

Homeland Security: Advancing the National Strategic Position

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ABSTRACT

In March 2011, President Obama issued Presidential Policy Directive 8: National Preparedness that began a new chapter in the intent and scope of preparedness. To better understand the current policy, this article first chronicles the decade of refinement in preparedness – from its definition to its guidance – and then describes a number of emerging policy themes. It identifies policy concerns for federal policymakers to consider as the national preparedness strategic direction continues to advance. These concerns are (1) the operational approach to meeting a national preparedness goal; (2) implementation of capabilities by the “whole community”—from the federal government to individual citizens—to address the “maximum of maximums” threats; (3) the inclusion of slowly emerging threats as priorities for action in near-term preparedness strategies; and (4) federal control over other governmental levels in the national interest.

INTRODUCTION

In March 2011, President Obama issued *Presidential Policy Directive 8: National Preparedness*. Its issuance and resulting implementation documents affirmed existing policy crafted under President George W. Bush, but the directive began a new chapter in the intent and scope of preparedness. Preparedness goals, risk assessment, tools, programs, and results expected from them experienced, to a greater or lesser extent, major refinements. To better understand the current policy, this article first chronicles the decade of refinement in the definition of national preparedness, its doctrines, and guidance from early framing under President Bush to the modifications made under President Obama.

Building on this history, the article describes a number of emerging policy themes and identifies policy concerns for federal policymakers to consider as the national preparedness strategic direction continues to advance. These concerns are (1) the operational approach to meeting a national preparedness goal; (2) implementation of capabilities by the “whole community” – from the federal government to individual citizens – to address the “maximum of maximums” threats; (3) the inclusion of slowly emerging threats as priorities for action in near-term preparedness strategies; and (4) federal control over other governmental levels in the national interest. At bottom, these policy concerns have a common root: whether the resources spent on the readiness efforts were worthwhile. Going forward, more realistic assessment of threats and preparedness capabilities and the identification of a proper balance of responsibility sharing seem in order. In addition, appropriate measurement approaches may well be found in management system standards already in existence.

PRESIDENT BUSH AND THE FORMATIVE YEARS

After the September 2001 terrorist attacks, the federal government raised terrorism as the primary domestic threat. Major policies developments, the creation of a new domestic security department, and the issuance of a specific national homeland security strategy reflected the criticality of the threat. In June 2002, President Bush released *Securing the Homeland: Strengthening the Nation*.¹ The president called the terrorist threat a permanent national condition and homeland security a new national calling. The document previewed the first homeland security national strategy, intended to be the national blueprint for confronting terrorism and that called for the federal government to

partner with other levels of government, the private sector, and citizens. In another document, the president presented the organizational structure at the federal level considered best suited to meet the terrorism threat: the Department of Homeland Security (DHS).² The Homeland Security Act of 2002 (P.L. 107-296) subsequently authorized the new department.

In July 2002, the Office of Homeland Security issued the first *National Strategy for Homeland Security*.³ The *Strategy* defined homeland security as “a concerted national effort to prevent terrorist attacks within the United States, reduce America’s vulnerability to terrorism, and minimize the damage and recover from attacks that do occur.”⁴ Terrorism prevention, vulnerability reduction, and minimizing damage and recovery were set as homeland security’s strategic objectives. This initial definition of preparedness carried over during the subsequent decade. Prevention meant action at home and abroad to deter, prevent, and eliminate terrorism. Reducing vulnerability meant identifying and protecting critical infrastructure and key assets, and detecting terrorist threats and augmenting defenses, while balancing the benefits of mitigating risk against economic costs and infringements on individual liberty. Response and recovery focused on managing the consequences of attacks and building and maintaining the financial, legal, and social systems to recover.

THE OVERARCHING GOAL AND POLICY AND OPERATIONAL SYSTEM

Starting in early 2003, the Bush Administration began issuing a number of directives and guidance, thereby accelerating the formation of a national preparedness goal and supporting policy and operational system. In February 2003, the president issued *Homeland Security Presidential Directive 5* requiring a National Incident Management System (NIMS) and a National Response Plan.⁵ The Homeland Security Act of 2002 also required the consolidation of existing federal government emergency response plans into a single national response plan. DHS issued the *National Response Plan* in December 2004,⁶ which

was subsequently replaced by the *National Response Framework* in January 2008.⁷

President Bush’s December 2003 issuance of *Homeland Security Presidential Directive 8* (HSPD-8) emerged as the major policy development for national preparedness.⁸ HSPD-8 crafted homeland security’s strategic position as national preparedness for all major events – terrorism, major disasters, and other domestic emergencies. It defined preparedness in terms of planning, operations, and equipment at all levels of government to prevent, respond to, and recover from major events. The directive mandated a national domestic all-hazards preparedness goal, established mechanisms to advance federal delivery of preparedness assistance to other governments, and described actions to further improve federal, state, and local entity preparedness.

