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# National Preparedness: Challenges, Definitions & Jurisdictions

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COMMENTS

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In late 2011, the U.S. Department of Homeland Security (DHS) released the second document in the series of Presidential Policy Directive 8: National Preparedness (PPD-8) guidance. Although the initial release of the National Preparedness Goal re-emphasized the use of a capabilities-based approach to preparedness, the National Preparedness System (NPS) description identified the process by which the nation should build and sustain its emergency management and homeland security capabilities, organized in accordance with the five mission

areas spelled out by PPD-8: prevention, protection, mitigation, response, and recovery. The NPS builds on several years of capabilities-based preparedness by updating the 2007 National Preparedness Guidelines with a process that matches the National Preparedness Goal's Core Capabilities.

At a surprisingly concise six pages, the "NPS Description" actually provides very little in the way of concrete and actionable steps, relying on supplementary guidance - in the form of Comprehensive Preparedness Guides

After the term "risk" has been defined for a particular jurisdiction, organizations and agencies can begin to address the risk assessments. capabilitu estimates, and validation challenges that they probably will

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incorporates the new DHS grant performance requirements of completing: (a) a Threat and Hazard Identification and Risk Assessment (THIRA); (b) a State Preparedness Report; and (c) the forthcoming Capability Estimation Process.

Having concluded the first required THIRA, which set the scope for the data collection and analysis needed for the State Preparedness Report, the states and major metropolitan areas in the Urban Area Security Initiative (UASI) program met the FY 2012 DHS grant performance requirements - mostly by trial and error, though, because they had no "best practices" to draw upon. Nonetheless, the FY 2013 DHS grant guidance will place even greater emphasis on the NPS as a driving mechanism for preparedness investment - mostly by incorporating capability estimation as the analysis tool between the THIRA's capability preparedness targets and the capability preparedness scoring of the State Preparedness Report. For the third straight year, state and major urban areas will have to further enhance their ability to implement the NPS in order to remain in compliance with DHS grants.

NPS implementation can usually be broken down into two major categories: organization and process. States and major urban areas with existing preparedness programs - usually based on legacy national preparedness programs or "homegrown" programs - may well be challenged with adapting their programs to meet the new requirements. Following are some of the more important aspects of the two categories mentioned above.

### Organization: An Emphasis on Core Capabilities

One of the most important components of emergency preparedness is the people directly involved. State and local governments implementing the NPS, therefore, will probably run into an organizational challenge when crafting their NPS implementation strategies. Interagency emergency preparedness programs at the state and local levels rely heavily on functional groupings,

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primarily based on the emergency support function structure of the National Response Framework. In the almost 12 years that have passed since the 9/11 terrorist attacks, the emergency support function structure has been an essential component of most state and local emergency management agencies. However, this institutionalized coordinating structure does not mesh well with the organization of the National Preparedness Goal's Core Capabilities.

The NPS's emphasis on capabilities organized by mission area is not an exact replication of the emergency support function construct, a bothersome reality that leaves at least some emergency managers confused about how to reconcile the differences. Adding to this challenge is the fact that the functional groupings within the National Disaster Recovery Framework – i.e., the recovery support functions – represent a departure from the emergency support function construct. However, it appears that the recovery core capabilities were developed with the pre-existing National Disaster Recovery Framework in mind.

To complicate matters even further, PPD-8 places responsibility on an organization to be the overall lead in coordinating each mission area's capabilities set. The primary choice for the traditional emergency management mission areas of mitigation, response, and recovery is the emergency management agencies, but it is not yet clear who or what agency should take ownership of the prevention and protection missions. Ultimately, agency authorities will have to dictate both the lead and the support roles, but several hard decisions will first have to be made.

The State Preparedness Report suggests that a tiered approach to data collection – emphasizing the use of intrastate emergency management or homeland security regions – might be the best alternative available. By using a regional approach, which recognizes the reliance on mutual aid and assistance in emergency operations, local jurisdictions would, in theory, report capability preparedness information to their regional working group(s); the latter would in turn report up the line to the state emergency management agency. Unfortunately, this primarily geographic view of emergency preparedness becomes somewhat problematic when integrating statewide agencies and partners such as nonprofit organizations, as well as state agencies with local offices that support local emergency operations. Thoughtful consideration must be given to the role of intergovernmental coordination if an emergency preparedness program is to be successful.

