

## HSPI Commentary Series

### COMMENTS ON THE DRAFT NATIONAL PREPAREDNESS GOAL

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HSPI Preparedness, Response, and Resilience Task Force

Co-Chaired by R. David Paulison, Mike Balboni, and Daniel Kaniewski

The Federal Emergency Management Agency (FEMA) recently released a draft of the next iteration of the *National Preparedness Goal* (the *Goal*). The *Goal*, called for in Presidential Policy Directive 8 (PPD-8)<sup>1</sup> and due to the President for review no later than September 25<sup>2</sup>, is meant to “be informed by the risk of specific threats and vulnerabilities – taking into account regional variations – and include concrete, measurable, and prioritized objectives to mitigate that risk.”<sup>3</sup> The

*Goal*, once finalized, should set the tone for the next step of the PPD-8’s implementation, the creation of the *National Preparedness System* (the *System*). Because the *System* has the potential to set the homeland security enterprise on a positive trajectory for the next several years, it is critical that the underlying *Goal* be on target. It is the position of the Task Force that, while the draft *Goal* has some positive elements in its current form, the *Goal* will best inform the creation of the *System* by 1) defining risk management as the essential driver for preparedness actions, 2) employing a systems-based approach to preparedness efforts, and 3) including explicit outcome-based measurements of preparedness.



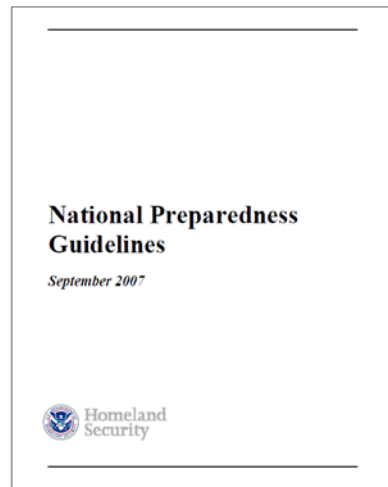
**Brian Kamoie, Senior Director for Preparedness Policy on the White House National Security Staff, unveils PPD-8 at HSPI in April**

<sup>1</sup> *Presidential Policy Directive-8, National Preparedness* (Washington, DC: The White House, March 30, 2011). Available at [http://www.dhs.gov/xabout/laws/gc\\_1215444247124.shtm](http://www.dhs.gov/xabout/laws/gc_1215444247124.shtm). PPD-8 was unveiled at a Homeland Security Policy Institute event; see [http://www.gwumc.edu/hspi/events/PPD8\\_national\\_preparedness302.cfm](http://www.gwumc.edu/hspi/events/PPD8_national_preparedness302.cfm).

<sup>2</sup> FEMA sought public comments of the draft *Goal*, and this HSPI commentary was provided to FEMA as part of the formal comment process.

<sup>3</sup> *Draft National Preparedness Goal* (August 22, 2011) <http://www.fema.gov/pdf/prepared/npg.pdf>

As the predecessor directive to PPD-8, Homeland Security Presidential Directive-8 (HSPD-8) directed the Secretary of Homeland Security to develop a *National Preparedness Goal*, which was released as the *National Preparedness Guidelines* (the *Guidelines*) in September 2007.<sup>4</sup> The development of the *Guidelines* was a laudable achievement, representing the first doctrinal shift in the nation's approach to national preparedness that incorporated the lessons learned from Hurricane Katrina. It offered a new set of tools – namely the National Planning Scenarios, Target Capabilities List, and Universal Task List – that could be used by homeland security and emergency management professionals at all levels of government, and it identified the concept of risk as a fundamental component of preparedness, particularly as it pertains to investment decisions. The release of a new *Goal* provides a watershed opportunity to improve the *Guidelines* and enhance overall preparedness doctrine. However, the current draft of the *Goal* is not a significant improvement over the *Guidelines*.



