



RON GALPERIN
CONTROLLER

November 10, 2022

Honorable Eric Garcetti, Mayor
Honorable Michael Feuer, City Attorney
Honorable Members of the Los Angeles City Council

Re: Follow-Up Audit — Alert and Aware: Modernizations to Improve NotifyLA, the City’s Emergency Mass Notification System

In August 2018, my office released the report, “Alert and Aware: Modernizations to Improve NotifyLA, the City’s Emergency Mass Notification System,” which examined the Emergency Management Department (EMD) and its use of NotifyLA, the City’s mass emergency alert system. The report identified several issues preventing the department from using the system as effectively as possible.

Since then, EMD has taken important steps to improve its operation of NotifyLA by formalizing standard operating procedures and developing consistency in messaging and dissemination protocols. However, opportunities remain to improve the program with additional training courses, message templates and pre-scripted alert translations.

Given the increasing frequency and magnitude of emergencies affecting Angelenos, my office initiated this follow-up review to assess the EMD’s implementation of the initial report’s recommendations. The table below summarizes our evaluation of EMD’s ongoing efforts:

2018 Recommendations	Status	Comments
Formalize Standard Operating Procedures (SOPs) for the activation of NotifyLA, and provide guidance and training to City departments on the importance of using NotifyLA and how they should request EMD to send notifications.	Implemented	LAFD, LAPD and EMD approved the Emergency Public Information and Warning Policy in 2021, which defines criteria and roles for the activation and use of public notification systems.

Require the dissemination of alerts via NotifyLA for any emergency that is communicated to the public by the City through other methods.	Implemented	The Emergency Public Information and Warning Policy establishes NotifyLA as a primary contact method for all possible incidents requiring emergency notifications.
Expand the use of generic pre-scripted alerts, which direct recipients to more detailed information on City websites and social media.	Implemented	EMD has developed pre-scripted messages for several scenarios and has templates for multiple message types for each scenario.
Develop protocols for the consistent dissemination of Wireless Emergency Alerts (WEAs) and submit them to the Emergency Operations Board for approval.	Implemented	The Emergency Public Information and Warning Policy establishes protocols for the dissemination of WEAs depending on the severity and scale of a threat.
Refine NotifyLA subscription campaign to demonstrate a clear value to potential subscribers.	Implemented	EMD actively encourages the public to subscribe to NotifyLA through Public Information Officers, City websites, social media, and informational postcards.
Establish protocols to require that all messages, including Wireless Emergency Alerts, be pre-scripted and translated from English to other commonly spoken languages.	<i>In progress</i>	The NotifyLA system has an automated Spanish translation feature for WEAs, and EMD has enough in-house Spanish speakers to translate all other pre-scripted alerts. However, no translations other than Spanish are possible for WEAs due to system limitations.
Develop a plan, including any needed funding, to facilitate translations of emergency alerts into the City's commonly spoken languages.	<i>In progress</i>	All existing pre-scripted messages have been translated into Spanish. EMD is currently working with the Mayor's Language Access Program to identify available funding for additional translations of non-WEA messages.
Work with stakeholders to	<i>In progress</i>	EMD plans to develop a

develop specifications for a new request for proposals and solicit competitive bids for the platform to support NotifyLA.		request for proposals for a citywide software purchasing contract in FY 2023-24. City departments, including the Harbor, that are leveraging EMD's current contract, will be able to use the new contract.
Provide subscribers with step-by-step instructions on how to filter messages for subscribers to define notifications that are relevant to them.	<i>No longer applicable</i>	Since the previous report, EMD has transitioned from the Nixle platform to Everbridge which allows the department to access millions of phone numbers for emergency alerts in addition to opt-in subscribers. As a result, EMD is much less reliant on subscriber databases and the location information submitted by participants.
Work with the Airport and Harbor departments to coordinate negotiations and contracting efforts, to provide the City with the best service agreement for the best price.	<i>Will not implement</i>	EMD will not fully implement this recommendation. LAWA's current use of the Everbridge system is considerably different from EMD's use of the platform. EMD is in the process of negotiating updated contract terms with the vendor, which will allow other departments interested in procuring services from the updated contract to piggyback off the new contract.

While EMD has taken important steps to improve the delivery of emergency notifications as recommended in our 2018 report, there is still work ahead. Continued investment in our City's emergency alert system is an investment in the safety and security of Los Angeles. I am encouraged by the findings of this follow-up report and I urge the City to continue seeking solutions that safeguard life and property no matter what challenges may lie ahead.

