OFFICE OF INSPECTOR GENERAL

INSPECTION OF THE U.S. INTERNATIONAL TRADE COMMISSION'S OCCUPANT EMERGENCY PROGRAM

Inspection Report
OIG-IR-01-03

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I. SUMMARY OF RESULTS

Given the September 11, 2001 attacks and subsequent terrorist threats, emergency preparedness remains critical to ensuring a safe environment in which federal employees and visitors can conduct their business. The Office of Inspector General (OIG) conducted an inspection of the U.S. International Trade Commission (USITC/Commission) Occupant Emergency Program (OEP) and found that the Commission actively has led emergency management at 500 E Street, SW, Washington, DC[1]. However, we suggested additional actions to further safeguard lives and property.

The Commission should develop an official building-wide Occupant Emergency Plan (OEP) for all occupants and obtain agreement to the plan from other tenants. Emergency procedures should be readily available and recognizable to all employees.

Based on General Services Administration (GSA) guidelines and our observations, the building-wide OEP should:

- Provide emergency phone numbers in addition to direct office numbers;
- Designate a meeting place away from the building to ensure all occupants have safely exited the building;
- Include information about the building and its occupants, as well as a floor plan with the evacuation routes clearly marked;
- Include procedures for an after-hour emergency; and
- Ensure all occupants follow procedures when an alarm is sounded.

Finally, the Commission formally should assign Command Center responsibilities and identify an alternate Command Center site in the event the building must be completely evacuated.

Responses to the draft report clearly reflected the Commission's commitment for safeguarding lives and property during an emergency. The Commission's Office of Human Resources proposed taking actions to ensure employees and their families receive benefits support, employees' emergency contact phone numbers are maintained and available, and an area is designated for injured employees. Furthermore, the Commission was working towards finalizing a "shelter in place" plan.

II. BACKGROUND

GSA's March 2002 *Occupant Emergency Program Guide* defines OEP as a short-term emergency response program that establishes procedures for safeguarding lives and property

[1] Observations made by the Office of Inspector General (OIG) during an unscheduled emergency evacuation drill in July 2002 are provided in Appendix B of this report.

during an emergency. Every federally leased facility should have one organized plan for all agencies within that particular facility as well as a Designated Official (DO)[2] responsible for managing emergencies in the facility.

The Commission shares a GSA leased building with the Social Security Administration (SSA) and the National Aeronautic and Space Administration (NASA). Located at 500 E Street, SW, in Washington, DC, and owned and operated by Boston Properties (landlord), the building includes nine floors and an underground parking garage. The Commission leases the majority of the first floor[3] and the third through seventh floors to provide office space for its 365 employees. The Commission also maintains several hearing rooms on the first floor to conduct business with non-Commission individuals.

SSA has 128 employees on the eighth and ninth floors; NASA has 111 contractors on the second floor.

III. OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this inspection was to determine if the Commission had an emergency program to adequately ensure the safety of its employees.

In conducting this inspection from June through December 2002, we reviewed applicable federal regulations and the GSA OEP Guide, and we evaluated USITC's Directive 3051.0 and Administrative Notice 3051. We reviewed the OEP for the SSA offices located on the eighth and ninth floor in the same building as the Commission as well as OEPs for the Federal Election Commission and the Department of Defense (DoD) located elsewhere. In addition, we interviewed the Directors of the Office of Administration and Office of Facilities Management. We observed the Commission's implementation of building evacuation during two fire drills.

The inspection was conducted in accordance with the *Quality Standards for Inspections*, promulgated by the President's Council on Integrity and Efficiency.

IV. DETAILS OF RESULTS

A. The Commission Has Made Progress In Managing Emergencies

As the largest agency occupying 500 E Street, SW, Washington, DC, the Commission designated the positions of DO and Alternate DO to its Directors of the Offices of Administration and

[2] The DO is the primary occupant agency's highest ranking official, or designee, by mutual agreement of all occupant agency ranking officials.
[3] A commercial tenant leases a small area on the first floor to operate a food shop.

Facilities Management, respectively. To safeguard the building and its occupants, the DO obtained a physical security assessment of the building, developed an OEP, assigned responsibilities, and acted to correct identified deficiencies. An overview of the actions is presented below.

Physical Security Assessment

Biennially, a Federal Protective Service specialist assessed physical security and, when warranted, recommended improvements at 500 E Street, SW. For the most recent assessment, completed December 23, 2002, the Federal Protective Service had not reported results at the time of our review. The prior January 6, 1999 assessment report[4] had discussed building and tenant security and noted that recommended countermeasures had been implemented.