The national preparedness goal was the critical policy requirement in HSPD-8. The goal was to establish measurable readiness priorities and targets, with the caveat that they balance the potential threat and emergency events with resources. Readiness metrics, standards, and a system to assess the nation’s overall preparedness to respond to major events emphasized actual results. There was an emphasis on assessing response in comparison to the objectives of prevention and recovery. The fiscal year 2005 DHS appropriations legislation (P.L. 108-234) established a statutory requirement for implementing HSPD-8. The legislation called for nationally accepted first responder preparedness levels by January 31, 2005, state and local adoption of national preparedness standards in fiscal year 2005 as part of federal grant guidance guidelines, and issuance of national preparedness goal final guidance by March 31, 2005.

DHS met the March 2005 deadline with the *Interim National Preparedness Goal*.⁹ DHS stated the *Interim Goal* enabled the nation to answer: “How prepared do we need to be?” “How prepared are we?” and “How do we prioritize efforts to close the gap?” The *Interim Goal* identified fifteen national planning scenarios and a target capabilities list (to accomplish necessary preparedness tasks in a universal task list) as two planning tools. The scenarios, issued earlier in 2004 by the Homeland Security Council, described

plausible terrorist attacks and natural disasters intended to stretch the nation's prevention and response capabilities for events such as a nuclear detonation, pandemics, chemical and biological attacks, a major hurricane or earthquake, and a cyber attack. Collectively, the scenarios identified a complete array of preparedness needs.¹⁰

The target capabilities list identified what was necessary to carry out critical operations and tasks in response to a major disaster or catastrophe based on the combined planning scenarios. It was derived from a universal task list intended to respond to the planning scenario events. For example, an incident management task included the coordination of transportation operations. The *Interim Goal* stated that such a capability was to provide the means to accomplish one or more tasks under specific conditions and to specific performance standards. It also reflected national preparedness as a continuous cycle of activity to develop the necessary elements, such as plans, policies, and equipment, vital to maximize capabilities. The target capabilities list set forth a set of essential capabilities, stated as necessary in whole or in part by various levels of government to carry out certain tasks to prevent, protect against, respond to, and recover from terrorist attacks and major disasters. Further, the *Interim Goal* included a number of national priorities, such as implementing NIMS and the *National Response Plan*.

The *Interim Goal* results were intended to be national, not purely federal products, but clearly governmental. However, efforts would be needed by all levels of government and between government and private-sector and nongovernmental organizations to identify threats, determine vulnerabilities, and identify required resources, all part of capabilities-based planning and operations.

IMPLEMENTING THE PREPAREDNESS GOAL AND FURTHER GOAL UPDATES

With the issuance of the *Interim Goal*, implementing guidance took center stage, expected to solidify the use of capabilities-based planning and related tools. Initial guidance was included in fiscal year 2005 homeland security grant program guidance.¹¹

In April 2005, the DHS issued the *National Preparedness Guidance*.¹² This document provided a more detailed explanation of the content and use of capabilities-based planning that was to support achievement of the interim goal, including the national planning scenarios, the universal task list, and the target capabilities list. It also expanded on the national priorities, standards and strategies for preparedness assessments of capabilities, and included a timeline for HSPD-8 implementation. Hurricane Katrina exposed a number of preparedness gaps, so Subtitle C of the Post-Katrina Emergency Reform Act of 2006 (P.L. 109-295) continued the call for immediate implementation of the HSPD-8 requirements, adding to the institutionalization of capabilities development because of legislative mandates.

Fiscal year 2006 appropriations legislation (P.L. 109-90) called for DHS to issue a final national preparedness goal by the end of December 2005. That month, DHS issued a new draft of the *National Preparedness Goal*.¹³ This draft *Goal* presented the achievement of capabilities as the central feature in the road from prevention to recovery from domestic incidents. The draft expanded attention on minimizing the impact of major events such as was experienced during the major hurricanes of 2005. The DHS defined the goal as "to achieve and sustain risk-based target levels of capability to prevent, protect against, respond to, and recover from major events, and to minimize their impact on lives, property, and the economy, through systematic and prioritized efforts by federal, state, local and tribal entities, their private and non-governmental partners, and the general public."¹⁴ As was the case with the use of target levels of capability in the definition of the goal, the definition of preparedness was stated as "the range of deliberate, critical tasks and activities necessary to build, sustain, and improve the operational capability to prevent, protect against, respond to, and recover from domestic incidents."¹⁵ The draft called again for the collective efforts at all levels of government and between government and private sector and nongovernmental organizations in a collective effort.

