

Preparedness Revisited: W(h)ither PPD-8?

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ABSTRACT

The most important purpose of Presidential Policy Directive (PPD-8) on national preparedness is to establish a foundation that can be adapted to and utilized by stakeholders of all kinds and at all public and private levels. PPD-8 appeared somewhat abruptly on the scene, essentially replacing Homeland Security Policy Directive (HSPD-8), which had accomplished much but suffered setbacks and stalled in its effectiveness. Perhaps the single most important step the Obama Administration can take at this point is to make as clear as possible to the nation not only about the need for, but also the challenges encountered in implementing a national preparedness plan. Efforts need to be redoubled if serious and sustained progress is to be made by the end of the President's second term. On balance, given that the fundamental elements of PPD-8 are similar to HSPD-8 but even more complex, the author's view is that the newer initiative faces the reality of ultimately being overwhelmed by powerful analytic difficulties and/or governance-related impediments – falling short of its goals, which may simply be too ambitious to realize.

DISCUSSION

On March 30, 2011, President Obama issued *Presidential Policy Directive (PPD-8)*, a sweeping statement on national preparedness.¹ Its objective is “aimed at strengthening the security and resilience of the United States through systematic preparation for the threats that pose the greatest risk to the security of the Nation, including acts of terrorism, cyber attacks, pandemics, and catastrophic natural disasters.”² One of the more important purposes of *PPD-8* is to establish a national-level foundation that can be adapted to and utilized by stakeholders at the state and local level.³

This punchy, six page *Directive* set in motion a complex set of supporting policies, programs, and procedures affecting the Department of Homeland Security (DHS) as well as all federal agencies with homeland security responsibilities. Critical components of this directive include developing a *National Preparedness Goal* (the *Goal*) that identifies core capabilities necessary for preparedness; employing a risk-informed capabilities planning method for prioritizing stakeholder capabilities; establishing a *National Preparedness System (NPS)* to guide planning and implementation activities needed to achieve the *Goal*; and producing a series of annual *National Preparedness Reports (NPR)* to assess progress.

As readers familiar with homeland security policies can attest, *PPD-8* appeared somewhat abruptly on the scene, replacing *Homeland Security Presidential Directive (HSPD-8)* signed by President George W. Bush in late 2003.⁴ No reasons were given in the *Directive* or accompanying public statements for why it was decided to replace *HSPD-8*, nor were references made in *PPD-8* to the existence of such an earlier, similar directive.⁵ It is difficult to avoid concluding that political forces as well as substantive needs were at work in driving *PPD-8*, designed to give President Obama full credit for moving forward on national preparedness, without explicit recognition of work done under the previous Administration.⁶

During the few years the new *Directive* has been in existence, the nation has experienced a series of devastating natural disasters and accidents, as well as the terrorist attack at the Boston Marathon.⁷ National preparedness has once again become a prominent public policy issue.

The purpose of this article is to explore the question of how well *PPD-8* might meet its goals and objectives by the time the Obama Administration's second term is completed. It offers an understanding of the important

similarities and differences between *PPD-8* and the earlier *HSPD-8*.⁸ Referring to the article's odd subtitle, our investigation can be framed as *whither PPD-8* (i.e., where is it bound?) or *wither PPD-8* (i.e., will it fade away?).

CORE CAPABILITIES FOR PREPAREDNESS

Preparedness in the *PPD-8* context is taken to mean building the core capabilities “necessary to prepare for the specific types of incidents that pose the greatest risk to the security of the Nation [... and a set of] prioritized objectives to mitigate that risk.”⁹ Using a capability-based planning process, *the Goal* identifies thirty-one different core capabilities aimed at turning each of five mission areas – prevent, protect mitigate, respond, recover – into practical policies and programs expressed as a set of prioritized objectives to reduce that risk.¹⁰ *The Goal* also offers preliminary targets for each capability – so-called capability targets (TC) – that serve as a basis for assessing effective preparedness capabilities and identifying capability gaps.

Many questions have arisen about the way core capabilities are addressed under *PPD-8*.¹¹ National level core capabilities need to be based on credible evidence and/or systematic use of expert opinion, quantitatively or heuristically measurable, and tailorable to different users and situations. Without having been on the inside and in the absence of open sources that tell the full story, it is unclear how the *PPD-8* national core capabilities were constructed and how performance targets for each capability were developed.¹²

Speaking to a spectrum of stakeholders, *the Goal* stresses individual and community preparedness as fundamental to success, together with preparedness of governments at all levels and the private sector, including businesses and Non-Governmental Organizations (NGO).¹³ Each member of the “whole community” is expected to achieve effective preparedness levels.¹⁴

A laudable goal of *PPD-8* is to establish measurable targets for core capabilities, scaled for diverse stakeholders. However, this is no easy task. As we will see, it is difficult enough

to create a set of national preparedness core capabilities and with measurable targets, but far more challenging to adapt and apply these to the needs of all specific members of the whole community. Perhaps this helps explain why the *PPD-8* implementation effort has faced difficulties in providing an analytically justified set of capabilities and targets that can support application across the diverse set of stakeholders and circumstances.¹⁵

PREPAREDNESS RISK ASSESSMENTS

A strategic, national-level risk assessment (SNRA) was conducted as a necessary step soon after *PPD-8* was issued.¹⁶ Results of the SNRA were used to formulate *PPD-8* national core capabilities and associated target priorities. The more important goal of the SNRA, however, was to provide the basis for developing a risk assessment method that could ultimately be used for the regions, communities, and multitude of local entities that comprise the nation, enabling them to prioritize their capability needs and gaps. Notwithstanding this expected follow-up role for the SNRA, a different path was followed to assist stakeholders below the national level in conducting risk assessments for preparedness.¹⁷

THIRA ARRIVES

In April 2012, FEMA issued a *Threat and Hazard Identification and Risk Assessment (THIRA) Guide*.¹⁸ Unlike the national-level thrust of the SNRA, the *THIRA Guide* is about community preparedness, a subject that has received great attention in recent years.¹⁹ While the focus is on communities broadly defined, the *Guide* claims its approach can be adapted for use by all relevant entities below the federal level to support a diverse array of stakeholders – from all kinds of businesses, to owners and operators of large power facilities, to sprawling urban areas.²⁰

The *THIRA Guide* itself notes the challenges in applying risk methodologies designed to deal with such a complex set of users as found in the range of communities across the nation,

each of which faces an array of relevant threats and hazards – sometimes in common but more often than not specific to its location, exposure, and other unique factors. Looked at from the opposite perspective, *PPD-8* calls for communities, as well as other entities, to each contribute to *the Goal* by preparing for risks that are most urgent and important from their perspective by employing core capabilities that can strengthen their resilience.