Occupant Emergency Plan

The Commission's OEP–USITC Directive 3051.0 *Emergency Evacuation of the U.S. International Trade Commission* (November 3, 1994)[5]–provides emergency evacuation guidance for ITC employees, contractors and any others occupying USITC leased space. Accordingly, in an emergency the DO or Alternate DO is to determine the course of action, communicate with fire department or other appropriate officials, and inform the Chief Warden when it is safe for people to re-enter the building.

In a building evacuation, the Chief Warden ensures that: the Wardens and their alternates monitor their areas and follow procedures; designated Wardens assist disabled individuals and notify the Chief Warden of the location of any disabled individuals requiring other assistance; and all employees leave the building. The Chief Warden also informs the DO about any employee not complying with evacuation procedures; assesses the evacuation's efficiency; and recommends necessary improvements.

The Commission supplemented the OEP by posting the location of first aid kits and evacuation chairs on the Intranet and providing ready access to medical emergency information and emergency phone numbers in its hard copy telephone directory.[6]

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[4] The assessment was performed in accordance with the Department of Justice's *Vulnerability Assessment of Federal Facilities*, dated June 28, 1995, as well as the Office of Federal Protective Service's guidance.
[5] USITC Directive 3051.0 was updated August 1, 2002 to eliminate the building's second floor emergency evacuation routes because the Commission no longer leased the second floor.
[6] The directory included a phone number for the: landlord; building security technical representative; Federal Protective Service; Kastle Security; police; and Commission's safety officer.

Assigned Responsibilities

The DO annually updated USITC Administrative Notice 3051 to apprise Commission employees of the floor wardens, their alternates, and their assigned locations. For individuals assigned responsibility in the Notice, the DO provided a printed copy of the Notice and floor diagrams indicating areas of responsibility (i.e., east wing and west wing).

Corrective Action

When a fire drill revealed a communication problem, the Commission and SSA[7] employees having OEP responsibilities obtained walkie-talkies, which were set on the same frequency. Similarly, recognizing the need for evacuation chairs, the Commission not only obtained the chairs but also provided training in their use. Finally, after finding that a new tenant–NASA's contractors–had not reported to the Chief Warden during an emergency evacuation drill, the Alternate DO alerted the landlord to resolve the problem. According to the Alternate DO, the landlord must address this problem because existing emergency policies and regulations do not apply to contractors.

B. An Official Building-wide OEP Is Needed

The Commission could further enhance its positive actions by leading the effort to establish one building-wide OEP—necessary to assure that all occupants fully understand emergency procedures and responsibilities. During the inspection, each agency and the landlord had separate plans.

The Commission's emergency documents included:[8]

- USITC Directive 3051.0, *Emergency Evacuation of the USITC* – available on ITC's Intranet
- *Procedures To Be Used In Case Of Bomb Threat* – distributed to all Commission employees over 5 years ago
- *Chemical Attack Procedures* – maintained by the DO

The Federal Property Management Regulations placed emergency management responsibility for a federally leased facility on the DO–the highest-ranking official of the facility's primary occupant agency or a designee selected by mutual agreement of occupant agency officials (41

[7] NASA was not a tenant of 500 E Street, SW at the time the Commission issued the walkie-talkies.
[8] For a more complete list of OEP related documents on 500 E Street, SW, Washington, DC, its originator and distribution, see Appendix A.

CFR 101-20.003(g)). GSA developed the *Occupant Emergency Program Guide* to help the DO establish a unified OEP for multiple tenants. According to GSA's guidelines, a facility's OEP should be entitled "Occupant Emergency Plan for (Name of Facility)." The benefit of having a standardized title is that it is easily recognizable to any federal employee or agency. Also, the plan should be signed by the DO, building manager, tenant agencies, and physical security specialist to certify that they participated in the developing the OEP and fully understand the procedures.

The Alternate DO said that the landlord and building tenants meet monthly to discuss any issues concerning the building. Although these meetings have not addressed evacuation procedures, tenants have in common the building emergency alarm system as well as the same three stairwells and corresponding exits to evacuate the building. Furthermore, the building security guards coordinate the three agencies' evacuation and report to the Commission's Chief Warden. NASA and SSA tenants rely on the ITC's Chief Warden to inform them it is safe to re-enter the building and generally understood that the ITC is the lead agency.

