

Concerns with the National Preparedness Goal Documents

Concern: The utilization of the National Planning Scenarios skews our preparedness capabilities to only address a limited number of specific hazards compromising our ability to consider and aptly prepare for the wide range of situations our Nation needs to mitigate, prepare for, respond to, and recover from.

Background: While the National Planning Scenarios document is careful to point out that it does not represent an extensive list of possible hazards, the fact that it brings our attention to a limited number of hazards narrows our scope and limits our nation's capacity to consider and aptly prepare for the wide range of situations we are likely to face. Although the National Planning Scenarios are identified as "all-hazards scenarios", labeling them as such is misleading and ultimately undermines the all-hazards concept.¹ By definition, an all-hazards approach does not focus on specific hazards but concentrates on a solid framework that ensures jurisdictions will be better prepared for all disasters. From this framework, we can strengthen the functions common to most disasters and address those unique to specific hazards. As highlighted in FEMA's Guide for All-Hazard Emergency Operations Planning, there are two problems with listing and concentrating on specific hazards:

"The first is the possibility of exclusion or omission: there is always a potential for new and unexpected hazards (which is part of why maintaining an all-hazard capability is important). The second is that such lists involve groupings, which can affect subsequent analysis. A list may give the impression that hazards are independent of one another, when in fact they are often related (e.g., an earthquake might give rise to dam failure)".²

While scenario-based planning is a useful tool for conducting specific planning efforts and exercises, its application is limited. The main concern regarding the National Planning Scenarios document is its placement as the centerpiece and foundation of the National Preparedness Goal from which all national preparedness efforts are generated. If we skew our nation's preparedness capabilities to only address specific hazards (regardless of the exhaustiveness of the list) we will limit our ability to mitigate, prepare for, respond to, and recover from all disasters. While scenario-based planning can be a valuable tool in enhancing our preparedness, our overall national preparedness efforts should be based on a comprehensive all-hazards risk assessment.

¹ [Terrorism and the All-Hazards Model](#). William L. Waugh, Jr., PhD, Professor, Andrew Young School of Policy Studies, Georgia State University. 2004.

² [Guide for All-Hazard Emergency Operations Planning](#), State and Local Guide (SLG) 101.

Recommendation: Establish a nationwide comprehensive all hazards risk assessment to guide the nation's preparedness efforts. This assessment should take into account the frequency and probability of occurrence of hazards, the vulnerability to the hazards, and the consequence of the exposure.

Concern: If scenario-based planning is used as the foundation of our nations planning efforts, the scenarios need to be driven by a comprehensive risk assessment. Currently, the National Planning Scenarios are too focused on terrorism and catastrophic events, which limits our ability to adequately prepare for the hazards we are most likely to face.

Background - Terrorism: The National Planning Scenarios concentrate heavily on terrorist events and leave out significant hazards like tsunamis, wildfires, and of course flooding, the one hazard that causes more destruction and economic damage than any other natural hazard in the United States³ and is involved with over 90 percent of all presidentially declared disasters.⁴

As a recent GAO report points out, state and local officials and emergency preparedness experts have "questioned whether the scenarios were appropriate inputs for preparedness planning, particularly in terms of their plausibility and the number of scenarios (12 of 15) that are based on terrorist attacks."⁵ While the threat of terrorism is real and requires new and innovative solutions, it should not eclipse the need to prepare for other disasters. In the words of disaster scholar Dennis Mileti, "Our current national emphasis on the hazards of terrorism, although warranted, should not assume that the laws of nature were repealed on September 11th."⁶ Out of the 1,657 declared disasters to date, four of them have been terrorist attacks.⁷ This means that while less than one quarter of one percent of the disasters we have experienced in our nation have been terrorist attacks, 80% of our preparedness efforts are focused on this single hazard. Planning for the most recent disaster is not a rational approach to managing risk for our nation. If the National Preparedness Goal is going to implement the use of planning scenarios the scenarios should be based on a comprehensive all-hazards risk analysis.

³ [GAO report number GAO-04-417](#) entitled 'Flood Map Modernization: Program Strategy Shows Promise, but Challenges Remain'. March 31, 2004.

⁴ www.fema.gov

⁵ [GAO report number GAO-05-652](#) entitled 'Homeland Security: DHS' Efforts to Enhance First Responders' All-Hazards Capabilities Continue to Evolve'. July 2005.

⁶ [Future of U.S. Emergency Management](#), Dr. Dennis Mileti, 8th Annual Emergency Management Higher Education Conference. June 8, 2005.