One area where the *Goal* could make some noteworthy progress is in bridging the gap between risk assessment and overall risk management. While risk assessments will help to identify and prioritize scenarios, risk management is an iterative process that allows decision makers to measure the return on their preparedness investments – namely, the relative buy-down in risk over time. In the current draft of the *Goal*, risk management is identified as one of the core capabilities within the protection Focus Area (the other Focus Areas being prevention, response, recovery, and mitigation). We believe that risk management is more than simply a core capability within one of the Focus Areas, but rather that it is, like the resilience it seeks to achieve, an underlying process that must be applied across and drive all preparedness efforts, and that it therefore deserves more prominent coverage as a crosscutting function in the *Goal*. Relegating the concept of risk management to the protection Focus Area creates the perception that only those involved in pre-incident planning really need to be concerned with it. In reality, risk management should be a unifying force that must be applied throughout all the homeland security mission areas, and employing it can help stakeholders determine their level of risk tolerance, which will enhance their ability to make preparedness investment decisions.

Akin to the draft *Goal's* treatment of risk management, the overall categorization of the core capabilities into five Focus Areas reinforces the notion that each of the homeland security enterprise's missions is distinct from the other. While delineating responsibility is fair enough, a high-level policy document such as the *Goal* should advance a systems-based approach to homeland security preparedness efforts. A number of conceptual approaches to preparedness have been produced at the Federal level since the creation of the Department of Homeland Security, but while many of them have largely been advanced within specific Federal components, they often serve the

<sup>4</sup> *National Preparedness Guidelines* (Washington, DC: The Department of Homeland Security, September, 2007). Available at <http://www.fema.gov/pdf/government/npg.pdf>.

same constituency at the regional, state and local levels. To truly promote the unity of effort required for a resilient nation, there must be clear recognition in the *Goal*, and ultimately in the *System* and its integrated planning frameworks, that each level of government, each mission area, and indeed each component of the public, non-profit and private sector is interdependent with the other. There is little effort in the current draft of the *Goal* to advance this notion of mutual interdependence.<sup>5</sup> While we question the utility of the draft *Goal* to Federal, state and local governmental entities, it is even clearer that the private and non-profit sectors would find little use of the document as written, as it rarely mentions how they fit into national preparedness efforts.

Furthermore, the focus on capabilities as currently written is myopic in that, like previous such documents, it attempts to inform state and local first responders how they ought to fulfill their missions. Instead, the *Goal* should help state and local officials determine their broad capability needs and, more importantly, provide potential remedies to build them. The core capabilities listed in the current draft of the *Goal* are inconsistent in their ability to be measured, and, with a few exceptions, provide measures that are output based as opposed to outcome based. As grants have decreased and become more targeted given the Federal budget deficit, the new *Goal* should establish a clear connection between federal homeland security grant allocations and the development and sustainability of necessary preparedness capabilities at the state and local level. Providing measures that are based upon outcomes (i.e., end results) would aid this process.

Once the *Goal* reaches its final form, it will establish the foundation for the *System* and its integrated planning frameworks. To be most effective, it should define risk management as the driver for preparedness actions, employ a systems-based approach to preparedness efforts, and include outcome-based measures. Only then will it truly advance national preparedness doctrine beyond that which already exists in previous iterations of preparedness policy, and only then will we make noteworthy progress in enhancing national resilience.

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<sup>5</sup> In the section that introduces the Focus Areas and Core Capabilities on page 7 of the draft *Goal*, the interdependence among Focus Areas is mentioned. An expansion of this concept both here and earlier in the *Goal* would better promote its acceptance.

*HSPI's Preparedness, Response, and Resilience Task Force brings together experts from government, academia, and the private and non-profit sectors to consider contemporary policy issues facing the nation's homeland security, first responder, and emergency management communities. To this end, the Task Force convenes sessions with the nation's policymakers and publishes policy papers and reports with actionable policy recommendations for the future. The Task Force is predicated on the idea that a more nuanced approach to these policy issues can contribute to a greater level of resiliency for all levels of government, the private sector, and the public writ large.*

*While consensus positions were sought and often achieved, the Task Force Co-Chairs take full responsibility for the opinions and recommendations herein. A full list of Task Force members is included at the end of the document.*

*Comments should be directed to [hspi@gwu.edu](mailto:hspi@gwu.edu). For more information on HSPI and its programs, please visit <http://homelandsecurity.gwu.edu>.*

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*Founded in 2003, The George Washington University Homeland Security Policy Institute (HSPI) is a nonpartisan think and do tank whose mission is to build bridges between theory and practice to advance homeland security through an interdisciplinary approach. By convening domestic and international policymakers and practitioners at all levels of government, the private and non-profit sectors, and academia, HSPI creates innovative strategies and solutions to current and future threats to the nation.*

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