The current informal understanding does not go far enough to ensure that all occupants know or will follow procedures. For example, during a recent fire drill, NASA contractors did not report to the Chief Warden. Absent a building-wide OEP, the Commission cannot assure that all occupants safely evacuate the building.

Suggestion 1

As DO, the Director, Office of Administration, should take the lead in developing a building-wide OEP, following GSA's *Occupant Emergency Program Guide*, addressing various emergencies. At a minimum, the landlord, representatives from all tenant agencies and a Physical Security Specialist should participate in its development. Readily available and recognizable (i.e., titled *Occupant Emergency Plan for 500 E Street, SW, Washington, DC*), the building-wide OEP should include each participant's signature acknowledging her or his understanding of assigned responsibilities.

C. A Comprehensive OEP Is Needed

To ensure that the building-wide OEP is comprehensive, the Commission should address the areas discussed below.

Emergency Contact Telephone Numbers

Administrative Notice 3051 and the Commission's telephone directory listed direct office numbers but did not include key officials' alternate numbers, such as cell phone or pager numbers. Another agency's plan provided the responsible officials' pager numbers. As key officials must vacate their workstations in an emergency, office numbers alone are of little use.

Designated Meeting Place

By having designated meeting places by manageable work units, occupants would not block access to emergency help and missing employees would be more readily identified. Although Directive 3051.0 instructs exiting employees to move to the other side of the E Street, it provides no further guidance on where groups of employees should assemble and be counted. During a recent unscheduled drill, many building occupants instead of crossing the street stood directly in front of the building. In a real emergency, these people could have been in danger of explosions, flying glass or falling debris. Their presence on the sidewalk outside the building entrance might also impede firefighters or rescue workers. During the same drill, others crossed the street but blocked the neighboring Police Station's driveway.

No method was evident for accounting for evacuated building occupants. Without designated assembly points or head counts, the risk becomes greater that people failing to leave the building may not be detected in time for rescue. A simple system in which co-workers in a designated small work unit know each other's whereabouts would be an efficient and effective way to account for everyone. Missing employees, presumed to still be in the building, could be reported quickly to the wardens.

Identification of Responsible Officials

The Commission issued easily identified colored hats to the responsible officials, but neither the Directive nor the Administrative Notice mentions it. Furthermore, during an unscheduled drill, only 2 of the 20 floor wardens wore a hat. While not everyone may have ready access to the hat when an alarm sounds, the Commission should stress the importance of wearing the hat. Also, the identifying factor–colored hat or article of choice–worn by the responsible officials during an emergency should be addressed in the OEP to apprise everyone of its purpose.

Annually Reviewed Policies and Procedures

The Commission had not performed an annual review of its OEP to determine whether a revision was needed based on current events, staff and any new laws or policies. The Federal Protective Service's Facility Evaluation Assessment of the building dated May 28, 1996, recommended that the OEP be reviewed annually. Our inspection found that the Plan included evacuation procedures for the second floor, which the Commission no longer occupied, and a rear exit, which the Commission no longer used. The Commission subsequently deleted reference to the second floor and rear exit.

Physical Details

The Commission's OEP did not contain: (1) information about the building and its occupants, and (2) a floor plan with the evacuation routes clearly marked. GSA's guide suggests an OEP

contains these details. Although the current *United States International Trade Commission Telephone Directory* includes floor plan diagrams of space the Commission occupies with the location of each working area clearly marked, the floor plan diagrams do not show evacuation routes. While we recognize that the area and stairs outside of the Commission's suites are marked at the elevators and exit signs are clearly displayed, a revised diagram provided in the directory that displays the location of exits, stairs and evacuation routes could reduce confusion in the event of an emergency and aid occupants in exiting the suites.

After-Hour Emergency

The Commission's OEP did not include procedures for after-hour emergencies. According to the Alternate DO, the Commission's contingency plan addresses after-hour emergency procedures. The Chairman will decide when to resume business and alert the Director, Office of Administration, to take appropriate action. However, the contingency plan's focus was on resuming business operations in general and not on permitting entry into the building.

In DoD's Plan, the DO will be notified of an after-hour emergency and subsequently will determine whether to delay admittance or close the building. Moreover, the DO will notify the Public Affairs/Information Office Representative who will in turn, notify the news media in accordance with prearranged procedures made between the DO and the news media. DoD's Plan also provides a list of radio stations that will broadcast information concerning delayed admittance or building closure.