The December 2005 draft *Goal* further delved into the specifics of preparedness. Operationally, for example, it meant establishing guidelines, protocols, and standards for planning, training and exercises, personnel qualification and certification, equipment certification, and publication management. The draft *Goal* reiterated previous policy and guidance that the target capabilities list would be the primary source of readiness metrics. Standards to assess national preparedness collectively would be found in the goal and the capabilities-based planning tools, such as the national planning scenarios and the target capabilities list.

In September 2007, DHS updated the national preparedness goal and its guidance in the *National Preparedness Guidelines*.¹⁶ The *Guidelines* contained four critical elements. One was the national preparedness vision, which the *Guidelines* called a concise statement of the nation's core preparedness goal for the nation: "a nation prepared with coordinated capabilities to prevent, protect against, respond to, and recover from all hazards in a way that balances risk with resources and need."¹⁷ Other elements were the national planning scenarios; the universal task list of some 1,600 unique tasks to prevent, protect against, respond to, and recover from the major events represented by the national planning scenarios; and the target capabilities list containing thirty-seven specific capabilities that communities, the private sector, and the levels of government should collectively have for effective disaster response.

The DHS stated that the publication of the *Guidelines* actually finalized the national goal and its related preparedness tools. The new *Guidelines* retained a capabilities-based approach to organize and synchronize national efforts in and investments for prevention, protection, response and recovery. The *Guidelines* also incorporated lessons learned from Hurricane Katrina and a 2006 review of states' and major cities' emergency operations and evacuation plans. Readiness metrics remained a feature of the national goal, although specific metrics and standards remained under development.

A NEW NATIONAL STRATEGY FOR HOMELAND SECURITY

In October 2007, the Homeland Security Council issued a new *National Strategy for Homeland Security*.¹⁸ While the first strategy identified terrorism as the central threat, the 2007 Strategy reflected better understanding of terrorist threats and additional risks, what it called the full range of potential catastrophic events, including natural disasters, infectious diseases, and man-made accidents. While the *Strategy* said that effective preparation for catastrophic natural disasters and man-made disasters was not homeland security per se,¹⁹ such preparation could increase homeland security.

Consistent with earlier policy documents, the *Strategy* presented the bedrock principle of a culture of preparedness and partnership that would share responsibility for homeland security across the entire nation – local, tribal, state, and federal governments, faith-based and community organizations, and businesses. Further, its four objectives remained consistent with earlier policies: (1) prevent and disrupt terrorist attacks; (2) protect the American people, critical infrastructure, and key resources; (3) respond to and recover from incidents that do occur; and (4) continue to strengthen the foundation to ensure long-term success. The fourth objective was targeted directly at homeland security management. The *Strategy* consistently stated the importance of capabilities to anticipate and handle incidents and the need to create and institutionalize a comprehensive homeland security management system incorporating all stakeholders.

The new *Strategy* directly discussed the establishment and institutionalization of a comprehensive Homeland Security Management System that would build on the planning and operations detailed in the National Preparedness Guidelines. The System was to have activity in the four phases of (1) guidance (presidential directives and other key policies); (2) planning (family of strategic, operational and tactical plans); (3) execution of operational and tactical level plans; and (4) assessment and evaluation of both operations and exercises.

In sum, under President Bush, combating terrorism within the United States was seen as a truly national, not a federal, responsibility, although the federal government assumed control of policy and strategy development, buttressed with federal grants to states and localities. In line with a managing for results philosophy, homeland security was to have specific goals, performance targets, and performance measures. The emergency management structure would continue its traditional role of anticipating the aftermath of any attack or emergency.

PRESIDENT OBAMA AND STRATEGIC ADJUSTMENTS

The change of administrations after the 2008 national election marked a confirmation of but continued refinements in national homeland security policies and strategies. Shortly after taking office, President Obama initiated a study to examine the organization of the White House to deal with homeland security and counterterrorism. He stated “Homeland Security is indistinguishable from National Security – conceptually and functionally, they should be thought of together rather than separately.”²⁰ The result was a new national security staff no longer divided between national security and homeland security.²¹ In February 2010, DHS released the legislatively required *Quadrennial Homeland Security Review Report*.²² As was the case with earlier policies, the *Report* called for a national framework of collective efforts and shared responsibilities to build and sustain critical homeland security capabilities. The grave security environment (beyond terrorism) identified in the *Report* clearly supported a broader security stance: it was expected that violent extremist groups would use terrorism to attack United States targets, social and/or political instability would continue, health threats would be more difficult to prevent, technological developments and cyber threats would pose threats, climate change would increase weather-related hazards, multiple simultaneous crises were likely, and complacency would be a danger as major crises receded from memory.

