

ASSEMBLY THIRD READING
AB 2475 (Committee on Emergency Management)
As Amended May 18, 2026
Majority vote

SUMMARY

This bill separates existing after-action reporting into two reports: a public safety response report due within the first 180 days of a state of emergency declaration, and a disaster recovery report due no later than 180 days after the declaration ends. It also requires Cal OES to provide annual recovery updates until the second report is completed, and mandates that local after-action reports be completed, no later than 120 days after a local emergency declaration for which the Governor has also declared a state of emergency.

Major Provisions

- 1) Requires Cal OES, in cooperation with involved local and state agencies, to complete an after-action report that reviews the public safety response, with conclusions and recommendations, within the first 180 days of a declaration of a state of emergency, instead of within the first 180 days of a disaster declaration.
- 2) Requires Cal OES, in cooperation with involved local and state agencies, to complete a second after-action report that reviews disaster recovery activities, with conclusions and recommendations, no later than 180 days after a declaration of a state of emergency ends, instead of as part of the single after-action report referenced above.
- 3) Requires Cal OES to annually draft written updates related to the recovery activities until the second, recovery focused after-action report is completed, as specified.
- 4) Requires a city and/or county, as applicable, in cooperation with involved local and state agencies, to complete an after-action report, as specified, no later than 120 days after declaring a local emergency for which the Governor also declared a state of emergency, and to share the report with Cal OES and all other interested public safety and emergency management organizations.
- 5) Specifies the above required local after-action report constitutes as the after-action report required by regulation, as specified.

COMMENTS

Background: The reporting deadline for Cal OES after-action reports is open to interpretation in current law. Current law states after-action reports are due "within 180 days after each declared disaster." Cal OES interprets this due date to mean within 180 days after a disaster declaration ends. However, some disaster declarations, or state of emergencies, can last over a decade. For example, on March 24, 2026, Governor Newsom signed a proclamation ending 18 open state of emergencies that were originally proclaimed in the years of 2015, 2017, 2018, 2020, 2021, and 2022. While some of these emergencies already have an associated, published after-action report, several do not (but should within 180 days). Furthermore, there are currently 52 open state of emergency declarations, going back as far as December of 2022. It is important to note that many of these emergency declarations have valid reasons for being left open for many years. including lengthy recovery periods, state and federal funding eligibility, and more. Yet when state of

emergency declarations can last years, the state – including local emergency managers on the front lines of disaster response – is left waiting for answers that would likely be useful for mitigating, preparing for, responding to, and recovering from future disasters.

This bill is attempting to solve this issue by splitting the current after-action report into two separate reports: a response focused report and a recovery focused report. These are the two topics required in statewide after-action reports by law, including associated conclusions and recommendations. This bill will functionally leave the report due date for recovery information unchanged, clarifying this report is due 180 days after a disaster declaration ends. However, the response report would now be due within the first 180 days of the disaster declaration. Furthermore, this bill requires annual recovery updates from Cal OES until the recovery after-action report is completed. It also codifies requirements for local level after-action reports.

After Action Reports: An after-action report is a retrospective document evaluating a declared emergency. An after-action report provides a source for documenting response and early recovery activities, identifies successes and areas needing improvement during emergency operations, analyzes the effectiveness of the different components of the Standardized Emergency Management System (SEMS), and describes and defines a plan of corrective action for implementing recommended improvements to existing emergency response efforts.

Per existing law, after-action reports are required for any emergency declared by the Governor. These reports must provide a review of public safety response and disaster recovery activities, including conclusions and recommendations based on the report's findings. These reports must be shared with all interested public safety and emergency management organizations.

Local after-action reports are currently required through California Code of Regulations, Title 19 Section 2450. These regulations require any city, city and county, or county declaring a local emergency for which the governor proclaims a state of emergency, and any state agency responding to that emergency shall complete and transmit an after-action report to Cal OES within 90 days of the close of the incident period. These local level after-action reports are required to include, at a minimum, a review of response actions taken, application of SEMS, suggested modifications to SEMS, necessary modifications to plans and procedures, identified training needs, and recovery activities to date.

Open Cal OES After-Action Reports: According to Cal OES, 23 Cal OES after-action reports are still in progress, dating as far back as 2017.

According to the Author

"California relies on after-action reports to capture critical lessons learned from disasters and improve future emergency response and recovery efforts. However, ambiguity in current law regarding the timeline for these reports has led to inconsistent implementation and significant delays. As the California Office of Emergency Services interprets current law as directing the completion of after-action reports no later than 180 days after an emergency declaration ends, reports are often postponed for years while emergency declarations remain open for valid recovery and funding purposes. As a result, the state and local emergency managers are left without timely access to information that could strengthen preparedness and response in the face of increasingly frequent and severe disasters.

This bill brings clarity, accountability, and timeliness to the after-action reporting process by separating response and recovery components into two distinct reports with clear deadlines. It

ensures that response-focused findings and recommendations are available within the first 180 days of a disaster, when they are most actionable, while maintaining the existing timeline for recovery reporting. Additionally, the bill requires annual recovery updates and provides greater clarity for local reporting requirements. By improving the structure and timeliness of after-action reports, this bill strengthens California's ability to learn from past emergencies and better protect communities in future disasters."

Arguments in Support

None on file.

Arguments in Opposition

None on file.

FISCAL COMMENTS

According to the Assembly Committee on Appropriations,

- 1) Annual costs of approximately \$2.2 million to OES for eight additional staff positions to manage expanded data collection, analysis, coordination, reporting, and metrics tracking across multiple concurrent disasters (General Fund (GF)).
- 2) By requiring a local agency to complete an after-action report in a manner different than the existing regulatory requirement to complete such a report, this bill may create a state-mandated local program. If the Commission on State Mandates determines the provisions of this bill create a new program or impose a higher level of service for which the state must reimburse local costs, the local agency could seek reimbursement from the state (GF). The magnitude of costs depends on the number of local emergencies for which a report is required and the staff workload needed to prepare each report, which will vary based on the complexity of each report's data analysis and recommendations.

VOTES**ASM EMERGENCY MANAGEMENT: 5-1-1**

YES: Ransom, Arambula, Bains, Bennett, Calderon

NO: Hadwick

ABS, ABST OR NV: DeMaio

ASM APPROPRIATIONS: 12-1-2

YES: Wicks, Hoover, Aguiar-Curry, Calderon, Caloza, Fong, Mark González, Krell, Pacheco, Pellerin, Sharp-Collins, Solache

NO: Tangipa

ABS, ABST OR NV: Dixon, Ta

UPDATED

VERSION: May 18, 2026

CONSULTANT: Ryan Fleming / E.M. / (916) 319-3802

FN: 0002939