



FEMA

National Advisory Council

March 14, 2012

MEMORANDUM FOR: Craig Fugate
Administrator

FROM: James Featherstone 
Chairman
National Advisory Council

SUBJECT: Recommendations from February 16, 2012 Meeting

The purpose of this memorandum is to forward the National Advisory Council's (NAC) recommendations from the February 16, 2012 meeting in San Francisco, CA for your consideration.

The Council met in a public session to review the progress of its four subcommittees since its meeting in September 2011 and deliberate potential recommendations set forth by the subcommittees. The NAC appreciated the opportunity to engage one-on-one with you during the public session. The whole community concept continues to be an integral part of the NAC's discussions and recommendations.

Through discussions and deliberations, the NAC concurred to forward 25 recommendations on the following issues:

Office of Protection and National Preparedness

- Grant Proposal (#1)
- Emergency Management Institute (#2-3)
- National Response Framework (#4-14)
- Metrics for Evaluating Public Preparedness (#15)

Office of Response & Recovery

- Response and Recovery (#16-18)
- Public Assistance (#19)
- FEMA Memorandum of Understanding with AARP (#20)

Office of Policy and Program Analysis

- FEMA Strategic Thinking (#21)
- Annual Strategic Report (#22)

Office of External Affairs

- Private Sector Engagement (#23)

Federal Insurance & Mitigation Administration

- National Mitigation Framework (#24-25)

OFFICE OF PROTECTION AND NATIONAL PREPAREDNESS

Grant Proposal

1. **Recommendation:** The NAC requests that FEMA engage the NAC in the development of the implementation plan for the FY13 Grant Proposal.

Background: The FY13 Grant Proposal will have cascading effects on national preparedness. To that end, the NAC has the following questions and concerns:

- The shift to a two-year period.
- As responsibility shifts to states, whether states can handle the shift.
- How it will affect the Post Katrina Emergency Management Reform Act direction on tribal portions of grants.
- How states may handle the responsibility in conjunction with big cities/Urban Areas Security Initiatives (UASI).
- What could be some of the best practices for the states to address the new responsibilities? How are they collected?
- How will this affect UASI process?

Emergency Management Institute

2. **Recommendation:** The NAC recommends that FEMA continue to involve the NAC in the advancement of the Emergency Management Training and Education System (EMTES) concept.

Background: The NAC wants to continue to be involved to help advance EMTES. The type of involvement the NAC is seeking is to receive briefings prior to public comment periods and opportunities to provide strategic guidance prior to draft documents being produced. The NAC sees great value in EMTES activities and EMTES as a critical component of preparedness. The NAC would like to assist in overcoming any barriers to success (e.g. the training of the private sector). The NAC sees great potential in how EMTES can advance whole community, career progression, and workforce development.

3. **Recommendation:** The NAC requests information on how FEMA will ensure that the development, training and education of the aspects of the core capabilities of PPD-8 that are the responsibility of other federal government agencies will be an all-hazards and comprehensive approach for whole of community stakeholders.

Background: However, as FEMA is the agency responsible for "building out" PPD-8, how will FEMA ensure that those core capabilities (or aspects thereof) that are non-traditional components of FEMA are addressed during development and through training and education to ensure an all-hazards and comprehensive approach?

National Response Framework

4. **Recommendation:** The NRF should recognize FEMA as the federal coordinating entity, regardless of the nature of the disaster or emergency (Stafford Act, National Contingency Plan, or other federal response).

Background: State and local governments need a clear and consistent means for integrating with the federal government in all incidents. FEMA is uniquely positioned to bring together the appropriate federal, state, tribal, and local players with a stake in the response, regardless of whether or not an incident falls under the Stafford Act. Specifically assigning this coordinating responsibility to one agency ensures that there will be one common intergovernmental integration structure, rather than several concurrent ad-hoc approaches. One federal coordinating agency will form and foster the critical relationships necessary for building an effective and inclusive response team.

5. **Recommendation:** The NRF should address all disasters and emergencies that require any federal response (Stafford Act, National Contingency Plan, or other federal response).

Background: As indicated by the initial confusion during Deepwater Horizon and other responses, when federal, state, tribal, and local governments are not on the same page (i.e. in a structured

environment—see Recommendation #7), these stakeholders end up working at cross-purposes. The NRF is the common playbook for all players in the nation and should address all federal responses to ensure all stakeholders are always on the same page.

6. **Recommendation:** The NRF must recognize National Incident Management System/Incident Command Structure (NIMS/ICS) as an integral component, and therefore, the NAC recommends incorporating the following recommendations made by the National Preparedness Task Force in the report *Perspective on Preparedness: Taking Stock Since 9/11* for Congress on October 8, 2010: Recommendation #12 (Establish and fund a national, comprehensive mutual aid system based on NIMS) and Recommendation #16 (Establish a NIMS-typed resource inventory for nationally deployed homeland security and emergency management assets).

