



FEMA

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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 from
September 27-28, 2012 Meeting

Thank you for your letter dated December 20, 2011, regarding the National Advisory Council's (NAC) recommendations from the September 27-28, 2011 public meeting in Arlington, VA.

I have worked in conjunction with the FEMA National Preparedness Directorate and FEMA Office of Response and Recovery to provide the following responses to each set of NAC recommendations.

Recommendation on the National Preparedness System:

NAC Recommendation #1: FEMA should be formally established as the lead federal coordinating agency for the National Preparedness System.

Discussion: The NAC members believe that there should be one single "broker" for all federal programs and agencies. FEMA is the ideal agency for this role. The intent is not that FEMA would have directive authority but it would be the central coordination point for all federal programs and agencies. This would decrease confusion at the local level and provide locals one federal agency to consult for response or recovery assistance. In the discussion there were several examples cited where state and local agencies have gotten conflicting information from different federal agencies that have caused considerable delays in obtaining appropriate assistance. Generally, locals interact with FEMA on a more regular basis than with other agencies, and this recommendation reinforces established communication networks.

NPD's Response to #1: Pursuant to 6 USC 744 (PKEMRA Sec. 644), the requirement for developing the National Preparedness System (NPS) is with the President, acting through the FEMA Administrator. The recommendation by the NAC for FEMA to be the single broker for all Federal programs and agencies would solidify FEMA's role in the NPS beyond development. This is consistent with both our ongoing efforts to implement and integrate the programmatic elements of the NPS and the future efforts to sustain it. In addition, as we operationalize the NPS through the National Planning Frameworks and the Federal Interagency Operational Plans, we will continue to examine FEMA's roles and responsibilities. This will include both Stafford and non-Stafford events.

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Recommendation on the Public Assistance Program:

NAC Recommendation #2: FEMA should ensure that the concept of mitigation is fully integrated into the Public Assistance Program.

Discussion: This recommendation reinforces the NAC's recommendations regarding mitigation for the Bottom-Up Review of the Public Assistance Program from the *Recommendations from May 11-12, 2011 National Advisory Council Meeting* memo dated July 14, 2011. Regarding the 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.

FEMA Response to #2: As FEMA initiates enhancements to the Public Assistance (PA) Program, it will continue its efforts to maximize 406 hazard mitigation opportunities. FEMA strongly encourages its grant applicants to consider hazard mitigation opportunities as a part of the repair and restoration of their facilities. FEMA has formed a 406 Mitigation Work Group for the purpose of identifying best practices and strengthening PA's delivery of assistance for hazard mitigation to damaged facilities. The work group is charged with identifying best practices and increasing collaboration and consistency between the Recovery Directorate and the Federal Insurance and Mitigation Administration Hazard Mitigation Directorates. This group is in the process of finalizing a Standard Operating Procedure (SOP) that will maximize 406 mitigation opportunities and leverage expertise from the 404 Mitigation programs. Additional tools and guidance will follow the completion of the SOP.

Recommendation on the Radiological Emergency Preparedness Program:

NAC Recommendation #3: The Radiological Emergency Preparedness Program should include catastrophic scenarios and no fault exercises.

Discussion: The Radiological Emergency Preparedness Program (REPP), while administered by FEMA, is a fee for services billed to the utilities on an annual basis for both the general and site specific costs for carrying out the program. The funding is in place at the beginning of every fiscal year. The regulatory basis is in 44 CFR 354. This creates discrepancies between the regulations and roles of stakeholder agencies, specifically with catastrophic planning. At this time, it appears that a number of the exercises that are executed, simply check a box. There needs to be a true exercise program that will generate real results regarding readiness.

NPD's Response to #3: *FEMA agrees that the REPP exercises need to be more varied, and better integrated with other exercise programs. In fact, FEMA and the Nuclear Regulatory Commission (NRC) are currently rolling out updated preparedness regulations and guidance, including comprehensive updates to the REPP exercise program. These updates require the scenarios for REPP exercises to be varied and tailored to the local community's respective threats and hazards. One recent example was the Wolf Creek Generating Station (Kansas) REP exercise conducted on November 15, 2011. The initiating event for this exercise was a magnitude 3.3 earthquake causing damage to fuel containment and loss of offsite power. Additional updates to the REPP guidance include:*

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- *Incorporation of hostile action scenarios*
- *No or minimal release scenarios*
- *Enhanced plume and ingestion pathway scenarios*
- *Off-hours/unannounced exercises*
- *Rapid escalation situations*
- *Incorporation of Homeland Security Exercise Evaluation Program (HSEEP) methodology*
- *Incorporation of National Incident Management System*

While the NAC cites that REPP's permanent budget authority is codified in 44 CFR 354 (allowing FEMA to collect user fees from NRC licensees to recover FEMA and contractor employee operational costs), this does not inhibit support from other Federal departments and agencies. Other Federal agencies, including the NRC, Environmental Protection Agency, Health and Human Services, and Department of Energy, regularly participate in REPP exercises. 44 CFR 350 and 351 provide the regulatory framework for other Federal departments and agencies to support and participate in FEMA REPP exercises and other preparedness-related activities. These regulations set forth the specific Federal agency roles and assign tasks related to assisting FEMA, States and locals with radiological emergency preparedness and planning activities.

