



FEMA

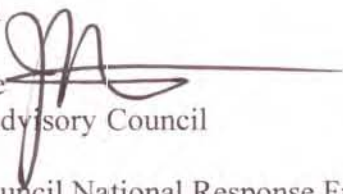


NATIONAL ADVISORY COUNCIL REPORT



January 28, 2011

MEMORANDUM TO: W. Craig Fugate
Administrator, FEMA

FROM: James G. Featherstone 
Chairman, National Advisory Council

SUBJECT: National Advisory Council National Response Framework
Revisions Recommendations Report

The purpose of this memo is to transmit the recommendations of the National Advisory Council to the FEMA Administrator for his consideration as FEMA moves forward with the National Response Framework (NRF) revision process.

1. The NRF should recognize that FEMA should be the federal coordinating entity, regardless of the nature of the disaster or emergency (Stafford Act, National Contingency Plan or other federal response).
2. The NRF should address all disasters and emergencies that require any federal response.
3. The NRF must recognize NIMS/ICS as an integral component and incorporate the Federal Preparedness Task Force's Recommendation #12 – Establish and fund a national, comprehensive mutual aid system based on NIMS and Recommendation #16 – Establish a NIMS-typed resource inventory for nationally deployable homeland security and emergency management assets.
4. The NRF must describe not only the “what”, but the “who”, “how”, “where” and “when” of the federal response. The NRF should include a higher level of operational detail by listing the roles and responsibilities of all partners (federal, state, tribal and local, as well as NGOs and the private sector) during an event requiring a federal response. Additionally the NRF must articulate the concept of “unity of effort” where all partners, at all levels of government and including NGOs and the private sector, resolve issues in a NIMS/ICS structure, at one location, based upon shared objectives and planning.
5. The NRF should include an additional Emergency Support Function (ESF) to (1) coordinate the brokerage of resources from the private sector; and, (2) to provide assistance to the private sector for their recovery to normal operations.
6. The NRF should incorporate the Administrator's Whole of Community/Maximum of Maximums concept.
7. The NRF should provide for a clean hand-off to the National Disaster Recovery Framework (NDRF).

Introduction

The *National Response Framework* (NRF) is a guide that details how the nation responds to all types of disasters and emergencies. It establishes a comprehensive, national, all-hazards approach to domestic incident response principals, as well as the roles and structures that organize national response.

Since the establishment of the NAC in 2007 the Council has provided input into the development and revision of the NRF. Prior to this report the NAC has put forward three recommendation memos on the NRF document, the NRF resource tools, and the planned stakeholder in engagement in the revision process. These NAC recommendations and FEMA responses can be found in the Appendix to this report.

The NRF was published in January 2008 and superseded the *National Response Plan* (NRP). While the NRF does not specify a formal process or schedule for review and revision of the document, on March 17, 2009 the Federal Emergency Management Agency (FEMA) promulgated the “*National Response Framework Review and Revision Process*.” This action, in accordance with the IPG¹, instituted a three-year revision cycle for the NRF with the first revision due by the end of Fiscal Year 2011. As stated in the March 17, 2009 FEMA memorandum:

[t]he ultimate scope of the NRF revision will be determined by the findings of the review; however, at a minimum, the 2011 revision of the NRF will accomplish the following:

1. *Align the NRF with the Integrated Planning System (IPS) and the Comprehensive Preparedness Guides (CPG)*
2. *Address incidents in the NRF that are not restricted to a single incident site (e.g., cyber attack, pandemic)*
3. *Address planning gaps and incorporate lessons learned and best practices from the following:*
 - a. *Actual events and related interagency activities*
 - b. *Exercises*
 - c. *Scenarios*
 - d. *Analyses*

The role of the National Advisory Council (NAC), and other stakeholders, is delineated throughout the March 17, 2009 memorandum. The Administrator has stressed that the NAC is “key to ensuring this important stakeholder involvement.”²

At the August 5, 2010 NAC Meeting, the NAC Chairman tasked both the Preparedness & Protection and the Response & Recovery subcommittees with review of the NRF revision process. As a result, the chairmen of the Preparedness & Protection and the Response & Recovery subcommittees formed the joint NRF Working Group (WG). The charge to the WG

¹ *Department of Homeland Security Integrated Planning Guidance (IPG. Fiscal Year 2011-2015.*

² Letter from FEMA Administrator W. Craig Fugate to NAC Chairman Bennett (September 18, 2009).

by the chairmen was to look at the NRF from a strategic standpoint concentrating on the broad policy considerations rather than the details of implementation.

