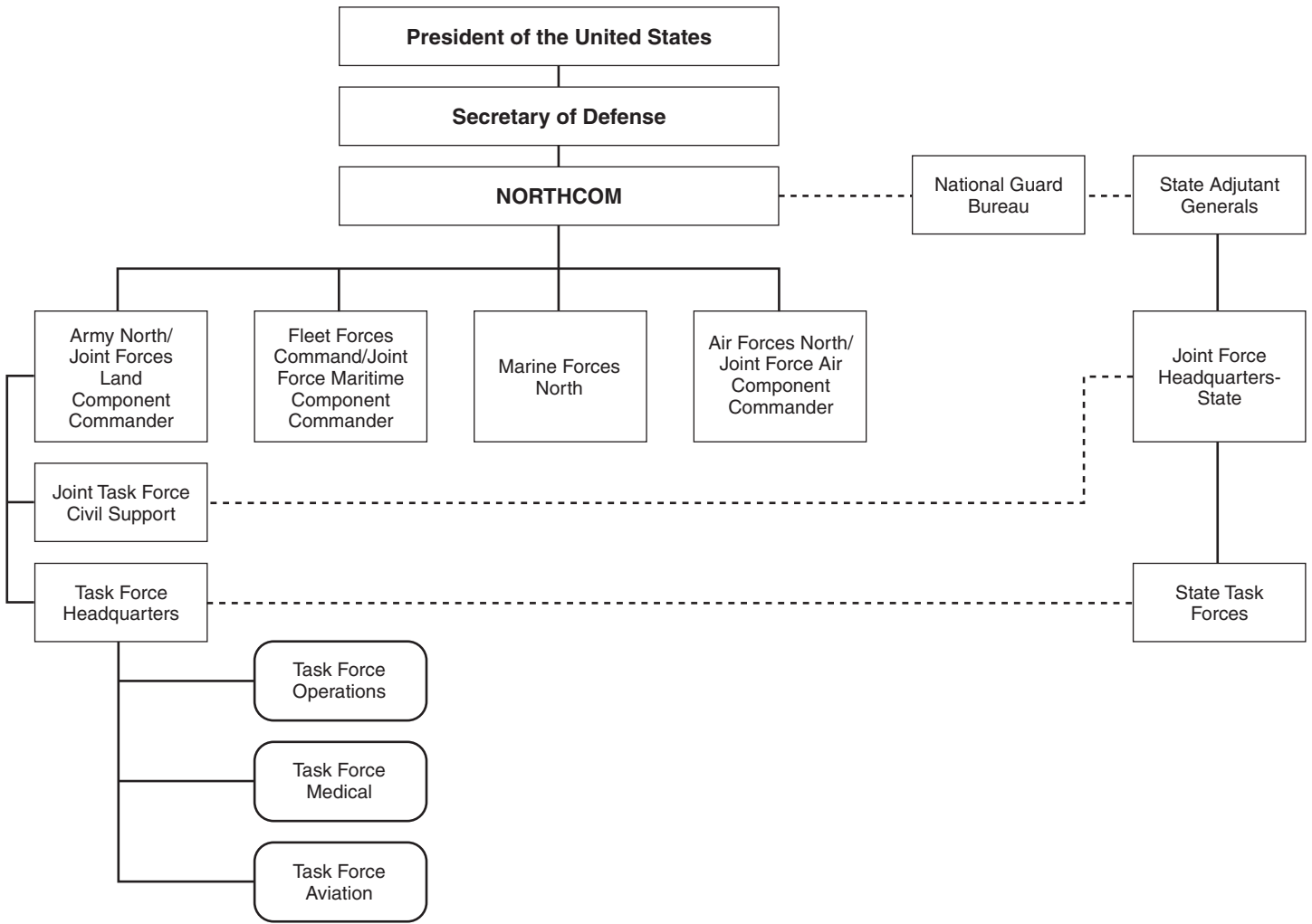
¹⁰Emergency Management Assistance Compact is a mutual aid agreement among member states and is administered by the National Emergency Management Association. States affected by disasters have increasingly relied on the compact as a means to access resources from other states, including emergency managers, National Guard assets, and first responders. GAO, *Emergency Management Assistance Compact: Enhancing EMAC's Collaborative and Administrative Capacity Should Improve National Disaster Response*, [GAO-07-854](#) (Washington, D.C.: June 29, 2007).

involving CBRNE, the framework also calls for federal response partners to anticipate the need for their capabilities before their assistance is requested. The framework lists 15 emergency support functions and designates federal lead agencies in areas such as search and rescue, public health and medical services, and transportation. DOD is a supporting agency for all 15 emergency support functions but is also one of the primary agencies for search and rescue and public works and engineering.¹¹ Additional tools to guide response efforts are provided by The National Preparedness Guidelines, including National Planning Scenarios, Target Capability Lists and Universal Target Lists, and national priorities.

The federal government has a wide array of capabilities and resources that can be made available to assist state and local agencies in responding to incidents. NORTHCOM would command the federalized DOD capabilities and coordinate the efforts of state controlled DOD capabilities. Figure 1 shows the organizational structure of key DOD CBRNE Consequence Management Organizations under federal and state control.

¹¹The U.S. Army Corps of Engineers is the DOD agent responsible for public works and engineering.

Figure 1: DOD CBRNE Consequence Management Organizations under Federal and State Control



----- Organizations for which NORTHCOM provides coordination
 ○ Units designated for the CCMRF would come under one of these task forces

Source: GAO analysis of NORTHCOM information.

In framing its role in providing CBRNE consequence management assistance, DOD has set its standard of preparedness as the ability to prepare for and mitigate the effects of multiple, near-simultaneous CBRNE

events.¹² DOD has significant capabilities that could be used to augment a federal CBRNE response and also contributes to the organization, training, and equipping of several state-controlled military units focused on consequence management, including the following.

- The National Guard Weapons of Mass Destruction Civil Support Teams. These 22-person units are composed of full time National Guard personnel and are located in each state and territory.¹³ Their mission is to assist civil authorities in responding to actual or suspected CBRNE incidents by identifying agents and substances, assessing consequences, advising civil authorities on response measures, and assisting with requests for additional support. The teams are under the control of the governors of their respective states and territories unless they are activated for federal service, at which time they would come under the control of DOD.
- The National Guard CBRNE Enhanced Response Force Packages. Each of these larger force packages (about 200 soldiers) is composed of personnel from numerous existing National Guard units; these personnel remain in the same status as most National Guard personnel and must be mobilized for duty. Their mission is to provide follow-on assistance in such areas as casualty search and extraction; patient decontamination; and emergency medical triage, treatment, and stabilization. There are currently 17 authorized response force packages, including at least one in each of the 10 FEMA regions of the country. Like the Civil Support Teams, the force packages are intended to be part of the state response to an incident and therefore remain under the control of the respective governors. States that do not have this capability can access these force packages through preestablished agreements. In rare instances, the force packages can also be federalized and placed under DOD authority.
- The DOD CBRNE Consequence Management Response Forces (CCMRF). These forces, when fully established, are intended to be three brigade-sized forces (approximately 4,500) that provide federal military assistance when a CBRNE incident exceeds local and state capabilities, including the National Guard forces described previously.

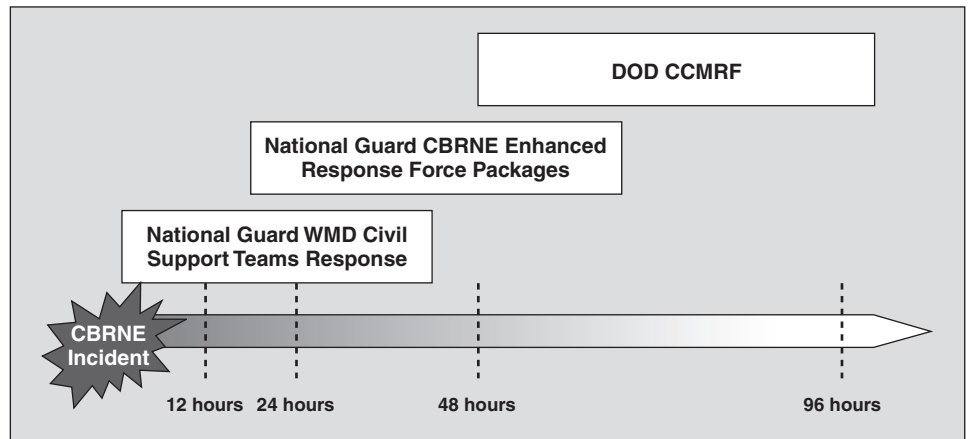
¹²U.S. Northern Command, *Department of Defense Homeland Defense and Civil Support Joint Operating Concept*, Version 2.0 (Oct. 2007), p. 43.

¹³California has two Civil Support Teams. New York and Florida are each currently establishing a second team.

The CCMRFs are comprised of many individual units that are of different types and sizes (for example, platoons, companies, battalions, and brigades), from multiple military services and DOD agencies, from the active, reserve, and National Guard, and are geographically dispersed throughout the United States. The response force is intended to provide assistance in such areas as command and control, technical search and rescue, explosive ordnance disposal, aviation evacuation, medical response, and CBRNE detection and decontamination. DOD's stated requirement is to have three of these forces. An important element of the first CCMRF is the unique capabilities provided by the Chemical Biological Incident Response Force (CBIRF), which is a U.S. Marine Corps unit consisting of about 400 personnel that assist local, state, or federal agencies and designated combatant commanders in the conduct of CBRNE consequence management operations. CBIRF maintains capabilities for agent detection and identification, casualty search, rescue, personnel decontamination, and emergency medical care and stabilization of contaminated personnel. Plans call for CBIRF to respond as part of the lead element for the first of three CCMRFs. DOD originally intended for all three to be comprised strictly of active duty military units. However, DOD's current plan is to have the first force, established October 1, 2008, be comprised predominately of active duty military units. The second and third response forces, which are scheduled to be fielded on October 1, 2009, and October 1, 2010, respectively, are expected to be comprised mostly of National Guard and Army Reserve units. DOD is currently working with the states and the National Guard Bureau on incorporating these units into the structure of the response forces.

Figure 2 shows the approximate time frames for response to a CBRNE incident involving the forces discussed above.

Figure 2: Approximate Response Time Frames for Military CBRNE Consequence Management



Source: GAO analysis of NORTHCOM information.

With the exception of key specialized capabilities, such as the National Guard Weapons of Mass Destruction Civil Support Teams, DOD relies on its “dual-capability forces” to provide all other CBRNE consequence management capabilities in addition to existing overseas missions. The CCMRFs—the only force listed above that is not under the control of state governors and adjutants general—is composed of forces that will come under the operational control of NORTHCOM in the event of an incident. The force is organized for a CBRNE incident under three task forces:

- Task Force Operations, which is to coordinate with local emergency responders; conduct decontamination operations; survey, monitor, and mark incident sites; provide security for DOD forces; and command and control of DOD general support operations, mortuary affairs, and transportation.
- Task Force Medical, which is to provide triage and treatment, definitive care, medical logistics, hospital augmentation, epidemiological support, agent technical support, stress management, preventative medicine, veterinary support, and prophylaxis and immunization (primarily in support of CCMRF personnel).
- Task Force Aviation, which is to provide medical evacuation, medical lift capability, air transport personnel, air transport supplies, search and rescue, and limited aircraft maintenance.