Background: To effectively deliver core capabilities, the needs and resources to fill the needs should be identified before mobilizing and delivering these resources. These steps should be accomplished quickly, often in the first hours after an incident, to ensure success. The current system, the Emergency Management Assistance Compact, does not provide/foster a fast-paced work environment. The critical gap in the system is that information about resources cannot be shared quickly enough between partners. Fortunately, a technology solution exists. For example, private sector solutions for finding and tracking resources are used all the time (e.g. Amazon.com or Buy.com). Government needs to harness and make this technology available. The NRF should lay the policy groundwork to support building this capability.

7. **Recommendation:** The NRF must describe not only the "what," but also the "who," "how," "where," and "when" of the federal response. The NRF should include a higher level of operational detail by listing the roles and responsibilities of all partners (federal, state, tribal, and local governments, as well as NGOs and the private sector) during an event requiring a federal response. Additionally, the NRF must articulate the concept of "unity of effort" where all partners resolve issues in a NIMS/ICS structure, at one location, based upon shared objectives and planning. The concepts in this recommendation are foundational to the NRF and the other mission area frameworks. These concepts should be addressed within the core document of each framework, not in the operational plans.

Background: Each level of government knows what it needs to do in a response—communicate and coordinate with the whole community. The question is: how do we get this done? As a nation, we fail during some incidents because we do not have a standardized approach for working together. Without a standardized approach for working together, response efforts will fail. Tactically, this integration is achieved through the ICS. At the executive level, the NRF should describe a structure through which all executives participate in coordinated strategic decision-making. Without this structure, decision-making is fractured and hampers the response. At the operational level, how resources and information will be coordinated, needs to be known. The enormous volume of data that must flow to all response partners cannot be managed by liaisons, as it creates a bottleneck. The NRF should establish a system by which players share robust common planning, logistics, and information functions at one location. These concepts are within the scope of the NRF. The NRF does not need to solve every problem; it only needs to establish processes for crafting common solutions.

8. **Recommendation:** The NRF should include an additional Emergency Support Function (ESF) to coordinate the brokerage of resources from the private sector and to provide assistance to the private sector for their recovery to normal operations.

Background: Without the "unity of effort" as described in Recommendation #7, whole community ideals cannot be successfully accomplished. If all of government is not on the same page, how can the rest of the community be brought into a common approach? When all government is working together, stakeholders can be directly plugged into the response, either through representation in the integration centers or in operations centers that are tied into the larger integrated "unity of effort" structure.

9. **Recommendation:** Creation of the "unity of effort" structure/process set forth in Recommendation #7 is necessary to operationally support the implementation of FEMA's whole community doctrine.

Background: (See background as described in Recommendation #8).

10. **Recommendation:** The NRF should consider recovery efforts undertaken through the National Disaster Recovery Framework (NDRF). A successful recovery will begin at the same time as the response and continue throughout (as well as beyond) the response phase.
Background: Response and recovery efforts need to move hand-in-hand. This concept applies to all five frameworks. There should be one shared description of how the interactions and transitions between the frameworks will be managed. This can be accomplished through the “unity of effort” structure, which will manage the overlaps between the mission areas and determine when and how transitions occur.
11. **Recommendation:** The NAC's formal review should be included at a point in the revision process before the public comment period, when significant changes can still occur in response to recommendations from the NAC.
Background: The NAC is a statutory body created to provide strategic advice on significant issues to the FEMA Administrator. The NAC should have a more formal status than members of the public at large and its comments and advice to the FEMA Administrator should be considered before general public comment periods begin.
12. **Recommendation:** The NRF should be integrated into existing training for key leaders, elected officials, emergency managers, and responders.
Background: It is important for all stakeholders to understand the changes associated with the adoption of the NRF. FEMA should ensure that all FEMA approved training and exercises are designed or updated to incorporate the relevant changes associated with the adoption of the NRF.
13. **Recommendation:** Private sector support should be more fully integrated into the NRF.
Background: Private sector considerations should be clearly incorporated into the various partner guides.
14. **Recommendation:** The NAC encourages FEMA to update the FEMA Online Resource Center in order to reach out to practitioners and public partners.
Background: It appears that the FEMA Online Resource Center needs to be updated. The intended objective of the FEMA Online Resource ORC Center is unclear.

Metrics for Evaluating Public Preparedness

15. **Recommendation:** The NAC advises that FEMA ensure that its evaluation of public preparedness emphasizes outcome-based measurements, as opposed to simple metrics (e.g. behavioral change).
Background: Behavior change is an important determinant of preparedness efforts. The ultimate outcome is saving lives and ensuring quality of life.