Since the promulgation of the March 17, 2009 memorandum, the White House has been drafting a new National Preparedness *Presidential Policy Directive* (PPD)³ relating to the role of FEMA in responding to disasters and emergencies. The WG has been advised that the likely role of FEMA will be to coordinate emergency and disaster response efforts. The implementation of the March 17, 2009 memorandum has been suspended until the final release of the PPD.

FEMA staff⁴, in consideration of the draft PPD, has requested the NAC provide comments to the following six (6) questions relevant to the NRF:

1. The NRF will likely be significantly affected by the anticipated receipt of a new National Preparedness PPD as outlined in the attachment. Does the NAC see other potential policy or legislative developments that will impact the revision of the NRF?
2. One possible structure for a revised NRF is to elevate it to the role of a concise overarching document- not more than 10 pages – accompanied by specific plans as attachments. These plans could include the National Contingency Plan as well as plans from other Federal entities such as the Department of Interior and Department of Energy. What are the pros and cons of this approach?
3. Should the NRF be expanded to include other sources of statutory authority? Is the NRF unnecessarily Stafford Act-centric?
4. How can the NRF be improved to ensure unity of voice among operational and technical personnel and elected officials?
5. How should the NRF address these requirements [outlined in the *May 2010 National Security Strategy*]?⁵ How should the NRF incorporate the Administrator’s intent regarding the Whole of Community/Maximum of Maximums concept?
6. How should a series of frameworks be constructed and unified? How can the NRF be designed to connect to series of frameworks?

³ As of the date of this report the PPD has not been released and has not been reviewed by the WG.

⁴ *National Integration Center National Response Framework (NRF) Questions for the National Advisory Council*. (October 8, 2010).

⁵ Referring to the May 2010 *National Security Strategy* requirement to effectively manage emergencies, improve resilience through public-private partnerships, and to engage communities and citizens.

NAC Responses to Questions

1. *The NRF will likely be significantly affected by the anticipated receipt of a new National Preparedness PPD as outlined in the attachment. Does the NAC see other potential policy or legislative developments that will impact the revision of the NRF?*

The WG acknowledges that release of the pending PPD is critical to the revision of the NRF and may, upon release, require the WG to review its recommendations. Additionally, it was noted that legislation relating to the reauthorization of the Stafford Act should be closely monitored for potential impacts on the NRF.

The work of the Local, State, Tribal, and Federal Preparedness Task Force⁶ was also reviewed. Specifically, the WG felt that any revision to the NRF incorporate Recommendation #12 – Establish and fund a national, comprehensive mutual aid system based on NIMS and Recommendation #16 – Establish a NIMS-typed resource inventory for nationally deployable homeland security and emergency management assets. It was concluded by the WG that NIMS is an integral component of the NRF.

There was also significant discussion regarding the role of NGOs, including faith-based organizations, and the private sector needs which should be addressed in any NRF revision. The WG noted that the Department of Homeland Security (DHS) has made a significant effort to incorporate NGOs into the response framework, but there remains a gap with regard to the private sector [this will be further discussed in the response to question 5].

2. *One possible structure for a revised NRF is to elevate it to the role of a concise overarching document- not more than 10 pages – accompanied by specific plans as attachments. These plans could include the National Contingency Plan as well as plans from other Federal entities such as the Department of Interior and Department of Energy. What are the pros and cons of this approach?*

The WG believes that the NRF revision should be developed as a simple, straight forward document that provides a general description of the roles and responsibilities of all federal agencies and the interactions between the federal, state, tribal and local players. There must be a consistent coordination effort for the federal response to all incidents. It is imperative that the NRF recognize that FEMA should be the federal coordinating entity, regardless of the nature of the disaster or emergency (Stafford Act, National Contingency Plan or other federal response). This will ensure that the unity of effort is maintained across all jurisdictions and levels of government.

Whether the NRF can be reduced to a document of “not more than 10 pages” resulted in considerable discussion by the WG. The NRF, as a document, must be written to reflect the wide diversity of its readers – from very small communities with little or no professional emergency management staff to large metropolitan organizations with a sophisticated emergency management systems (e.g., NYC OEM) - from states and tribal governments to

⁶ *Perspective on Preparedness: Taking Stock Since 9/11 Report to Congress of the Local, State, Tribal, and Federal Preparedness Task Force* (September 2010).

federal partners. Regardless of the length of the document, the WG felt strongly that the NRF must be a simple and concise (but not small) document that, at a minimum, answered the following questions:

- Who is responsible for the federal response?
- How will interaction with the federal partners work?
- What type of federal and state response will occur?
- What resources will be available for the response?