The Joint Task Force Civil Support is the command element that provides command and control for the first CCMRF. Joint Task Force Civil Support is a subordinate command of U.S. Army North (also the Joint Force Land Component Commander), which is the Army component command of NORTHCOM. Joint Task Force Civil Support is a permanent standing task force that has been in existence since 1999 and plans and integrates DOD support to the designated lead federal agency for domestic CBRNE consequence management operations. When directed by the NORTHCOM Commander, Joint Task Force Civil Support will deploy to the incident site, establish command and control of the first CCMRF or other designated DOD forces, and direct military consequence management operations in support of civil authorities. Additional command and control organizations are being established for the second and third CCMRFs.

DOD Has Its Own CBRNE Consequence Management Plans in Place but is Unable to Fully Integrate Them with Other Federal Plans, Which Are Incomplete

DOD has operational plans for CBRNE consequence management. However, DOD has not integrated its plans with other federal government plans because the concept and strategic plans associated with the Integrated Planning System mandated by Presidential directive in December 2007 have not been completed.

DOD Has Developed Plans for CBRNE Consequence Management

Unlike most federal agencies, DOD has had CBRNE consequence management operational plans for over 10 years. DOD, NORTHCOM, and its components have prepared individual plans that address CBRNE consequence management following DOD's well-established joint operation planning process.¹⁴ This process establishes objectives, assesses threats, identifies capabilities needed to achieve the objectives in a given environment, and ensures that capabilities (and the military forces to deliver those capabilities) are distributed to ensure mission success. Joint operation planning also includes assessing and monitoring the readiness of

¹⁴One of the primary joint doctrine documents that lays out DOD guidance for joint operation planning is Joint Chiefs of Staff, Joint Pub. 5-0, *Joint Operation Planning* (Dec. 26, 2006).

those units providing the capabilities for the missions they are assigned. DOD and NORTHCOM routinely review and update their plans as part of DOD's joint planning system. For example, the most recent NORTHCOM CBRNE consequence management plan was completed in October 2008. DOD and NORTHCOM have also developed such planning documents as execute orders that are key to linking immediate action to those plans, as well as scenario-based playbooks to guide the planning, operations, and command and control of military forces for CBRNE efforts.

**Governmentwide
Integrated Planning
System Is under
Development but Not Yet
Complete**

DHS is leading a governmentwide effort to develop an Integrated Planning System that would link the plans of all federal agencies involved in incident response, including DOD's; however, this effort is not yet complete.¹⁵ While much in the way of federal guidance has been developed, to be most effective, policy documents must be operationalized by further detailing roles and responsibilities for each entity that may be involved in responding to high-risk or catastrophic incidents.

In December 2007, Homeland Security Presidential Directive 8, Annex 1, mandated that the Secretary of Homeland Security, in coordination with the heads of other federal agencies with roles in homeland security, develop an Integrated Planning System to provide common processes for all of the entities developing response plans.¹⁶ The Integrated Planning System is intended to provide a framework to link the family of related U.S. preparedness planning documents at the federal, regional, state, and local levels that are called for in the directive, such as strategic plans, concepts of operations plans, and operations plans related to the 15 National Planning Scenarios. DHS has grouped the 15 national planning scenarios on which preparedness plans are to be based into 8 scenario sets, of which 5 are CBRNE-related. Each of the scenarios, listed in table 1,

¹⁵The full *National Response Framework* is also not yet completed. Partner guides, incident annexes for terrorism and cyber incidents, and the incident annex supplement for catastrophic disasters remain incomplete.

¹⁶White House, Homeland Security Presidential Directive 8, Annex 1, *National Planning* (Washington, D.C.: Dec. 2007).

includes a description, assumptions, and likely effects, so that entities at all levels can use them to guide planning.¹⁷

Table 1: Fifteen National Planning Scenarios Grouped into Eight Scenario Sets

Scenario set	National planning scenarios
1. Explosives Attack —Bombing Using Improvised Explosive Device	Scenario 12: Explosives Attack—Bombing Using Improvised Explosive Device
2. Nuclear Attack	Scenario 1: Nuclear Detonation—Improvised Nuclear Device
3. Radiological Attack —Radiological Dispersal Device	Scenario 11: Radiological Attack—Radiological Dispersal Device
4. Biological Attack —with annexes for different pathogens	Scenario 2: Biological Attack—Aerosol Anthrax Scenario 4: Biological Attack—Plague Scenario 13: Biological Attack—Food Contamination Scenario 14: Biological Attack—Foreign Animal Disease
5. Chemical Attack —with annexes for different agents	Scenario 5: Chemical Attack—Blister Agent Scenario 6: Chemical Attack—Toxic Industrial Chemicals Scenario 7: Chemical Attack—Nerve Agent Scenario 8: Chemical Attack—Chlorine Tank Explosion
6. Natural Disaster —with annexes for different disasters	Scenario 9: Natural Disaster—Major Earthquake Scenario 10: Natural Disaster—Major Hurricane
7. Cyber Attack	Scenario 15: Cyber Attack
8. Pandemic Influenza	Scenario 3: Biological Disease Outbreak—Pandemic Influenza

Source: DHS.

The directive required that the Integrated Planning System be submitted to the President for approval within 2 months of the directive’s issuance in December 2007. As we have reported, the Integrated Planning System was approved in January 2009 by former President Bush, but is currently under review by the new administration, and no time frame for its publication has been announced.¹⁸ The approval of the CBRNE plans required under the directive (see table 2 below) would be a step toward unifying and integrating the nation’s planning efforts. For example, for each National Planning Scenario, a strategic guidance statement is intended to establish

¹⁷The 15 National Planning Scenarios have been grouped in 8 scenario sets of similar characteristics. For example, the 4 National Planning Scenarios related to chemical incidents have been grouped together. Concept and operation plans are being developed for the 8 scenario sets.

¹⁸GAO, *National Preparedness: FEMA Has Made Progress, but Needs to Complete and Integrate Planning, Exercise, and Assessment Efforts*, [GAO-09-369](#) (Washington, D.C.: Apr. 30, 2009).

the nation's strategic priorities and national objectives and to describe an envisioned end-state. Strategic guidance statements will have corresponding strategic plans, which are intended to define roles, authorities, responsibilities, and mission-essential tasks. Under each strategic plan, a concept of operations plan will be developed, and federal agencies are further required to develop operations plans to execute their roles and responsibilities under the concept of operations plan.

As of July 2009, strategic guidance statements have been approved for all five CBRNE-related scenario sets. Four of the five required strategic plans have also been completed. The remaining strategic plan (chemical attack) was begun in June 2009 upon the approval of the strategic guidance statement for that scenario. One of the five required overall federal concept plans—that for terrorist use of explosives attack—has been completed. Table 2 shows the status of federal CBRNE strategy and plans called for under Homeland Security Presidential Directive (HSPD)-8 Annex 1.

Table 2: Status of Development for CBRNE-Related Plans Called for under HSPD-8 Annex 1, Utilizing the Integrated Planning System (as of July 2009)

Planning scenario	DHS and Interagency Incident Management Planning Team		FEMA	Federal departments and agencies
	Strategic guidance statement status	Strategic plan status	Overall federal concept plan status	Agency operational plans status
Terrorist Use of Explosives Attack	Approved by Secretary of Homeland Security, August 2008	Approved by Secretary of Homeland Security, November 2008	Approved by Secretary of Homeland Security, May 2009	DOD has approved plans. Other agencies started January 2009.
Improvised Nuclear Device Attack	Approved by Secretary of Homeland Security, September 2008	Approved by Secretary of Homeland Security, January 2009	Under development; interagency review/adjudication	DOD has approved plans. Other agencies awaiting development; due 120 days after Concept Plan.
Biological Attack	Approved by Secretary of Homeland Security, January 2009	Approved by Secretary of Homeland Security, July 2009	Under development; interagency review/adjudication; due 180 days after Strategic Plan	DOD has approved plans. Other agencies awaiting development; due 120 days after Concept Plan.
Radiological Dispersion Device Attack	Approved by Secretary of Homeland Security, January 2009	Approved by Secretary of Homeland Security, July 2009	Awaiting development; due 180 days after Strategic Plan	DOD has approved plans. Other agencies awaiting development; due 120 days after Concept Plan.
Chemical Attack	Approved by Secretary of Homeland Security, June 2009	Under development; started in June 2009	Awaiting development; due 180 days after Strategic Plan	DOD has approved plans. Other agencies awaiting development; due 120 days after Concept Plan.

Source: GAO analysis of DHS data.

DOD's plans and those of other federal and state entities cannot be fully integrated until the supporting strategic and concept plans are completed. As we have previously reported, apart from the sequential timelines required in HSPD-8 Annex 1, FEMA and DHS have no schedule or project plan for completing the guidance and plans. We have recommended and DHS generally agreed that FEMA should develop a program management plan in coordination with other federal entities to ensure completion of key national preparedness policies and plans called for in such sources as presidential directives and that the plan should, among other things, define roles and responsibilities and planning processes, as well as identify a schedule for completion.¹⁹

Current Capability Assessments at Local, State, and Federal Levels May Provide Insufficient Data for DOD to Shape Its Response to CBRNE Incidents

A number of efforts to develop capability assessments are under way at local, state, and federal levels, but these efforts may not yet be sufficiently mature to provide DOD with complete data that it can use to shape its response plans for CBRNE-related incidents. For example, in fiscal year 2007, FEMA developed its Gap Analysis Program, which focuses on seven general capabilities that are often needed in the aftermath of a hurricane. These are: evacuation, medical needs, debris removal, commodity distribution, sheltering, interim housing, and fuel availability. While these capabilities would be needed for most scenarios, including CBRNE-related scenarios, the Gap Analysis Program does not identify unique capabilities needed for CBRNE incidents, such as decontamination assets or detection assets. In 2008, FEMA expanded the program to include not only hurricane-prone states, but all states and all hazards. However, FEMA officials stated that neither their questionnaires—which were used to query states about potential gaps in their capabilities—nor any of their other guidance specified how states should identify requirements unique to a CBRNE-related incident.

FEMA also collects capability data by other means. However, none of these efforts—either individually or in the aggregate—has provided a comprehensive capability assessment. The Post-Katrina Emergency Management Reform Act of 2006 (Post-Katrina Act) requires that FEMA report to Congress on federal preparedness, in part by collecting information on state capability levels; states receiving DHS federal preparedness assistance must provide preparedness reports. FEMA also

¹⁹GAO-09-369.

requires these reports in order for states to qualify for its grant funds.²⁰ States, territories, and the District of Columbia completed and submitted their first state preparedness reports to FEMA in the spring of 2008 and have also submitted reports in the spring of 2009. However, as we have previously reported,²¹ the state capability data that FEMA has collected do not provide a comprehensive picture of national capability gaps, because they are incomplete and the states do not use common metrics to assess their capabilities. FEMA officials stated that in order to provide the comprehensive capability-based assessment that Congress requires, the next National Preparedness Report, which as of September 2009 is being drafted and reviewed, will apply one, comprehensive, capability based analytical framework to meet a series of preparedness reporting requirements. FEMA anticipates that through this effort, it will be able to gain a more complete picture of national preparedness.

As noted in DHS's January 2009 Federal Preparedness Report, several key components of the national preparedness system are still works in progress, and not all data required for the federal government to assess its preparedness are available. As DHS also states in its report, standards for reporting operational readiness are not fully developed, and DHS does not possess the authority to compel the submission of data from other federal homeland security partners. Moreover, according to DOD and FEMA, even to the extent that states have capability data available, their sensitivity about disclosing data that highlight the state's capability gaps has limited the degree to which they share these data with DOD or with entities responsible for developing DOD's plans and related capabilities. DOD officials stated that in the absence of a comprehensive capability assessment, they continue to work with FEMA and continue to build relationships with individual states to collect data on their capabilities.