Compliance with Procedures

Not all employees followed procedures and evacuated the building when an alarm sounded. One senior staff member, not taking the alarm seriously, called the Alternate DO asking to be notified of whether an alarm is real or a drill. According to the Alternate DO, employees often call when an alarm sounds to determine if there is a real emergency. The Alternate further stated that many times even he does not know if it is real or a drill and is too busy fulfilling his responsibilities as Alternate DO to answer the phone.

To encourage full participation every time the alarm sounds, employees need to be reminded to never assume an alarm is false. Directive 3051.0 instructs employees to take seriously all alarms and never assume an alarm is false. Failure to follow procedures–whether for an actual emergency or a practice drill–could put self, fellow employees and rescuers in danger. On the other hand, cooperative employees not only ensure workplace safety but also help identify needed improvements in the evacuation process.

For each evacuation, the Alternate DO filed a report recording the total time for the evacuation, designated areas that reported all their charges had exited the building and problems encountered. To identify employees exhibiting patterns of noncompliance, the Alternate DO's report could

include a list of those employees who ignored the alarm. Rather than filing the report, the Alternate DO could provide the report to the Chairman, Vice Chairman and the Senior Staff.

Building Security Committee

Although emails sent on August 6, 2002 between the DO and Alternate DO suggest replacing members on the Commission's Building Security Committee, such a Committee was not referenced in Commission documents. If such a Committee either exists or is to be, the Commission would need to formally define the Committee's duties and assign its members.

Suggestion 2

As DO, the Director, Office of Administration, should incorporate the following into a building-wide OEP:

a. Provide emergency phone numbers in addition to the direct office or workstation numbers of key employees.
b. Designate a meeting place for each manageable work unit away from the building to ensure all occupants have safely exited the building.
c. Establish a system in which work unit employees are aware of their co-workers' whereabouts and will alert wardens to employees thought to still be in the building.
d. Include in the OEP the identifying article of clothing—colored armband or hat--worn by the responsible officials during an emergency, and stress the importance of wearing the article.
e. Review the OEP at least yearly to determine whether a revision is needed based on the current events, staff and any new laws or policies.
f. Include information about the building and its occupants, as well as a floor plan with the evacuation routes clearly marked as suggested in GSA's guide. Also, the Commission should revise the floor plan diagrams of space it occupies to clearly indicate the location of exits, stairs and evacuation routes in the *United States International Trade Commission Telephone Directory*.
g. Include procedures for an after-hour emergency.
h. Formally define the duties and assign individuals to the Commission's Building Security Committee.

Suggestion 3

As DO, the Director, Office of Administration, should remind employees that everyone is required to take seriously all alarms and follow procedures. Also, the Alternate DO should modify the drill report to include the name of each non-participant. This report should be forwarded to the Chairman, Vice Chairman, and Senior Staff for appropriate action.

D. Command Center Policies And Procedures Should Be Strengthened And Formalized

Neither the Directive nor Administrative Notice mentions a Command Center and a Command Center Team. The Commission informally created a Command Center at the security guards' desk in the front lobby of the building, but did not identify an alternate site if the main Center is damaged. Additionally, the Commission had not created a process or assigned responsibilities to relay important information to the building's occupants when in non-evacuation status.

A Command Center where emergency operations are conducted should be centrally located and easily accessible for effective communication and control. GSA's Guide also suggested that the Commend Center have good communications capability, including at least two telephones, portable radios and pagers, and messengers should be available to augment communication.

The present Command Center was equipped with the two telephones and access to the alarm system. Key emergency personnel had radios and the Chief Warden had a bullhorn. The Commission's Directive assigned communication responsibilities when the building is in evacuation status, but there were no procedures for communicating vital information when the current Command Center is inoperable and when there is a need for occupants to remain in the building or relocate within the building.

Because of the Command Center's essential coordinating role, an alternate Command Center is necessary in the event that a building emergency shuts down the Command Center. The Commission had not established an alternate Command Center.

The Command Center Team is responsible for directing all emergency operations from the Command Center. GSA's Guide suggests that for a small facility the Command Center Team should consist of the DO, an Occupant Emergency Coordinator, a Damage Control Team Coordinator, and Technical Advisors. The Commission's Command Center Team consisted of the DO, the Alternate DO, and the Chief Warden.