3. *Should the NRF be expanded to include other sources of statutory authority? Is the NRF unnecessarily Stafford Act-centric?*

In keeping with the premise that the NRF “is a guide to how the Nation conducts all-hazards response”⁷, the WG believes that the NRF should address all disasters and emergencies that require any federal response. This would include the federal response to events normally covered under the Stafford Act (natural disasters) as well as other significant events (e.g., Deepwater Horizon, Quran burning in Gainesville, FL).

Consistent with the WG’s responses in the questions above, the WG sees FEMA’s role as the federal coordinating entity. For example, during a pandemic FEMA would coordinate the federal response with the Department of Health and Human Services in the role of incident commander. Again, the NRF should recognize the NIMS/ICS system as an integral component of the federal response.

The WG recognizes that there may be some incidents which remain outside the scope of the NRF such as cyber attacks or military strikes against the homeland; but, these events should be limited to events of national security and should be the exception rather than the rule. However, in those particular events, it is likely that FEMA would coordinate the management of the consequences, though not coordinate the response. The NRF should reflect that modified role for FEMA.

4. *How can the NRF be improved to ensure unity of voice among operational and technical personnel and elected officials?*

There is an expectation from the public and their elected officials that any federal response will be consistent; essentially translating to the structural management of an event having little variance from one incident type to another. In order for that expectation to be met, there must be “unity of voice” from all levels of government which can be obtained from an effective implementation of the NIMS/ICS system.

In that regard, the WG believes the NRF must describe not only the “what”, but the “who”, “how”, “where” and “when” of the federal response. The NRF should be revised and expanded to include a higher level of operational detail by listing the roles and responsibilities of all partners (federal, state, tribal and local, as well as NGOs and the private sector) during an event requiring a federal response.

⁷ *Department of Homeland Security National Response Framework* (January 2008), page 1.

However, recognizing our previous statement of the need to keep the NRF as a simple and concise (but not small) document, the WG recognizes the additional (and perhaps conflicting) need to not have a document that lacks sufficient detail to be rendered useless or insignificant. At a minimum the NRF must describe how all the partners will achieve shared situational awareness (i.e., one situation report) and work together on a common set of incident objectives. To emphasize conciseness, the NRF would show the partners in one organization chart and one floor plan, clearly defining the “who” of the response effort.

Again, the WG emphasizes that we believe that the NRF should recognize FEMA has the responsibility as the coordinating agency, regardless of whether or not the event is covered under the Stafford Act, to bring the federal support agencies to the response and into a one NIMS-compliant organizational structure.

5. *How should the NRF address these requirements [outlined in the May 2010 National Security Strategy]?⁸ How should the NRF incorporate the Administrator’s intent regarding the Whole of Community/Maximum of Maximums concept?*

A key component of the *National Security Strategy* is the improved resilience through increased public-private partnerships.⁹ As stated before, this is an area where the WG believes that there remains a gap in an effective federal response. Specifically, one of the primary barriers to an effective public-private partnership has been the inability for the private sector to find the appropriate entry point to support disaster response and recovery operations.

While the NRF currently addresses private sector participation through the Private Sector Coordination Support Annex, it’s vague on many issues, especially regarding the entry points for engagement by the private sector. The NRF should provide a mechanism for greater participation of private industry starting with the planning process, enabling government to anticipate the private sector’s participation and resources in a federal response. It is clear that the private sector must be engaged and capable to participate in order to have a successful response and recovery. In this regard, the WG believes that the role of the private sector in a federal response is of such significance as to warrant to creation of an Emergency Support Function (ESF) to (1) coordinate the brokerage of resources from the private sector; and, (2) to provide assistance to the private sector for their recovery to normal operations.

As to the how the NRF should incorporate the Administrator’s Whole of Community/Maximum of Maximums concept, the WG believes that concept should be fully described within the NRF. The WG does, however, note that the NRF is a “response” framework and the elements of the concept relating to preparedness and recovery should be referenced, but discussed in detail in other documents.

⁸ Referring to the May 2010 *National Security Strategy* requirements to effectively manage emergencies, improve resilience through public-private partnerships, and to engage communities and citizens.

