



MEMORANDUM FOR: James Featherstone
Chair, FEMA National Advisory Council

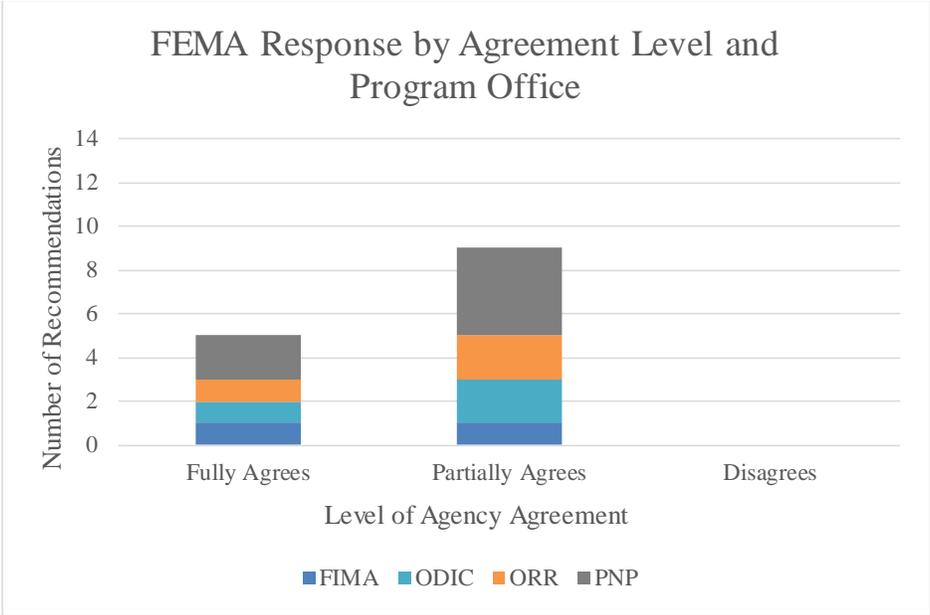
FROM: W. Craig Fugate
Administrator 

DATE: June 2, 2016

SUBJECT: Response to FEMA National Advisory Council Recommendations

Thank you for your letter dated February 19, 2016, regarding the FEMA National Advisory Council (NAC) recommendations from the February 2016 NAC meeting. Attached, please find a table with FEMA’s level of agreement and written response to each of the NAC’s recommendations.

FEMA agrees with all 14 recommendations, fully agreeing with five and partially agreeing with nine. The Office of the NAC will work with the FEMA program offices to track progress implementing these recommendations. See the below graphic for FEMA’s level of agreement to the recommendations:



NAC Recommendation		FEMA Response	
Topic/Issue	Recommendation Summary	Agreement Level	Text
Hazard Identification and Risk Assessments	<p>Recommendation 2016-16: FEMA should develop and promulgate guidance and training for state, local, tribal, and territorial emergency managers on tools, methodologies and best practices for conducting detailed, data-driven risk assessments.</p>	Partially Agrees	<p>Currently, FEMA offers both in-person (G-318) and online (IS-318) training through FEMA’s Emergency Management Institute (EMI) to State, local and tribal officials on how to develop hazard mitigation plans. These trainings include the requirements for conducting hazard identification and risk assessments to meet 44 CFR Part 201 requirements. Each year at the deployment of the Unified Reporting Tool FEMA issues guidance aiding jurisdictions in completing the THIRA/State Preparedness Report (SPR) assessment. Additionally, FEMA conducts several webinars and in-person technical assistance workshops to assist state and local emergency managers in developing and completing their THIRA/SPR assessment. These annual trainings and guidance reflect the evolution of the assessment.</p>
	<p>Recommendation 2016-17: The Federal Insurance and Mitigation Administration and the Protection and National Preparedness program offices should collaborate to determine how the HIRA will feed into the THIRA.</p>	Partially Agrees	<p>FIMA and National Preparedness Directorate (NPD) met on March 4th to discuss points of intersection between the HIRA and THIRA processes, as well as the appropriate vehicles (policy, fact sheets, etc.) with which to communicate these points of intersection with state, local, and tribal stakeholders. PNP (National Integration Center/National Preparedness Assessment Division) have conducted a cross-walk of the two assessments to identify THIRA steps that may be informed by HIRA requirements. PNP and FIMA are engaged in an ongoing dialogue for how to integrate these processes. PNP is identifying methods to use the THIRA process to inform hazard mitigation planning.</p>
	<p>Recommendation 2016-18: FEMA should change the reporting requirement for THIRA from every year to every other year.</p>	Partially Agrees	<p>The 2016 Homeland Security Grant Program Notice of Funding Opportunity specifies that the State Preparedness Report is the annual assessment that should be completed while stating that state, territories and urban areas should only review, and if necessary, update their THIRA on an annual basis. Therefore, jurisdictions are not required to develop a new THIRA annually. However, jurisdictions should update their THIRAs anytime they identify a new risk of significant concern, which may be annually.</p>