RISK ASSESSMENT PROCESS

A five-step process is presented in the *THIRA Guide* covering such issues as identifying likely threats and hazards, characterizing these challenges, conducting risk assessments, developing core capabilities and targets, and establishing preparedness measures to mitigate risk.²¹ Execution of each of these steps is far from simple. Special expertise is needed to develop the needed methodological techniques for these risk assessments – estimating threats, developing scenarios, calculating consequences, producing capability needs, developing performance targets, and measuring mitigating effects. Not all required expertise might be available in each situation.²²

With SNRA applied nationally and to federal agencies and *THIRA* available for all stakeholders below the federal level, *PPD-8* holds out great expectations for risk assessments as a tool to develop and prioritize core capabilities across the five mission areas. The idea is to use such tools for integrating contributions toward achieving *the Goal* from all stakeholders of different types and levels. This means not only combining risk results horizontally at the state level across the nation, but also aggregating these results vertically up the chain in order to characterize how well the system meets the broad national objectives presented in *the Goal*. As further explored below, this process faces such a high degree of significant challenges that it might prove to be impossible to execute in practice – a key issue the *Guide* does not address in a serious manner.²³

In sum, the *THIRA Guide* is an informative document about risk in connection with

preparedness planning for homeland security. However, it has an upbeat style that does not pay enough attention to how risk assessments in connection with *PPD-8* are extremely difficult to develop and execute with meaningful results integrated across the diverse range of stakeholders, missions, and scenarios. The conundrum is how to find an accurate way to conduct preparedness risk assessments that can be executed by key groups of stakeholders, notably typical communities.

NATIONAL PREPAREDNESS SYSTEM

The *PPD-8 Implementation Plan* calls for the secretary of Homeland Security to develop a *National Preparedness System (NPS)* in coordination with other executive departments and agencies, and in consultation with state, local, tribal, and territorial governments, the private and nonprofit sectors, and the public. Published in late 2011 as an official FEMA document, the *NPS* is a means of outlining the process for how all stakeholders can move forward with their preparedness activities. This system is composed of six interlinked components: (1) identifying and assessing risk; (2) estimating the level of capabilities needed to address those risks; (3) building or sustaining the required levels of capability; (4) developing and implementing plans to deliver those capabilities; (5) validating and monitoring progress; and (6) reviewing and updating efforts to promote continuous improvement.²⁴

NATURE OF THE NPS

Given such a broad scope and significant statement of purposes, the *NPS* is a surprisingly short, readable, somewhat informal publication, apparently aimed at interested citizens needing an overview of the process, rather than audiences of large institutions or homeland security professionals where a more thorough presentation would be suitable.²⁵ This might be due to an attempt to target the lowest common denominator of the diverse *NPS* audience..

In April 2013, FEMA published a new document focused on estimating capability

needs and gaps, known as the *Capability Estimation Comprehensive Planning Guide (CPG) 201*.²⁶ This document is said to support the second *NPS* component and replace *THIRA* in supporting the first component by enhancing but going beyond presenting a risk method *per se* and demonstrating the process by which communities could apply a risk assessment to determine resources needed to deliver core capabilities to the target levels.²⁷

CPG 201 describes in detail a method that leads to core capabilities for mitigating risk. The *THIRA Guide*, as noted earlier, needs more detail in explaining a risk assessment method if this is to be an operational rather than educational product. Unfortunately, the processes found in *CPG 201* suffer from the opposite problem of being too complex for real world application by communities, even with experts involved.²⁸ Balance is essential to ensure that stakeholders at all levels understand and apply risk assessments that result in countermeasures and mitigation strategies.

The third and fourth *NPS* components are fleshed out in a set of five National Planning Frameworks – one for each mission area – billed as instrumental to the success of *PPD-8* implementation in helping ensure the whole community can work together to achieve national preparedness.²⁹ Frameworks for almost all of the five *PPD-8* mission areas have been released.³⁰ Each Planning Framework is relatively comprehensive – defining relevant mission areas, summarizing the roles and responsibilities of members of the whole committee, and identifying relevant information to help with operational planning in delivering core capabilities to communities. The status of the two final components remains unclear.

STATUS OF THE *NPS*

Much is riding on how the goals and objectives of *PPD-8* at the local level are turned into the reality of meaningful policies and cost-effective programs all based on serious planning efforts. The Government Accountability Office (GAO) concluded, “FEMA has made progress addressing that agency’s earlier recommendation to

develop a national preparedness assessment with clear, objective, and quantifiable capability requirements and performance measures, but continues to face challenges in developing a national preparedness system that could assist the agency in prioritizing preparedness grant funding.”³¹ In giving FEMA credit for making progress in managing *PPD-8* implementation, the GAO mentions publication of the *THIRA Guide* in 2012 and issuance of the first *National Preparedness Report (NPR)*, which will be discussed below.³²

There remains work to be done, for example, in finalizing the full set of Frameworks to include validating and monitoring progress. Also needed are steps for reviewing all capabilities, resources, and plans based on updated risk assessments, and showing how the various components interact dynamically.³³ From an overall perspective, what needs to be secured and sustained is a strategy to build the proper capabilities for each group of stakeholders that are affordable and support the five preparedness missions. There is also a critical need, as will be further discussed, to develop a credible method for integrating and aggregating preparedness levels achieved by stakeholders that result in a national level preparedness assessment.

NATIONAL PREPAREDNESS REPORT

PPD-8 requires annual *National Preparedness Reports (NPR)* be submitted by the secretary of Homeland Security to the president. As officially expressed, “[L]ooking across all...core capabilities outlined in *the Goal*, *NPRs* provide a national perspective on critical preparedness trends for whole community partners to use to inform program priorities, allocate resources, and communicate with stakeholders about issues of shared concern.”³⁴ The first in this series of *NPR* was issued in March 2012 and the second a year later.³⁵

UNDERSTANDING THE *NPR*

The 2013 *NPR* focuses on homeland security programs and policies completed or underway as reported for 2012. It is an extremely

comprehensive document filled with detailed charts, graphs, and other forms of data presentation, as well as case studies, to support a series of eight overarching national trends and sixty-two key findings that align to the thirty-one core capabilities across the five *PPD-8* missions.³⁶

The foundation for this analytic structure is the local assessments within each state and territory, which take the form of *State Preparedness Reports (SPR)*.³⁷ These contain state-level ratings of each core capability as high, medium, or low priority, based on results of *THIRA* risk assessments and capability estimates derived by aggregating results on risk-informed inputs from the *Sub-State Regions (SSR)* into which each of the fifty-six states and territories are supposed to be divided.³⁸ The *SSR* provide locally based assessments and data to the fifty-six states and territories that form draft *SPR* for FEMA to review. Once finalized, these are synthesized by FEMA to produce ten regional risk/capability assessments, which then lead to the national preparedness assessment captured in the *NPR*.³⁹

The 2013 *NPR* findings incorporate preparedness information for each core capability from the 2012 *SPR* process, which serves as a baseline for assessing progress made in implementing preparedness efforts in support of *PPD-8* capability targets. There is no room in this article to cover the many details covered in the 2013 *NPR*. Worth highlighting, however, are the document's discussions of the following items.

- Progress made for core capabilities that support all five mission areas, notably Planning, Operational Coordination, Intelligence and Information Sharing, and Operational Communication.
- Accomplishments in other core capabilities with broadly relevant capabilities identified – notably, cybersecurity, recovery-focused core capabilities, and integration of individuals with disabilities and access and functional needs.
- Newly identified national areas for improvement under *PPD-8*, which have

been part of preparedness initiatives for many years, including resilience of infrastructure systems and maturing the role of public-private partnerships.

With these sorts of outputs, the 2013 *NPR* represents a snapshot in time showing progress, current status, and issues to be tackled on the road to national preparedness.