⁹ *The White House National Security Strategy* (May 2010), page 19.

6. *How should a series of frameworks be constructed and unified? How can the NRF be designed to connect to series of frameworks?*

The WG makes seven (7) recommendations (see “WG Recommendations” below) which it believes will serve to allow the NRF to connect a series of frameworks.

It is important to recognize that the WG supports the revision of the NRF to reflect FEMA as the coordinating federal partner in all federal responses. The NRF must set forth the “what”, “who”, “how”, “where” and “when” of the federal response.

Additional Discussion

The WG also discussed the need for the NRF to provide for the definition of the conclusion of the response effort and the commencement of the recovery effort. In essence, the NRF should provide for a clean hand-off to the National Disaster Recovery Framework (NDRF). The WG recognizes that the point where the hand-off might occur is nebulous at best and encourages that maximum flexibility in that determination be maintained.

NAC Recommendations

After much discussion and deliberation the NAC would like to provide the following recommendations to Administrator Fugate for his consideration as FEMA moves forward with the NRF revision process.

1. The NRF should recognize that FEMA should be the federal coordinating entity, regardless of the nature of the disaster or emergency (Stafford Act, National Contingency Plan or other federal response).
2. The NRF should address all disasters and emergencies that require any federal response.
3. The NRF must recognize NIMS/ICS as an integral component and incorporate the Federal Preparedness Task Force's Recommendation #12 – Establish and fund a national, comprehensive mutual aid system based on NIMS and Recommendation #16 – Establish a NIMS-typed resource inventory for nationally deployable homeland security and emergency management assets.
4. The NRF must describe not only the “what”, but the “who”, “how”, “where” and “when” of the federal response. The NRF should include a higher level of operational detail by listing the roles and responsibilities of all partners (federal, state, tribal and local, as well as NGOs and the private sector) during an event requiring a federal response. Additionally the NRF must articulate the concept of “unity of effort” where all partners, at all levels of government and including NGOs and the private sector, resolve issues in a NIMS/ICS structure, at one location, based upon shared objectives and planning.
5. The NRF should include an additional Emergency Support Function (ESF) to (1) coordinate the brokerage of resources from the private sector; and, (2) to provide assistance to the private sector for their recovery to normal operations.
6. The NRF should incorporate the Administrator's Whole of Community/Maximum of Maximums concept.
7. The NRF should provide for a clean hand-off to the National Disaster Recovery Framework (NDRF).

Conclusion

The WG has completed its review of the NRF utilizing the questions posed to the NAC by FEMA staff responsible for the NRF revision process. It is the conclusion of the WG that the NRF be revised to reflect a framework for all federal response to disaster and emergencies that is based upon FEMA as the coordinating federal partner in a NIMS-centric system. The NRF must describe not only the “what”, but the “who”, “how”, “where” and “when” of the federal response. The end result of the NRF revision process must be a framework for a federal response that is a clear, concise and predictable from event to event.

Acknowledgements

The WG would like to acknowledge the efforts of FEMA staff, particularly National Preparedness Assistant Administrator Corey Gruber, Acting Director of the National Integration Center Don Grant and Deputy Designated Federal Officer Breese Eddy for their assistance in the review of the NRF. Additionally, we would like to thank New York City Office of Emergency Management Deputy Commissioner for Planning and Preparedness Kelly McKinney for his input in this process.


Appendix

- A. August 17, 2009 NAC Memo on the Role of the NRF and the Revision Process & September 18, 2009 FEMA Response**
- B. January 21, 2009 NAC Memo on the National Response Framework & March 3, 2009 FEMA Response**
- C. December 19, 2007 NAC Memo on Formal Comments on the Revised National Response Framework (Pre-release) & February 29, 2008 FEMA Response**



August 17, 2009

MEMORANDUM FOR: W. Craig Fugate
Administrator

FROM: Dr. G. Kemble Bennett 
Chairman, National Advisory Council

SUBJECT: Recommendations on the role of the NRF and the NRF Revision
Process

At the July 2009 meeting, the Federal Emergency Management Agency's (FEMA) National Advisory Council's (NAC) National Response Framework (NRF) Subcommittee discussed and provided recommendations on the nature of the NRF as a document and how that may impact work on the NRF Partner Guides. The NRF Subcommittee also provided recommendations on the NRF Review and Revision process outline document. On July 29, the full Council voted unanimously to send these recommendations to the Administrator.