²⁰The Post-Katrina Act was enacted as Title VI of the Department of Homeland Security Appropriations Act, 2007, Pub. L. No. 109-295, (2006). Section 652 of the Post-Katrina Act requires that FEMA submit a federal preparedness report to Congress in October 2007 and annually thereafter. Section 652 also requires the submission of annual state preparedness reports to FEMA, beginning January 2008, by recipients of DHS preparedness assistance, including states, territories, or the District of Columbia. 6 U.S.C. § 752(a), (c); see also 6 U.S.C. §§ 101(15), 701(11) for the definition of a "state."

²¹GAO, *National Preparedness: FEMA Has Made Progress, but Needs to Complete and Integrate, Planning, Exercise and Assessment Efforts*, [GAO-09-369](#) (Washington, D.C.: Apr. 30, 2009).

DOD's Planned Response to CBRNE Incidents May Be Insufficient

DOD has had plans to provide CBRNE consequence management support to civil authorities since before 9/11 and in the last few years has set higher goals in the expectation of being able to provide expanded capabilities through its three CCMRFs. However, its ability to respond effectively may be compromised because (1) its planned response times may not meet the requirements of a particular incident, (2) it may lack sufficient capacity in some key capabilities, and (3) it faces challenges in adhering to its strategy for sourcing CCMRFs with available units.

DOD's Planned Response Times May Be Too Long

In 2005, DOD established a standard for itself that called for the ability to respond to multiple, simultaneous catastrophic incidents,²² and it initiated efforts to create three CCMRFs. For the first 3 years, DOD did not regularly assign units to the CCMRF mission, and this decreased DOD's ability to actually field any of the CCMRFs within the timelines it had established. In October 2008 DOD sourced the first CCMRF, primarily with active force units. A second CCMRF, comprised primarily of reserve units, will assume the mission in October 2009 and a third in October 2010. In the absence of national guidance suggesting what level of response capability DOD should have available within a specified time frame, DOD's plans use a phased deployment to allow the first CCMRF to be able to provide consequence management support to civilian authorities within 48-96 hours of being notified of a CBRNE incident.²³ The earlier phases of the deployment will provide the lifesaving capabilities. However, multiple DOD estimates for some of the more catastrophic scenarios, such as a nuclear detonation, have identified significant gaps between the time certain life saving and other capabilities would be needed and DOD's planned response times. For example, victims of a nuclear attack would require decontamination, which medical experts have established must be provided as soon as possible after exposure. If DOD adheres to its planned response times in such a scenario, the capabilities of early responders such as local police and fire departments would likely be overwhelmed before DOD arrived at the incident site. NORTHCOM's assessment²⁴ and

²²Department of Defense, *Strategy for Homeland Defense and Civil Support* (Washington, D.C.: June 2005), p. 3. DOD has since refined that standard to "prepare for and mitigate the effects of multiple, near-simultaneous CBRNE events." U.S. Northern Command, *Department of Defense Homeland Defense and Civil Support Joint Operating Concept*, Version 2.0 (Oct. 2007), p. 43.

²³This assumes the CCMRF is tasked to deploy immediately after an incident occurs.

²⁴U.S. Northern Command, *Homeland Defense and Civil Support Capabilities Based Assessment* (Colorado Springs, CO: Mar. 2009).

other DOD estimates demonstrated that, for a number of capabilities, DOD's response would not be timely. Table 3 shows one estimate of the potential shortfall in decontamination capabilities that could result.

Table 3: Estimate of Potential Lifesaving Decontamination Requirements Compared with Likely Capabilities for a 10 Kiloton Nuclear Detonation in a Major Metropolitan City In the First 72 Hours after Incident

Source of decontamination capability	Estimated capability by time frame (persons)		
	First 24 hours	24-48 hours	48-72 hours
Local	14,460	14,640	14,640
State	1,350	5,400	10,800
CCMRF Package 1	1,350	5,400	5,400
CCMRF Package 2	0	0	2,880
Self decontamination	8,000	8,000	8,000
Other federal decontamination capabilities	270	1,080	1,080
Total decontamination capabilities by time frame	25,610	34,520	42,800
Total decontamination requirement	138,000	112,390	77,870
Unmet decontamination requirement	112,390	77,870	35,070

Source: GAO analysis of DOD information.

DOD has also identified several other areas where it may not be able to provide the needed capabilities as quickly as required. These areas included CBRNE search and rescue, transportation, mass care support, and mortuary affairs.

DOD's efforts to determine the types and quantities of capabilities that will likely be needed to augment local, state, and federal response forces are based on general requirements and tasks spelled out in federal guidance such as the *National Response Framework* and the *National Preparedness Guidelines*. For example, CCMRF planning documents indicate that the DHS Universal Task List, which is described in the Guidelines, includes over 1,600 tasks that need to be performed in order for entities to be prepared to address the National Planning Scenarios. However, the task list is not prescriptive in determining which agency should do which tasks, how they should be done, or when they might be needed. Additionally, the *Target Capability List*, which is a companion document to the Guidelines, contains 37 key capabilities. As they relate to the CCMRF, key response capabilities include emergency triage and prehospital treatment, weapons of mass destruction and hazardous materials response and decontamination, and medical surge. The NORTHCOM capability-based assessment suggests that without a national, risk-based determination of DOD's share of the federal capability

requirements, DOD will be unable to determine whether its planned response times should be adjusted.

DOD's Planned Force May Lack Sufficient Capacity in Some Key Capabilities Needed for Catastrophic Incidents

In addition to timeliness issues, DOD's planned force has limited quantities of some of the needed life saving capabilities, such as medical and decontamination services. For example, some nuclear detonation scenarios project that hundreds of thousands could be killed, injured, displaced, contaminated, or in need of medical care. CCMRF would be able to provide only a small portion of the necessary capability. Although a CCMRF is estimated, under optimal circumstances, to be capable of decontaminating several thousand people per day, some estimates project that the gap between needed decontamination capabilities and what local, state, and other entities could provide would be tens of thousands. DOD recognizes that it may need additional units to augment CCMRF, and it has made some tentative estimates. For example, DOD plans anticipate that in the case of a blister agent event, an additional medical package would be needed beyond what is included in CCMRF. For a nerve agent incident, plans anticipate that an additional mortuary affairs package would be needed. For a chlorine tank explosion, additional packages for both medical and mortuary affairs would be needed, beyond those that are included in CCMRF.

However, DOD has not designated specific units to augment CCMRF. Unless these units are identified in advance and trained for the mission, they may be unable to deploy rapidly. By not aligning CCMRF objectives with the projected need for response capabilities and clearly delineating national expectations for timely response, neither DOD nor other entities involved in incident response can be certain that the CCMRFs will be able to respond adequately to mitigate the consequences of a catastrophic CBRNE incident.

DOD Faces Challenges in Adhering to Its Strategy for Sourcing CCMRFs with Available Units

In sourcing its three CCMRFs, DOD has encountered challenges in implementing an approach that could enhance unit availability and training and readiness oversight for forces that are not assigned to NORTHCOM. DOD originally intended all three CCMRFs to be comprised entirely of federal active military forces, but the two follow-on CCMRFs will be sourced with large numbers of National Guard and Army Reserve units. The demands of ongoing overseas operations have led DOD to draw more and more heavily on Guard and Reserve forces to fulfill civil support functions. Because National Guard units have responsibilities in their respective states, a competition for resources issue may arise between

DOD and the states. For example, while governors may need the same capabilities within the state or to support mutual assistance agreements with other states as would be needed to support a CCMRF, there is no clear understanding between the governors and DOD to ensure that these units will be available promptly if they are needed for a federal mission without being federalized. Moreover, elements from a single unit can be spread over many states, further complicating the task of coordinating between DOD and each of the states. For example, one Army National Guard aviation company belonging to one of the CCMRFs has elements in Arkansas, Florida, and Alabama. Three different states would be required to make these elements available to form the company. The potential rapid deployment mission of CCMRF makes it imperative that specific agreements be reached. However, the agreements that have been reached to date are general in nature and do not specify how states are to ensure that Guard units will be available for a CCMRF deployment.

Similar issues arise with the Army Reserve. The training demands of the CCMRF mission have caused DOD to authorize additional training days, but according to Army Reserve officials, reservists cannot be compelled to attend training events beyond their annual training requirement. They stated that, as a result, units must rely on the voluntary participation of their personnel for training beyond the requirement, which reduces their assurance that these personnel will be available for other necessary CCMRF training. For example, one reserve company was unable to fulfill all aspects of its mission requirements because of low participation at a training event. Unit officials stated that some of the unit's members had school or work obligations that conflicted with this training. Moreover, reserve unit officials stated that, unlike with active unit officials, they cannot restrict the personal travel of unit members to ensure that they will be available if they are needed to support an unexpected federal CBRNE incident response. These challenges to sourcing the CCMRFs increase the risk that DOD's ability to effectively respond to one or more major domestic CBRNE incidents will be compromised. That risk can be mitigated by plans that integrate the Active and Reserve Component portions of the CCMRFs and agreements between DOD and the states on the availability of National Guard units and the duty status under which they would respond to a major incident requiring federal forces.

DOD's decision to change its approach to how NORTHCOM will routinely interact with units designated for CCMRF will present additional challenges. In 2008, DOD's sourcing approach was to assign the first CCMRF (primarily active forces) to NORTHCOM and allocate the remaining two CCMRFs (mix of Guard and Army Reserve) to

NORTHCOM.²⁵ Beginning in October 2009, DOD will allocate the units from all three CCMRFs to NORTHCOM, rather than assigning them to the NORTHCOM commander outright. As a result, despite the fact that NORTHCOM's commander is responsible for commanding the federal military domestic CBRNE response in the continental United States, NORTHCOM will have no CBRNE forces under its direct control. There are advantages to assigning forces directly to NORTHCOM. For example, the command would have direct authority over the units' day-to-day activities, including training and exercise schedules, and would be better able to monitor readiness. Additionally, there would be fewer administrative steps required for the NORTHCOM commander to activate and deploy CCMRF units in the event of an incident. This would be crucial for deploying the critical initial response elements of the overall force. Under DOD's current allocation approach, NORTHCOM would have authority over units while they are participating in scheduled NORTHCOM training events, but would have to coordinate with multiple commands to enable participation from these units. Current guidance states that other commands should make their units available for scheduled NORTHCOM exercises "to the greatest extent possible." However, NORTHCOM cannot always be assured that units will be available for these exercises. In addition, NORTHCOM remains uncertain about the extent to which it will have oversight of CCMRF units' day-to-day training activities and be able to confirm that these units are ready to perform their mission even when they are under the authority of another command.

DOD Has Taken Actions to Improve CCMRF Readiness, but Training Gaps and Conflicting Priorities May Degrade Performance

DOD has taken a number of actions in the past year to improve the readiness of the first fielded CCMRF. However, DOD faces challenges in providing the training necessary to ensure readiness for the full CCMRF. We found that CCMRF may be limited in its ability to successfully conduct consequence management operations because (1) it does not conduct realistic full-force field training to confirm its readiness to assume the mission or to deploy rapidly and (2) conflicting priorities between the CBRNE mission and overseas deployments affect some units' mission preparation and unit cohesion.