President Obama released a new *National Security Strategy* that reflected the homeland security policies and concepts identified in the *Quadrennial Review Report*.²³ The *Strategy* emphasized that the traditional distinctions between homeland and national security was no longer appropriate. The *Strategy* reaffirmed the “whole of government” approach, which is the need for all levels of government, if not the entire country, to strengthen national preparedness. The *Strategy* retained the earlier policy notions of a homeland security enterprise (federal, state, local, tribal, territorial, nongovernmental, and private-sector entities, as well as individuals, families and communities sharing a common national interest in American safety and security) and a culture of preparedness.

PRESIDENTIAL POLICY DIRECTIVE 8

The 2010 *Quadrennial Review Report* and the newer *National Security Strategy* set the stage for a restatement and revitalization of the presidential direction for national preparedness. President Bush’s 2003 HSPD-8, which had been codified by Congress, was replaced by President Obama’s March 2011 *Presidential Policy Directive 8 National Preparedness* (PPD-8).²⁴ The new directive reaffirmed past policies and direction. PPD-8 stressed the need for systematic preparation for the greatest risk, the shared preparedness responsibility from government to the citizen (“all-of-Nation”), and a capabilities-based approach to preparedness. The directive stipulated the development of (1) a national preparedness goal identifying the core capabilities necessary for preparedness and (2) a national preparedness system guiding activities enabling the nation to achieve the goal. National preparedness was defined as actions taken to plan, organize, equip, train, and exercise to build and sustain the capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover from the threats posing the greatest risk to the nation’s security.

PPD-8 required that a new national preparedness goal address specific threats and vulnerabilities. This overtly reduced

reliance on national planning scenarios issued several years earlier as yardsticks to measure preparedness capabilities. The goal was to define the core capabilities necessary to prepare for incidents posing the greatest risk to the nation's security. This made concrete the new policy emphasis on maximum capacity for any major disaster or catastrophe that would emerge in implementation efforts.

The directive also mandated a new piece to the national preparedness system – planning frameworks for each of the five preparedness objectives – from prevention to recovery. It was envisioned that each planning framework would include a basic plan to address all-hazards. There would be roles and responsibilities at the federal level, but annexes would address unique requirements for particular threats or scenarios. The directive also required a “campaign” to build and sustain preparedness. This would integrate community-based, nonprofit, and private sector preparedness programs, research and development activities, and preparedness assistance.

THE IMPLEMENTATION OF PPD-8

The DHS has issued a flurry of documents in response to PPD-8's mandates. In May 2011, DHS issued the *Implementation Plan for Presidential Policy Directive 8: National Preparedness*.²⁵ The *Implementation Plan* clarified that PPD-8's reference to “all-of-Nation” was the same as “whole community,” or the participation of the private and nonprofit sectors, including nongovernmental organizations, and the general public. The DHS was to perform a strategic, national-level risk assessment applicable to national, regional, and local levels. The assessment would help identify where core capabilities and associated performance objectives for the entire homeland security community should be placed, building the maximum preparedness capacity needed to respond to a catastrophic event.

Thus, the whole community is to develop core capabilities for incidents posing the greatest risk to the nation's security. FEMA

administrator Craig Fugate described the change as planning for a “meta-scenario” (or “maximum of maximums”) disaster. This was a worst-case scenario based on different hazards that challenges preparedness and overwhelms the response capabilities of every governmental level.²⁶ The scenario, a no-notice event, contemplated the impact area of at least 7 million population and 25,000 square miles, and involving several states and FEMA regions. It results in 190,000 fatalities in its initial hours, with 265,000 citizens requiring emergency medical attention. There is severe damage to critical infrastructure and key resources, including transportation. The fiscal year 2011 Regional Catastrophic Grant Program guidance used the meta-scenario to promote preparing for a catastrophe where extraordinary levels of mass casualties, damage, and disruption overwhelm traditional and well-established government response and recovery plans and procedures.