Suggestion 4

As DO, the Director, Office of Administration, should formally establish the location of the main Command Center and identify an alternate location in the event the primary location is incapacitated. Also, the DO should ensure the Command Center Team is made up of key individuals with formally assigned responsibilities. The DO should develop procedures to ensure vital information is communicated to all occupants and emergency officials under evacuation and non-evacuation emergency situations. All of these actions should be made part of the building-wide OEP.

OCCUPANT EMERGENCY PROCEDURES AND RESPONSIBILITIES FOR 500 E STREET SW, WASHINGTON, DC

Originator	Document	Purpose	Distribution
Commission	USITC Directive 3051.0, *Emergency Evacuation of the USITC*	Provides evacuation guidance to Commission employees	USITC intranet (internal access)
Commission	USITC Administration Notice 3051, *Emergency Evacuation of the U.S. International Trade Commission*	Assigns responsibility to Commission employees when evacuating the building	USITC intranet (internal access)
Commission	Diagram of Commission occupied floors with designated areas of responsibility (i.e., east and west wing).	Ensures wardens are aware of their area of responsibility	Commission Floor Wardens
Commission	United States International Trade Commission Telephone Directory	Quick reference to emergency phone numbers and medical emergency procedures.	Internal distribution
Commission	List of first aid kits and location of wheelchairs	Identifies individuals assigned a first aid kit by location and location of wheelchairs.	USITC intranet (internal access)
Commission	*Procedures To Be Used In Case Of Bomb Threat*	Bomb threat procedures	Handout provided to all Commission employees over 5 years ago.
Commission	Chemical attack procedures	Procedures in the event of a chemical attack	DO and Alternate DO
SSA	*Emergency Management/Civil Defense*	Emergency guidance	SSA agency-wide manual
SSA	*Emergency Evacuation Information*	Building specific evacuation procedures. Assigned wardens and evacuation chair monitors; identified the color of hats to be worn by SSA's wardens for easy identification; supplied emergency office and pager phone numbers; and provided a detailed floor plan with arrows indicating the direction to follow when exiting the building. Additionally, the guidance advised SSA employees to re-enter the building when the ITC Chief Warden indicates.	Handout provided to SSA employees occupying 500 E Street, SW, Washington, DC
NASA	*Health and Safety* manual	An evacuation plan	Unknown
Boston Properties	Tenant Information Booklet	Contains bomb threat and fire emergency procedures.	New tenants

OCCUPANT EMERGENCY PROCEDURES AND RESPONSIBILITIES FOR 500 E STREET SW, WASHINGTON, DC

Originator	Document	Purpose	Distribution
Boston Properties	Independence Square Emergency Procedures Manual, also known as the Landlord's Handbook	Provides action steps that should be taken by the landlord and tenants in the event of specific situations such as fire, bomb threat, medical emergency, natural disaster, civil disturbance procedures.	New tenants
Boston Properties	Fire Alarm Procedures	Describes the landlords' role when an alarm sounds.	New tenants
Boston Properties	Emergency Recovery Contingency Plan	Describes what the landlord will do in the event of a mechanical outage – electric, water, HVAC, heat, etc.	New tenants
Boston Properties	Building Questionnaire	Contains building specifications and identifies responsible officials.	All tenants and GSA when there is a change in either specifications or staff.
Boston Properties	Handout addressing the Damage Control Coordinator	The landlord accepts responsibility to: alert Kastle Security to unlocked all doors for an expeditious exit out of the building; assist in safely evacuating people out of the building; verify the cause of an alarm and monitor the phone for updates on the emergency; update arriving firemen if smoke or fire is found and clear building access for the firemen and equipment; and reset elevators and alarms and notify the security guards that it is safe to enter the building.	New tenants

OIG OBSERVATIONS DURING THE JULY 2002 EVACUATION DRILL AT 500 E STREET SW, WASHINGTON, DC

During the July 24, 2002 unscheduled evacuation, OIG staff observed that the building occupants immediately began to exit the building at the sound of the alarm. After approximately eight to ten minutes, no other building occupants were seen exiting the building. The following areas were conducted appropriately:

- The occupants that were seen exiting the building did so in a quick and orderly manner.
- The security guards assisted by directing traffic on E Street, SW so that the building occupants could cross the street.
- The security guards also checked identification badges as the staff re-entered the building.
- The Command Center Team maintained their positions to offer assistance.
- While exiting the building, OIG staff tested a secured door to verify that the Kastle Key was deactivated.
- The Chief Warden announced when it was safe to re-enter the building.