²⁵ Assigned forces are under the direct command of their unified command, such as NORTHCOM. Allocated forces are transferred from their assigned unified command to another command for employment for a specific period of time.

DOD Has Taken Actions to Improve CCMRF Readiness

The initial assignment of CCMRF to NORTHCOM in October 2008, and the increased priority DOD has placed on the CBRNE consequence management mission, have resulted in a number of improvements in the preparation of the units that comprise the first fielded CCMRF. The Army, in coordination with NORTHCOM and its subordinate commands, has established guidance for both individual and collective training—including joint mission essential task lists—for units designated for CCMRF. Therefore, for the first time, identified units have been conducting both individual and collective training focused on the CBRNE mission. For example, at the individual level, soldiers were required to be proficient in a number of skills, including skills related to operating in a CBRNE environment. Individual soldiers were also required to take online courses on operating in a domestic environment supporting civil authorities. Table 4 shows examples of some CBRNE-related training tasks that individuals should be able to perform before assuming the CBRNE mission as part of CCMRF.

Table 4: Selected CBRNE Individual Training Tasks

Be able to protect yourself from CBRN injury/contamination with the chemical-protective suit ensemble
Decontaminate yourself and individual equipment using chemical decontaminating kits
Perform first aid for nerve agent injury
React to nuclear hazard/attack
React to chemical or biological hazard/attack
Be able to protect yourself from chemical and biological contamination using your assigned protective mask
Detect chemical agents using chemical detector paper

Source: U.S. Northern Command (NORTHCOM).

Also, key leaders such as brigade task force headquarters personnel and battalion commanders are required to participate in a number of command and control training events to gain an understanding of how to organize and conduct operations in a complex interagency environment under catastrophic disaster conditions. For example, commanders are required to attend resident Defense Support to Civil Authorities courses and to participate in a number of command and control training events, to ensure that unit leaders are familiar with DHS's National Planning Scenarios and with operating in a civil support role. These training events that leaders participate in include tabletop exercises—which provide participants opportunities to simulate interagency planning, discuss simulated scenarios, and assess plans and procedures for CBRNE consequence

management—as well as command-post exercises. In order to confirm CCMRF’s readiness prior to mission assumption, U.S. Army North conducted a command-post mission rehearsal exercise that included key leaders from each of CCMRF’s three task forces—Operations, Medical, and Aviation. The goal of this exercise is to give the participants experience in organizing and conducting operations in a complex interagency environment in support of civil authorities under catastrophic disaster conditions. The leadership simulates the full participation of units through modeling. Under U.S. Army North’s current training guidance, this exercise validates CCMRF’s pre-mission readiness.

In addition, units are training on and reporting their proficiency to perform CCMRF Joint Mission Essential Tasks. We had previously reported that, in 2007, NORTHCOM had developed a list of joint mission-essential tasks—including the major tasks that units are required to perform to respond to potential domestic CBRNE incidents.²⁶ These include both tasks that units typically perform as part of their wartime missions and some tasks that would be emphasized during or be unique to a domestic CBRNE incident. For example, among other mission-essential tasks, the Task Force Operations element of each CCMRF

- commands and controls subordinate units;
- conducts nuclear, chemical, and biological route, zone, area, and point reconnaissance;
- conducts agent detection, casualty search, technical rescue, hot zone extraction, personnel decontamination, and time-critical medical care and stabilization;
- conducts CBRNE incident response force operations;
- assesses tactical and operational situation;
- identifies nuclear, biological, and chemical hazards; and
- conducts mortuary affairs operations.

Further, we previously reported that NORTHCOM and Joint Task Force Civil Support officials had difficulties tracking the readiness of units that were identified for the CBRNE consequence management mission, because so few of the units were actually filled with the necessary personnel and equipment.²⁷ However, the increased priority given to

²⁶GAO, *Homeland Defense: U.S. Northern Command Has Made Progress but Needs to Address Force Allocation, Readiness Tracking Gaps, and Other Issues*, [GAO-08-251](#) (Washington, D.C.: Apr. 16, 2008).

²⁷[GAO-08-251](#).

CCMRF in the spring of 2008 has led to designated units receiving personnel and equipment ahead of many other units that are not designated for CCMRF. Consequently, most units that assumed the mission in October 2008 reported that they were prepared to perform the mission and had been provided by their respective military service with the personnel and equipment they needed to meet established guidance.

Lack of Sufficient Field Training Affects CCMRFs' Ability to Perform Effectively

Although individual units were certified as ready prior to assuming the CBRNE mission in October 2008, it is unclear whether the full CCMRF can effectively perform CBRNE consequence management operations throughout the 1-year mission to which it is assigned, because the readiness of the full CCMRF is not confirmed through a realistic field training exercise before the force assumes the mission, nor have its rapid deployment capabilities been fully assessed. Before individual units designated for CCMRF assume the CBRNE mission, the military services are required to certify that these units are trained to perform that mission. However, there is currently no requirement for all of the units that comprise CCMRF to participate together in a realistic full-force field training exercise that could confirm that the full CCMRF can perform its required tasks in an integrated manner before it takes on the CBRNE consequence management mission. While other brigade-sized units typically conduct this type of training prior to an overseas deployment, and NORTHCOM and U.S. Army North²⁸ (in its role as Joint Force Land Component Commander) training officials have discussed the desirability of such an exercise, the first fielded CCMRF has not had the opportunity to have the entire force train together; only a subset of CCMRF units have trained together in field exercises. Further, these exercises were conducted several months after these units had assumed the CCMRF mission and had already been certified as trained to perform it.

Joint military guidance describes training as a key element of readiness, which is defined in two parts—unit level and joint level readiness. However, current DOD and NORTHCOM CCMRF guidance does not require the full CCMRF to conduct a joint field exercise to confirm its readiness prior to assuming the mission. Rather, DOD guidance requires that NORTHCOM annually confirm that the designated headquarters organizations can deploy operationally and employ their respective

²⁸U.S. Army North is the designated Joint Force Land Component Commander for domestic civil support operations NORTHCOM would command.

CCMRF elements. While DOD's guidance further requires that supported combatant commands, such as NORTHCOM, confirm unit readiness and the ability to activate, deploy, employ, and command and control CCMRF assets effectively, it does not specifically require that the full CCMRF conduct a field training exercise to confirm readiness before units assume the mission, as is the case with other missions such as overseas deployments. Such training is a particularly important matter for CCMRF, since this force does not exist as a standing unit that typically operates together. Moreover, training officials at Joint Task Force Civil Support, Army North, and NORTHCOM have cited the desirability of such exercises, which could allow the full CCMRF to demonstrate its ability to operate in an integrated manner in a tactical environment. According to Joint Task Force training officials, full-force field exercises could strengthen unit integration and facilitate units' gaining familiarity with the different capabilities comprising CCMRF. However, as previously stated, NORTHCOM confirms the readiness of each CCMRF through a command-post exercise directed by U.S. Army North, as the designated Joint Force Land Component Commander, and these exercises do not include all of the personnel from each unit. For example, less than 20 percent of CCMRF participated in the 2008 mission readiness exercise that was used to confirm readiness.

While NORTHCOM's October 2008 mission execution order did not contain a requirement for full-force pre-mission field training, it did include a requirement for CCMRFs to conduct a full field training exercise during the mission period—that is, after the units have already assumed the mission. However, no full-force CCMRF training exercise was conducted during fiscal year 2009. Rather, subsets of CCMRF have conducted field exercises, but these exercises usually did not include all of the key units with which they might work during an incident. For example, members of the First Brigade Combat Team of the Third Infantry Division conducted search and extraction exercises with the Marine Corps's Chemical Biological Incident Response Force (CBIRF) in November 2008. No other units from Task Force Operations participated in this training exercise. In addition, CBIRF participated in a number of other field training exercises, and Army Reserve chemical companies—including companies not designated for CCMRF—also participated in field training events for tasks such as mass decontamination.

Further, in January 2009, officials from Task Force Operations—one of the three CCMRF task forces—and the Joint Task Force-Civil Support proposed that a field training exercise be conducted in March 2009 at a training site in Florida. The exercise was approved by U.S. Army North

and NORTHCOM, and plans were put in place to include other units from CCMRF. The exercise was successful in getting participation from about 1,500 personnel of the approximately 4,500 —about a third of the personnel that comprise the full CCMRF, including 1,200 from Task Force Operations. A Joint Task Force-Civil Support training official stated that 2 months was an extremely short time frame in which to coordinate exercise participation and that with such a short time frame not all potential participants would be available. For example, the Army Reserve chemical company that would provide decontamination and reconnaissance resources was unable to attend the field training exercise because, company officials stated, the unit was not notified in time to program funding to attend the exercise and did not have enough lead time for some of its soldiers to arrange leave from their civilian employment. Their participation would have addressed a previous recommendation from U.S. Army North that the chemical company should conduct training in a realistic CBRNE environment with other CCMRF units such as a medical support company and the Marine Corps CBIRF, in part to observe other military units with similar technical support capabilities and to obtain a better understanding of the sequence of events in a joint collective training exercise. Absent a directive for CCMRF to conduct a full-force exercise prior to units assuming the mission, there is increased risk that units may have to respond in support of an incident without prior experience or training that simulated such conditions.

NORTHCOM is taking steps to train the full CCMRF through field exercises in the future, but this training is not planned to take place until at least several months after CCMRF assumes responsibility for the CBRNE mission. For example, in March 2009, NORTHCOM provided additional training guidance that has led to NORTHCOM and U.S. Army North developing plans for all future CCMRFs to conduct field training exercises beginning in fiscal year 2010. However, units will already have been on the mission for at least 2 months—and as many as 8 months—before these exercises take place.

In addition to the importance of confirming the proficiency of the entire CCMRF for conducting its mission, DOD has stated that its forces must be available in a timely and reliable manner and must be able to deploy rapidly. To accomplish this, units must demonstrate that they will be able to meet the required CCMRF response times once they assume the mission. However, neither NORTHCOM nor Army North has yet conducted deployment readiness exercises for the full CCMRF, and it is not clear if its plans for future CCMRFs will include such exercises. Officials from various units that comprise the first CCMRF have expressed

concerns about being able to deploy rapidly from their home stations. For example, Task Force Operations headquarters officials stated that one of their primary challenges in conducting the CCMRF mission is deploying rapidly from their home stations; these units are accustomed to deploying overseas on established schedules and do not have experience deploying on short notice. Deployment readiness exercises are important because they test units' ability to ascertain how quickly personnel can be notified and assembled, equipment prepared and loaded to fit in potential transportation modes such as trucks and airplanes, and both staff and equipment moved to the designated point of departure. DOD has provided general guidance that supported commands, such as NORTHCOM, should confirm the ability of CCMRF units to activate and deploy. In addition, NORTHCOM has established guidance that directs U.S. Army North (as the Joint Force Land Component Commander) to conduct deployment readiness exercises when they are initiated by NORTHCOM. These deployment exercises could be conducted to test all processes and procedures needed for deployment or to test only those process and procedures that do not involve unit movement. Moreover, the NORTHCOM guidance does not specify whether these exercises should be conducted with or without prior notice. U.S. Army North guidance includes a requirement for two deployment exercises per year to confirm the ability of CCMRF and Joint Task Force Civil Support to deploy within time frames established by NORTHCOM. However, training officials at both Joint Task Force headquarters and U.S. Army North said that there have been no deployment readiness exercises for the full CCMRF or for any of the CCMRF force packages. A Joint Task Force Civil Support training official added that a no-notice readiness exercise was being considered by NORTHCOM and U.S. Army North to test alert notification and the deployment processes and procedures of the full CCMRF, but officials were uncertain when such a deployment exercise would take place. Training officials also expressed concern that it could become more difficult in the future to have no-notice exercises when units from all three CCMRFs are no longer under the direct authority of NORTHCOM.