Recommendations:

- The Subcommittee considers the National Response Framework (NRF) to be doctrine and, therefore, should be underpinned by a federal response plan that is shared with non-federal partners.
- The Subcommittee believes the NRF Partner Guides are not applicable to doctrine and the Subcommittee recommends FEMA reassess the need for the Partner Guides.
- The Subcommittee has reviewed the FEMA provided NRF Review and Revision outline document and will continue to be involved in the revision process. The Subcommittee would like to provide the following recommendations on this outline:
 - Suggest that objectives be added to each phase of the outline document;
 - As indicated in the outline document, FEMA should provide updates to the NAC at the conclusion of each phase of the revision process;
 - Suggest that additional language on any preliminary analysis be followed-up on in later phases; and
 - It is recommended that the NAC be added as a formal point of review in Phase 4 of the revision process.



January 21, 2009

MEMORANDUM FOR: Nancy Ward
Acting Administrator and Career Transition Official

FROM: Dr. G. Kemble Bennett *Gem*
Chairman, National Advisory Council

SUBJECT: National Advisory Council (NAC) Recommendations on the
National Response Framework

The purpose of this memorandum is to provide the Administrator of the Federal Emergency Management Agency (FEMA) with guidance statements, recommendations and specific requests in reference to the National Response Framework (NRF) that were approved by the National Advisory Council (NAC) during its December 10-11, 2008 meeting in Dallas, Texas.

Guidance Statements:

Familiarity with the NRF is critical to the effective coordination of the roles and actions of local, tribal, State, Federal, and private-sector preparedness and response partners.

The FEMA website's NRF Resource Center provides an accessible, comprehensive and well-organized hub for information pertaining to, and tools in support, of the National Response Framework. The NAC commends FEMA for their immediate response to updating the NRF Resource Center with links to other FEMA documents and websites. We encourage all NAC members to participate in outreach efforts promoting NRF familiarization whenever possible, through the use of FEMA's "Elevator Speech", fact sheet, and other tools available on the site. The NAC strongly encourages FEMA leadership to adopt widespread use of the NRF and the NRF Resource Center by FEMA staff and contractors; urges FEMA to better promote the NRF and the NRF Resource Center; and feels that information from the NRF Resource Center should be incorporated into workshops, seminars, exercises, etc. Additionally, the NAC encourages the use of the NRF Resource Center as a clearinghouse for questions regarding the NRF and that the FEMA-NRF@dhs.gov email address be better publicized as a resource to answer questions regarding the NRF.

The NAC supports the findings in the GAO report (National Response Framework: FEMA Needs Policies and Procedures to Better Integrate Non-Federal Stakeholders in the Revision Process, June 2008) encouraging FEMA to continue to improve their inclusion of stake holders in future versions of the NRF.

The NAC shall provide input into any proposed changes to the NRF.

Recommendations:

The NAC is providing the following recommendations that will support efforts to enhance implementation of the NRF and use of the NRF Resource Center.

- 1) Integrate the National Response Framework into existing training for key leaders, elected officials, emergency managers and responders.
 - a. Ensure that all FEMA approved training and exercises are designed or updated to incorporate the relevant changes associated with the adoption of the NRF.
- 2) Integrate private sector support more fully into the NRF.
 - a. Private Sector considerations should be clearly incorporated into the various partner guides.

Specific Requests:

The NRF subcommittee requests that FEMA provide quarterly updates (scheduled to coincide with the quarterly NAC meetings) regarding any changes in content or status of the NRF, the NRF Resource Center, or relevant coordinated efforts, including but not limited to the following:

- 1) The NAC NRF subcommittee is requesting updates on the NRF Partner Guides.
 - a. NRF Subcommittee is requesting current drafts of the partner guides for review and to provide advice and stakeholder input. The NRF Subcommittee will serve as a focal point for this review effort.
 - b. FEMA should also provide the NRF subcommittee and NAC with the policy and processes for review and updates of the partner guides (prior to release).
- 2) The NAC NRF subcommittee is requesting updates regarding the following issues addressed in the GAO report:
 - a. Status on the development of the policies and procedures:
 - i. For future revision processes for the NRF and the NRF Resource Center.
 - ii. For collaboration with non-federal stakeholders
 1. Define timelines for how FEMA incorporates stakeholder input.
 - b. Methodology regarding communication of policies and procedures relevant to the NRF.
- 3) The NAC should be informed regarding any changes in content or status of the NRF, the NRF Resource Center, or relevant coordinated efforts. The NRF subcommittee is requesting that FEMA provide drafts of the policies and procedures related to the NRF revision and status reports on the recommendations outlined in this document.



