

## Frequently Asked Questions - FEMA REP Program Demonstration Guidance

- 1) **Question:** In Exhibit III-2: Federal Evaluation Process Matrix, 1.b.1. is listed as being evaluated once every 8 years. On page III-31, it states it is evaluated once and then only after substantial changes. Which one is correct?

**Answer:** Criteria 1.b.1. will be evaluated once every 8 years. FEMA will correct page III-31 by page change, when possible.

- 2) **Question:** Why were there new criteria and revised sections added to the October 2011 RPM version that were not part of the 2009 RPM version?

**Answer:** As previously indicated in the discussion of the public comment adjudication matrices, FEMA accepted, noted, rejected or modified public comments. A review of the Summary of Revisions section contained in the final version of Supplement 4 and compare it with the one contained in the May 2009 draft. Little difference exists between the two documents. The May 2009 version lists a summary of revisions to evaluation criteria A.1.a., C.6., N.1.a., and N.1.b. The only further additions appearing in Supplement 4, *i.e.*, N.1.c. and N.1.d., represent logical outgrowths of adjudicating the public comments. Specifically, N.1.c. applies only to licensees, and N.1.d. simply relocates ingestion scenario language originally appearing in N.1.b.

- 3) **Question:** Can FEMA discuss the changes in the Evaluation Areas?

**Answer:**

The following lists the changes to the current Evaluation Criteria. The effective dates are listed below:

Effective December 23, 2011 (all future extent-of-plays should follow these criteria):

- Criteria 3.a.1. and 3.b.1. are dosimetry and Potassium Iodide (KI) respectively. For ease of evaluation, these criteria have been reconstituted so as 3.a.1. is dosimetry and KI for emergency workers, and 3.b.1. is KI for the public and institutionalized.
- Similarly, 6.a.1. is Monitoring and Decontamination of Evacuees and Emergency Workers and 6.b.1. is Monitoring and Decontamination of Evacuee and Emergency Worker vehicles and equipment. These criteria have been redone such that 6.a.1. is Monitoring and Decontamination of Evacuees and their vehicles, and 6.b.1. is Monitoring and Decontamination of Emergency Workers, their vehicles and equipment.
- Criteria 4.a.1. was removed. The contents of this criterion can be found under 1.e.1.

Because the frequency of these criteria is changing, the following will be effective at the beginning of the first 8-year cycle:

- Criteria 1.b.1. will be evaluated once every 8 years. FEMA will correct page III-31 by page change, when possible.
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- Criteria 5.a.3. was demonstrated “as needed per scenario” and is now listed as once every 8 years. Criteria 5.a.4. was demonstrated “as needed per scenario” and is now listed as biennially.

- 4) **Question:** Currently, Radiological Monitoring drills are conducted annually, and evaluated every other year. Per criterion N.2.d., the RPM now states that they are conducted annually, with no reference as to how often they are evaluated. Has the frequency of evaluation changed?

**Answer:** No, per the Federal Evaluation Process Matrix, these drills are still evaluated biennially.

- 5) **Question:** Plans/procedures need to include the initiating event starting from an ORO versus the standard utility initiation, as may potentially occur during an HAB event. Does this “reverse notification” have to be exercised?

**Answer:** Yes, per Evaluation Criteria sub-element 1.a.1., “Local responders must demonstrate the ability to receive and/or initiate notification to the licensee or other respective emergency management organizations of an incident in a timely manner, when they receive information from the licensee or alternate source.”

- 6) **Question:** Criterion 6.b.1 discusses the monitoring of emergency workers and their equipment. There is no discussion of registration or documentation requirement for the emergency worker. Shouldn’t a record of monitoring results and decontamination be maintained for the emergency workers?

A: Yes, at a minimum, there should be a record for anyone found to be contaminated to include monitoring results before and after decontamination.

- 7) **Question:** Social media monitoring is discussed extensively under Criterion G.4.c; however, it is not addressed at all in the evaluation criteria. Will OROs be evaluated on monitoring media outlets?

A: Social media is considered part of the general “media”. It is strongly suggested that OROs plan to address social media. Once an ORO has plans to monitor social media, it will be evaluated under 5.b.1.

- 8) **Question:** The new program manual includes a requirement that electronic dosimeters used be tested with hand-held radios or cell phones used by emergency responders to determine whether the dosimeter will be affected by the radio frequency. What are the testing requirements and how should this be documented? Is documentation required to FEMA? Can the manufacturer's specifications be used to prove that there is no risk of interference from radio or cell signals?

A: The testing of electronic dosimeters with the use of hand-held radios is suggested, not required, by the RPM. On Page II-96 it states: "The electronic dosimeters used are tested with any hand-held radios or cellular telephones that may be used by the emergency responders to determine whether the dosimeter will be affected by radio frequency interference."

- 9) **Question:** Is there any guidance for planning for and meeting access and functional needs in general population shelters.

**Answer:** As the October 2011 revision of the Radiological Emergency Preparedness (REP) Manual discusses, on page I-8, FEMA developed guidance for shelters to support Federal, state, local, and tribal governments with the integration of children and adults with and without disabilities who have access and functional needs into every aspect of emergency shelter planning and response. This document is titled "*Guidance for Planning for Integration of Functional Needs Support Services in General Population Shelters*."

This guidance is not designed to establish local government as the single shelter operator or establish a new "tier" of sheltering. It is not intended to establish new legal obligations, alter existing obligations, or constitute a legal interpretation of the statutes that are the basis of the guidance materials. The guidance is not meant to duplicate or cover all requirements found in existing or potential shelter plans or Standard Operating Procedures (SOP). This is simply a resource for integrating FNSS into the general shelter planning process and/or existing documents. Listing an agency or organization's processes/ procedures as an operational tool in this guidance does not constitute a recommendation or endorsement of the resource. In addition, information presented in an operational tool may have been summarized, modified and/or combined with other cited sources.

Communities can use this document in conjunction with general population shelter SOP to ensure that all shelter residents benefit equally from programs, services, and activities. This document provides a context for FNSS integration in light of other existing plans and describes a process to use in any planning effort. The scalability of these guidelines enables their application to urban, suburban, and rural localities with multiple or limited resources.

The Department of Justice published revised final regulations implementing the Americans with Disabilities Act (ADA) for Title II (State and local government services) and Title III (public accommodations and commercial facilities) on September 15, 2010, in the Federal Register. These requirements, or rules, clarify and refine issues that have arisen over the past 20 years and contain new, and updated requirements, including the 2010 Standards for

Accessible Design (2010 Standards).

The REP Program will evaluate centers used for public services during an emergency, congregate care, and the services and supplies provided by those centers based on requirements of the sixteen planning standards and the criteria contained in NUREG-0654/FEMA-REP-1 and the October 2011 revision of the REP Program Manual. The REP Program will not evaluate shelters for compliance with other regulations or laws promulgated by another Federal Agency or Department. The States are compiling a list of questions for the Department of Justice through the sponsorship of the National Emergency Managers Association that reflect their implementation concerns of the revised ADA laws.