As was the case with field training exercises, individual units have separately conducted deployment readiness exercises that involved all phases of deployment preparation, including movement of personnel and equipment. However, in these exercises, deployment was planned well in advance. For example, staff from units in Task Force Operations that incorporated a deployment exercise prior to conducting a March 2009 field exercise had up to 45 days to plan for the exercise. However, many anticipated CBRNE incidents can occur without notice. With no program in place to test the ability of all units in CCMRF to meet specified response

times on short notice, NORTHCOM and DOD will continue to be unable to verify the ability of CCMRF units to deploy.

Units' Preparation for the CCMRF Mission and Efforts to Achieve Unit Cohesion Are Affected by Other Missions

The demands that other missions are placing on the Army also may put the effectiveness of the CCMRF's mission at risk. DOD has identified CCMRF as a high-priority mission; however, the Army has at times designated units for CCMRF when they have just returned from overseas missions. When units first return from overseas, they are in the "reset" phase of the Army Force Generation process, over the course of which they progress through three sequential readiness pools. The reset phase is typically when units reconstitute by repairing equipment, receiving new equipment, and assigning new personnel, and begin training to achieve the capabilities necessary to enter the ready force pool. Because these units are at the beginning of their reset phase, they often lack personnel and equipment. Although the Army attempts to accelerate the fill of personnel and equipment to these units, some units may not receive their personnel and equipment in sufficient time to allow them to meet all of the requirements of the CBRNE consequence management mission before they assume it. In contrast, units are deployed for overseas missions only when they have progressed to the "ready" or "available" phase of the cycle. In most cases, units reported having received the necessary personnel and equipment before the October mission assumption date, but their personnel had not always completed all of the CCMRF-related training before the assumption date.

Army Forces Command officials acknowledged that a number of units were still receiving personnel and equipment while preparing for the mission. For example, several units, while stating they were prepared to perform the mission, still had key personnel that needed training related to performing the CCMRF mission. In one instance, a medical company that assumed the mission on October 1, 2008, did not complete its post-deployment reconstitution until October 31, 2008. While the company's assigned personnel had completed the required training at the time of mission assumption, newly assigned personnel did not receive the required training until November 2008. Another medical unit had significant personnel turnover in July 2008 and stated that the turnover affected its ability to conduct all CCMRF-related training before its mission assumption date. Army Forces Command officials said that its units are designated for CCMRF while in the reset phase because there are not enough units in the available force pool to sufficiently source CCMRF in addition to meeting other combatant command requirements for overseas deployments. Moreover, many CCMRF units will be deployed

overseas after they have completed their CCMRF rotations, and anticipating future deployment may distract them from their CCMRF training. For example, officials from the Task Force Operations headquarters said that they had conducted a number of field exercises at the brigade and battalion levels at the beginning of these units' CCMRF rotations. In contrast, CCMRF sustainment training in the latter half of the year was conducted by telephone because the units were focused on their upcoming overseas missions and were unavailable for field training.

Moreover, unit cohesiveness and training proficiency have been affected by the frequent turnover in units that were assigned to the first fielded CCMRF in fiscal year 2009. While the goal has been to have units assigned for at least 12 months and to have standard start and end dates for each rotation,²⁹ several critical units have been unable to complete their full 1-year rotation in the fiscal year 2009 CCMRF, and other units will not be assigned on the same rotation schedule for fiscal year 2010. For example, the brigade headquarters for the aviation task force has changed three times, and the brigade headquarters for the medical task force rotated out of the CBRNE consequence management mission after only 6 months.

The pace of this turnover affects the ability of units and personnel to both conduct initial training and sustain training. For example, the medical brigade originally assigned to CCMRF participated in the mission rehearsal exercise conducted in September 2008. The assignment of a second medical brigade in February 2009 required the Joint Task Force Civil Support to alter the focus of a planned command-post exercise from rehearsing its processes and procedures and those of subordinate task forces staff to confirming the readiness of Task Force Medical, which was preparing to assume the mission in March 2009. Also, while elements from the Aviation Task Force headquarters participated in the same 2009 exercise, the Aviation Task Force currently assigned to CCMRF did not participate in the field exercise because it had not yet assumed the mission. Officials from another unit cited a challenge associated with the frequent higher-level headquarters and other unit rotations. These officials stated that the frequency of these rotations means that units have to continuously dedicate both time and people to learning the requirements of higher headquarters and adjacent units and that turnover in headquarters leadership could cause the unit to change its tactics,

²⁹The standard CCMRF rotation for the first CCMRF, which is predominately active units, is from October 1 to September 30.

techniques, and procedures. The frequent rotations of units could also result in the need for more frequent exercises, since not all CCMRF units have had the opportunity to train with the full CCMRF as an integrated force. DOD officials have acknowledged that providing aviation and medical capabilities to the CCMRFs will continue to be a challenge, due to the high demand for these capabilities for other missions.

These training and force rotation issues have prevented DOD from providing the kind of stability to the force that would allow units to build cohesiveness. Because key leaders from units of the entire force attend a mission rehearsal exercise prior to mission assumption, the replacement of these units after only a few months negated much of the value that was gained from these three task forces working together and deprived the replacement task force leaders of having the same opportunity.

CCMRF Requirements Have Not Been Fully Developed, and Funding and Oversight Are Decentralized

DOD is making progress in identifying and providing funding and equipment to meet CCMRF mission requirements; however, its efforts to identify total program requirements have not been completed, and its approach to providing program funding has been fragmented because funding responsibilities for CCMRF-related costs are dispersed throughout DOD and are not subject to central oversight.

CCMRF Mission Requirements Have Not Been Fully Developed

The units initially designated for the CCMRF mission did not have fully developed funding and equipment requirements. In addition, the recent NORTHCOM *Homeland Defense and Civil Support Capabilities-Based Assessment* report highlighted a number of systemic capability gaps that need to be addressed and may generate additional funding requirements.³⁰ Moreover, other important requirements for this mission have not been identified and funded. The Joint Forces Land Component Commander (U.S. Army North) and the Joint Task Force Civil Support³¹ are responsible for developing and approving service-specific equipment unique to the CCMRF's Joint Mission Essential Tasks. However, to date, mission-

³⁰U.S. Northern Command, *Homeland Defense and Civil Support Capabilities Based Assessment* (Colorado Springs, CO: Mar. 2009).

³¹U.S. Army North and Joint Task Force Civil Support are subordinate commands of NORTHCOM.

essential equipment requirements have not been fully developed. While some equipment requirement lists have been developed and are being reviewed by NORTHCOM, equipping officials said that lists have not been developed for nonstandard equipment that units may need in order to support civil authorities in a CBRNE environment. As a result, some units in fiscal year 2009 have determined requirements based on their own independent mission analyses. Unit officials stated that filling some of the needs they identified—such as the need for nonstandard communications equipment that is compatible with civilian equipment—was difficult because the units lacked a documented requirement for their planned acquisition. In addition, the review process did not always include the command organizations that are responsible for the mission. Thus, decisions on what to buy and in what quantity were not consistently vetted to ensure standardization in equipping various units. U.S. Army North officials stated that they were in the process of developing mission-essential equipment lists and hope to have them completed in time for the next rotation, which begins in October 2009.

DOD's *Strategy for Homeland Defense and Civil Support* recognized the importance of proper funding and budget oversight for the CBRNE consequence management mission and noted that the mission's funding is not accounted consistently. However, provision of funding for the mission is fragmented and is not monitored centrally within the department. While CCMRF is a joint mission, funding guidance leaves the funding responsibilities for most requirements to the respective military departments or defense agencies. For example, it is up to the military departments to determine day-to-day funding requirements and fund unit training. Moreover, DOD has not created an integrated, fully dedicated, and consistent approach and funding strategy across the department, instead dispersing responsibility for funding CCMRF among the military services, NORTHCOM, and other entities. For example, while NORTHCOM funds predominately joint mission training for the current force, the day-to-day funding for CCMRF-assigned units and individual mission training continue to come from the services. However, the services are also simultaneously scheduling and funding the training required to meet the units' wartime mission requirements for which they are responsible after the CCMRF mission ends. Table 5 shows funding responsibilities for some CCMRF activities.

Table 5: CCMRF Mission Costs and Funding Sources

CCMRF funding events	Northern Command	DOD components
Day-to-day operational costs		✓
Individual participation in educational events		✓
Deployment Readiness Exercise		✓
Command-Post Exercise Execution	✓	
Command-Post Exercise travel expenses		✓
Base support installation or training area costs		✓
Field Training Exercise Execution	✓	
Field Training Exercise Travel Duty expenses		✓
Other exercise costs (reconstitution or replenishment of expended supplies)	✓	
Specialized and other CCMRF equipment		✓

Source: GAO analysis of DOD data.

Starting in fiscal year 2010, NORTHCOM expects to fund training for two CCMRFs, including mission rehearsal, mission readiness, command post, and field training exercises. However, unit training not directed by NORTHCOM is not funded centrally and must be funded by the military services. This fragmentation in funding responsibilities is normal in DOD, but the lack of a coordinated plan that allows visibility over all CCMRF-related funding increases the risk that NORTHCOM would be unaware of whether individual units have the necessary resources to effectively conduct the pre-mission training they need. DOD’s guidance does not identify a single organization to provide oversight of total program requirements and available resources. We have previously reported that adequate oversight, including program direction and visibility of all costs and individual program efforts, provides stronger assurance to DOD that it is making the most effective use of departmentwide resources to meet mission needs.³² Without this kind of funding strategy and oversight, DOD cannot develop a complete understanding of mission activities, priorities, and shortfalls or identify resource redundancies and gaps.

³²GAO, *Defense Management: DOD Needs to Improve Program Management, Policy, and Testing to Enhance Ability to Field Operationally Useful Non-lethal Weapons*, GAO-09-344 (Washington, D.C.: Apr. 21, 2009), p. 35.

Extent of Dedicated Funds for Some CCMRF Training Affects Mission

In the spring of 2008, sourcing priority for the CCMRF mission increased substantially within the department, and funding was provided for specific aspects of the mission. For example, NORTHCOM's training program includes more than \$33 million to design, plan, and manage exercises as well as funds for participant costs for CCMRFs for fiscal year 2010. The Army Reserve planned funds of more than \$37 million for fiscal years 2009 and 2010 to support additional full-time personnel and training days that have been authorized to support the CCMRF mission. In addition, while the military services have not planned funds for equipment specifically for the CCMRF mission, some nonstandard equipment has been purchased with other remaining funds. In other cases, purchase requests for certain equipment were denied by administrative parent commands because, unit officials believed, the equipment was considered noncritical by reviewing officials. Moreover, units must fund their CCMRF training activities from their operations and maintenance accounts, which were developed and approved months before units knew they would be assigned to CCMRF. According to unit officials, many units were not provided with additional funds for the CCMRF mission. As a result, these units sometimes have funds allocated from other sources to meet identified requirements for the CCMRF mission. Also according to these officials, while the lack of planned funds for CCMRF has been mitigated to some extent by the mission's high-priority level, they have found it necessary to curtail or cancel some desirable training because funding was unavailable. Army officials told us that if funding shortfalls develop because units lack sufficient funds to conduct both CCMRF and follow-on mission training, units can request additional funds from the Army. However, unless units assess their total funding requirement for CCMRF and their other designated mission and receive funding based on both missions, CCMRF units may be at risk of not having enough funding to conduct all of their CCMRF training. This, in turn, puts units at risk of not being fully prepared if they are needed to respond to an incident.