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National Flood Insurance Program	<p>Issue: The NFIP needs to better integrate mitigation and affordability to reduce long-term Federal exposure.</p>	<p>Recommendation 2016-19: The National Flood Insurance Program (NFIP) should explore a new pilot program, consisting of means-tested vouchers, mitigation loans, and multi-year policies, to promote affordability, mitigation, and reduced federal exposure. This is based on the Addressing Affordability in the National Flood Insurance Program by Carolyn Kousky and Howard Kunreuther published May 23, 2014.</p>	<p>Partially Agrees</p> <p>FEMA will develop an affordability framework in 2017, looking at a various mechanisms to promote affordability of flood insurance that can be used to inform decision making. This is informed by two reports published by the National Academy of Sciences titled "Affordability of National Flood Insurance Premiums."</p>
		<p>Recommendation 2016-20: FEMA should work through the Mitigation Framework Leadership Group (MitFLG) to develop cross-department programs to provide funding and support of hazard mitigation for flood prone housing.</p>	<p>Fully Agrees</p> <p>FEMA will seek to advance Recommendation 2016-20 through the MitFLG. FEMA is developing the Federal Mitigation Investment Strategy (FMIS), which is being developed pursuant to a GAO recommendation from July 30, 2015 (GAO-15-515), to identify, prioritize, and guide federal investments in disaster resilience and hazard mitigation-related activities and make recommendations to the President and Congress on how the nation should prioritize future disaster resilience investments. FMIS may include a component on hazard mitigation for flood prone housing. It is envisioned that FMIS will consider a three to five year investment horizon, and FEMA will bring NAC Recommendation 2016-20 to the MitFLG prior to FMIS implementation.</p>