⁷ http://www.fema.gov/news/disaster_totals_annual.fema

Background - Catastrophes: Although the words “disaster” and “catastrophe” are routinely used interchangeably, they are inherently different and we need to recognize and clarify the important distinction between the two. As disaster scholar E.L. Quarantelli points out, “...just as “disasters” are qualitatively different from everyday community emergencies, so are “catastrophes” a qualitative jump over “disasters.”⁸ The National Response Plan (NRP) also states that a catastrophic incident, “...almost immediately exceeds resources normally available to State, local, tribal, and private-sector authorities in the impacted area; and significantly interrupts governmental operations and emergency services to such an extent that national security could be threatened.”

While we are considerably more likely to suffer damages from a disaster, each of the National Planning Scenarios focuses on a catastrophic incident. Although some argue that jurisdictions will be better prepared for disasters if they are prepared for catastrophes, this is a faulty assumption. While the traditional emergency management framework and planning assumptions can be expanded to address catastrophes, catastrophic planning assumptions are not applicable to most disasters.

In considering Quarantelli’s observations on catastrophes and the NRP definition, it is evident that catastrophic planning requires a distinct set of planning assumptions including the likelihood that state and local authorities will immediately become overwhelmed and unable to implement their plans. This assumption leads planners to automatically focus on limitations and barriers rather than their capabilities and the coordination needed to leverage resources to meet the needs of most disasters. Automatically planning to rely on Federal resources will erode local capabilities and put even more stress on our national emergency management system.

Because of this, catastrophic planning should be addressed separately from disaster planning. Like a unique hazard, planning and preparedness for catastrophes should be above and beyond all-hazard planning and based on a comprehensive risk assessment.

Basing our planning and preparedness efforts solely on catastrophic events is as limiting as preparing for one type of hazard. If our nation’s preparedness efforts are to be guided by a set of scenarios, the scenarios should be based on a comprehensive all-hazards risk analysis.

⁸ [*Catastrophes are Different from Disasters: Some Implications for Crisis Planning and Managing Drawn from Katrina*](#), E.L. Quarantelli, Professor and Founding Director of the Disaster Research Center at the University of Delaware. 2005.

Recommendation: Establish a nationwide comprehensive all hazards risk assessment to guide the nation's preparedness efforts. This assessment should take into account the frequency and probability of occurrence of hazards, the vulnerability to the hazards, and the consequence of the exposure.

Concern: The Universal Task List (UTL) and Target Capability List (TCL) downgrade preparedness and planning tasks to a level where they are not appropriately considered or easily assessed.

Background: While HSPD-8 mandates a National Preparedness Goal that addresses the nation's need for preparedness capabilities, the four homeland security missions (prevent, protect, respond, and recover) leave out preparedness. Since the UTL and TCL are designed around these four missions, the importance of preparedness (specifically planning) is diluted in the National Preparedness Goal documents. Preparedness is identified as "Common Task" in the UTL and Planning as a "Common Capability" in the TCL. By lumping these important functions into a common category (that includes other functions such as supporting technology, risk management, and citizen preparedness), planning and preparedness is downgraded and not appropriately considered or easily assessed.

Recommendation: Instead of structuring our Nation's preparedness around the four homeland security missions of prevent, protect, respond, and recover, we should make the capability of planning and preparedness a priority.

Concern: Many of the tasks and capabilities in the UTL and TCL are ambiguous as to who is responsible for them and at what level.

Background: Although the UTL and TCL assign some responsibilities to specific levels of government and the level of capability needed for certain population ranges, these documents should clarify these specifications to more precise levels. Until this is done the TCL can not be expected to accurately assess a jurisdiction's capability to respond to disasters. Nor can responsible entities know what is expected of them. A prime example is the use of the following metric in a recent Target Capability Assessment used to measure local jurisdictions' capabilities in responding to explosive devices: "Bomb squad has robot? (Y/N)". Obviously, a "no" answer would indicate a greater shortfall for a high risk jurisdiction with a population of 500,000 than a low risk jurisdiction with a population of 600. Capability measurements and metrics need to be tied to national and local risk

assessments and specific to the various levels of necessity and responsibility.

Recommendation: Ensure that each entity responsible for capabilities and tasks in the UTL and TCL can determine exactly what is expected of them.

Concern: The UTL and TCL structure does not adequately consider the need for mitigation efforts outside of the threat of terrorism.

Background: While the UTL and TCL label their taxonomy as “all-hazards”, the missions of prevent and protect only address mitigation of terrorist events. There is no consideration of mitigation activities to address natural or other man-made hazards. HSPD - 8 states that the National Preparedness Goal should include prevention efforts that address all disasters and the National Preparedness Goal currently falls short of this mandate.

Recommendation: Ensure that the UTL and TCL adequately address the efforts needed in mitigation, preparedness, response, and recovery. These efforts should be based on a nationwide comprehensive all hazards risk assessment. This assessment should take into account the frequency and probability of occurrence of hazards, the vulnerability to the hazards, and the consequence of the exposure.