DOD lacks visibility across the department over the total funding requirements for this mission because it has no funding strategy for meeting CBRNE mission requirements. The services, in the absence of funding dedicated to the CBRNE mission, have been using existing operations and maintenance accounts to meet mission requirements. Without an overarching approach to developing requirements and a funding strategy for meeting these requirements, DOD's ability to carry out this high-priority homeland security mission efficiently and effectively is at risk.

Conclusions

Our nation faces a continuing threat of the potential use of weapons of mass destruction by terrorist organizations, and the federal government recognizes the need for a comprehensive capability to mitigate the consequences of such an attack. A domestic, catastrophic CBRNE-related incident would require a unified, whole government, national response. DOD plays a crucial role in support of civil authorities for CBRNE consequence management and under certain circumstances might even be designated as the lead federal agency for such an incident. To provide timely and effective support when local and state capabilities are no longer adequate, it is crucial that DOD be able to integrate its plans with those of other federal agencies involved in disaster response. Until all CBRNE plans that are being developed under the Integrated Planning System are complete, it will be difficult for DOD to know whether its considerable body of operational plans will adequately address anticipated gaps in the capabilities needed to respond to multiple, near-simultaneous, CBRNE incidents. DOD will also need to overcome challenges related to sourcing its CBRNE Consequence Management Response Forces, including issues regarding coordinating with states about the availability and deployment status of National Guard units, integrating Guard and Reserve units with active duty forces, and ensuring that forces charged with dual missions are properly trained to function effectively when called on for consequence management response.

Because each of the CCMRFs are comprised of units that are geographically dispersed, from both the Active and Reserve Components, and from all of the military services, it must have opportunities to train as a complete force before assuming the mission and to demonstrate its capability to successfully conduct the mission, including the ability to deploy rapidly. For the mission to succeed, it is critical to ensure that each unit can meet its designated response time. Because DOD has not developed complete and approved requirements for the CCMRF mission and fully defined and monitored funding responsibilities, it lacks full visibility across the department for this mission. Without an overarching approach to develop full and complete mission requirements, an approach and mechanisms in place to fully support those requirements, and a centralized focal point to ensure that all requirements have been identified and fully funded, DOD's ability to carry out this high-priority homeland security mission efficiently and effectively could be in jeopardy.

Recommendations for Executive Action

In the absence of completed plans under the Integrated Planning System or other specific guidance on DOD's expected contribution to the federal response to a domestic CBRNE-related incident, we recommend that the Secretary of Defense direct the Assistant Secretary of Defense for Homeland Defense and Americas' Security Affairs to work with DHS, FEMA, and other interagency partners to agree on

- interim goals, objectives, and planning assumptions for DOD's role in responding to one or more simultaneously occurring CBRNE incidents in the United States.; and
- the specific types and quantities of capabilities that DOD is expected to contribute and the time frames in which those capabilities are to be provided.

In order to ensure that DOD's plans are consistent with stated program goals, we recommend that the Secretary of Defense direct the Commander of NORTHCOM and the military services to

- align plans for all parts of CCMRF, including specialized and general-purpose units, with stated objectives for CCMRF, and include in their planning efforts the extent to which existing CCMRF capabilities contribute to identified response requirements and stated CCMRF mission goals; and
- work with the state governors through the states' Adjutants General and the National Guard Bureau to create a long-term plan for sourcing CCMRF and ensure that the agreements being established between DOD and state governors include specific terms on National Guard force availability and duty and response status.

In order to increase the assurance that CCMRF can effectively provide CBRNE consequence management in support of civil authorities, we recommend that the Secretary of Defense direct the Commander of NORTHCOM—in coordination with the military services—to include in the CCMRF training program requirements that

- the entire CCMRF conduct a joint field training exercise as part of its mission validation, and
- the entire CCMRF conduct at least one no-notice deployment readiness exercise annually.

We also recommend that the Secretary of Defense direct the Commander of NORTHCOM, the Joint Staff, the Joint Forces Command and the Service Secretaries to

- determine the time needed by units to perform the necessary pre-mission CCMRF training, and
- examine sourcing options that would ensure that units had adequate time to train prior to mission assumption once they had all required personnel and equipment.

In order to provide a departmentwide understanding of requirements, priorities, and resource shortfalls and to identify potential redundancies and gaps in CCMRF resourcing, we recommend that the Secretary of Defense, in coordination with the Commander of NORTHCOM, the Secretaries of the military services, the National Guard Bureau, and the heads of participating defense agencies

- determine the total requirements for CCMRF, including unique, nonstandard equipment requirements for each type of unit that comprises CCMRF, and develop a plan on how those requirements will be filled;
- develop an overall funding strategy for establishing, fielding, and exercising CCMRF and designate a single focal point for coordinating this strategy.

Agency Comments and Our Evaluation

In comments on a draft of this report,³³ DOD generally agreed with the intent of our recommendations and discussed steps it is taking or plans to take to address these recommendations. DOD also provided technical comments, which we have incorporated into the report where appropriate. DHS also reviewed a draft of this report and provided technical comments, which we have incorporated into the report where appropriate.

In response to our recommendation that DOD work with DHS, FEMA, and other interagency partners to agree on interim goals, objectives, and planning assumptions for DOD's role in responding to CBRNE incidents in the United States, DOD agreed and stated that in addition to its routine

³³At the time of DOD's review, this report was numbered GAO-09-928. Subsequently, the report number was changed to [GAO-10-123](#).

planning activities, the Office of the Assistant Secretary of Defense for Homeland Defense and Americas' Security Affairs emphasizes the need for the kind of planning we discuss in the report and our recommendation. DOD stated that it recently convened an advisory panel to evaluate and, as appropriate, make recommendations on modifying DOD authorities, capabilities, plans and programs, and policies to assist civil authorities in preventing or responding to CBRNE incidents. DOD stressed that this panel is authorized to coordinate directly with any department or agency the panel considers necessary to carry out its duties. We believe the panel DOD described will be a suitable mechanism for coordinating with DHS, FEMA, or any other relevant federal agency in addressing the substance of our recommendation.

DOD also agreed with our recommendation that DOD work with DHS, FEMA, and other interagency partners to agree on the specific types and quantities of capabilities that DOD is expected to contribute and the time frames in which those capabilities are to be provided. DOD reiterated that the panel discussed above will assist in addressing the recommendation. Additionally, DOD highlighted a number of ongoing efforts within the department (such as the Quadrennial Defense Review), and efforts being coordinated with DHS, FEMA, and other interagency partners (such as the Task Force for Emergency Readiness) to more fully understand the capabilities that may be required of DOD in the event of a CBRNE incident. DOD stressed and we agree that realistic, detailed, and coordinated planning at the federal, state, and local levels is essential to resolving the uncertainty over just what specific CBRNE consequence management capabilities DOD should be preparing to provide in the event of an incident. We believe that if consistently pursued and coordinated, the ongoing efforts DOD described should help address this recommendation and greatly assist overall federal, state, and local planning and preparedness for responding to CBRNE incidents.

DOD agreed with our recommendation that it align plans for all parts of the CCMRFs, including the specialized and general purpose units, with stated objectives for the CCMRF to include the extent to which existing CCMRF capabilities contribute to identified response requirements and stated CCMRF mission goals. DOD stated that it would continue to evaluate changes to the CCMRF's roles, missions, and requirements and make the necessary adjustments to the units' missions and goals.

DOD agreed with our recommendation that it work with the state governors through the states' adjutants general and the National Guard Bureau to create a long-term plan for sourcing the CCMRFs and ensure that the agreements being established between DOD and state governors include specific terms on National Guard force availability and duty and response status. DOD stated that the Secretary of Defense has directed the Chairman of the Joint Chiefs of Staff to develop a long-term total force sourcing plan for the CCMRFs and to ensure that as they are fielded, the CCMRFs remain appropriately sourced. DOD stated that it continues to work with the Departments of the Army and Air Force, and the National Guard Bureau along with states' adjutants general, to address resourcing and readiness matters. We believe DOD's approach to developing a long-term CCMRF sourcing plan will help build stability into its preparedness efforts. We continue to believe that negotiating and coordinating clear agreements between DOD and the states on the availability and duty status of National Guard units designated as part of CCMRF is critical to the overall DOD CCMRF capability. If the specific availability and duty status of these units is consistently pursued and coordinated, DOD's efforts vis-à-vis the states should help in this regard.

In response to our recommendation that the Commander of NORTHCOM—in coordination with the military services—include in the CCMRF training program requirements that the entire CCMRF conduct a joint field training exercise as part of its mission validation, DOD agreed but cautioned that the availability of funds to conduct full force exercises was a critical factor in fully addressing the recommendation. We agree that field exercises for each of the CCMRFs requires considerable logistical effort and associated costs. However, establishing a requirement for the entire CCMRF to exercise would allow DOD to evaluate the relative priority of the domestic CBRNE consequence management mission against other requirements and would allow DOD to evaluate potential risk if full funding is not available.

DOD agreed with our recommendation that NORTHCOM—in coordination with the military services—include in the CCMRF training program requirements that the entire CCMRF conduct at least one no-notice deployment readiness exercise annually. DOD stated that NORTHCOM has a field training exercise requirement in its proposed CCMRF training plan and that the command is working with the services and U.S. Transportation Command to determine the transportation requirements

associated with a no-notice exercise for CCMRF. We agree that these efforts should help NORTHCOM and DOD continue to develop the CCMRF exercise plan. We continue to believe that given the rapid response requirement of the mission, the geographic dispersion of CCMRF units (Active, Reserve, or National Guard), and the fact that these units do not work together routinely underscore the importance of no-notice deployment readiness exercises.

In response to our recommendation that DOD determine the time needed by units to perform the necessary pre-mission CCMRF training, DOD agreed and stated that it is developing guidance that will direct force providers to facilitate NORTHCOM access to allocated CCMRF units 180 days prior to mission assumption to synchronize CBRNE training and exercises. We continue to believe that allocating CCMRF units to NORTHCOM rather than assigning them curtails the commander of NORTHCOM's ability to ensure adequate CCMRF training and monitor readiness. However, we believe that if consistently implemented, the guidance DOD describes will help DOD ensure that CCMRF units and their parent commands can adequately plan for critical training.

In response to our recommendation that DOD examine sourcing options for the CCMRF that would ensure that units had adequate time to train prior to mission assumption once they had all required personnel and equipment, DOD partially agreed. DOD stated that the Chairman of the Joint Chiefs of Staff has responsibility for sourcing the CCMRFs and that the services and the National Guard Bureau support the Joint Staff in this responsibility. DOD stated that it is preparing guidance that will task components to allocate properly equipped, manned, and trained forces to NORTHCOM to accomplish the CCMRF mission. We believe that if consistently implemented such guidance will help DOD components and commands better plan for and conduct the necessary CCMRF training. However, we believe that DOD should continue to assess the sourcing and timing of CCMRF unit assignments with respect to force rotations to DOD's vital commitments overseas. Because the domestic CBRNE consequence management mission is so different from DOD's warfighting missions, it is all the more important to account for adequate time to train for it.