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Active Shooters Issue: The incidence of active shooter situations continues to increase. There seems to be a lack of clarity about available training curriculum and the intended audience of various curricula. First responders and law enforcement training on active shooter is available, but there is gap in training for citizens and other response disciplines (e.g. hospitals, schools) on initial response actions and recovery from active shooter incidents.	Recommendation 2016-21: FEMA in its Whole Community role, should prioritize and continue to support federal counterparts in the development and promotion of community-based training for active shooter incidents.	Fully Agrees	FEMA’s Individual and Community Preparedness Division (ICPD) supports and promotes the work of federal counterparts in the development and promotion of community-based training for active shooter incidents through existing platforms. One of these platforms includes the National Training and Education office, whose many training courses are offered through the Emergency Management Institute (EMI), the Center for Domestic Preparedness (CDP), the National Preparedness Consortium, and Continuing Training Grants partners. These are geared towards the nation’s emergency response community so that they can better respond and protect the citizenry. These and other training partners offer courses for schools, hospitals, the private sector, and other members of the community. For the suite of current preparedness training programs, please refer to the National Training Education course catalog that can be found at https://www.firstrespondertraining.gov/content.do . Attendance at these courses may be coordinated with each State Administrative Agency Training Point of Contact, which can be found at https://www.firstrespondertraining.gov/content.do?page=saa .
	Recommendation 2016-22: FEMA should leverage America's PrepareAthon! to initiate and promote training and community awareness for active shooter incidents. Community response to active shooter should be made a focus hazard in a future April/September America's PrepareAthon!.	Partially Agrees	In 2016, the America’s PrepareAthon! Campaign is focused on taking preparedness actions for natural hazards; however, ICPD can use existing outreach channels to help promote active shooter materials and training developed by DHS, FEMA and other agency experts in counter-terrorism, active shooter incidents, and security preparedness. ICPD will help promote active shooter materials and training as they are finalized and in coordination with distribution plans developed by the lead components. ICPD will use existing outreach channels to promote awareness and utilization of EMI Independent Study courses for the public such as IS-906 Workplace Security Awareness, and IS-907 Active Shooter: What You Can Do.
	Recommendation 2016-23: Using data available from the U.S. Secret Service, FEMA should champion and help streamline the implementation of best practices of active shooter incidents through preparedness grant programs.	Fully Agrees	FEMA will include a section in the Notices of Funding Opportunity for the FY17 preparedness grant programs, addressing the need for preparedness capabilities in the areas of complex, coordinated terrorist attacks, including active shooter incidents. The guidance will make reference to best practice reports, data, guidance, and other relevant informational products that would benefit states, territorial, tribal, and local governments, and other stakeholders. The guidance will also encourage grantees to review the referenced active shooter guidance, to evaluate their preparedness needs in conjunction with, or supplemental to, their THIRA and SPR processes, and to utilize preparedness grant funds as necessary to address any capability gaps identified in this area.

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<p>Family Reunification</p>	<p>Issue: FEMA should conduct a study to identify all reunification systems, including those overseen by governmental (federal, state, local, territorial, and tribal), private sector, and non-profit entities; maintain information on all identified systems in a single location, accessible to the public, and capable of showing which systems are active during an event; and solicit feedback from the NAC on the study's results before they are published.</p>	<p>Recommendation 2016-24: FEMA should conduct a study to identify all reunification systems, including those overseen by governmental (federal, state, local, territorial, and tribal), private sector, and non-profit entities; maintain information on all identified systems in a single location, accessible to the public, and capable of showing which systems are active during an event; and solicit feedback from the NAC on the study's results before they are published.</p>	<p>Partially Agrees</p> <p>The recommendation calls for a study with which FEMA agrees, but it also appears to create a requirement to develop public facing resource that will "... maintain information on all identified systems in a single location, accessible to the public, and capable of showing which systems are active during an event..." FEMA agrees with conducting a study but would defer a decision on the best resources or outcome, pending completion of a study and feedback from the NAC.</p> <p>FEMA has already identified many of the reunification systems available across the country and included the listing in Appendix L Reunification and Evacuation Tracking Systems in the Multi-Agency Reunification Services Plan Template (http://nationalmasscarestrategy.org/new-release-multi-agency-reunification-services-plan-template/). FEMA has relationships with most of the providers listed in the previously referenced Appendix, and established engagement with the Missing Persons Community of Interest (MPCI). The MPCI is an inter-connected community among many of the providers with whom FEMA has relationships.</p> <p>FEMA will engage the Red Cross, the MPCI, and other yet to be identified stakeholders to explore a single resource that will show active systems, including potentially utilizing the FEMA or Red Cross Apps.</p>