In September 2011, DHS issued the *National Preparedness Goal First Edition*.²⁷ The new *Goal* included detailed tables with core capabilities for prevention through recovery (called mission areas) and their preliminary targets. For example, prevention capabilities included planning, public information and warning, operational coordination, forensics and attribution, intelligence and information sharing, interdiction and disruption, and screening, search, and detection. Each capability was described; to illustrate, interdiction and disruption is to delay, divert, intercept, halt apprehend, or secure threats and/or hazards.

The document made clear that these core capabilities presented an evolution from the voluminous target capabilities list developed in response to HSPD-8. The core capability targets would be the performance thresholds for each core capability and the basis to develop performance measures to evaluate progress in meeting the targets. The description of the core capabilities and their preliminary targets were significantly streamlined from the task and capability lists issued in response to HSPD-8 and subsequently tied to federal homeland security funding. While still prescriptive, it appears the notion was that streamlining should create more room for members of the

homeland security community to craft capabilities tailored to local and regional considerations, as well as the national interest.

The *Goal* stated that a strategic national risk assessment should confirm the need for an all-hazards, capability-based approach to preparedness planning. The DHS December

2011 unclassified *Strategic National Risk Assessment* grouped threats and hazards into national-level events to test the nation's preparedness.²⁸ These included natural, technological/accidental, and adversarial/human caused threat and hazard groups:

Natural	Animal disease outbreak, earthquake, flood, human pandemic outbreak, hurricane, space weather, tsunamis, volcanic eruption, wildfire.
Technological or Accidental	Biological food contamination, chemical substance spill or release, dam failure, radiological substance release.
Adversarial or Human-Caused	Aircraft as a weapon, armed assault, biological terrorism attack (non-food), chemical/biological food contamination terrorism attack, chemical terrorism attack (non-food), cyber attack against data, cyber attack against physical infrastructure, explosives terrorism attack, nuclear terrorism attack, radiological terrorism attack.

The *Goal* did not address slowly emerging threats or drivers of threats such as climate change identified in the *Quadrennial Homeland Security Review Report*. This was purposeful. The unclassified *Strategic National Risk Assessment* said it evaluated the risk from known threats and hazards. Those events, it noted, had a distinct beginning and end and were clearly linked to homeland security missions. Thus, political, economic, and environmental, and societal trends possibly contributing to a risk environment but not national events for homeland security were excluded from the assessment. Nevertheless, the document said non-national-level threats, such as droughts and heat waves, could pose risks to jurisdictions and should be considered in preparedness planning.

In November 2011, DHS released a brief description of a new *National Preparedness System*.²⁹ Its components included (1) identifying and assessing risk, (2) estimating capability requirements, (3) building and sustaining capabilities, (4) planning to deliver capabilities, (5) validating capabilities, and (6) reviewing and updating. To identify and assess risk, the *System* document stated that the *Strategic National*

Risk Assessment would analyze the greatest risks to the nation. The *Threat and Hazard Identification and Risk Assessment* guidance under development at that time would provide a common, consistent approach to identify and assess risks and associated impacts.

Measuring progress toward achieving the National Preparedness Goal could be done through tools such as exercises, remedial action management programs, and assessments. The National Exercise Program was deemed the principal mechanism to measure readiness, supplemented by exercises done by individual organizations. Training and performance during actual events would test and validate achievement of desired capabilities. Ongoing sharing of lessons learned and monitoring also would occur through a remedial action management program and a comprehensive assessment system of the whole community. A *National Preparedness Report* was targeted for November 2012.

On March 6, 2012, the Federal Emergency Management Agency (FEMA) released draft national framework documents for comment. The working drafts included the *National Prevention Framework*, the *National*

Protection Framework, the *National Mitigation Framework*, and the *National Response Framework*. These documents briefly described factors such as stakeholder roles and responsibilities and coordinating structures to deliver core capabilities. The January 2008 *National Response Framework* will be superseded once the new framework is finalized. Comments on the drafts were due to FEMA no later than April 2, 2012. FEMA had already released the *National Disaster Recovery Framework* in September 2011. This framework replaced the existing National Response Framework's Emergency Support Function #14—Long Term Community Recovery.³⁰ FEMA also released a draft of the *Recovery Interagency Operational Plan* intended to implement the already published *National Disaster Recovery Framework*. The detailed draft specifically covered items such as the concept of operations for federal recovery support to stakeholders and maintaining readiness.