Sincerely,



RON GALPERIN
L.A. Controller

Alert and Aware: Modernizations to Improve NotifyLA, the City's Emergency Mass Notification System





SUMMARY

In the event of a catastrophic incident, local government authorities typically have the most accurate and real-time understanding of the emergency and its potential adverse impacts. Depending on the scale and complexity of the emergency, some incidents may require immediate action from the public to preserve life and property. The City of Los Angeles (City) has the critical responsibilities of coordinating emergency response efforts, dispatching assistance, and determining whether the public needs to take steps to protect themselves or others.

To ensure Angelenos receive timely emergency information, the Emergency Management Department (EMD) manages and operates NotifyLA, the City's mass emergency alert system. When there is an imminent threat to public safety, the City uses NotifyLA to alert subscribers through their landline phone, mobile phone, or email.



In August 2018, our Office issued a review of EMD's management and operation of NotifyLA and identified several issues preventing the department from using the system as effectively as possible. The purpose of this report is to follow-up on EMD's progress in implementing recommendations during the ensuing four-year period; it is not a new review and it does not provide additional recommendations.

Follow-up Results

Overall, we found that EMD has made substantial progress in addressing issues identified in the August 2018 review, but opportunities remain for the department to improve the NotifyLA program. **EMD has implemented five recommendations, and three recommendations are in progress. The department has elected not to implement one recommendation, and one recommendation is no longer applicable.** EMD should continue its work toward developing additional training courses, message templates, and translations. These improvements are essential given the increasing frequency and magnitude of emergencies affecting Angelenos.

BACKGROUND

About NotifyLA

NotifyLA delivers alerts, warnings, and instructional messages to City residents and businesses during disasters or large-scale citywide events. The system also notifies recipients of necessary precautions, such as evacuations, curfews, or sheltering in place orders. Individuals are encouraged to subscribe to the service, which is free to the public, to remain informed during emergencies. Alerts can be communicated in several forms—recorded messages through landline phones, text messages through mobile phones, or mass emails—and may provide links to other sources with more specific and targeted information.

NotifyLA runs on a platform from Everbridge, a software and public safety solutions provider. Everbridge maintains a database known as Resident Connection, which has more than 200 million landline, VoIP (i.e., internet), and mobile phones in the United States that emergency managers can access to send out emergency alerts. Residents and business owners can also choose to opt-in to the NotifyLA system and add up to five addresses per account to ensure they receive alerts for those. As of June 2022, there were approximately 1.7 million addresses covered by NotifyLA through Everbridge’s Resident Connection system, representing nearly three million separate phone lines. There are approximately 602,000 additional opt-in NotifyLA subscribers.

Wireless Emergency Alerts - In addition to sending notifications to opt-in subscribers, the City can send Wireless Emergency Alerts (WEAs) when there is an imminent threat to safety or life. The City has an executed agreement with the Federal Emergency Management Agency (FEMA), authorizing the use of NotifyLA to initiate WEAs through participating wireless carriers. Upon activating WEA, the City pushes alerts to mobile devices in affected areas via a federally-regulated communications network.

Any individual with a WEA-enabled mobile device that is present in a designated geographic location during the notification will receive it, even if they are not a local resident, or an active NotifyLA subscriber. Similar to Amber Alerts, WEAs emit distinct ring tones and vibrations which can be particularly helpful for people with hearing or vision-related disabilities.

All City departments can request that EMD send a WEA, with LAFD and LAPD being the most common requestors. Los Angeles World Airports (LAWA) has its own ability to send alerts independent of EMD. During the COVID-19 pandemic, the Mayor’s Office requested WEAs to share public health information and available resources for people to keep themselves safe.

System Platform – The City established its emergency mass notification system in 2009. LAPD, in partnership with LAFD, EMD, and the City’s Information Technology Agency (ITA), developed technical specifications for the system and selected web-based software platform Nixle to support NotifyLA. In 2015, Nixle was acquired by communications software company Everbridge. Since the previous review, EMD has fully transitioned NotifyLA to the Everbridge platform. EMD continues to pay for a Nixle subscription, which residents can use if they wish to receive alerts from neighboring jurisdictions and law enforcement agencies.