FEMA

MAR 3 2009

Dr. G. Kemble Bennett, P.E.
Chairman, National Advisory Council
Texas A& M University
College Station, TX 77843

Dear: Dr. Bennett:

Thank you for your letter of January 1, 2009 regarding the National Response Framework (NRF). I appreciate the NAC's interest in the NRF and your willingness to help us continue to institutionalize and improve this document.

I also appreciate your positive comments regarding the NRF Resource Center and the NRF support materials that it contains. We agree with your assessment and have adopted the NRF Resource Center look and feel as a model for other FEMA web portals such as the National Incident Management System Resource Center.

As you suggest, the materials from the NRF Resource Center are regularly incorporated into FEMA training and outreach efforts. Also, as you suggest, the "Contact Us" link on the NRF Resource Center provides a simple and effective way for users to reach the FEMA staff responsible not only for the NRF, but also for NIMS and other national emergency management guidance. Through this mailbox, we receive and respond to not only questions regarding the NRF but also suggestions for enhancements and questions on a broad range of other FEMA matters.

The process that led to development of the NRF was a collaborative effort that included a broad range of stakeholders from local, tribal, State, and Federal governments as well as private sector, nongovernmental organizations, and the general public. (The NAC was just being formed at that time; however, members of the NAC contributed to the process.) We found the process to be not only productive, but essential in getting the broad cross-section of input that ultimately produced such a useful document. We are committed to involving the broadest possible range of Federal and non-Federal stakeholders in future projects to revise the NRF and will, of course, rely on the NAC as our principal advisory body in all phases of the process.

Now, let me address your specific recommendations and requests:

Recommendations:

- 1) *Integrate the National Response Framework into existing training for key leaders, elected officials, emergency managers and responders.*
 - a. *Ensure that all FEMA approved training and exercises are designed or updated to incorporate the relevant changes associated with the adoption of the NRF.*

FEMA Response: Agree. The NRF has already been fully integrated into all pertinent training offered by FEMA training activities (the Emergency Management Institute, the Center for Domestic Preparedness, and the National Fire Academy) and we are working with our other NPD training and education partners (i.e., National Domestic Preparedness Consortium, Naval Postgraduate School, etc.) to incorporate the NRF into their curriculum. EMI, for example, offers an exercise-based course entitled *Integrated Emergency Management Course--National Response Framework* that provides State-level emergency management professionals with the knowledge, skills, and abilities they need to conduct effective all-hazards emergency response. In the area of formal exercises, the NRF (and NIMS) have been integrated into FEMA's Homeland Security Exercise and Evaluation Program (HSEEP) to ensure that NRF/NIMS competencies are addressed in all HSEEP exercises.

- 2) *Integrate private sector support more fully into the NRF.*
 - a. *Private Sector considerations should be clearly incorporated into the various partner guides.*

FEMA Response: Agree. The key roles that the private sector plays in national response are addressed throughout the NRF. An "NRF Partner Guide" specifically designed for the private sector has been developed and will be revised and finalized in collaboration with the DHS and FEMA Private Sector Offices and a number of private sector constituency groups.

Specific Requests:

The NRF subcommittee requests that FEMA provide quarterly updates (scheduled to coincide with the quarterly NAC meetings) regarding any changes in content or status of the NRF, the NRF Resource Center, or relevant coordinated efforts, including but not limited to the following:

FEMA Response: Agree. We will be happy to provide regular updates regarding NRF-related activities at quarterly NAC meeting.

- 1) *The NAC NRF subcommittee is requesting updates on the NRF Partner Guides.*

- a. *NRF Subcommittee is requesting current drafts of the partner guides for review and to provide advice and stakeholder input. The NRF Subcommittee will serve as a focal point for this review effort.*

FEMA Response: Agree. Officials from FEMA's National Preparedness Directorate (NPD) met on January 15, 2009, with the chair of the NAC Subcommittee and agreed to provide draft copies of the Partner Guides to her through the Designated Federal Official for the NAC. We look forward to working with NAC NRF Subcommittee to finalize these guides.

- b. *FEMA should also provide the NRF subcommittee and NAC with the policy and processes for review and updates of the partner guides (prior to release).*

FEMA Response: Agree. NPD staff will work with the NAC NRF Subcommittee on policies and processes for review and updates of the Partner Guides before any of them are published.

