FEMA
National Advisory Council

March 3, 2010

MEMORANDUM FOR: Craig Fugate
Administrator

FROM: G. Kemble Bennett, Ph.D., P.E.
Chairman
National Advisory Council

SUBJECT: Recommendations on the National Disaster Recovery Framework

The purpose of this memorandum is to convey the Federal Emergency Management Agency's (FEMA) National Advisory Council's (NAC) feedback on the National Disaster Recovery Framework (NDRF).

The Council has received updates on the work that lead to this draft document since October. These updates included information about the opportunities for stakeholders to engage in the dialogue to determine what should be included in the NDRF through a series of regional Video Teleconferences (VTC's) and Stakeholder Forums. The Council held a public teleconference on December 14, 2009 to receive an update on the NDRF and to discuss the stakeholder engagement process. The Council discussed, deliberated, and provided to FEMA their initial feedback on the questions that had been asked of stakeholder forums in the previous months.

On Wednesday, February 10, 2010, the Council met in a public session in Washington, DC to discuss the National Disaster Recovery Framework (NDRF). The NDRF document was made available for NAC members to review shortly before the February 10th meeting, and the document was discussed by each council subcommittee prior to the public meeting. During this meeting, the NAC received an updated briefing from the Response and Recovery Deputy Associate Administrator.

The council offers the following recommendations and feedback regarding the NDRF for the Administrator's consideration:

1. Need to more clearly identify how this will work operationally (possibly through a companion document)
    a. There needs to be more developed information, such as an implementation guide.
    b. Council is concerned that State/local reaction will be mixed without reference to a potential implementation guide.

2. It would be helpful to be clearer on the federal leadership in the recovery effort. While the collaborative tone of the document is to be commended, it needs to identify the DHS/FEMA role as leading the overall effort from federal standpoint.

3. Recovery Support Functions (RSF), Coordinator Roles, and reporting relationships need more detail within the document. Of particular concern is the lack of clarity on who the Federal Recovery Coordinator reports to.

4. Need clarity on when efforts transition from Emergency Support Functions (ESF) to RSFs.

5. Who do local/state emergency management officials go to when the process is not working well? Again, this should be addressed in the document or a companion document.

6. Further discussion may be required on how the referenced concept of "Unity of Effort" is achieved. A core principle of the NDRF is Unity of Effort, but there is no description of how this is achieved – a NIMS compliant coordinated structure needs to be defined.

7. The NDRF seems to lack advanced recovery or pre-recovery guidance and planning. It is important to articulate expectations of states, tribal nations, and local governments regarding the steps they should take pre-disaster to ensure a successful recovery.

8. The document does not address primary importance of logistical needs as highlighted by recent events.

9. The Council raised concerns related to the requirement of Return on Investment hampering recovery work at the local level, which is specifically likely to impact smaller localities. The key concern is that we avoid lengthy ROI justification process at the expense of timely recovery resourcing.

10. The Council raised concerns about the intent and definition of terms related to the health and medical community, which should be considered an important part of a community's infrastructure.

11. All State and local governments should have hazard mitigation plans in place that guide recovery, but the NDRF does not seem to reflect this requirement. The Council advises that the document be more directive in this expectation.

12. The document should ensure that there is clarity regarding the sensitive transition from response to recovery

13. Greater definition of the roles of all segments in a disaster is needed.

The Council would also like to convey what they particularly appreciated about the overall document:

1. The document was written in a way that anyone could read and understand the doctrine.
2. The council appreciated the collaborative approach.
3. The recognition of the local role in recovery was appreciated.
4. The area of crisis communications was well done.

Again, the council appreciated the opportunity to provide feedback on this critical document. We look forward to the final product.