VALUE OF THE *NPR*

The first two *NPR* represent a pattern of slowly assembling the many pieces of national preparedness policies and programs at the stakeholder level as a means of providing a national perspective. The first *NPR* affirms the longer-term vision of this series of publications – notably, establishing “a routine, repeatable process that builds on other preparedness efforts, engages whole community partners, and provides meaningful, consistent input to show progress annually.”⁴⁰ Constructing a truly representative, supported, and useful picture of something as complex as the national preparedness of the nation to meet a wide range of threats and hazards across the country at all levels of stakeholders will take time to demonstrate and develop for operational use in forming policies and priorities.⁴¹

The overall methodology employed to gather and assess data to generate what the *NPR* calls a national level assessment is complex and questionable. The first two *NPR* are filled with facts, figures, anecdotes, and observations, but do not represent credible, objective, supportable analysis. Using the *SSR* inputs, for example, both *NPR* rank order the percentage of states and territories rating themselves as high on a five-point assessment scale for planning, organization, equipment, training, and exercises. Here, as in other parts of the overall *PPD-8* process, we face the issue of false precision, where results might look good but be misleading by not accounting for the many uncertainties inherent in complex system behaviors. As preparedness efforts evolve and mature, there is recognition that “future iterations of the *NPR* will increasingly reflect quantitative performance data and assessment results, as well as qualitative

program accomplishments that align with *the Goal*.”⁴²

However, at the end of the day, the path chosen by the *NPR* for fulfilling the need for a national preparedness assessment is likely to fail. Results based on non-validated data gathered at local levels within states will almost surely remain questionable, given the pilot program’s results and more recent observations. Not to be forgotten is that *SPR* – instrumental inputs for the *NPR* – are built upon obtaining complete and credible assessments from the ground up for integration and aggregation. While lessons have been learned from earlier testing under a series of DHS-organized Pilot Capabilities Assessments (PCA), obtaining comprehensive and accurate sub-state and local preparedness inputs may not be feasible and, as self-assessments are used at this level, may not be credible.⁴³

One final methodological concern is that the *NPR* are based upon self-assessments by the states. Even if relying upon what seems to be comprehensive and consistent data – an assumption that cannot be taken for granted – such self-assessments raise serious concerns over objectivity and credibility in Congress and with the stakeholder community and the public at large. Shifting to an independent assessment might be a wise step to take.

TWO BIG ISSUES

The GAO’s conclusion that progress has been made towards reaching *PPD-8*’s goals and objectives are correct as far as they go.⁴⁴ However, with its public face and in open testimonies as well as published documents, the Administration has yet to directly confront and discuss in some detail the inescapable fact that this program continues to face enormous challenges. Quite the opposite, *PPD-8* and its key implementing documents tend to present preparedness plans and actions as relatively easy to execute by any member of the whole community – from individuals to large organizations.

This approach is misleading. The public should be made aware at least of the two largest hurdles to overcome before national

preparedness can in fact be achieved: the difficulties in understanding the level of preparedness and the dilemmas faced in dealing with governance issues.

WICKED PROBLEM

When turning from words to implementation, the *PPD-8* approach to national preparedness reflects the characteristics of what is called a “wicked problem” – hard to define, delimit, and understand, reflecting uncertainties, and having many moving parts that interact often in unknown ways.⁴⁵ The sheer complexity of the multifaceted *PPD-8* implementation strategy has already been demonstrated in our discussions of such elements of the *Directive* as capabilities-based planning, risk assessments, and the National Planning Frameworks. For this reason, practical assessment of national preparedness will involve a multivariable, multi-dimensional process of measuring, assessing, and aggregating the performance of many different capabilities deployed by many different entities at many different stakeholder levels to address five different mission areas. Such wicked problems are typically not prone to analytic solutions leading to useable outcomes.

One aspect of wickedness in *PPD-8* has to do with the extremely difficult analytic task of developing a set of measurable preparedness national capabilities that can be adapted to the needs of state and local stakeholders across the whole community with different threats and hazards and capabilities. Is it really expected that each of the ten FEMA national regions as well as the fifty-six states and territories, hundreds of metropolitan areas, thousands of cities, and tens of thousands of communities will have the interest, capabilities, and resources to produce such a plan? How can these pieces be integrated into a coherent nationwide puzzle that portrays a credible picture of preparedness? What about incorporating cooperation with international partners, especially Canada and Mexico? As put by the GAO, “until FEMA develops clear, objective, and quantifiable capability requirements and performance measures, it is unclear what capability gaps currently exist and

what level of federal resources will be needed to close such gaps.”⁴⁶

More fundamentally, multi-level nationwide preparedness capability assessments, such as represented by the *PPD-8* initiative, pose complex analytic and organizational challenges. While there are existing methods for hierarchical data assessments – including the concept of multi-stage sampling and selective indicators – these approaches have their own limitations, do not deal directly with homeland security preparedness, and cannot easily be adapted to the problem *PPD-8* seeks to address. A 2007 report by the *Homeland Security and Analysis Institute* provides a useful initial “proof of concept” examination of a layered homeland security preparedness approach. It “presents a method for developing preparedness capability assessments that integrate and aggregate assessments across all levels of responsibility, ultimately resulting in a nationwide assessment.”⁴⁷ It demonstrates just how complex and virtually undoable such problems become when examined closely.

Preparedness can be said to have one reality at the federal level, another at the regional, another at the state, and still another at the local level. For example, the risks seen by a medium-sized Midwestern community would be very different from those seen by coastal urban areas that are different still in regions such as the Pacific Northwest. The challenge faced is how to form a top-level aggregated assessment across all levels of government and non-governmental entities, aimed at providing the president and Congress with an overall rating of how well the nation as a whole is prepared to meet major terrorist and natural disaster challenges. This is what the *NPR* ultimately aims to develop. It is not clear that there are other fundamentally different ways of trying to gauge national preparedness.⁴⁸

Regrettably, as noted above, the *PPD-8* implementing documents do not clearly address the wickedness of the challenges faced. We find some instances where this issue is noted; for example, *THIRA*'s acknowledgement that risk assessments can be complicated. We also find a few broad statements made in passing within which lurk extremely complex analytic

challenges that are not mentioned, such as, “[t]he five mission areas exist along a continuum, and *there is a dynamic interplay between and among them* and even some commonality” [emphasis added].⁴⁹ However, the set of *PPD-8* documents as a whole do not do justice to the many analytic obstacles that need to be overcome in key assessment steps that need to be taken.

As a final point, *HSPD-8* has also been characterized also as a wicked problem – though with more moving parts, *PPD-8* may well be a more wicked problem to solve than *HSPD-8*.⁵⁰

THE GOVERNANCE DILEMMA

PPD-8 implementation has been trying to engage all members of the whole community in a sustained manner, as preparedness requires constant attention as threats, circumstances, and requirements change. Without question, jurisdictions, agencies, and organizations at all levels would benefit from a standardized but flexible method to plan for, assess, and track preparedness within a common analytic framework.

Given our federalist system, however, governance issues tend to arise when interactions take place among responsible authorities at all levels in developing capability assessments. States and local jurisdictions often resist what they perceive as federal imposition of a one-size-fits-all set of homeland security objectives, standards, and procedures. Early in the process of *HSPD-8* implementation, for example, a senior DHS official observed that it would require a “consensual community” to accept and apply this approach, recognizing that endorsement of this process across all jurisdictions would be complicated and entail, *inter alia*, concerns over loss of sovereignty in some states.”⁵¹

Difficult as it may be, *PPD-8* implementation, as *HSPD-8* before it, must somehow seek to balance the federal government’s responsibility for the nation’s safety against the freedom for state and local jurisdictions to govern at their respective levels. There is no simple solution. Some argue that a top-down approach

intended to assist, but not direct, planning and measurement is, by definition, antithetical to a federalist form of government. Others argue that bottom-up approaches have no coherence and may not have significant impact at higher levels.