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Family Reunification	<p>Issue: The presence of multiple reunification systems, which do not “talk” to one another, unnecessarily encumbers the reunification process. An individual could check-in safe on one system but fail to reach their loved ones monitoring a separate system. Increasing effective communication between these systems or considering moving to a single system, may alleviate this potential problem. Additionally, reunification systems that support the</p> <p>Recommendation 2016-25: FEMA should facilitate a working group of end users and entities who oversee reunification systems with the goal of working towards a single or integrated system. The workgroup should identify a way for the current (and future) disparate systems to operate more effectively together. As part of the process, FEMA may want to consider working with National Institute of Standards and Technology (NIST) towards the development of universal technology standards and protocols for reunification systems. FEMA should also solicit feedback from the NAC on the working group’s results before they are implemented.</p>	Partially Agrees	<p>While FEMA agrees that a working group to further integration among multiple reunification stakeholders across all levels of government, the private and non-governmental sectors is a worthwhile effort, "the goal of working towards a single or integrated system" as the forgone conclusion seems too directive. The working group, if established, should be given latitude to explore what the members perceive as the best approach and possibly recommend multiple courses of action.</p> <p>A common data standard for reunification already exists; it was developed a few years ago by members of the Missing Persons Community of Interest (MPCI). More information is available in the “Best Practices for Missing Persons Registries” document on the MPCI website (http://www.mpcionline.org/documents/).</p> <p>The community of reunification service providers face significant challenges utilizing the common standard and sharing of information in general because of limitations and constraints imposed by and misunderstandings related to federal privacy laws and private sector/NGO organizational protocols. These challenges restrict implementation of data exchanges as well as funding for system redesign.</p> <p>This is indeed a significant challenge connected to the aforementioned issue of privacy considerations and organizational protocols as well as the difficulties of sharing information among the many agencies with overlapping roles in reunification (mass care [is not limited to shelter operators], health, law enforcement, fatality management, children’s services etc.).</p> <p>The Multi-Agency Reunification Services Plan Template provides recommendations for overcoming some of these challenges.</p>

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<p>Family Reunification</p> <p>reunification of unaccompanied, separated, and lost children have special legal requirements to help ensure the safety and protection of the children they serve. FEMA’s effort to help provide clear guidance and transparency on reunification systems and planning, must include specific and clear provisions regarding the reunification of children.</p>	<p>Recommendation 2016-26: In an effort to expedite the reunification process, expedite the identification of missing persons, and ensure the safety of all mass care and health care facility residents, FEMA should research, identify, and recommend promising practices to increase the flow of communication among facilities and emergency management personnel involved in mass care and reunification during and after a disaster.</p>	<p>Fully Agrees</p>	<p>FEMA fully agrees with the objective of "FEMA should research, identify, and recommend promising practices to increase the flow of communication among facilities and emergency management personnel involved in mass care and reunification during and after a disaster." Such an effort will require significant interaction across the federal enterprise and collaboration with private and non-governmental entities/stakeholders; future success would be dependent on their willingness to adopt or accept the best practices identified. There is already a significant amount of information targeted to the type of integration and seamless efforts recommended in Multi-Agency Reunification Services Plan Template (http://nationalmasscarestrategy.org/new-release-multi-agency-reunification-services-plan-template/). Any such effort to identify and then raise awareness of and disseminate best practices as recommended will involve a significant communications plan and dedicated human and communications resources during disaster incident operations.</p>