Aside from the biennial exercises, REPP utilizes other methods to continually review and assess the current state of readiness and preparedness within REPP communities across the nation. Some examples of these methods include seminars, training activities, interviews, site visits, and responses to actual events. In addition, REPP assigns a dedicated Site Specialist for each Nuclear Power Plant, whose responsibilities include maintaining an ongoing assessment record that reflects the status of offsite preparedness and training. This approach allows FEMA to maintain a current and comprehensive snapshot of reasonable assurance throughout the year and provides increased integration with other Federal, State, and local preparedness activities.

Recommendation on the Emergency Management Training and Education System:

NAC Recommendation #4: The NAC considers the Emergency Management Training and Education System (EMTES) to be critical for today's emergency management workforce and to future professional development. The NAC recommends that FEMA support the EMTES in its continued development, distribution, and on-going programmatic support.

Discussion: EMTES provides career long training and supports professionalism in the field of emergency management and is developing training at the foundational, executive/managerial, specialized, and technical levels. The National Emergency Management Academy completed two pilots of a week-long Emergency Management Foundations course in June and July 2011 and shared an evaluation of and lessons learned from the pilots. The pilots validated the target audience and 15 key foundational topics and established a path and peer-to-peer network for lifelong learning in the field of emergency management.

NPD's Response to #4: *FEMA recognizes the importance of EMTES to further professionalize the field of emergency management and thanks the NAC for their ongoing engagement and support of the system.*

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NAC Recommendation #5: Among the other identified distribution channels, FEMA should leverage community colleges as potential providers of the EMTES.

Discussion: EMTES identified states and regions as roll-out channels for the National Emergency Management Academy. After the Foundations course is finalized, the National Emergency Management Academy should explore other providers to deliver the training because the target audience (e.g. individuals from a jurisdiction or private sector business) may not have the capacity to be absent from their job for a week of training.

NPD's Response to #5: *FEMA agrees on the large national need for the EMTES and is identifying opportunities to partner with internal and external organizations for delivery. The National Emergency Management Academy is designed specifically for organizations to deliver in modules to accommodate those students unable to attend in a week-long format. The Academy Train-the-Trainer (TTT) offerings are designed to build a cadre of instructors available to the Regions, States, and other partners. In 2012, EMI will deliver four offerings of the TTT with four additional offerings scheduled in 2013.*

FEMA will deliver the Academy both in residence and at offsite locations in FY 12 and FY 13. A schedule of offerings is under development and review and will be published and provided to the NAC. The Academy curriculum will also be provided to the States in an EMI developed/State delivered (G course) format so that States can deliver or incorporate portions of the course into their own Academy programs. In addition, FEMA is exploring opportunities to partner with the National Domestic Preparedness Consortium members for delivery. Finally, FEMA appreciates the recommendation to leverage colleges and universities and will further explore this recommendation.

NAC Recommendation #6: Provide regular updates to the Subcommittee on the EMTES program, including an opportunity to advise on the Executive-Managerial level program.

Discussion: The Preparedness & Protection Subcommittee has been engaged with the Emergency Management Institute (EMI) since April 2011 and has received information briefings from Vilma Milmo, the Acting Superintendent/Deputy Superintendent at EMI. The Subcommittee looks forward to the opportunity to provide valuable input to the Foundations training and would like to continue providing feedback as the programs develop at EMI.

NPD's Response to #6: *FEMA leadership will continue to provide regular updates on the EMTES and appreciates the NAC's feedback on the system. In addition, the EMI Superintendent will attend the NAC meeting and provide updates as appropriate.*

NAC Recommendation #7: FEMA should develop end-state metrics (compared from baseline values) to measure the effectiveness of EMTES on emergency management nationally.

Discussion: Metrics have already been developed to evaluate the success of the participants and their feedback. However, metrics should also measure whether the instruction and training are successfully implemented, used, and improve the field of Emergency Management at all levels.

NPD's Response to #7: *The emergency management core competency crosswalk has identified existing EMI curricula that support the competencies and identified gaps to be addressed. The core competencies will be sustained through an annual review cycle. EMI will continue to conduct*

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Kirkpatrick Level I, II, and III evaluations to measure training effectiveness and identify development and revision requirements. In addition, EMI is developing a training evaluation strategy to include metrics such as return on expectations and return on investment.

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.