The answer lies in between and is a function of the particular issue. In connection with *PPD-8*, perhaps Christopher Bellavita is right in observing that putting up with all the “messiness, inefficiency and other faults” as the price to be paid for living within a federalist system of governance formed the main hurdle to be faced in the attempt to implement [...the] earlier [...*HSPD-8*] preparedness strategy.⁵²

CONCLUSIONS

The preparedness program called for by *PPD-8* is extremely ambitious, with implications for how to proceed in future years. Expanded efforts can be made by the Obama Administration to place higher policy priority on and provide greater resources for getting the nation in a better preparedness position by the end of the president’s second term. On the other hand, even with such efforts, national preparedness may not move demonstrably ahead over the next few years.

KEEP TRYING

The game is not over. Further initiatives can and should continue to be taken to increase the chances of *PPD-8* making a sustained imprint on national preparedness policies, programs, perceptions, and priorities. At the moment, however, the single most important step the Obama Administration can take is not only to make clear to the nation the need for enhancing our preparedness in the face of terrorist threats and natural disasters, but also to acknowledge the major challenges that must be overcome in implementing a national preparedness plan.⁵³ The aim would be to reinforce the need for the whole community to work on this problem, adapting solutions to local and regional conditions within broad federal guidelines, while at the same time seeking to lower expectations regarding the outcome being

sought by the time this Administration leaves office. Care should be taken to acknowledge the existence of large uncertainties and complexities in understanding the dangers facing the nation from major natural disasters and terrorist attacks as well as the best ways to mitigate these challenges to reduce risk while adhering to our federalist system of governance.

Examples of specific steps to be considered in improving preparedness include:

1. **Improving Stakeholder Engagement.** The Administration has been working with federal, state, and local governments as well as NGO and the private sector to realize the objectives of *PPD-8*.⁵⁴ However, it is not too late for DHS to take even more vigorous steps to engage all key stakeholders in the *PPD-8* process. In doing so, policies and programs need to remain sensitive to the need for states and local communities to act in their own interests as long as this is not inconsistent with the thrust of the new preparedness strategy. More effort ought to be put into creating greater incentives for the private sector to enhance their preparedness, building on programs currently in place, which would offer financial assistance, tax write-offs, and the equivalent of a “good preparedness seal of approval” known as *Resilience STARTM*.⁵⁵ Practically speaking, resource limits will likely constrain how much effort can be put into more vigorous stakeholder engagement efforts.⁵⁶
2. **Fixing the *NPR*.** The second report, issued two years after *PPD-8*, is much improved over the first edition, which sought to assess preparedness progress while *PPD-8* was replacing key elements of *HSPD-8*. Future *NPR* should be more heuristic than the first or second, with less false precision using low confidence numbers and typically unreliable percentages. They should manage expectations by acknowledging the difficulties of implementing and measuring preparedness progress at all levels, especially at the national level. Moreover, rather than a fruitless pursuit of practically unattainable performance

goals that presumably would *eliminate* risk, subsequent *NPR* ought to focus on the *relative* progress of *PPD-8* toward the desired end state of *managing* risk. No matter how well put together, however, if subsequent *NPR* remain self-assessments, they will continue to suffer from credibility problems. Finally, some mechanism needs to be found for developing an independent assessment of the first draft of each *NPR* as produced by FEMA.⁵⁷

3. **Developing an *NPS* “Do it yourself” Kit.** The challenge here is how to find a balance between the somewhat simple 2011 version of the *NPS* and what appears to be the production of each of the six *NPS* component parts in great detail.⁵⁸ One idea would be an updated *NPS* that again pulls together all parts of this system in the form but this time in the form of a “do it yourself kit” for non-federal public and private users. This document would offer easy-to-follow steps for each of the six components that reflect decent accuracy and note unavoidable uncertainties. Sections of the kit would include examples for different types of users of appropriate adaptation and prioritization of the *PPD-8* national-level core capabilities and targets for use in different categories of stakeholders, ranging from communities, to large urban areas, states, and regions comprised of many states. It would then go further to at least illustrate how risks, capability gaps, and solutions to enhance preparedness can be aggregated from local, to sub-state, to state levels across the nation. This can then lead to risk assessments for the ten FEMA Regions and ultimately provide national assessment input to the president via a series of *NPR*.⁵⁹

SUCCESS MAY NOT BE AROUND THE CORNER

Steps such as those summarized above can be useful. However, the experience thus far with *PPD-8* implementation suggest that, as a practical matter, this initiative does not have a

high chance of succeeding in reaching its stated goal. Many experts believe that *HSPD-8* failed to make significant and sustained progress in meeting its preparedness objectives for the nation. By the time *PPD-8* was published, there were examples galore of issues that led to *HSPD-8* showing serious signs of failure.⁶⁰ If this were true for the less complex *HSPD-8*, it would seem to be a serious warning flag for the success of *PPD-8*.⁶¹ Indeed, as noted in our discussion, *PPD-8* may prove to be more difficult to implement than *HSPD-8* because of its greater number of inherent complexities and the early confusion caused by an abrupt switch from one preparedness strategy to another.

The Goal defines success in the *PPD-8* context as “a secure ...and resilient Nation with the capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk.”⁶² Looked at another way, success is not only aimed at ensuring preparedness for all stakeholders across the country at all levels, but also designed to help reach the more expansive goal of ensuring that the whole community is prepared to cope with successful terrorist attacks and major national-level disasters.

While well expressed, a key question associated with *PPD-8* is how will success be measured? It is doubtful that there will be a magic measuring stick invented that could tell the president, the Congress, and the nation as a whole, how well *PPD-8* implementation is going and how close the total efforts made under this *Directive* might come to reaching the rather broad end-state quoted above by the time the president leaves office. It would be misleading at best and dangerous at worst if the attempts to rate progress via the methods employed by the *NPR* are relied upon, even if best efforts are made to find better tools. It is the nature of wicked problems that issues such as success and failure are difficult if not impossible to assess in credible and objective ways.

We are clearly faced with a very wicked, wicked problem in seeking to develop a truly strategic view of the nation’s preparedness. As discussed, this would entail a horizontal and vertical hierarchical, analytically based

assessment method that poses significant analytic and governance challenges and may not be doable as a practical matter.

Realistically, all that can and should be done is to chip away at the problem at all levels, employ only well-tested and cost effective measures, and temper expectations. At the national level, this is the time to objectively debate the effectiveness and efficiency of our national preparedness strategy and capabilities. What is needed is not be some sort of pseudo-analytic formula for measurement, but an informed national perception of how well *PPD-8* and other preparedness policies and programs have improved the country's preparedness against a range of likely threats and hazards with nationwide implications and a set of low likelihood incidents that can cause high consequences.

THE ROAD AHEAD

If *PPD-8* shows significant progress by the time President Obama leaves office, an incoming administration might decide to adopt a low-key effort that keeps slugging away at improving national preparedness. Less probable, but possible, would be a decision to undertake yet a third effort with the same thrust but a brand new name and number in the tradition of *PPD-8* and *HSPD-8* before it.