DOD partially agreed with our recommendation that DOD determine the total requirements for the CCMRF, including unique, nonstandard equipment requirements for each type of unit that comprises the CCMRF,

and develop a plan on how those requirements will be filled. DOD stated that NORTHCOM and the services are working on a Joint Mission-Essential Equipment List that defines CCMRF equipment requirements and that NORTHCOM is working with the Army on procurement, storage, and management of personal protective equipment for CCMRF units. We believe that to the extent these efforts address standard and nonstandard equipment needed by units designated for CCMRF, they should help DOD provide more stable CCMRF equipment planning and reduce the uncertainty of unit commanders about what equipment is needed but not clearly identified in existing equipment lists. In addition, as we have previously stated, we believe that DOD must identify all requirements for CCMRF to provide decision makers with complete visibility over the status of filling CCMRF requirements and to highlight potential risks.

DOD partially agreed with our recommendation that DOD develop an overall funding strategy for establishing, fielding, and exercising the CCMRF and designate a single focal point for coordinating this strategy. DOD stated that it has developed a CCMRF funding strategy and that the Assistant Secretary of Defense for Homeland Defense and Americas' Security Affairs is the appropriate focal point for coordinating the funding strategy for DOD assistance to civil authorities in response to a CBRNE incident. DOD stated that the assistant secretary will examine, in coordination with the Chairman of the Joint Chiefs of Staff, secretaries of the military services, and appropriate defense agencies, what additional steps should be taken to streamline coordination of the CCMRF funding strategy. DOD added that as the employer of the CCMRF during an actual incident, NORTHCOM also plays a significant role. While we do not believe DOD's existing funding efforts constitute a complete CCMRF funding strategy, particularly in light of all requirements not having been defined, we agree that the steps DOD describes in further developing or refining its funding strategy should help address the recommendation and better assist DOD to plan for and oversee CCMRF preparedness.

DOD's written comments are reprinted in appendix II.

We are sending copies of this report to the Secretary of Defense, Secretary of Homeland Security, and other interested parties. In addition, the report will be available at no charge on GAO's Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-5431 or dagostinod@gao.gov. Contacts points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix III.

A handwritten signature in black ink, reading "Davi M. D'Agostino". The signature is written in a cursive style with large, flowing loops.

Davi M. D'Agostino
Director, Defense Capabilities
and Management

List of Requesters

The Honorable Joseph I. Lieberman
Chairman

The Honorable Susan M. Collins
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Adam Smith
Chairman

The Honorable Jeff Miller
Ranking Member
Subcommittee on Terrorism and Unconventional Threats
and Capabilities
Committee on Armed Services
House of Representatives

The Honorable Mac Thornberry
House of Representatives

Appendix I: Scope and Methodology

To determine the extent to which the Department of Defense (DOD) has planned for and structured its force to provide chemical, biological, radiological, nuclear, and high-yield explosive (CBRNE) consequence management assistance, we met with DOD officials and reviewed DOD's plans to determine sourcing requirements for the CBRNE Consequence Management Response Force (CCMRF). We reviewed the DOD, Northern Command, Army North, Joint Task Force Civil Support, Army Forces Command, and Army Reserve Command execution orders to determine the requirements for the number of CCMRFs, planned response time frames, force composition, sourcing, training, and readiness. We also reviewed concept and operations plans for CBRNE. We discussed DOD's plans for providing units to CCMRF with officials from the Joint Forces Command, Army Forces Command, Northern Command, Army North, Joint Task Force Civil Support, U.S. Army Reserve Command, and the National Guard Bureau. To determine DOD's approved incremental sourcing of the three CCMRFs, we interviewed officials from the Office of the Assistant Secretary of Defense for Homeland Defense and Americas' Security Affairs and the Joint Staff to assess the CCMRF sourcing requirements in structuring the force. We discussed with officials from the U.S. Army Reserve Command, Joint Forces Command, Army Forces Command, and Army North the sourcing requirements for CCMRF technical support forces (which perform in the contaminated or hot zone) and general support force to determine how units are selected for CCMRF and to obtain perspectives on sourcing challenges. We also reviewed documentation and interviewed National Guard Bureau officials to determine its unit sourcing plans for future CCMRFs.

To determine the extent to which DOD has planned for CBRNE consequence management operations and integrated plans with other federal government plans, we met with officials from the Department of Homeland Security, the Federal Emergency Management Agency, the Office of the Assistant Secretary of Defense for Homeland Defense, and the Joint Task Force Civil Support. For example, we met with the Department of Homeland Security officials to discuss the interagency process used to support planning for responding to a domestic incident. Additionally, we met with Northern Command, Army North, and Joint Task Force Civil Support to discuss their plans for supporting federal CBRNE consequence management efforts and to discuss how their plans are integrated with those of federal agencies that DOD will support and reviewed plans, playbooks, and briefing documents that described DOD's responsibilities related to provided capabilities in support of others in response to a CBRNE event. Further, we reviewed Joint Task Civil Support playbooks relevant to each of the Department of Homeland

Security's National Planning Scenarios to determine the extent to which DOD has planned for CBRNE consequence management operations. We reviewed relevant reports and documents that govern the national response to disasters. We discussed with Department of Homeland Security and Federal Emergency Management Agency official their efforts to establish roles and responsibilities in response to a CBRNE event. We also reviewed our prior work on national preparedness to determine the status of the Federal Emergency Management Agency's (FEMA) efforts to complete and integrate plans.¹ We also reviewed the Department of Homeland Security's National Response Framework, *National Preparedness Guidelines*, and *Target Capabilities List* to assess DOD's and other federal departments' roles and responsibilities in providing support to civil authorities in response to a CBRNE event.

To determine how prepared the CCMRF is to perform the CBRNE consequence management mission, we compared existing DOD readiness policies and practices to the practices for preparing CCMRF units and plans for assessing and reporting mission readiness. We discussed these issues with officials from the U.S. Joint Forces Command, U.S. Army Forces Command, U.S. Army Reserve Command, the Joint Staff, U.S. Northern Command, and U.S. Army North. Further, we discussed the assignment of forces and readiness reporting with officials at the U.S. Joint Forces Command to assess the CCMRF sourcing priority requirements and the readiness reporting guidance for designated units assigned to the CCMRF mission. We also discussed with these officials their plans for training and assessing the readiness of units designated for CCMRF to determine CCMRF training and readiness certification and validation requirements. In determining the requirements, we reviewed pre-mission training, exercise, and validation guidance that was used to assess unit readiness. We also reviewed training requirements and spoke with officials to determine individual and unit mission-essential tasks identified for CCMRF. We also reviewed our prior work on U.S. Northern Command planning efforts for homeland defense and civil support² to assess mission-essential tasks previously reported for units assigned to the

¹GAO, *National Preparedness: FEMA Has Made Progress, but Needs to Complete and Integrate, Planning, Exercise and Assessment Efforts*, [GAO-09-369](#) (Washington, D.C.: Apr. 30, 2009).

²GAO, *Homeland Defense: U.S. Northern Command Has Made Progress but Needs to Address Force Allocation, Readiness Tracking Gaps, and Other Issues*, [GAO-08-251](#) (Washington, D.C.: Apr. 16, 2008).

CCMRF mission. Additionally, we reviewed the Defense Science Board's report, *Unconventional Operational Concepts and the Homeland*³ to obtain their assessment of training and readiness of military units for the domestic homeland security mission and recommendations for providing realistic training and exercises. Further, we reviewed our prior work on the Army's overall training strategy to determine how it is supported by the Army Force Generation Model⁴ and to determine the effect of overseas deployments on the preparation for units designated for CCMRF.

We reviewed readiness briefings and mission readiness exercise lessons-learned reports to determine pre-mission assumption validation requirement challenges for task force units. To determine criteria for training and readiness of designated units for the CCMRF mission, we reviewed orders and plans that discussed individual, leader, and unit training requirements and discussed those issues with Joint Staff, Northern Command, Army North, Army Forces Command, and Army Reserve Command officials. We also discussed with CCMRF unit officials the guidance and resources that they were provided to prepare for the mission to determine preparation challenges. These units were judgmentally selected. While we cannot generalize the results of these discussions to all units, they were selected to provide a cross section of units from different services, from both the active and reserve forces, and from units that will provide either specialized CBRNE capabilities or general support capabilities.

To determine CCMRF fund planning and the linkage to mission requirements, we met with officials from Northern Command, Army North, Army Forces Command, and the Army Reserve Command to discuss mission funding requirements and funding sources. We also reviewed guidance and funding plans to determine efforts to develop CCMRF-unique requirements and to identify the status of funding plans for meeting requirements. We met with the National Guard Bureau to discuss their current capabilities, identified shortfalls, and their approach to mitigate any identifiable shortfalls. Further, we reviewed program-identified

³Defense Science Board, *Unconventional Operational Concepts and the Homeland, Report on the 2007 Summer Study on Challenges to Military Operations in Support of U.S. Interests* (Washington, D.C.: Mar. 2009).

⁴GAO, *Military Training: Actions Needed to More Fully Develop the Army's Strategy for Training Modular Brigades and Address Implementation Challenges*, [GAO-07-936](#) (Washington, D.C.: Aug. 6, 2007).

funding shortfalls to determine the impact of planning, coordination, and execution of homeland defense training and readiness exercises. We discussed with unit officials the funding guidance that their units were provided to meet the CCMRF mission and obtained their perspectives on the extent to which additional specialized equipment beyond the units' standard equipment would be needed to perform the CCMRF mission. We also discussed funding requirements with officials from the Department of the Army to determine long-term funding plans for units designated for the CCMRF mission. We also met with U.S. Army Reserve Command officials to determine equipment and training costs for general support and commercial-off-the-shelf equipment costs for technical support units for the CCMRF mission.

In addressing our objectives, we reviewed plans and related documents, obtained information, and interviewed officials at the following locations:

- United States Northern Command, Peterson Air Force Base, Colorado
- Joint Forces Command, Norfolk, Virginia
- The Office of the Secretary of Defense, Washington, D.C.
- The Joint Chiefs of Staff, Washington, D.C.
- Joint Task Force Civil Support, Ft. Monroe, Virginia
- U. S. Army North, Ft. Sam Houston, Texas
- Army Forces Command, Ft. McPherson, Georgia
- Army Reserve Command, Ft. McPherson, Georgia
- National Guard Bureau, Arlington, Virginia
- Department of Homeland Security, Washington, D.C.
- Federal Emergency Management Agency, Washington, D.C.

We conducted our review from February 2008 to October 2009 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Comments from the Department of Defense

Agency comments were made on GAO-09-928. This report number was subsequently changed to [GAO-10-123](#).



HOMELAND DEFENSE
& AMERICAS' SECURITY AFFAIRS

ASSISTANT SECRETARY OF DEFENSE
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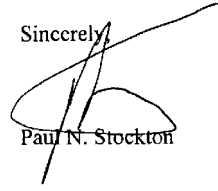
Ms. Davi M. D'Agostino
Director, Defense Capabilities and Management
U.S. Government Accountability Office
441 G Street, N.W.
Washington, DC 20548

Dear Ms. D'Agostino:

This is the Department of Defense (DoD) response to the GAO draft report, GAO 09-928, "HOMELAND DEFENSE: Planning, Resourcing, and Training Issues Challenge DoD's Response to Domestic Chemical, Biological, Radiological, Nuclear, and High-Yield Explosive Incidents," dated August 20, 2009 (GAO Code 351150). DoD concurs with seven recommendations, and partially concurs with three recommendations. Our response to the recommendations is enclosed.