- 2) *The NAC NRF subcommittee is requesting updates regarding the following issues addressed in the GAO report:*

- a. *Status on the development of the policies and procedures:*
 - i. *For future revision processes for the NRF and the NRF Resource Center.*
 - ii. *For collaboration with non-federal stakeholders*
 1. *Define timelines for how FEMA incorporates stakeholder input.*
- b. *Methodology regarding communication of policies and procedures relevant to the NRF.*

FEMA Response: Agree. The NRF is a high-level document that describes broad principles and roles and responsibilities on how the nation responds to all types of major disasters and emergencies. It does not provide operational guidance and, therefore, is not expected to change as quickly as concept of operations plans and other operational guidance.

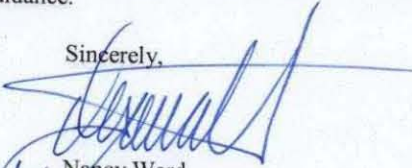
Policy decisions regarding future revisions to the NRF (and other national guidance) will be examined by the new FEMA leadership team in the coming months in consultation with the NAC. This will include processes to ensure the participation of non-Federal stakeholders in the process.

The NAC should be informed regarding any changes in content or status of the NRF, the NRF Resource Center, or relevant coordinated efforts. The NRF subcommittee is requesting that FEMA provide drafts of the policies and procedures related to the NRF revision and status reports on the recommendations outlined in this document.

FEMA Response: Agree. The NAC will be advised regarding changes to the NRF, the NRF Resource Center, and associated activities. As indicated above, the NAC will also be consulted, to include providing drafts, with regard to policies and procedures related to revisions to the NRF.

Thank you again for your commitment to the NRF and to supporting our efforts to increase recognition and understanding of the document among all stakeholders. We look forward to working with you on this important guidance.

Sincerely,




for
Nancy Ward
Administrator



December 19, 2007

MEMORANDUM FOR: R. David Paulison
Administrator

FROM: G. Kemble Bennett 
Chairman
National Advisory Council

SUBJECT: National Response Framework Comments

Attached for your review is a consolidated list of the comments submitted by the members of the National Advisory Council (NAC) regarding the final draft of the National Response Framework (NRF).

The comments fell into the following categories, with the majority being focused on writing style and diction:

- Writing Style and Diction
- Authorities, Roles and Responsibilities
- Special Needs Population
- NRF/NIMS Principles and Operations
- Planning, National Preparedness Guidelines, National Planning Scenarios and Playbooks
- General Comments

A summary of the comments is captured in this memorandum and all comments have been incorporated into the attached form for the NRF Writing Team.

Category Writing Style, Diction, and Scope

Description Comments relate to narrative style of the NRF, its readability, specific word use, and tone. Also includes suggested technical edits, rewording, and deletions. This category also tracks comments regarding the scope and overall focus of the document.

Primary Issues

- Always spell out acronyms when they are first used
- “Community” should not be used for everything
 - Specify if it is a local jurisdiction or a state jurisdiction
- Diction, vocabulary complaints and word-smithing
 - Inconsistent use of syntax (“will be” or “are”)
 - Do not use NRP and NRF interchangeably

Category Authorities, Roles and Responsibilities

Description Comments pertain to specific roles, responsibilities or authorities of NRF stakeholders

Primary Issues

- Put more emphasis on the responsibility at the local level
- What is the role of Mitigation in the NRF's mention of incident management? Need to add a section explaining this.
- Private sector needs a section in the Continuity section. Especially when it comes to training opportunities.
- Concern over the definition of "private sector"
 - Both for-profit and not-for-profit organizations should be included in this definition
 - Role of private sector needs to be expanded to include nongovernmental ambulance services
- Role of interstate mutual aid needs to be emphasized
 - Emergency Management Assistance Compact (EMAC) should be explained
 - Action item needs to be added to State responsibilities – that they must activate request for interstate mutual aid through EMAC
- Role of Governors in an emergency needs to be emphasized more. Instead of saying that "governors can" request assistance, it should be stated that they "should" request this assistance. Former statement is too ambiguous
- Role of healthcare agencies in a response needs to be further defined
- Safety of workers is not prioritized enough. No safe workers = no safety for the public

Category Special Needs Issues

Description Comments relate to the special needs population.

Primary Issues

- Define health agencies to more specific of "health and human service agencies"

Category NRF/NIMS principles and operations

Description This category includes comments directed at NRF and/or NIMS principles (including definitions) and operational comments.