If it appears that substantial progress in developing a feasible and meaningful national preparedness program has *not* been made by the time Obama leaves office, however, a new administration might simply decide that no credible nationwide approach to preparedness is workable in this large, diverse country with its special governance structure. This would of course allow for communities and all stakeholders to continue to prepare themselves as best they can with help from the federal government, but with no attempt to forge a common strategy and measure overall national preparedness.

After diving into and digging out of this issue, this article argues that *PPD-8* faces the reality of ultimately being overwhelmed by similar and equally powerful analytic difficulties and/or governance impediments as the *HSPD-8*

initiative before it. In sum, regarding overall national preparedness strategies, to the extent that proverbs can proscribe policy, it can be said that if a second attempt to attain sufficient and sustained national preparedness through *PPD-8* is seen as not succeeding, it might *not* make sense to “try, try,[...and] try again.”⁶³

ABOUT THE AUTHOR

Jerome Kahan is currently an independent writer and analyst. He was formerly a distinguished analyst at the Homeland Security Studies and Analysis Institute in Arlington, VA. Mr. Kahan has been in the national security, arms control, and homeland security fields for over forty years –including twenty years with the Department of State, where he held positions on the policy planning staff and as deputy assistant secretary with the Political-Military and Intelligence Bureaus and served as counselor at the American Embassy in Turkey. He worked for many years with non-governmental research organizations, including the Brookings Institution, the Center for Naval Analyses, and Systems Planning and Analysis. He has written and/or contributed to a number of books, published articles in a variety of journals, taught at the Air Force Academy, and served as an adjunct professor in the School of Foreign Service at Georgetown University. Mr. Kahan holds a Master's Degree in Electrical Engineering from Columbia University, with bachelor's degrees from Queens as well as Columbia College. He has also been a member of the Council on Foreign Relations and the International Institute of Strategic Studies.

NOTES

1. The White House, *Presidential Policy Directive (PPD-8)* (Washington, DC: Government Printing Office, March 30, 2011).
2. *Ibid.*, 1. Although resilience is included in this definition, PPD-8 and its implementing documents do not apply this concept as a major strategic driver or practical planning factor. The focus is on preparedness, which produces resilience as one of its outcomes.
3. As put by the *Directive*, while PPD-8 is “intended to galvanize action by the Federal Government, it is also aimed at facilitating an integrated, all-of-Nation, capabilities-based approach to preparedness [...as] national preparedness is the shared responsibility of all levels of government, the private and nonprofit sectors, and individual citizens.” *Ibid.*, 1.
4. The White House, *Homeland Security Presidential Directive (HSPD)–8, National Preparedness* (Washington DC: Government Printing Office, December 17, 2003).
5. Those in the preparedness business when PPD-8 was issued were surprised. As an example, an apparently disgruntled FEMA employee offered the following observations via a PPD-8 website created by this agency: “Since HSPD 8 is now replaced by PPD8, what has this done in regards to the training and direction that many of us have spent years teaching? ...How much time and money will it draw away from other areas while 80% to 90% of the current training and documentation is changed to reflect these small changes? My question is, is it really worth the time and effort to go through all of this? ...What were the driving factors to make this change? Were they driven by reality? Or was this just an expensive and time-consuming political stunt?” Promoting Preparedness - (FEMA) - by IdeaScale fema. ideascale.com/a/ideafactory.do?id=14692&mod.
6. As pointed out by a homeland security expert, the PPD-8 initiative does not refer to or recognize “what has and has not been accomplished since the last major preparedness directive was issued... [and] reads as though the past seven years never happened.” See “Homeland Security’s Presidential Policy Directive: Two Steps Backwards,” [Jena Baker McNeill](http://www.heritage.org/.../two-steps-backward-homeland-security-presidential) and [Matt A. Mayer](http://www.heritage.org/.../two-steps-backward-homeland-security-presidential), Heritage Foundation, April 14, 2011, www.heritage.org/.../two-steps-backward-homeland-security-presidential
7. Recent natural and accidental disasters across the nation include massive wildfires, floods, and hurricanes, as well as the fertilizer plant explosion in Texas.
8. A full side-by-side comparative analysis of these two directives is beyond the scope of this article, but important insights can be gained by looking back at HSPD-8 in considering the future of PPD-8.
9. PPD-8, 1. A capability is “the ability to provide the means to accomplish one or more tasks under specific conditions and to specific performance standards. A capability may be achieved with any combination of properly planned, organized, equipped, trained, and exercised personnel that achieves the intended outcome.” Jared T. Brown, *Presidential Policy Directive 8 and the National Preparedness System: Background and Issues for Congress* (Washington DC: Congressional Research Service, October 21, 2011), 15.
10. Capabilities-based planning, used by the Department of Defense and in the private sector, entails planning under uncertainty to provide capabilities suitable for a wide range of future challenges and circumstances. It involves working within a framework that considers costs and sustainability and necessitates prioritization and choice to enable officials at all levels to make informed choices that best strengthen homeland security capabilities. As applied to homeland security, capabilities-based planning serves as an analytic method for conducting risk assessments under uncertainty against all-hazard threats to develop the means to respond to a wide range of potential challenges and circumstances. For groundbreaking work on the challenges faced in applying capabilities based planning to homeland security see Sharon Caudle, “Homeland Security Capabilities-Based Planning: Lessons from the Defense Community,” *Homeland Security Affairs* I, no. 2 (Fall 2005), <http://www.hsaj.org/?article=1.2.2>, and also her *Homeland Security and Capability Based Planning: Improving National Capabilities*, Thesis, Naval Postgraduate School, Monterey, CA, September 2005, 49-50, <http://www.dtic.mil/dtic/tr/fulltext/u2/a439372.pdf>.
11. Developing core capabilities with associated targets, and seeking to adapt these to the diverse needs of all relevant stakeholders, posed major analytic and governance related difficulties during the HSPD-8 era. The Target Capability List (TCL) was surrounded in controversy from the start. The TCL established national targets for performance and resource capabilities across the prevent, protect, respond, and recover mission areas. Seventy-one critical capabilities were initially identified, which differ in substantive detail as well as numbers from the thirty-one TCs developed for PDD-8. Moreover, the TCL issued under HSPD-8 contained only thirty-seven of the seventy-one initial capabilities.

Developing, implementing, and evaluating the core capabilities associated with *PPD-8* are likely to experience many of the same inherent challenges that were experienced in the earlier *HSPD-8* attempt to realize preparedness core capabilities. For groundbreaking work on the challenges faced in applying capabilities based planning to homeland security see Sharon Caudle, as referenced above.