KEY ISSUES FROM 2018 REVIEW

Inconsistent Dissemination of Alerts

EMD lacked formal standard operating procedures for the activation and use of NotifyLA. In accordance with the City’s Emergency Public Information Annex, LAFD and LAPD are the incident commanders that determine the preferred method of sharing information during an emergency. If the City’s Emergency Operations Center (EOC) is not activated and staffed, depending on the nature of the emergency, either LAFD or LAPD acts as the lead department responsible for sending NotifyLA messages. Both departments may also choose to use other avenues of communication, including official press releases and public statements from City officials, social media, and websites. At the time of the previous review, this meant that LAFD and LAPD could choose to not use the NotifyLA system, even when advised to do so by EMD.

Insufficient guidance on how and under what circumstances departments should request an alert to be sent also led to potentially critical information being inadvertently withheld from the public. During the 2017 La Tuna Fire, no alerts were delivered via NotifyLA despite the hundreds of notifications and statements disseminated by LAFD and elected officials. Just three months later, EMD elected to use NotifyLA to advise residents about initial evacuation orders in the Sylmar area for the Creek Fire, but did not use the system’s WEA functionality until they updated residents about evacuation orders later in the day.

Customizing NotifyLA to Meet Subscriber Needs

NotifyLA alerts were limited to just two languages, English and Spanish—but the City infrequently sent alerts in Spanish. Census bureau data showed that in the Los Angeles metropolitan area, at least 185 languages were spoken at home and nearly half of households spoke English less than “very well.” Emergency notification systems used by the County of Los Angeles and the Los Angeles Unified School District (LAUSD) supported a minimum of five languages. New York City’s emergency notification system offered scripted alerts in thirteen languages.

EMD staff at the time also expressed concerns about the efficiency of Nixle and the risk that subscribers would receive information that may not be useful. Nixle used a subscriber's provided zip code to determine which notifications they received. Subscribers were not provided with instructions on how to limit messaging, so they may have been subject to messages not immediately relevant to them.

Cost Saving Opportunities

At the time of our previous review, EMD was paying approximately \$235,000 annually for its Nixle subscription, a cost that represented 33% of the City's Emergency Operations Fund annual budget. Both LAWA and the Harbor Department (Port) had comparatively lower costs for their service licensing agreements with Everbridge, paying a total of \$97,000 and \$23,000, respectively.

Cost differences may have been in part due to differences in procurement methods, as well differences in how the departments used the platform. Neither LAWA nor the Port used their platforms for public alerts, nor did they solicit public subscribers. Even so, **the City may not have been receiving the best pricing and services from the system platforms that support NotifyLA.** The system license was not purchased directly from the company and the City did not leverage other departments' agreements with the same vendor.

RECOMMENDATION FOLLOW-UP

Overall, EMD has made significant progress in improving the NotifyLA program, but have yet to fully address the risks identified in our previous review:

- five recommendations were **implemented**;
- three recommendations are **in progress** (the department continues to work toward full implementation);
- one recommendation will **not be implemented** (the department has determined implementation is unnecessary); and
- one recommendation is **no longer applicable**.

While EMD has formalized emergency notification procedures, it must continue to train City departments on policies and procedures regularly so that departments are fully prepared to use NotifyLA as a public safety tool. The department has developed generic, pre-scripted alerts to make the notification distribution process more efficient. However, EMD has been unable to develop a comprehensive translation program for emergency notifications, despite a significant portion of the Angelenos speaking languages other than English.

1. EMD should formalize Standard Operating Procedures (SOPs) for the activation of NotifyLA, and provide guidance and training to City departments on the importance of using NotifyLA and how they should request EMD to send notifications.

Status: Implemented

In June 2021, LAFD, LAPD, and EMD approved the Emergency Public Information and Warning Policy, which defines criteria and roles for the activation and use of public notification systems. The policy includes procedures for determining the notification types and distribution methods, depending on the severity and scale of a threat.

EMD provides additional guidance and templates in their NotifyLA Message Sending Guide, and hosts training for all City agencies that can request notifications (LAFD, LAPD, LAWA and the Harbor Department). Departments authorized to send notifications (EMD, LAFD, and LAPD) are also responsible for tracking internal training for their own departmental operating procedures. EMD is also planning to provide training to the Office of the Mayor.

2. EMD and/or the LAPD’s Department Operations Center should be required to disseminate alerts via NotifyLA for any emergency that is communicated to the public by the City through other methods. The Emergency Operations Board (EOB) should approve, support, and enforce this policy.

Status: Implemented

The Emergency Public Information and Warning Policy establishes NotifyLA as a primary contact method for all possible incidents requiring emergency notifications. In all instances, information will be shared via texts, emails, the NotifyLA app, and social media; phone calls are optional depending on the time of day and the urgency of the situation.