Primary Issues

- Document needs to include an appendix of acronyms

Category DHS Coordination Responsibilities vs. Other Federal Agency Authorities

Description Comments pertain to DHS' role in incident management as well as the role of other Federal departments and agencies acting under their own authorities.

Primary Issues

- Needs to be clear that the DHS referred to in this document is on the Federal level

Category Planning, National Preparedness Guidelines, National Planning Scenarios and Playbooks

Description Comments pertain to the NRF planning process, including the National Preparedness Guidelines, National Planning Scenarios and the Playbooks

Primary Issues

- Private sector organizations and NGOs are not mentioned in the planning section. They fall into the CIKR so it is critical that they be added.

Category General Comments

Description Comments are general in nature, frequently relating to DHS grant programs or other aspects of emergency management beyond the scope of the NRF. Comments in this category either do not fall into any of the other established NRF review categories or relate in a general way to multiple categories.

Primary Issues

- Add a section on domestic terrorist and other religious groups – this document only refers to “violent Islamic” groups
- Take Mass Fatality Management out of ESF8 and make it an additional ESF.
- Add a section for HHS to include the NDMS system (DMAT, DMORT, VMAT) as part of the field structure support.
- This is a good detailed plan on how to plan and prepare for response and recovery. Too many times emergency response does not plan or prepare for recovery.
- Resources: detailed plan on how jurisdictions take inventory of critical resources within not just their jurisdiction, but also surround their jurisdiction. Including interoperability.
- The Governor (elect) role in emergency management prior to being sworn in was a good idea.
- A detailed section on Individual and Community Preparedness with particular emphasis on National Citizen Corp Citizen Council programs is helpful.
- The Response Doctrine: Five key principles. Unified Command is hard to comprehend when teaching it from NIMS. I hope that the NRF and NIMS can help

to "iron out" confusion about the roles and responsibilities of those in Unified Command.

- With regards to the current NIMS teaching, how is FEMA going to replace NRP with the new guidelines of NRF and/or bring everyone up to date on some of the changes?

On behalf of the Council, we appreciate the opportunity to review and comment on this critical document.

Attachment: NRF Comment Form



FEMA

February 29, 2008

Dr. G. Kemble Bennett
Chairman, FEMA National Advisory Council
500 C Street, SW
Washington, D.C. 20472

Dear Dr. Bennett:

Thank you for providing comments on the draft National Response Framework (NRF). I appreciate the significant effort that members of the National Advisory Council (NAC) invested in reviewing the document during its development.

We considered your comments very carefully and made several changes to the document based on the NAC's advice, which were reflected in the NRF released in January 2008.

For example:

- A bullet was added to the Local, Tribal, and State Actions section of Chapter II regarding activation of mutual aid and assistance agreements.
- Language was added to the Introduction indicating that assistance is available to Governor's from both the Federal government and other States.
- Healthcare has been added as part of CI/KR recovery in Chapter II.
- The word "community" was replaced or removed in several places.
- The definition of "private sector" includes both profit and not-for-profit and can be found in Glossary located on the Resource Center www.fema.gov/nrf.
- All acronyms are spelled out and an appendix of acronyms is located on the Resource Center www.fema.gov/nrf
- Private sector organizations and NGOs are included in the Plan section of Chapter II.

Unfortunately, we were not able to accept all comments, as some were either outside the scope of the document, too limited to a particular functional area, or inconsistent with current policy.


Examples include:

- The suggestion to include a section on mitigation was not accepted because this subject is outside the scope of the NRF.

- The recommendation to separate the function of mass fatality from Emergency Support Function (ESF) #8 and create a new ESF was not accepted as the scope and content of ESF #8 has already been established.
- The proposal to specify a distinct role for nongovernmental ambulance services within the NRF fell outside the overarching nature of the NRF, even though such services may be critical assets at the local level, because the NRF cannot recognize one service to the exclusion of others.
- The recommendation that language mandate or require a Governor, local jurisdiction or private sector organization to perform certain actions cannot be accepted because the NRF is a non-regulatory Federal government document.

We greatly appreciate the Council's expertise and look forward to working with you on the implementation of the NRF. Please do not hesitate to contact Al Fluman, Acting Director of the National Preparedness Directorate's Incident Management System Integration Division (IMSID) at (202) 646-4605 or al.fluman@dhs.gov with any questions or concerns you may have.

Sincerely,



R. David Paulison
Administrator