12. Relying on unclassified and unrestricted information, a good faith effort was made by the author to discover the process by which the core capabilities were constructed and performance targets developed under *PPD-8*. Non-governmental analyses are few and official sources are overly general, for example, *Learn About Presidential Policy Directive-8*, [FEMA.gov/www.fema.gov/learn-about-presidential-policy-directive-8](http://www.fema.gov/learn-about-presidential-policy-directive-8). One useful source is the statement by Sharon L. Caudle, Ph.D., Younger-Carter Distinguished Policymaker in Residence and Visiting Lecturer, The Bush School of Government and Public Service Texas A&M University, House Committee on Homeland Security, Subcommittee on Oversight, Investigations, and Management: *Is DHS Effectively Implementing a Strategy to Counter Emerging Threats?* February 3, 2012. As to setting numerical target levels for certain TCs, such attempts convey a sense of credibility and precision, are often not well supported, and can be highly misleading. For example, for the capability designated “Screening, Search, and Detection,” the Target Capability found in *the Goal* is conveyed as “screen 67,500 people associated with an imminent terrorist threat or act using technical, non-technical, intrusive, or non-intrusive means.”, *National Preparedness Goal* 1st Edition, Table 2 (Washington DC: September 2011), 3. In such situations, the author likes to cite the saying attributed to John Maynard Keynes, “it is better to be roughly right than precisely wrong.” <http://www.goodreads.com/quotes/265041-it-is-better-to-be-roughly-right-than-precisely-wrong>.

13. “Every member of the entire nation takes actions to strengthen their preparedness by adapting and applying [... the national] core capabilities for each mission area as relevant to the threats and hazards they expect to experience—including individuals, communities, the private and nonprofit sectors, faith based organizations, and Federal, state, and local governments. By so doing, they not only improve their preparedness, but also make overall national preparedness stronger.” *The Goal*, 1.

14. The “whole community” is the current term for characterizing the different types and sizes of stakeholders not only at federal level, but across the country to include private as well as public stakeholders at state and local government levels, a wide range of cities/urban areas and communities, large and small private businesses, non-governmental organizations (NGO), and concerned citizens and families. It has largely replaced the term “Homeland Security Enterprise.”

15. One major impediment to success, as put by GAO two years ago is the lack of “national preparedness capability requirements based on established metrics to provide a framework for... assessing federal, state, and local preparedness capabilities against capability requirements to identify capability gaps for prioritizing investments in national preparedness.” See *Measuring Disaster Preparedness: FEMA Has Made Limited Progress in Assessing National Capabilities*, Testimony by William O. Jenkins, Jr., GAO Director Homeland Security and Justice Before the Committee on Homeland Security and Governmental Affairs, U.S. Senate, Statement United States Government Accountability Office (Washington DC. March 17, 2011), 9-10. This continues to be an issue needing to be resolved.

16. The *PPD-8 Implementation Plan* specifically calls for the secretary of Homeland Security “to conduct a strategic, national-level risk assessment to identify the relevant risk factors that guide where core capabilities are needed and develop a list of the capabilities, [...capability targets], and associated performance objectives for all hazards that will measure progress toward their achievement.” *Implementation Plan for Presidential Policy Directive 8: National Preparedness* (Washington, DC: May 2011), 2. Against a five-year planning period, the *SNRA* assessed risk as a function of frequency and consequences for a set of 24 national-level events. The methodology incorporated data from a variety of inputs, including leveraging existing models and assessments, the historical record, and expert judgment. *SNRA* produced risk-informed results were used to develop and prioritize the national core capabilities. What we know is based on an unclassified summary issued by FEMA, *the Strategic National Risk Assessment in Support of PPD 8: A Comprehensive Risk-Based Approach toward a Secure and Resilient Nation* (Washington DC: FEMA, December 2011), <http://www.dhs.gov/xlibrary/assets/rma-strategic-national-risk-assessment-ppd8.pdf>. Without access to classified materials, it is not possible to check how these risk outcomes shaped national capabilities and targets and whether any capabilities were solidified without flowing from a credible risk assessment.

17. Perhaps it was recognized, upon a closer look, that adapting the *SNRA* to regional and local levels is not easily accomplished. A single methodology might not be applicable. Even with a credible national level risk assessment using the national core capabilities and a set of generic scenarios, there are special challenges in determining the methodology, level of detail, and data requirements to support risk assessments by communities and other public and private entities in various locations exposed to different threats and hazards.

18. *Threat and Hazard Identification and Risk Assessment (THIRA) Guide*, First Edition, CPG 202 (Washington, DC: Department of Homeland Security, April 2012). *PPD-8* is based on the premise that all communities need to conduct risk assessments of the threats and hazards they face in order to make informed decisions about the capabilities they must deploy in order to manage risk.
19. For example, see the work done by the Community and Regional Resilience Institute (CARRI), www.resilientus.org/. See also, Jerome Kahan, et al, *Community Resilience Profiles: Assessment and Evaluation, Final Report*, Homeland Security Studies and Analysis Institute, December 19, 2011, www.dhs.gov/homeland-security-studies-and-analysis-institute-hssai
20. There are many public and private entities below the national level besides communities, such as the interstate regions, individual states and territories, major metropolitan areas, all kinds of smaller jurisdictions and localities as well as different slices of critical infrastructure, hosts of NGO, and multitudes of large and small businesses.
21. *THIRA*, 3.
22. Even experts find it challenging to develop threat assessments requiring estimates of likelihoods and consequences set within credible scenarios for each stakeholder facing particular dangers. See National Research Council, *Review of the Department of Homeland Security's Approach to Risk Analysis* (National Academies Press, 2011). On-the-ground assistance can be of great value in adapting and applying normative risk principles to local capability needs, but DHS cannot afford to send experts to all the cities, communities, and localities across the nation, let alone meet the needs of concerned citizens.
23. More specifically, *the Guide* fails to properly articulate address whether the proposed risk method is feasible when applied by a wide spectrum of users facing different threats and circumstances; the degree to which the varied technical abilities of users are sufficient to execute the method and apply results; and the implications of differing levels of stakeholder interest in high priority risk assessments for preparedness planning. Another impediment integrating risk assessments from top to bottom is the fact that risks aggregated upwards to the national level would be based on *THIRA*, which turns out not to be directly related to the earlier top-down *SNRA* effort!
24. FEMA, *National Preparedness System*, (Washington DC: Department of Homeland Security, November 2011) www.fema.gov/pdf/prepared/nps_description.pdf . In the interest of keeping the public informed as the *NPS* moves forward, FEMA has a website that explains the components of the *NPS* and provides specific tools and resources to help communities and individuals through the *NPS* cycle. At <http://www.fema.gov/national-preparedness-system>
25. The *NPS* uses the word “you” quite often, as in “you coordinate your plans with other organizations,” and uses informal expressions such as “Now it’s time to see if your activities are working as intended.” This tone has the ambience as if someone from FEMA is having a nice chat about preparedness in someone’s living room.
26. *Capability Estimation Comprehensive Preparedness Guide (CPG) 201*, second edition, FEMA, April 2013.
27. *Community* refers broadly to all types of communities, including communities of practice, communities defined by geography (regions and jurisdictions), and communities with other shared interests. *Resources* typically refers to personnel, teams, facilities, equipment, and supplies, but is here expanded to include plans, procedures, strategies, training, exercises, programs, systems, technologies, services, funding, authorities, laws, ordinances, and policies.” *CPG*, 2.
28. The following passages, drawn somewhat arbitrarily from different pages of *CPG 201* give a flavor of some of the issues involved. “This analysis compares current resource levels to the desired capability targets... or each capability target, communities should examine current resource levels using information from real-world incidents, assessments, planning processes, and exercises. This examination may involve additional information gathering and research in partnership with whole community partners, including those from the private and nonprofit sectors, faith-based organizations, and community-based organizations... This strategy should take into account existing community resources, resources from non-traditional partners, mutual aid agreements and partnerships, partners at other levels of government, and, lastly, grant investments. Communities should pull from and consult with strategic, operational, and tactical plans, including emergency operations, hazard mitigation, comprehensive/land use, economic development, housing, resource protection, transportation, and recovery plans; after action reports, improvement plans, and other capability assessments; local and regional planning groups...; groups representing those with disabilities and others with access and functional needs; trusted public-private relationships and working groups such as local business and industry groups..., and laws, authorities, policies, and procedures...When communities successfully implement this strategy, the *THIRA* capability targets may need to be reduced. ...This would then require revision of this capability

estimation process.” As a former (Adjunct) Professor, the author can only remind the reader that there will be a short Q&A test on this material!