#### Process: Six or More Steps – And Lower Barriers

The first step in implementing the NPS process for states and major urban areas is to thoroughly consider the six steps and determine whether: (a) various elements have to be added or subtracted; and/or (b) if the six steps should be further divided in order to make the system actionable to the extent needed to meet the challenges of a particular jurisdiction. Many of the steps that encompass the NPS would have to cover several programs when implemented – a requirement that could be cumbersome in itself and also could cause confusion related to program administration and oversight.

Although it is important that a "customized" implementation of the NPS not require too many steps, the goal should be to devise a system that would actually reduce barriers to participation by, among other things, increasing the specificity of tasks and spelling out the accountability for each. After a customized implementation has been developed, there are several other challenges that must be addressed to fully realize how various capabilities will be built, delivered, and evaluated. Following is a brief analysis of the most important of those challenges.

Risk assessment challenges — The first requirement in this area is to determine the definition of "risk" that the jurisdiction will use to fully identify threats and hazards and, by doing so, assess the risk posed by each. The THIRA and the hazard mitigation planning related to hazard identification and risk assessment are among the more important tools to use in this step, but each jurisdiction must ultimately decide how it wants to evaluate the risk to the community posed by each threat or hazard considered.

The threat and hazard identification process drives the formulation of specific preparedness targets, as well as preparedness goals, that various jurisdictions must develop. The preparedness target identifies what the jurisdiction needs to fully deliver a specific capability. Capability targets must be based in turn on the understanding, on the part of jurisdiction leaders, of what they are preparing for, which would be either: (a) the realistic consequences of the





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threats and hazards they face; or (b) the most likely impacts of a catastrophic occurrence. For UASI states, harmonizing the THIRA is critical to ensuring consistency between capability targets at both the state and UASI levels.

Capability estimation challenges — Capability estimation involves: (a) determining the plans, organization, equipment, training, and exercise elements required to build and sustain a specific capability; and (b) comparing those requirements to the actual resources and activities available to determine any gap that remains. When conducting a capability assessment, it is important to interface not only with neighboring jurisdictions but also with state and regional partners. Such collaboration could result in capability estimates that consistently measure capability requirements and allow for information sharing, particularly information related to implementation of the National Incident Management System. Effective state-to-local jurisdiction coordination and communication also ensures that resources are not double counted as both a local and a state asset. The potential to overestimate resources through double counting is particularly high in areas where state agencies have local offices that support local emergency operations.

Capability validation challenges - For capability validation, it is important that a consistent policy be used to determine when it is appropriate for after-action reporting. It is unrealistic to require a formal after-action process each and every time a capability is delivered. For example, coping with a multi-vehicle collision involving the potential spill of hazardous materials requires several core capabilities - critical transportation, environmental response/health and safety, on-scene security and protection, and public health and medical services. Such incidents are relatively common in some jurisdictions. To require an after-action report for all such situations in those jurisdictions, though, could be unduly cumbersome and might ultimately result in unnecessary paperwork and capability validation data. Among the potential thresholds that should be considered in such cases are the following: (a) The number of capabilities delivered; (b) any remaining challenges identified that require improvement; (c) significant improvements in the delivery of the various capabilities needed; and (d) the number of agencies involved in the delivery of those capabilities.

## The Scarcity of Best Practices & Other Pitfalls

One continuing challenge that state and local jurisdictions must face as they move forward with implementing PPD-8 is the limited number of existing best practices that have already been validated. Each jurisdiction will, therefore, either have to develop a preparedness system process from the ground up or wait for other jurisdictions to develop best practices that can be adapted to fit the needs of other locales.

Nonetheless, political and operational jurisdictions must conduct their own thorough and systematic capability estimates and develop the processes needed to build, maintain, and evaluate the various capabilities required. Any jurisdictions that will not or cannot do this will lack the accurate and consistent data on resource gaps that they will need to make their own future resource procurement and allocation decisions. Beginning the process by giving full and objective consideration of the potential pitfalls identified above can help ease the overall system development decisions required.

For most states and major urban areas, implementation of the NPS has become a necessity for many reasons, but particularly to continue receiving DHS grant funding. It also is important, though, that the DHS itself recognize the challenges that lower-level jurisdictions will face in meeting the National Preparedness Goal, specifically including giving thoughtful consideration to the quantity and variety of resources required to sometimes totally transform legacy preparedness programs that are no longer valid or effective.

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