U.S. Department of Homeland Security
Washington, DC 20472

FEMA

JUN 22 2011

Mr. James G. Featherstone
Chairman, National Advisory Council
City of Los Angeles, Emergency Management Department
200 North Spring Street, Room 1533
Los Angeles, CA 90012

Dear Mr. Featherstone:

In response to the letter from former Chairman, Dr. G. Kemble Bennett, dated March 3, 2010, which conveyed recommendations from the meeting of the National Advisory Council (NAC) on February 10-11, 2010, relating to the National Disaster Recovery Framework (NDRF) draft. As we near the finalization and publication of the NDRF, I would like to provide you with details of how each recommendation is being addressed in the NDRF draft document. We have concurred with all but one recommendation.

Recommendation 1: Need to more clearly identify how this will work operationally (possibly through a companion document).

1. There needs to be more developed information, such as an implementation guide.
2. Council is concerned that state/local reaction will be mixed without reference to a potential implementation guide.

Response: The base document now includes additional explanation of overall operational structures. We are working with the designated Recovery Support Function (RSF) coordinating agencies to develop annexes that provide more detail about how the NDRF's operational concept and constructs will be implemented.

Recommendation 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.

Response: Further clarification of Federal Disaster Recovery Coordinator (FDRC) role and relationship to the overall effort will be included in the FDRC and RSF sections of the base document. The FDRC Standard Operating Procedure (to be developed) will detail how FEMA will manage the FDRC training, guidance and field operations.

Recommendation 3: Recovery Support Functions, 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.

Response: The NDRF base document now clearly establishes the reporting relationships. As mentioned earlier, the annexes under development will provide further detail how these groups work together.

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

Response: The NDRF now includes a section that speaks to ESF-RSF differences/commonalities and the general operational relationship between the two coordinating structures.

Recommendation 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.

Response: The FDRC, in coordination with the State Disaster Recovery Coordinator (SDRC), has the responsibility to assist the local/state emergency management officials when the process isn't working well.

Recommendation 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 achieved - a NIMS compliant coordinated structure needs to be defined.

Response: The Unity of Effort description now speaks to common objectives built upon consensus and a transparent and inclusive process. This theme is infused throughout the document. Lastly, the NDRF draft now establishes the coordinating structure to enhance recovery collaboration and coordination in support of disaster impacted communities. The coordinating structure for delivering technical assistance and program resources to communities uses the NIMS methodology to frame an adaptable organizational structure for the FDRC and federal agency representatives.

Recommendation 7: 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.

Response: The NDRF draft was revised and now dedicates a chapter to planning for successful recovery actions that addresses pre-disaster recovery planning guidance for states, territories, tribal nations, and local governments.

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

Response: The draft NDRF now includes clearer organizational structures and roles in order to strengthen coordinated resource management and provision of services.

Recommendation 9: The Council raised concerns related to the requirement of Return on Investment (ROI) 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.

Response: We are unable to address this within a Framework-level document. The Framework will not change program-specific legal, statutory or regulatory requirements. It does establish a structure for better coordinating programs and streamlining application and delivery processes.

Recommendation 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.

Response: The NDRF Health and Social Services RSF section of the base document and the RSF annex under development now both specifically speak to the key role of the health and medical community and the importance of ensuring continuity and rapid restoration of services.

Recommendation 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.

Response: As a Framework, the NDRF does not provide programmatic or regulatory detail for all recovery authorities but rather promotes the inclusion of hazard mitigation principles and practices in all Recovery activities.

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

Response: The NDRF draft now speaks more effectively to the ESF-RSF transition issue. Details relating to the transition of individual ESF to RSF activities will be covered in supporting guidance documents.

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

Response: The NDRF draft now defines roles for all segments of the community in the "Roles and Responsibilities" chapter.

I very much appreciate the NAC's continued support for the NDRF development process and the thoughtful comments on the draft NDRF. I fully expect that they will strengthen the final product. In addition, I look forward to engaging the NAC's guidance as we undertake the process of implementing the new NDRF and encouraging stakeholders at all levels to fully embrace its core principles. Please don't hesitate to contact Patty Kalla if you require any additional information or clarification.

Sincerely,

W. Craig Fugate
Administrator