29. The Frameworks follow the whole community approach to preparedness, which recognizes that everyone can contribute to and benefit from national preparedness efforts. Each Framework explains the guiding principles and scope of mission area; summarizes the roles and responsibilities of each part of the whole community; defines the mission area’s core capabilities, along with key examples of critical tasks; defines coordinating structures—either new or existing—that enable the whole community to work together to deliver the core capabilities; describes the relationships to the other mission areas; identifies relevant information to help with operational planning; and provides information that state, local, tribal and territorial governments can use to revise their operational plans. See *National Planning Frameworks* at [FEMA.gov](http://www.fema.gov) www.fema.gov/national-planning-frameworks

30. The National Disaster Recovery, National Prevention, National Mitigation Framework, and second edition of the National Response Framework have been released, with the National Protection Framework to be released later to conform with the evolution of national protection policy. *Ibid.*

31. *FEMA Has Made Progress, but Additional Steps Are Needed to Improve Grant Management and Assess Capabilities*, Government Accountability Office, GAO-13-637 (June 25, 2013), 1, at <http://www.gao.gov/products/GAO-13-637T>

32. In 2011, the Congressional Research Service (CRS) highlighted a number of issues that Congress may wish to oversee as the Administration “creates and implements” its many elements. These include “evaluating how *PPD-8* policies conform with statute; how federal roles and responsibilities have been assigned to implement and execute *PPD-8* policies; how non-federal resources and stakeholders will be impacted by national preparedness guidance; and how the overall federal budget may be reprioritized by a new national preparedness goal.” Jared T. Brown, *Presidential Policy Directive 8 and the National Preparedness System: Background and Issues for Congress* (Washington, DC: CRS, October 21, 2011), Summary.

33. On this point, in what is surely an understatement, *CPG 201* notes that *NPS* components continuously affect each other, but does not demonstrate these dynamics. What is presumably meant are such interactions as TSA, CBP, and ICE work together at airports to detect and deal with the risk of terrorists entering the country using illegal immigration documents when arriving in country.

34. *NPR 2013*, Fact sheet

35. *National Preparedness Report* (Washington, DC: Department of Homeland Security, March 30, 2012, and *National Preparedness Report*, March 30, 2013.

36. The 2013 *NPR* relies upon approximately 1,400 sources and 3,200 measures and metrics that contribute to analysis of the core capabilities and related targets identified in *the Goal*. Inputs were elicited from all types and levels of public and private partner, which are then systematically synthesized by FEMA into observations on capability progress achieved.

37. *State Preparedness Reports (SPR)* have been produced annually starting in 2007 under the *HSPD-8* framework. The results of the *THIRA* risk and capability estimation processes for states and territories receiving Federal preparedness assistance are reported annually through the State Preparedness Report (SPR). They initially reflected self-assessments of how the *TCL* was meeting its thirty-seven target capabilities under *HSPD-8* initiative, changing as the initial *TCL* changed, and refocusing themselves as *PPD-8* replaced *HSPD-8* with its thirty-one core capabilities and targets. FEMA published an online, interactive tool that guides states and territories through the *SPR* assessment process to ensure consistency of data and continued implementation of the capability assessment aspect of the National Preparedness System. See *State Preparedness Report Guidance*, Fiscal Year 2008, Department of Homeland Security.

38. The *SSR* concept arose in December 2004, when the Office of Domestic Preparedness (ODP) requested that states designate *Sub-State Regions* for homeland security. Reflecting their own histories and preferences, different states have chosen to build *SSRs* using a variety of structures and organizing principles. Many *SSR* are organized according to emergency preparedness needs keyed to natural disasters as opposed to terrorist threats. Some states designate *SSR* only for periodic preparedness planning, not for sustained preparedness assessments.

39. *NPR 2012*, 3.

40. *NPR 2012*, 1. A unique challenge faced by the first *NPR* was handling the transition from *HSPD-8* to *PPD-8*, which entailed working with the new set of thirty-one *PPD-8* core capabilities while facilitating a transition from the

old to the new system. This complicated efforts to identify measurable performance and assessment data to determine annual yearly progress in implementing. Given the press of time to get the first *NPR* out the door, the FEMA team was forced to assess the county's overall preparedness progress by utilizing existing assessment approaches and associated data based on the *old* capabilities and targets associated with *HSPD-8*, not the *new PDD-8* core capabilities and their associated performance targets. For this and other reasons, this first *NPR* candidly acknowledges that "the rating system used to score target capability goal performance on a scale of 100% is not reliable and...in many cases, measures and metrics do not yet exist to gauge performance [...for use as] a reliable source of deficiencies nor for that matter of successes." *NPR* 2012, 60.

41. As articulated in the 2013 *NPR*, "trends in national preparedness will be increasingly evident in future reports, as the *NPR* development process continues to mature and incorporates additional input from across the whole community [... and] more significant changes in levels of capability and overall national preparedness will become clearer by evaluating trends across multiple years." *NPR* 2013, 1.

42. *NPR* 2013, 12.

43. The intent of an early test program, held in 2006, was to learn important lessons about real implementation challenges for *HSPD-8* and significantly revise the methodology for further use in measuring the preparedness level of States. Working with FEMA, six States conducted Pilot Capability Assessments (PCAs). Each PCA was subjected to a self-assessment, with inputs from a selected number of SSRs in each State. All this effort led to uneven, inconsistent, and not analytically based outcomes. Many difficulties arose in implementation and funding. Some believe that this program represented a good start, but it faded away. See U.S. Department of Homeland Security, Preparedness Directorate, Office of Grants and Training, *Pilot Capabilities Assessment (PCA): RDSTF Region 3*, September 15, 2006, and *RDSTF Region 7*, July 17, 2006. See also FEMA, "Measuring Effectiveness – Capabilities Assessment," <http://fema.ideascale.com/a/dtd/Measuring-Effectiveness-Capabilities-Assessment/316114-14692> Further complicating this process is the continued growth of intra and cross state regional cooperation on homeland security. This has led to an evolving structure of layered and often overlapping cooperative arrangements at various levels across the nation, reflecting different purposes and defined through various organizing principles. How to account for these arrangements in developing intra state and regional risk assessments without facing such issues as double counting and merging differing methodologies is quite demanding.

44. *FEMA Has Made Progress*, GAO-13-637, June 25, 2013.

45. See Ozzie Mascarenhas, "Innovation as Defining and Resolving Wicked Problems," http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0CCcQFjAA&url=http%3A%2F%2Fweaverjm.faculty.udmercy.edu%2FMascarenhasLectureNotes%2FMascarenhasWickedproblems.doc&ei=RvzUq71DsPdoAS2yIGIBg&usq=AFQjCNFa8lMBrjeiuoUfsnY6iivsHR_TZA&sig2=U95veKrqyfn4nJpj-1qebw May 11, 2009 at On Wicked Problems and their Solution Strategies. For the homeland security context, see Jay Rosen, "What Are Journalists For?" [PressThink.org](http://www.pressthink.org), 2005.