CONCERNS IN STRATEGY AND IMPLEMENTATION

In sum, national preparedness has been the subject of a significant amount of Presidential and Congressional attention and direction since September 2001. Perhaps lost in the detail is a number of broad policy themes running through the refinement in the national preparedness strategic direction to this point in time. These include:

- Homeland security – previously a domestic focus – is placed within national security. The federal government, particularly the Federal Emergency Management Agency, is established as the lead for national preparedness policy and guidance.
- Preparedness is defined with the full coverage of objectives: prevention, protection, mitigation, response, and recovery, with response and recovery no longer the centerpieces of preparedness.
- The full range of potential catastrophic events, including natural disasters, infectious diseases, and man-made accidents join terrorism as the focus for

homeland security. Known threats with a distinct beginning and end are central to homeland security risk management and preparedness. Slowly emerging threats are not an initial emphasis.

- Maximum capacity for a catastrophic event (a meta-scenario) is set as the benchmark for preparedness, replacing a more generic “major disaster” on a local or regional level.
- The whole homeland security community has the responsibility to protect national interests and way of life, anticipating that all levels of government will be initially overwhelmed. Core capabilities and targets for a national effort update past prescriptive, detailed individual tasks and target capabilities.
- A homeland security management system detailed to accomplish homeland security and crafted with planning frameworks, performance expectations, and assessment and adjustment requirements. Measurable readiness priorities and targets to be developed and assessed, primarily through exercises and actual events.

National preparedness policy certainly is not static: refinements will continue as the newer national preparedness directives and operational guidance are implemented and others are issued. There are three concerns that federal policymakers might consider as the national preparedness strategic direction continues to advance. These are (1) the operational approach to meeting a national preparedness goal; (2) implementation of capabilities by the “whole community” – from the federal government to individual citizens – to address the “maximum of maximums” threats; and (3) the inclusion of slowly emerging threats as priorities for action in near-term preparedness strategies.

ALTERNATIVE TO THE CURRENT CAPABILITIES DEVELOPMENT APPROACH

The current and earlier national preparedness goals and their implementing documents, as well as federal legislation,

have identified the need to build and sustain specific preparedness capabilities for the entire homeland security community. Federal, state, and local governments, nongovernmental organizations, private organizations, and the general public are that community. National preparedness comes from capabilities across this whole community. The DHS in large part adopted the capabilities approach (used by the defense community in many countries) from the Department of Defense.³¹ HSPD-8 required a national preparedness goal to define measurable readiness (preparedness) priorities and targets, but also with a caveat about the resource investments. PPD-8 called for actions to achieve a preparedness approach to optimize the use of available resources.

Developing capabilities may have been the optimal route at that time toward achieving preparedness, but whether other alternatives that were better investments were considered was not made explicit – if, in fact, they were even considered. The DHS has provided billions in preparedness grants intended to aid states, urban areas, tribal governments, and nonprofit organizations, supposedly to strengthen their capabilities to meet threats associated with potential terrorist attacks and other hazards. Over time, the department has attempted to link dollars spent with the development of capabilities.³²

However, whether this approach has been or will be successful is unclear, as assessing preparedness based on national preparedness capabilities remains very elusive. Summing the difficulties, the Government Accountability Office (GAO) found that evaluation efforts that collected data on national preparedness capabilities faced limitations such as data reliability and the lack of standardized data collection.³³ According to GAO, FEMA had problems in completing a comprehensive assessment system and developing national preparedness capability requirements based on established metrics. The GAO continues to cite these operational and implementation weaknesses, even though the assessment of capabilities and evaluation of preparedness is a legislative requirement.³⁴ Concerns have also surfaced in the defense community regarding measuring capabilities and their results. For

example, an article in 2007 described significant ambiguity in the definition of capability and its use.³⁵ In a similar vein, another report in 2011 stated that no one had been able to adequately create analytical tools to quantify capability to compare effectiveness with “units of capability.”³⁶

In addition, GAO specifically found problems with at least one tool mentioned by the new *National Preparedness Goal* as central to measuring progress – the *National Exercise Program*.³⁷ The FEMA implementation of the national program has run consistently into problems, such as ensuring that federal and state governments addressed deficiencies identified by the exercises. In March 2011, FEMA developed a new *National Exercise Program Base Plan* that extensively revised the program, with major changes in requirements and leadership.³⁸ The verdict is still out whether the past history of the DHS in failing to adequately measure progress will be reversed.

Thus, still left unanswered is the most significant question: What preparedness did the billions of dollars buy? With federal funding constraints and similar challenges for other levels of government and other members of the homeland security community for the foreseeable future, this is an opportune time to consider if other policy options might be more cost effective or, at a minimum, justify the current policy of capabilities development and sustainability.