The Emergency Operations Board (EOB), composed of the Police Chief, the Fire Chief, and the heads of 15 City departments and offices, has reviewed the Emergency Public Information and Warning Policy. While the policy was not approved by the full EOB, the policy was signed by the Police Chief and the Fire Chief (who serve as Chair and Vice-Chair) respectively, and EMD's General Manager.

3. EMD should expand its use of generic pre-scripted alerts, which direct recipients to more detailed information on City websites and social media.

Status: Implemented

Since the previous review, EMD has developed pre-scripted messages for the following scenarios: wildfire, debris flow, hazardous material release, active shooter, "avoid the area", curfew, and general evacuation. Each scenario has templates for multiple message types, including English and Spanish WEAs, text messages, phone messages, and emails. EMD is in the process of developing templates for additional disaster scenarios.

4. EMD should develop protocols for the consistent dissemination of Wireless Emergency Alerts (WEAs) and submit them to the Emergency Operations Board for approval.

Status: Implemented

The Emergency Public Information and Warning Policy establishes protocols for the dissemination of WEAs depending on the severity and scale of a threat. Whether notifications are sent to targeted areas or citywide, WEAs are only initiated when the public needs to take actions to preserve life and safety.

5. EMD should establish protocols to require that all messages, including Wireless Emergency Alerts, be pre-scripted and translated from English to other commonly spoken languages.

Status: In progress

Target Date: To be determined

The NotifyLA system has an automated Spanish translation feature for WEAs, and EMD has enough in-house Spanish speakers to translate all other pre-scripted alerts. However, no translations other than Spanish are possible for WEAs due to system limitations. The department will need additional funding for other language translations.

6. EMD should develop a plan including any needed funding to facilitate translations of emergency alerts into the City’s commonly spoken languages.

Status: In progress

Target Date: 12/2024

All existing pre-scripted messages have been translated into Spanish. EMD is currently working with the Mayor’s Language Access Program to identify available funding for additional translations of non-WEA messages. EMD anticipates it will be able to develop additional translations by the end of 2024, though specific implementation date targets are dependent on funding availability.

7. EMD should refine its NotifyLA subscription campaign to demonstrate a clear value to potential subscribers.

Status: Implemented

EMD actively encourages the public to subscribe to NotifyLA through Public Information Officers, City websites, social media, and informational postcards. The department’s website now specifies the types of alerts subscribers will potentially receive through NotifyLA and Nixle, and includes links to sign in to both platforms so users can manage their settings. EMD also advertises NotifyLA through their public program campaigns, including extreme heat programs that offer information about local cooling centers.

In the future, the department plans to use grant funding to further develop public awareness campaigns. EMD’s subscription to Everbridge Resident Connection, which allows the department to access millions of phone numbers for emergency alerts in addition to opt-in subscribers, means NotifyLA’s success is less reliant on public outreach and subscription campaigns.

8. EMD should provide subscribers with step-by-step instructions on how to filter messages for subscribers to define notifications that are relevant to them.

Status: No longer applicable

Since the previous review, EMD has transitioned from the Nixle platform to Everbridge. EMD’s subscription to Everbridge Resident Connection allows the department to access millions of phone numbers for emergency alerts in addition to opt-in subscribers. As a result, EMD is much less reliant on subscriber databases and the location information submitted by participants. Individuals still have the option to subscribe to Nixle and set location and message delivery settings if they wish to receive updates from other government agencies.

9. EMD should work with the Airport and Port departments to coordinate negotiations and contracting efforts, to provide the City with the best service agreement for the best price.

Status: Will not implement

EMD will not fully implement this recommendation. LAWA’s current use of the Everbridge system is considerably different from EMD’s use of the platform. LAWA uses a visual control center for operational coordination, and EMD pays for a mass notification program for public emergency alerting. EMD is in the process of negotiating updated contract terms with the existing vendor. City departments interested in procuring services from the updated contract will be able to piggyback off the new contract through individual agreements with the service provider.

10. EMD should work with stakeholders to develop specifications for a new request for proposals and solicit competitive bids for the platform to support NotifyLA.

Status: In progress

Target Date: 07/2023

EMD plans to develop a request for proposals for a citywide software purchasing contract in FY2023-24. Other City departments, including the Port and departments that are leveraging EMD’s current contract, will be able to use the new contract. EMD is working with the City Attorney’s Office and other departments to coordinate the procurement process.