Our point of contact for this action is Thomas LaCrosse, Office of the Assistant Secretary of Defense for Homeland Defense and Americas' Security Affairs (OASD (HD&ASA)), (703) 697-5822 or tom.lacrosse@osd.mil.

Sincerely,



Paul N. Stockton

Enclosure:
As stated



GAO DRAFT REPORT DATED AUGUST 20, 2009
GAO-09-928 (GAO CODE 351150)

“HOMELAND DEFENSE: Planning, Resourcing, and Training Issues
Challenge DoD’s Response to Domestic Chemical, Biological, Radiological,
Nuclear, and High-Yield Explosive Incidents”

DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATIONS

RECOMMENDATION 1: The GAO recommends that the Secretary of Defense direct the DoD officials he deems appropriate to work with the Department of Homeland Security (DHS), the Federal Emergency Management Agency (FEMA), and other interagency partners to agree on interim goals, objectives, and planning assumptions for DoD’s role in responding to one or more simultaneously occurring chemical, biological, radiological, nuclear, and high-yield explosive (CBRNE) incidents in the United States.

DOD RESPONSE: Concur. The National Preparedness Guidelines and Annex 1 to Homeland Security Presidential Directive 8 (HSPD-8) establish an overarching framework and comprehensive risk-based approach to national planning, including planning for domestic CBRNE incidents. Under these mandates, DoD actively participates in the Integrated Planning System (IPS) to develop interagency CBRNE terrorism prevention and response plans. Planning improves effectiveness by clearly defining required capabilities, shortening the time required to gain control of an incident, and facilitating the rapid exchange of information about a situation.¹ In addition to its routine planning activities, the office of the Assistant Secretary of Defense for Homeland Defense and Americas’ Security Affairs has consistently emphasized the need for detailed, operationally executable interagency planning in order to conduct informed analyses of the capabilities required in response to a catastrophic CBRNE incident, such as those outlined in the 15 National Planning Scenarios – 12 of which are CBRNE related.

DoD recently convened the advisory panel required by section 1082 of the National Defense Authorization Act for Fiscal Year 2008. This panel will evaluate and, as appropriate, make recommendations on modifying DoD authorities, capabilities, plans and programs, and policies to assist civil authorities in preventing and responding to CBRNE incidents. Additionally, the panel is authorized to secure directly from DHS, the Department of Energy, the Department of Justice, the Department of Health and Human Services, and any other department or agency of

¹ Department of Homeland Security, National Response Framework, January 2008, page 28.

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the Federal Government information that the panel considers necessary for the panel to carry out its duties.

Of note, section 2313 of Title 50, U.S. Code, assigns responsibility for coordinating DoD assistance to Federal, State, and local officials in preventing and responding to CBRNE threats to the Assistant Secretary of Defense for Homeland Defense and Americas' Security Affairs.

RECOMMENDATION 2: The GAO recommends that the Secretary of Defense direct the DoD officials he deems appropriate to work with DHS, FEMA, and other interagency partners to agree on the specific types and quantities of capabilities that DoD is expected to contribute and the timeframes in which those capabilities are to be provided.

DOD RESPONSE: Concur. See response to Recommendation 1. DoD has been working with DHS, FEMA, and others through the IPS, implementation of section 1815 of the National Defense Authorization Act for Fiscal Year 2008, the Task Force for Emergency Readiness (TFER), the Quadrennial Defense Review (QDR), and other efforts to determine the demand for DoD capabilities to assist civil authorities in a CBRNE incident. In the absence of a complete definition of Federal, State, and local capabilities and their needs for DoD assistance, DoD planners have prepared several assumptions about necessary capabilities and capacities based on a wealth of experience and local partners. Until DOD and its USG partners have greater visibility into national capabilities, DoD's planning approach has been to ensure it has a significant designated capacity to fulfill each of the required capabilities and then draw on contingency sourcing from the Total Force to meet the additional response requirements of a domestic incident, while balancing the ongoing requirements of military preparedness to execute DoD's primary mission worldwide. Efforts underway with IPS, section 1815, TFER, and the QDR should eventually give DoD a much better understanding of the "demand signal" from its Federal, State, and local partners.

Realistic, detailed, and coordinated planning at the Federal, State, and local levels is essential to resolving this uncertainty by identifying needed resources, eliminating organizational, jurisdictional, and operational seams and gaps, and ensuring a unity of effort in future responses.

Of note, section 2313 of Title 50, U.S. Code, assigns responsibility for coordinating DoD assistance to Federal, State, and local officials in preventing and responding to CBRNE threats to the Assistant Secretary of Defense for Homeland Defense and Americas' Security Affairs.

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RECOMMENDATION 3: The GAO recommends that the Secretary of Defense direct U.S. Northern Command (USNORTHCOM) and the military services to align plans for all parts of the CBRNE Consequence Management Response Forces (CCMRFs), including the specialized and general purpose units, with stated objectives for the CCMRF, to include the extent to which existing CCMRF capabilities contribute to identified response requirements and stated CCMRF mission goals.

DOD RESPONSE: Concur. As part of DOD's continuing effort to optimize its capabilities in regards to CBRNE Consequence Management, it will continue to evaluate any changes to the CCMRFs' roles, missions, and requirements and make the necessary adjustments to the units' missions and goals.

RECOMMENDATION 4: The GAO recommends that the Secretary of Defense direct USNORTHCOM and the military services to work with the state governors through the states' adjutants general and the National Guard Bureau to create a long-term plan for sourcing the CCMRFs and ensure that the agreements being established between DoD and state governors include specific terms on National Guard force availability and duty and response status.

DOD RESPONSE: Concur. The Secretary of Defense has already directed the Chairman, Joint Chiefs of Staff to develop the long-term Total Force sourcing plan for the CCMRFs. In addition, the Chairman, Joint Chiefs of Staff, via the Global Force Management Process, ensures that, when fielded, the CCMRF continue to remain appropriately resourced.

In cases where National Guard units and personnel constitute elements of the CCMRFs, DoD has worked, through Departments of the Army and the Air Force and the National Guard Bureau, with the Adjutants General of the States to address resourcing and readiness matters. This cooperative approach will continue when the CCMRFs are fully operationally capable to ensure appropriate sustainment.

RECOMMENDATION 5: The GAO recommends that the Secretary of Defense direct the Commander of USNORTHCOM – in coordination with the military services – to include in the CCMRF training program requirements that the entire CCMRF conducts a joint field training exercise as part of its mission validation.

DOD RESPONSE: Concur, subject to the availability of funds. An FY2007 USNORTHCOM cost estimate for deploying a partial CCMRF for a field training exercise exceeded \$30 million. According to current DoD plans, there will be three operational CCMRFs by October 1, 2010. Field training exercises for each of the

Attachment

three CCMRFs would be expensive due to the requirement to bring together forces from multiple locations in the United States.

RECOMMENDATION 6: The GAO recommends that the Secretary of Defense direct the Commander of USNORTHCOM – in coordination with the military services – to include in the CCMRF training program requirements that the entire CCMRF conducts at least one no-notice deployment readiness exercise annually.

DOD RESPONSE: Concur. USNORTHCOM has already included a requirement for a field training exercise in its proposed CCMRF training plan. In addition to a planned field training exercise, USNORTHCOM is working closely with the Services and US Transportation Command to determine the transportation requirements associated with a no-notice exercise for CCMRF 10-1, their impact on ongoing operations and their cost, which will further inform development of the CCMRF exercise plan.

RECOMMENDATION 7: The GAO recommends that the Secretary of Defense direct the Commander USNORTHCOM, the Joint Staff, and the Service secretaries to determine the time needed by units to perform the necessary pre-mission CCMRF training.

DOD RESPONSE: Concur. Guidance is being finalized that will direct force providers to facilitate USNORTHCOM access to allocated CCMRF units and headquarters 180 days prior to mission assumption in order to synchronize and coordinate participation in a CBNRE training exercise, confirmation command post exercise, and confirmation field training exercise. In accordance with DoD Directive 5105.77, *National Guard Bureau*, the National Guard Bureau will also contribute to these determinations

RECOMMENDATION 8: The GAO recommends that the Secretary of Defense direct USNORTHCOM, the Joint Staff, and the Service secretaries to examine sourcing options that would ensure that units had adequate time to train prior to mission assumption once they had all required personnel and equipment.

DOD RESPONSE: Partially concur. The Secretary of Defense has assigned the responsibility for sourcing the CCMRFs to the Chairman, Joint Chiefs of Staff. USNORTHCOM, the Military Services, and NGB support the Joint Staff in the execution of this responsibility. Guidance is being finalized that will task components to allocate properly equipped, manned, and trained forces to USNORTHCOM to accomplish the CCMRF mission.

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RECOMMENDATION 9: The GAO recommends that the Secretary of Defense, in coordination with Secretaries of the military services, the National Guard Bureau, and the heads of participating Defense Agencies determine the total requirements for the CCMRF, including unique nonstandard equipment requirements for each type of unit that comprises the CCMRF, and develop a plan on how those requirements will be filled.

DOD RESPONSE: Partially concur. The Secretary of Defense is advised by the Chairman of the Joint Chiefs of Staff, Secretaries of the Military Services, USNORTHCOM, NGB, and Defense Agencies on capability requirements. USNORTHCOM and the Military Departments are staffing a Joint Mission Essential Equipment List that defines CCMRF equipment requirements. USNORTHCOM is also working with the Department of the Army on procurement, storage, and management of Personal Protective Equipment sustainment stocks for the CCMRF units.

RECOMMENDATION 10: The GAO recommends that the Secretary of Defense, in coordination with secretaries of the military services, the National Guard Bureau, and the heads of participating Defense Agencies develop an overall funding strategy for establishing, fielding, and exercising the CCMRF and designate a single point for coordinating this strategy.

DOD RESPONSE: Partially concur. The Secretary of Defense is advised by the Chairman of the Joint Chiefs of Staff, Secretaries of the Military Services, USNORTHCOM, NGB, and Defense Agencies on capability requirements. DoD has developed an overall funding strategy for fielding, sustaining, and employing the CCMRFs. In accordance with Public Law 109-163 of the FY 06 National Defense Authorization Act, the Assistant Secretary of Defense for Homeland Defense and Americas' Security Affairs is responsible for the coordination of the DOD assistance to Federal, State, and local officials in responding to threats involving nuclear, radiological, biological, chemical weapons, or high-yield explosives or related materials or technologies, including assistance in identifying, neutralizing, dismantling, and disposing of nuclear, radiological, biological, chemical weapons, and high-yield explosives and related materials and technologies. Consistent with the statutory role of the Assistant Secretary of Defense for Homeland Defense and Americas' Security Affairs, OASD (HD&ASA) will examine in coordination with the Chairman of the Joint Chiefs of Staff, Secretaries of the Military Services and appropriate Defense Agencies what additional steps are to be taken to further streamline coordination of the CCMRF funding strategy. As the force employer, USNORTHCOM also plays a significant role.

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Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

Davi M. D'Agostino, (202) 512-5431 or dagostinod@gao.gov.

Acknowledgments

In addition to the contact named above, Joseph Kirschbaum, Assistant Director; Rodell Anderson; Sandra Burrell; David Fox; Joanne Landesman; Greg Marchand; Robert Poetta; and Jason Porter made key contributions to this report.

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