The capabilities approach is not etched in stone. There is at least one policy option the federal policymakers might consider to contrast with the capabilities approach. This option is grounded already in Congressional legislation and administration policies. Simply, it is the application of national and/or international management system preparedness standards useful for all organizations. This approach has been advocated in the past.³⁹

Two national voluntary programs use management system preparedness standards, not elusive core capabilities, as the benchmark for preparedness requirements. Legislation implementing many of the 9/11 Commission’s recommendations (Section 524 of the August 2007 P.L. 110-53) called for DHS to create a voluntary private sector

preparedness program with standards, including accreditation and certification processes. In June 2010, DHS produced the Private Sector Preparedness Accreditation and Certification Program (PS-Prep). Three management system standards were approved for adoption in the program: ASIS SPC.1-2009 *Organizational Resilience: Security Preparedness, and Continuity Management System*; British Standard 25999-2:2007 *Business Continuity Management*; and National Fire Protection Association 1600: 2007/2010 *Standard on Disaster/ Emergency Management and Business Continuity Programs*. At the end of September 2010, DHS announced a certification program tailored to the needs of small business.

The other national effort using management system standards is the current Emergency Management Accreditation Program (EMAP), a voluntary review process for state and local emergency management programs. EMAP certifies government programs against standards directly based on NFPA 1600. State and local entities can use federal homeland security grant funding to pay for EMAP activities. Interestingly, at one time, FEMA used the EMAP standards to administer its National Emergency Baseline Capability Assurance Program. If there truly were to be a “whole of community” effort, it would seem to be a necessary condition to have a compatible approach for all the entities involved.

Still to be resolved would be whether adoption of the management system preparedness standards should be mandated, perhaps tied to federal funding or regulations, and how certification or accreditation against the standards would be conducted. Normally, management system standards such as those under the PS-Prep program or EMAP are voluntary, although compliance with such standards may be seen as part of a legal standard of care across an industry.

Government agencies such as DHS could implicitly mandate standards by using them as guidelines for complying with regulatory requirements. Or the agencies may forego a mandatory regulation if they view voluntary compliance as meeting policy goals. This seems to be the legislative and executive

branch approach taken with the PS-Prep voluntary standards for the private sector. Established provisions can be invoked for mandatory adoption as part of national regulatory frameworks or legislation. The National Technology Transfer and Advancement Act of 1995 and resulting Office of Management and Budget (OMB) Circular A-119 (revised in 1998) mandated that federal agencies use management system standards developed by either domestic or international standards bodies instead of federal government-unique standards (e.g., the National Preparedness Goal) in their regulatory or procurement activities.

To date, DHS has not publicly addressed how the management system standard voluntary program is to be reconciled, if at all, with building and sustaining core capabilities. At a minimum, metrics identified as part of implementing the National Preparedness Goal should be compared to those in PS-Prep and the EMAP standards.

IMPLEMENTING WHOLE COMMUNITY EFFORTS FOR THE MAXIMUM OF MAXIMUMS

A second concern is realistically implementing a whole community effort in anticipation of a maximum of maximums effort. In June 2011 testimony, FEMA Administrator Fugate stated that emergency management historically planned for scenarios to which government could respond and recover from.⁴⁰ He testified that modern disaster planning should be for a “meta-scenario” (or “maximum of maximums” event) destined to overwhelm all levels of government. Such worst-case planning would require the efforts of a whole community approach intended to leverage the expertise and resources of governmental and non-governmental stakeholders—the entire emergency management community from the federal government to individuals, families, and communities. This philosophy was further defined in FEMA’s *A Whole Community Approach to Emergency Management: Principles, Themes, and Pathways for Action*.⁴¹

The emphasis on shared responsibility and coordination in the whole community concept reaffirms past policies. President Bush's June 2002 proposal to create DHS expressed hope that the agency would make state, local, and private sector coordination one of its "key components."⁴² The 2002 *National Strategy for Homeland Security* viewed homeland security as a concerted national effort. The approach was based on shared responsibility and partnership involving the Congress, state and local governments, the private sector, and the American people in a concerted national effort to prevent attacks.⁴³

The draft national planning frameworks are very general in their discussion of the roles and interactions of the whole community to achieve capability targets and what scarce resources practically can be expected for investment. Presumably, explicit guidance will await finalization of the National Preparedness System and the planning frameworks and their implementation plans. For example, the National Disaster Recovery Framework and the draft *Recovery Interagency Operational Plan* are explicit in terms of requirements and hierarchy, but not the practical issue of funding and the sharing of resources within and across stakeholders from the government to the individual citizen.