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<p>Americans with Disabilities Act (ADA) Tool</p> <p>Issue: Jurisdictions have a clear understanding of legal requirements for integrating and accommodating the needs of people with disabilities and/or access and functional needs into emergency management operations. Many jurisdictions have taken action on planning integration efforts but have concern that their actions will not be sufficient. However, there is limited operational guidance for what is considered adequate, achievable, and reasonable by federal partners, creating hesitancy and confusion among local officials.</p>	<p>Recommendation 2016-27: FEMA should develop one or more implementation guidance documents that provide strategies for integrating and accommodating the needs of individuals with disabilities and others with access and functional needs. Implementation guidance should:</p> <ul style="list-style-type: none"> • Include key stakeholders; • Incorporate strategies on how to develop emergency operational programs, plans, and procedures that are inclusionary, integrated, and provide for accommodations, as required by law; • Include clear definitions and tactical guidance; and • Scalable to allow jurisdictions the flexibility to apply their own tactics to execution. 	<p>Partially Agrees</p>	<p>FEMA's Office of Disability Integration and Coordination (ODIC) worked with Individual Assistance, Mass Care to develop <i>Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters</i>, which was published in 2010. ODIC has worked with the Emergency Management Institute to develop and deliver the updated E/L0197 course "Integrating Access and Functional Needs into Emergency Planning" to provide participants who are responsible for emergency planning with the information necessary to utilize disability and access and functional needs-inclusive practices as well as the additional updated skills and knowledge they will need to prepare for, respond to, and recover from emergencies. Objectives of the E/L0197 course include defining access and functional needs and disabilities, key terms related to inclusive planning, identifying resources to assist in planning with and for adults and children with disabilities and access and functional needs, planning to meet civil rights obligations and identification of the importance of inclusive practices, and learning how to incorporate strategies to meet the equal access and functional needs of the whole community in all phases of emergency management. This course is frequently requested by state and local communities. ODIC meets as many requests for the E/L0197 as its funding will allow. The course was delivered 33 times in 2015. Many requests were unmet due to limited funding. ODIC's annual operating budget of approximately \$90,000 has not increased since 2010 even as the office has expanded from one person to a cadre of 285 employees and requests for training continue to rise every year. The office spends almost all of its annual budget on formal training and technical assistance related travel expenses. To meet all E/L0197 training requests, FEMA will need to invest in funding for trainer travel, travel for trainees to expand the availability of geographically dispersed qualified trainers, costs associated with updating materials, and potentially expanding the courses to increase both on-site content and remote delivery to more fully meet the depth and breadth of state and local requests. ODIC has consistently provided guidance and technical assistance throughout all training development and delivery and has provided extensive input into the Emergency Manager Orientation course for new employees, and if fully integrated into the course, FEMA will have established a baseline message and approach to introduce new employees to integration and coordination.</p>

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<p>ADA Tool</p> <p>Issue: Training opportunities on ADA implementation strategies are scarce. Incorporation of ADA is an issue that permeates many facets of emergency management; thus, it may be more prudent to incorporate guidance on these considerations into pre-existing training courses.</p>	<p>Recommendation 2016-28: FEMA should update current training and develop additional training that incorporates disability, access, and functional needs considerations into emergency management planning and practices. This recommendation is interdependent with recommendation 2016-27. The training should focus primarily on “how” in addition to “what or why.” Subject matter experts should be used for the development and delivery of current and future training. These trainings should address strategies for implementing integration and inclusion in all areas of emergency management programs.</p>	<p>Fully Agrees</p>	<p>The U.S .Department of Justice (DOJ) is about to publish updated tools for emergency management civil rights compliance. Once these tools are published, FEMA has a great opportunity to develop guidance for successful planning and implementation. ODIC welcomes the opportunity to develop additional tools but will need the resources to do this.</p>

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<p>ADA Tool</p> <p>Issue: A lack of funding, resources, and low visibility has led to the underutilization and misinformation of many of the tools and resources currently available to support local jurisdictions with ADA considerations. FEMA has taken steps to put contracts and programs in place that would support local jurisdictions should they exceed their state’s capacity to respond. Increasing public awareness of these resources is key to enabling and equipping local jurisdictions with the “how to” tools needed for the inclusion of people with disabilities and other access and functional needs.</p>	<p>Recommendation 2016-29: FEMA should develop a matrix that identifies federal resources related to people with disabilities, and others with access and functional needs, available for states to request during a disaster. The matrix should:</p> <ul style="list-style-type: none"> • Identify the responsible federal agency for each resource; • Provide the details of the available resource; • Offer a timeline to deploy upon request; • Estimate cost share; • Provide any other pertinent information that would allow states to make informed decisions on requesting support; and • Be easily accessible and updated in real time to ensure accuracy. 	<p>Partially Agrees</p>	<p>ODIC is very active in contributing to available resources; however, FEMA does not support separate databases of resources for people with disabilities. All ODIC contributions should be in alignment and under the responsibility of Individual Assistance, Individuals and Households Program, and Voluntary Agency Liaisons efforts in this area. With regard to federal resources, ODIC has asked members of the Interagency Coordinating Council on Emergency Preparedness and Individuals with Disabilities to contribute to this effort by providing information on available grants and additional funding sources.</p>