46. *FEMA Has Made Progress, but Additional Steps Are Needed to Improve Grant Management and Assess Capabilities*, Government Accountability Office, GAO-13-637 (June 25, 2013), 1, at <http://www.gao.gov/products/GAO-13-637T>

47. *Assessing National Preparedness: Integrating and Aggregating Capability Assessments*, Homeland Security Studies and Analysis Institute (HSSAI), Final Report, 28 March 2007, Prepared for the Department of Homeland Security (DHS), Preparedness Directorate, for the National Preparedness Task Force. At the moment, the HSSAI document remains designated For Official Use Only (FOUO), meaning it contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 522). For this reason, it must be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information, and not to be released to the public or other personnel who do not have a valid need to know without prior approval of an authorized DHS official. Contact author for suggestions on how access might be obtained.

48. Assessing national preparedness might use a form of network analysis, but this method has apparently not been developed for this purpose. See Andrew Gelman, "Multilevel Hierarchical Modeling: what it can and can't do" (June 1, 2005), 1, <http://www.cs.berkeley.edu/~russell/classes/cs294/fo5/papers/gelman-2005.pdf>; *No Child Left Behind: A Roadmap for State Implementation* (Washington, DC: November 10, 2005), <http://www2.ed.gov/admins/lead/account/roadmap/roadmap.pdf>.

49. *The Goal*, 3.

50. To the author, *PPD-8* wins the complexity battle. For example, *PPD-8* adds a fifth mission of mitigation to the four used in *HSPD-8*, provides a risk methodology for stakeholders to adapt and apply that is not done in *HSPD-8*; focuses on a National Preparedness System with Planning Frameworks playing a prominent role unlike *HSPD-9*, and calls for annual national-level progress reports that have no formal counterpart in *HSPD-8*.
51. Corey Gruber, at that time Director of the DHS Office of Grants and Training, cited in Sharon Caudle, “Homeland Security and Capabilities-Based Planning: Improving National Preparedness,” (master’s thesis, Naval Postgraduate School, September 2005), 33.
52. Christopher Bellavita, *Homeland Security Watch*, Preparedness and Response, April 12, 2011, www.hlswatch.com/2011/04/page/2/. For analyses of federalism as it relates to homeland security, see Pietro S. Nivola, “Reflections on Homeland Security and American Federalism,” *The Brookings Institution* (Working Paper), May 13, 2002 and Samuel H. Clovis Jr. “Federalism, Homeland Security and National Preparedness: A Case Study in the Development of Public Policy,” *Homeland Security Affairs* 2, no. 3 (October 2006).
53. What the President does *not* need is a repeat of the way *ObamaCare* was advertized, where the whole story was not made public at the beginning of public rollout – i.e., “if you like your plan, you can keep it!”
54. Among the many ongoing outreach efforts is the idea of National Preparedness Months, where FEMA provides tool kits with “suggestions” for activities and events that state, local, tribal and territorial governments, business, non-governmental organizations, and community organizations could sponsor to promote the initiative. Toolkits also include templates and drafts of newsletter articles, blogs, posters, and other collateral material that local as well as state and federal organizations can use y in various outreach efforts.
55. One effort along these lines is a pilot, voluntary certification program that aims to make homes and buildings more secure and resilient to all hazards. Homes that receive a Resilience STAR™ designation will be awarded one to five stars, five being the highest level of capabilities attained. See Secretary Janet Napolitano before a Senate Committee on the Judiciary hearing, “The Oversight of the Department of Homeland Security,” April 25, 2012. See also *Homeland Security News Wire*, August 20, 2013. This is consistent with *PPD-8* calling for “private-sector programs to enhance national resilience.” *PPD-8*, 3.
56. One aspect of *PPD-8*’s attempt to engage stakeholders is its calls for a comprehensive campaign to build and sustain national preparedness. As part of this overall effort, the administration developed a public outreach and feedback program called the *Campaign to Build and Sustain Preparedness*. FEMA also established a website to facilitate interaction with the public in terms of progress made and suggestions from stakeholders regarding content and implementation of *PPD-8*. There are limits, however, as to how effective this outreach and feedback program can be in helping stakeholders and the public understand, accept, and execute the *PPD-8* plans. In principle, a more “hands on” approach with FEMA officials interacting on a sustained basis with community leaders, non-governmental organizations, businesses, and interested citizens has greater potential to have a significant impact. In practice, however, this would require a costly increase in developing a well-trained and large enough outreach force, which is likely to prove prohibitive.
57. For example, DHS could ask the Homeland Security Studies and Analysis Institute (HSSAI), its Federally Funded Research and Development Center (FFRDC), to conduct such an assessment, consistent with its charter. It would be beneficial if independent reviews could also be done for each of the *SSR* assessments and each of the sub-state inputs to the State reports, but these may simply not be practical, especially the latter.
58. The sum of all these individual *PPD-8* products might, if printed and stacked, compete in size with the hard copy set of the *Encyclopedia Britannica* volumes some readers may still have adorning their bookshelves.
59. The kit would also contain links to an available database of estimated likelihoods and consequences for different hazards in connection with different types and sizes of communities, urban areas, regions as well as businesses, and other entities. Also part of the kit would be a National Planning System Guide for creating and maintaining the Frameworks and operational plans required to make all parts of the overall *NPS* work for all users—an effort that is supposed to be underway if not yet completed. www.fema.gov/pdf/prepared/nps_description.pdf. The last part of the kit, perhaps in an appendix, would demonstrate how results could be horizontally integrated and vertically aggregated to get a national level assessment by mission, capability, and stakeholder type (along the lines of the limited access HSSAI report, which could be officially approved for public release, assuming FEMA takes this initiative).
60. Recall such issues as publishing a *TCL* that includes only half of the core capabilities identified and neglecting to provide stakeholders with risk assessment guidelines.

61. Some might see the Obama *PPD-8* initiative as largely a repeat of *HSPD-8* with few changes that matter. Others might see *PPD-8* as having more elements and adding more layers of detail than *HSPD-8*. Still others might hold the view that *PPD-8* seems to be “a modest evolution of *HSPD-8*, with more attention to a broader set of stakeholders, and with at least the hint of more flexibility about what preparedness means”....Christopher Bellavita, Homeland Security Watch, “Preparedness and Response” (April 12, 2011) <http://www.hlswatch.com/2011/04/12/there-is-a-quality-even-meaner-than-outright-ugliness/> See also Philip J. Palin, “PPD-8 as a natural evolution of HSPD-8: Preparedness and Response,” Homeland Security Watch, April 9, 2011, and Jared Brown, *Presidential Policy Directive 8 and the National Preparedness System: Background and Issues for Congress*, CRS Report (Washington D.C, October 21, 2011). Past experience does not always govern future performance. If the earlier *HSPD-8* experience did not work well, however, useful lessons can be learned on what not to do, but not necessarily on how to solve problems the second time around.

62. *The Goal*, 1.

63. This saying, originally with its three “tries,” was popularized by educator Edward Hickson (1803-70) in his *Moral Song*. It is now applicable in any of its forms, to all activities, not just educational. *Oxford Dictionary of Proverbs* (New York: Random House, 1996), 154.

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