OFFICE OF RESPONSE & RECOVERY

Response & Recovery

16. **Recommendation:** FEMA should build a transparent system, or effort, that enables shared resource and capability awareness.
Background: The intent is that this system, not a database, provides a foundation to build upon and institutionalize processes that provide a sharing of available resources between all levels of government (federal, state, tribal, and local). For example, all stakeholders involved in the National Level Exercise 2011 Resource Allocation Workshops (RAW's) were informed of federal (including military) capabilities, and federal stakeholders were informed of state, tribal, and local capabilities. Visibility of the available capabilities and resources during steady state and the response and recovery phases is needed for all stakeholders.
17. **Recommendation:** In order to include whole community capabilities into the response and recovery, a process that defines FEMA's role and responsibility, among others, is needed in the NRF or elsewhere.
Background: Standard response protocols are followed during small, medium, and large disasters. However, there are tipping points in major catastrophic events that require more coordination to

ensure information and data is shared, objectives are discussed and established, and problems are solved with engagement of the whole community. For example, a tipping point is reached when it may be more prudent to evacuate survivors rather than move resources into a severely impacted area. In this type of situation, greater visibility and deeper discussion that engages the whole community is needed.

18. **Recommendation:** FEMA should build a “national” disaster relief reservist force based on common national standards that includes federal, state, local, and tribal partners and capabilities.

Background: This approach builds regional capabilities for all levels of disaster response activities. By allowing individuals from various levels of state and local and/or Community Emergency Response Team (CERT) members to be trained as part of a “national” reservist force, there would be enhanced resource sharing as well as promotion of whole community. The sponsoring agency would benefit from the additional experience in the event of a local disaster.

Public Assistance

19. **Recommendation:** The Public Assistance Bottom-Up Review (PA BUR) should incentivize use of advance recovery concepts.

Background: Advance recovery concepts are measures taken in advance of disaster that enable faster recovery and a reduction in accumulated losses generally associated with longer recoveries. Advance recovery concepts may include: community leaders with relationships between agencies or organizations; government resources identified in advance of a disaster in the form of discretionary funds; post event lines of authority established; spending and emergency purchasing authorities established in advance; and procedures and authorities established in advance to allow adjustment in man power resources as needed (e.g. union contract provisions negotiated and established).

FEMA Memorandum of Understanding with AARP

20. **Recommendation:** The NAC supports FEMA’s action to enter into a partnership with AARP.

Background: FEMA intends to enter into a Memorandum of Understanding with AARP and requested the NAC support the partnership.

OFFICE OF POLICY AND PROGRAM ANALYSIS

FEMA Strategic Thinking

21. **Recommendation:** The NAC recommends that FEMA embed valuable ideas and concepts—such as whole community, Strategic Foresight Initiative (SFI), and Youth Preparedness—into the “FEMA DNA.”

Background: The NAC recognizes the need for, and is concerned about, the long-term survival of important ideas and initiatives that need to pervade the practice, culture, and philosophy of emergency management.

Annual Strategic Report

22. **Recommendation:** FEMA’s strategic thinking efforts (e.g. SFI) should be institutionalized. The NAC recommends that FEMA deliver an annual strategic report for use by the emergency management community that includes trends, trend analysis, and changes. FEMA’s strategic findings should be relevant, usable, and “real” to the end users at the state, local, and tribal levels.

Background: The NAC fully supports the SFI efforts, sees there is an application to the emergency management community, and requests that FEMA take it to that level for it to realize its full impact. The NAC realizes there was significant outreach to prepare the January 2012 “Crisis Response & Disaster Resilience 2030” report and encourages its promulgation.

OFFICE OF EXTERNAL AFFAIRS

Private Sector Engagement

23. **Recommendation:** FEMA should redouble its efforts to focus on the small business community for preparedness and resiliency issues.

Background: FEMA should develop strategies for this specific group. Public-private partnerships have successfully engaged large private companies—such as Wal-Mart and Target—but small businesses need more attention and motivation to recognize the value of preparedness. Indications are that small businesses are largely unprepared and that models and tools would encourage participation in the whole community culture of preparedness.

FEDERAL INSURANCE & MITIGATION ADMINISTRATION

National Mitigation Framework

24. **Recommendation:** As the National Mitigation Framework (NMF) is operationalized, FEMA should develop a process that ensures involvement of all stakeholders and emphasizes community investment, engagement, and education.

Background: Community investment, engagement, and education are critical pieces of the NMF. The implementation of these three critical pieces has been a long-term challenge and has not been happening consistently. The NAC encourages FEMA to emphasize and identify a means to address these pieces in the implementation plans. Community engagement needs to be meaningful and include all partners, not just the powerful, but the local affected groups and those affected by hazard and mitigation policy. The dialogue needs to be customized to the different degrees of communities.

25. **Recommendation:** In order to better understand flood risk dynamics, the true costs of flooding, and to advance the national dialogue on flood risk; the NAC advises FEMA to open a transparent dialogue on flood costs, insurance policy, flood risk, and potential solutions for the future and who bears the cost.

Background: Flooding is the nation's largest risk in terms of dollars and frequency. However, the NAC's understanding of the true costs and impacts of flooding is unclear. Therefore, the NAC sees value in FEMA opening a broader discussion on the cost of flooding and who bears these costs.

Again, the Council appreciates the opportunity to provide these recommendations to FEMA for your consideration.