

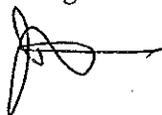


FEMA

National Advisory Council

December 31, 2013

MEMORANDUM FOR: Craig Fugate
Administrator
Federal Emergency Management Agency

FROM: James Featherstone 
Chairman
FEMA National Advisory Council

SUBJECT: Recommendations from December 3, 2013 Meeting

The purpose of this memorandum is to forward the National Advisory Council's (NAC) recommendations from the December 3, 2013 public teleconference for your consideration.

The Council met in a public session to review the progress of two of its three subcommittees since its meeting in April 2013 and deliberate potential recommendations set forth by these subcommittees.

Through discussions and deliberations, the NAC concurred to forward nine recommendations on the following issues: Implementation of the Biggert Waters Flood Insurance Reform Act of 2012 and the Review and Revision of the National Incident Management System. The recommendations are as follows:

FEDERAL INSURANCE AND MITIGATION ADMINISTRATION

Implementation of the Biggert-Waters Flood Insurance Reform Act of 2012 (BW-12)

The implementation of BW-12 directly affects the National Flood Insurance Program (NFIP). The NAC is concerned about the impact of these changes to individuals and communities in high risk areas. The NAC recommends that FEMA prioritize the following initiatives for consideration:

- a. Encourage and maintain participation in the National Flood Insurance Program (NFIP);
 - b. Educate consumers about the NFIP and the flood risk associated with their property; and
 - c. Complete the Affordability Study, which is intended to address the affordability of the NFIP premiums and the effects of increased premiums on low-income homeowners and will identify ways to increase affordability.
2. The NAC identified the Community Rating System (CRS) and associated discounts on flood insurance premiums as a significant and active measure that community leaders can take in reducing the impact of the BW-12 on their citizens. The NAC recommends that:
- a. FEMA's Federal Insurance and Mitigation Administration (FIMA) conduct a systematic analysis of community participation in the CRS. This analysis should focus on obstacles that prevent participation, identify methods to increase participation and establish options to incentivize attempts to attain higher ratings which lead to decreased insurance premiums; and
 - b. FEMA's FIMA consider an outreach or public engagement strategy that targets realtors, building associations, bankers, chambers of commerce and other impacted industries and organizations with a direct and vested interest in strong and resilient communities.
3. The NAC feels that there is a lack of intentional and sustained engagement with the public, particularly those most impacted, on this issue. The result is often misinformation that elicits anger and fear and leads to public confusion and inaccurate media reports. Therefore, the NAC recommends

that FEMA immediately conduct a comprehensive and aggressive public information campaign which clarifies the issue and requirements and provides impacted citizens with the information they need to act to protect their interest and make future decisions. Priority attention should be placed on two impacted audiences:

- a. Those already in Flood Zone A or V and who may not be aware of the increased rate; and those who are subject to mandatory flood insurance requirements because new maps have identified their properties are in a Special Flood Hazard Area.
4. Homeowners and businesses, particularly those in Flood Zones A and V, may be facing steep increases in NFIP premiums. In addition, the entire community may be impacted by these increases in the form of reduced enrollments in local schools, lost tax revenue and other secondary and tertiary effects. Therefore, the NAC recommends that:
- a. FEMA's FIMA look for ways to minimize the impact of the steep increases that may be faced by homeowners and businesses, particularly those in Flood Zones A and V, and communicate these methods to the stakeholders; and
 - b. FEMA's FIMA identify the secondary and tertiary impacts of the implementation of the BW-12 on the whole community, not just the property owners and develop solutions to mitigate these multi-layered consequences.

NATIONAL PREPAREDNESS DIRECTORATE

The Review and Revision of the National Incident Management System

1. NIMS represents a core set of doctrines, concepts, principles, terminology, and organizational processes that enables effective, efficient, and collaborative incident management. To expect a vast majority of individuals to read and understand the complexities of NIMS is unreasonable. In its current form, the NIMS document does not clearly define its stakeholders, lacking an explanation and incorporation of the role of nongovernmental organizations and the private sector in emergency management. As such, the NAC recommends that FEMA clearly define the intended NIMS audience(s)—relevant stakeholders—in drafting the revised NIMS document. Specifically that audience should include all levels of governmental, nongovernmental organizations, and the private sector.
2. For NIMS to be relevant to stakeholders, NIMS must be compatible, not in conflict, with the doctrines, concepts, principles, terminology, and organizational processes of other agencies and groups. The NAC recommends that the National Integration Center (NIC), during the review and revision process, should ensure that NIMS integrates effectively with the Hospital Incident Command System (HICS), the National Contingency Plan and the Department of Defense's Support of Civil Authorities mission, and other response systems that are employed during response and recovery activities.
3. Governmental stakeholders have a mandate to be NIMS compliant [see Recommendation 4], but there lacks a similar motivation for the private sector and nongovernmental organizations. The NAC recommends that FEMA develop an aggressive rollout of the revised NIMS document and that the NIC develop targeted promulgation strategies early on in the revision process, rather than at its conclusion. The rollout should include the development of incentives and the distribution of Partner Guides. The incentives should motivate stakeholders to readily adopt NIMS and to utilize the NIMS document. The promulgation of Partner Guides for NIMS will provide a targeted index to information in the NIMS document that is specifically pertinent to each stakeholder. The use of partner guides was done effectively during the rollout of the National Response Framework (NRF).

4. The term “NIMS Compliant” and the need for “NIMS Compliance” must be better defined and measurable. The NAC recommends that the NIC incorporate specific NIMS compliance metrics for federal departments, state, local, tribal and territorial governments into the revised NIMS document to ensure consistent application by federal departments.

5. The current NIMS review and revision cycle is two years. In order to effectively engage stakeholders, a review and revision cycle of longer than two years is necessary. Revisions to NIMS should not be based upon a specific timetable; rather those updates should be conducted within a timeframe that supports stakeholder engagement and without compression that creates an unrealistic and unachievable expectation for review and revision. Likewise, the timeframe for review and revisions must be frequent enough to ensure the constant relevancy of NIMS. Therefore, the NAC recommends that the two-year review and revision cycle be re-examined to determine if it is realistic and appropriate

The National Advisory Council is grateful for the opportunity to provide these recommendations to you and FEMA for your consideration and looks forward to the next opportunity in March 2014.