



FEMA

SEP 26 2011

MEMORANDUM FOR: Jim Featherstone
Chairman, National Advisory Council
200 North Spring Street, Room 1533
Los Angeles, CA 90012

FROM: W. Craig Fugate Administrator 

SUBJECT: Response to National Advisory Council Recommendations on
July 14, 2011

Thank you for your letter dated July 14, 2011, regarding the National Advisory Council's (NAC) recommendations from the May 11-12, 2011 public meeting in Los Angeles, CA.

I have worked in conjunction with the FEMA National Preparedness Directorate, FEMA Office of Response and Recovery, and FEMA's Federal Insurance and Mitigation Administration to provide the following responses to each set of NAC recommendations.

Public Assistance Bottom-Up Review

NAC Recommendations: The National Advisory Council recommended that the following eight concepts be incorporated into the Bottom-Up Review of the Public Assistance (PA) Program:

1. Self-Managed States – this concept incentivizes a broader comprehensive role for states and locals in managing the recovery, while the federal government provides high-level oversight. One example of this is the Enhanced Mitigation Plan.
 - Administrative Costs – This structure may be one incentive mechanism. State and local administrative allowance need to be truly reflective of costs incurred rather than a set percentage split. Possibly incorporate administrative costs into covering the cost share requirements.
2. Formula Reimbursement for Emergency Protective Measures – a formula for reimbursement that is reflective of the effort rather than simply supported by time and materials documentation. For example, shelter management could be reimbursed on a per capita basis and some regard should be included for the level of effort of volunteers.

Note: There was additional discussion regarding handling of debris. Excessive cost and effort of current oversight contributes to delays in recovery efforts. For example, this could be addressed through the use of historical data in a formula for covering these costs after a disaster.
3. Reimbursement for Permanent Work – assuming the broader role for states and localities, this would be a component of the comprehensive plan for response, recovery and mitigation. Move from one-for-one reimbursement to overall recovery within the state and local's

broader comprehensive framework possibly utilizing formula or insurance model based processes.

4. Immediate Needs Funding

- Cost of borrowing funds – as a part of the comprehensive plan, interest costs paid by State and, particularly, local government for borrowing funds to implement response and recovery activities should be a reimbursable expense under PA.
- Loan guarantees – State and local governments would be able to borrow at a lower rate if the PA program provides loan guarantees to financial institutions providing loans.

5. Hazard Mitigation Program (404 and 406 Program) – recommend further ties and incentives to do this as a part of any comprehensive plan in order to have mitigation programs and recovery operate in a more coordinated manner. The cost-benefit analysis needs to be restructured in order to allow local governments, of all sizes, to effectively participate.

6. Revision of Categories – remove distinction between small and large projects. Alternatively, remove the limitation on small projects if the distinction cannot be removed.

7. Snow Policy/Wildfire Policy – review of current policies need to ensure consistency with the definition of major damage as defined by within the Stafford Act.

8. FEMA Lead Coordinator – consistent with the National Advisory Council’s previous recommendations on the National Response Framework, FEMA serves as the lead coordinator to bring other federal partners and their programs to complement FEMA’s work on PA projects.

FEMA Response: In conjunction with our engagement with the NAC, FEMA solicited input from State and local governments, private entities, stakeholder organizations, and FEMA staff. FEMA received a significant amount of feedback, and we are in the process of reviewing and analyzing this information. Once complete, FEMA will develop new program design concepts and share them with the NAC. Because these concepts are not yet fully developed, FEMA is unable to provide specific responses to each of the NAC’s recommendations at this time.

As a general response, the NAC’s recommendations are consistent with feedback from other stakeholders. Furthermore, they are aligned with FEMA’s goals to strengthen our partnerships with the states and enhance their ability to administer the PA Program with greater autonomy while streamlining our processes and supporting response, recovery, and mitigation through a more comprehensive and coordinated approach.

It is important to note that some of the NAC’s recommendations may require changes to the Stafford Act. For example, Congressional action is likely necessary to remove the distinction between small and large projects.

FEMA is committed to making the PA Program more efficient and effective. We will continue to work with the NAC to identify measures to improve the program. Once we have developed our new program concepts, we will share them and seek feedback. At that point, we will be able to respond with greater specificity to the recommendations and provide a course of action for how we can implement those we agree to adopt.

Implementation of NIMS Credentialing Guide

NAC Recommendations: FEMA's National Preparedness Directorate provided an overview briefing to the NAC on steps taken to this point and requested recommendations for implementation of the NIMS Credentialing Guidelines in the field.

In regard to the implementation of the NIMS Credentialing Guide, the NAC made the following seven recommendations:

1. FEMA engages the National Advisory Council in the ongoing development of the credentialing process.
2. The implementation and distribution of this Guideline highlights the importance of a process behind the issuance of a credential (badge).
3. FEMA develops a common lexicon (resource typing) with an associated dictionary for the terminology to be used on the credential that defines and distinguishes qualifications and credentials.
4. FEMA creates and distributes guidelines for the process of credentialing, which includes either the full or partial revocation of the credential, and establishes the framework and commonalities needed but leaves the actual logistics to the entity credentialing.
5. FEMA develops a template for a credential term with the associated certifications and qualifications.
6. FEMA conducts a formal review of other credential specifications and creates a cross walk reference of differences in these requirements so to the extent possible a single credential can be used.
7. If a sponsoring organization identifies an entity which they believe needs a credential, the sponsoring organization may assume the role of credentialing and issuance to the sponsored, as needed.

FEMA Response: Thanks in large part to feedback from our stakeholders, including the NAC, Secretary Napolitano recently approved the NIMS Credentialing Guideline which was released and posted to the NIMS Resource Center (<http://www.fema.gov/emergency/nims>). Now that the Guideline has been released, FEMA's National Integration Center will continue to engage the NAC on implementation of credentialing in the field, including many of the NAC recommendations.

Whole Community Catastrophic Preparedness, Response and Recovery

During May 2011, FEMA requested that the NAC provide advice and recommendations to the following five questions, in support of FEMA's ongoing efforts to refine its Whole Community Approach to the Emergency Management Practice:

1. How do we most effectively engage the "whole of community" in this initiative, to include a wide breadth of local and state community representatives, academia and research institutions?
2. How might we solicit creative assistance in identifying atypical partners and solutions?
3. How do we tie this initiative to national and community level resilience goals?
4. How might we continue to refine this approach, through follow-on forums and exercises?
5. How do we most effectively engage States and urban areas in out-year activities?

Based on these five FEMA questions, the NAC presented back to FEMA five recommended actions. FEMA provides the following updates to the actions we have undertaken thus far to address these five NAC recommended actions:

NAC Recommendation #1: Engage academic and direct existing academic partners to establish the hypothetical benchmarks (baseline) specific to the community.

FEMA Response #1: The recommendations from the NAC regarding whole community are right on point. FEMA is actively engaging academic partners to provide expertise and research support to preparedness activities.

On June 17, 2011 the NLE 2011 "Whole Community Quick Look Report" (Draft Working Paper) was completed. Appendix C of this report, "Academic Engagement," represents the initial academic generated findings in support of the Whole Community effort. The team of academic partners from both the United States and Canada presented a number of independent observations both supportive and critical of our local stakeholder and community engagement and involvement efforts to date. On July 23, 2011, a team of senior FEMA leaders from across the Agency met with the academic team who produced this "Academic Engagement" critique. The findings and recommendations contained in this report were discussed and the team agreed to further pursue common themes in support of advancing the integration of community level stakeholders in the maturing Whole Community approach to emergency management.

NAC Recommendation #2: Develop the tools and identify the barriers to real-time outcome data collection to both modify the benchmarks and modify progress toward the benchmarks. Include mitigation, preparedness, protection, response, and recovery including those that occur concurrently to the event, not solely those that occur after the event.

FEMA Response #2: Rather than establishing hypothetical benchmarks, we are challenging the academic community to develop benchmarks based on sound research and analysis. For example, during NLE 2011, FEMA had academics provide observation for the exercise, with the specific charge to observe Whole Community integration. Since NLE 2011, FEMA has been assessing how to overcome barriers that inhibit real-time decision making, particularly during the initial 72 hours of a catastrophic event, where saving and sustaining lives and stabilizing the incident is of paramount concern. The development of a National Advanced Operations Plan during NLE 2011 has enabled the National Response Coordination Center's planning staff to identify critical resource gaps in a more efficient manner; mission critical gaps that would likely be manifested in subsequent operational periods.

The Whole Community was afforded an opportunity to simulate the identification and mitigation of barriers to real time outcome data through the novel use of a MERS generated Action Request Form for vendor support to deploy commercial satellite internet capability during NLE 2011. This innovative effort satisfied a Whole Community objective to connect multiple communications systems through a common hub for temporary interoperable communications.

NAC Recommendation #3: Provide tools for State, local, and tribal officials for subcomponents to self-determine what components make up their Community of Whole, and, therefore, the solutions(s) for resiliency that work for them.

FEMA Response #3: We also support the recommendation to develop tools and guidance for stakeholders to self-determine the components that make up their Whole Community and development of these tools is currently underway. In June 2011, the DHS Homeland Security Advisory Committee published its "Community Resilience Task Force Recommendations." Recommendation 3.4 of this report, Enable Community-Based Resilience Assessment, recommends DHS coordinate the development of a community-based, all-hazards American Resilience Assessment methodology and toolkit. FEMA is assessing the recommendations in this report, and has become an active participant in a number of community resilience focused efforts and activities. FEMA has also continued to increase its level of involvement with both regional and national level organizations directly supportive of enhancing community and national resilience. Our initial efforts are focused on assessing Whole of Community supportive tools that are emerging from various resiliency focused organizations. One such initiative, and associated tool, that FEMA has been assessing is The Community and Regional Resilience Institute's (CARRI) Community Resilience System Initiative (CRSI) online software package, which will soon be piloted in several communities across the Nation. The CRSI will provide relevant resiliency guidance, planning templates, established processes, software tools, data sets, and databases to make it practical and usable in any community.

NAC Recommendation #4: Show how public input and lessons learned from past disasters has led to changing behavior, motivating people to participate, and engaging the community.

FEMA Response #4: The implementation of PPD-8 will also support the recommendation to develop planning deliverables to engage the FEMA regions and draw input and lessons learned from stakeholders. Recognizing the continuing value of the Lessons Learned Information System (LLIS), the Whole Community effort continues to derive invaluable insights from historic and topical lessons learned assessments documented on LLIS. To supplement this historical archive with more visceral lessons learned experiences, members of the larger FEMA Whole Community strived to assess lessons learned from individuals, municipal and county leaders, and others during our response and recovery efforts across a number of recent domestic and international catastrophic events. Data was collected from the devastating tornadoes in AL and MS and the severe floods experienced across many areas of our Nation. We also participated in several lessons learned forums focused on the Japanese cascading meta-disaster, and specifically evaluated psycho-social and behavioral outcomes with respect to achieving our established Whole Community core capabilities.

NAC Recommendation #5: Expand planning initiative for whole community out the regions in order to draw from local and state stakeholders.

FEMA Response #5: FEMA's senior leadership, to include our Regional Administrators, has been actively expanding the Whole Community Initiative well beyond the confines of both FEMA and the Federal family. The resolve to fully carry out this NAC recommendation is unwavering. We recognize that the ultimate success of the Whole Community approach to emergency management is dependent upon it being encouraged and adopted by our state and local partners, and incorporated into the way we all prepare, plan, exercise and conduct emergency response and recovery operations. For example, as our Regions continue to support the development of regional all hazards plans, we are actively incorporating the Whole Community approach to the emergency management practice throughout the planning process, and striving to include a much wider range of state and local stakeholders. We are driven to do so by the direction and guidance set forth by our leadership, and

we are fully supportive of the approach we are pursuing. This strategic plan advances a Whole Community approach to the practice of emergency management that embraces the reality that it takes all aspects of a community (volunteer, faith and community-based organizations, the private sector, and the public, including survivors themselves) – not just the government – to effectively prepare for, protect against, respond to, recover from, and mitigate against any disaster.

Risk Messaging

NAC Recommendation: The National Advisory Council recommends that FEMA messaging includes:

1. Guiding aspects of trust and empathy used in the FIMA Strategic Initiative be carried over to other FEMA programs and initiatives.
2. Communication to audience where the message is clear, simple, and visual (e.g. photos, graphics).
3. Examples for actions the audience can take and examples of consequences.
4. Leveraging current and region specific events.

FEMA Response: The four recommendations are in line with FEMA's approach under the Risk MAP (Mapping, Assessment, and Planning) program. The program emphasizes the importance of good outreach and risk communication by focusing on increasing awareness to lead to action which reduces risk. To accomplish this, FEMA will engage local, tribal, state, and other federal agencies in crafting clear messages and identifying specific actions that will reduce risk. Maps at a local scale showing flood depth potential and expected flood frequency are being developed to help communicate the hazard. Further, flood risk maps (which includes both the hazard and the consequences), are also being developed to focus decision makers in areas where action will make the most difference.

Emergency Management Training and Education System

NAC Recommendation: The National Advisory Council recommends that FEMA provides the Council with a briefing on the comprehensive evaluation of the National Emergency Management Academy pilot and a briefing on the integration of comments into the Emergency Management Training and Education System (EMTES). This should be completed prior to the September 2011 National Advisory Council meeting and be coordinated through the Office of the National Advisory Council.

FEMA Response: On September 27, 2011, the Emergency Management Institute's (EMI) Acting Superintendent, Vilma Milmoie, will provide a briefing to the NAC outlining the specific evaluation comments from the stakeholders that participated in the first two National Emergency Management Academy pilots. Ms. Milmoie will also provide an update on the Emergency Management Training and Education System (EMTES). FEMA looks forward to continued engagement and feedback throughout development of this system, as we collectively work toward professionalization of the emergency management field.

I want to thank you and the Council for the recommendations and the continued commitment to improve FEMA and emergency management. I look forward to additional feedback and recommendations at the next NAC meeting.