However, is it realistic to root whole community preparedness in anticipation of a truly mega-disaster scenario? A mega-disaster is a very high bar for the initial and ongoing investment in preparedness core capabilities defined in the *National Preparedness Goal* and draft national planning frameworks. All homeland security actors must anticipate and be ready for a "no-notice" catastrophe much more severe than virtually all past major disasters in the United States, including Hurricane Katrina, the 1964 Alaska earthquake and tsunami, or the 1993 eastern and central superstorm. A mega-disaster, under FEMA's criteria, would be akin to "no notice" devastating earthquakes, tsunamis, and volcanic eruptions that killed or injured hundreds of thousands and leveled cities. A nuclear event in a major urban area or a fast-moving worldwide pandemic also would overwhelm immediate response and recovery for a good length of time.

It is not clear how the federal government can direct and pragmatically facilitate the crafting and sustaining of capabilities across the whole community necessary for a mega-disaster with these levels of devastation going forward. Preparing for a mega-disaster appears to run counter to the professed emphasis on risk management and setting priorities for preparedness, not a worst-case scenario for the entire nation to anticipate. It well may be that emergency managers will actually scale the requirements to a more convincing expectation. For example, Northeast emergency managers have posited the following possible mega-disasters:⁴⁴

- A 6.5 earthquake striking a heavily populated urban area causing billions of dollars in damage and killing hundreds,
- A category 3 hurricane making landfall over Long Island, NY and tracking up through New England killing hundreds and causing billions of dollars in damage.
- An F5 tornado striking a heavily populated area killing a thousand people and causing hundreds of millions in damage.
- A major blizzard hitting the Northeast during a heavy rush hour commute with over fifty inches of snow and hurricane force winds causing billions of dollars in damage along the coast, widespread extended power outages and stranding thousands.

EMERGING THREAT PRIORITIES

A third concern in the strategic direction is addressing threats that are slowly emerging as a direct threat to national security. Among other things, the September 2010 Local, State, Tribal, and Federal Preparedness Task Force report to Congress called for (1) improving the ability to strategically forecast emerging preparedness requirements and associated policies and/or capabilities and (2) develop a strategic policy planning process that prepares for future challenges by performing long-range assessments.⁴⁵ The Task Force said that the complexity of the envisioned homeland security and emergency management enterprise, especially in terms of non-governmental roles, means that

desired preparedness outcomes often may take years to achieve. In their view, a range of dynamic issues – such as the environment, demographics, economics, and health trends – are likely to play increasingly important roles. Preparedness policies, therefore, should be anticipatory, not reactionary, enabling anticipatory investments in key areas.

As mentioned earlier, the hazards listed in the *National Preparedness Goal* reference well-known, specific event hazards and attacks determined by the current *Strategic National Risk Assessment*. However, the current *National Security Strategy* and *Quadrennial Homeland Security Review Report* explicitly define a strategic threat environment and global trends that appear to have national preparedness implications, although they are not described as imminent. These include the gradual emergencies and disasters that result from dependence upon fossil fuels, global climate change, fragile and failing states, and global illicit trafficking and related transnational crime, and economic and financial instability.

A 2009 article on national security strategies presented drivers of changes in security on a national and global scale, such as pandemics, population changes, and economic stress.⁴⁶ These drivers translate into threats to security, whether individually or collectively, which countries have incorporated into their strategies. In other countries, the security environment includes these longer-term threats. In general, their national security strategies (including those covering homeland security or domestic security) incorporate them into the strategies and follow-on policy and operational requirements and guidance. For example, climate change or environmental change pose dangers that may occur on a national or global scale, such as more frequent heat waves, droughts, flooding, reduced crop yields, and wildfires.⁴⁷

The *National Preparedness Goal* and supporting documents target building and sustaining capabilities narrowly for the near term threat of a meta-scenario. It is not clear how these capabilities will prepare the country for the challenges of the longer-term, slowly emerging threats. Certainly past history is informative: flooding and famines

because of drought and crop failure have killed millions worldwide.

There have been a multitude of studies on these drivers or changes with recommendations for immediate action. The Organization for Economic Co-Operation and Development (OECD) presented an analysis of “global shocks” – cascading risks that become active threats as they spread across global systems.⁴⁸ These included pandemics, financial crises, critical infrastructure disruption, and cyber risks, geomagnetic storms, and social unrest. As the OECD study pointed out, surveillance is central to risk assessment and management. In addition, security agencies, working with regulatory agencies, should use, adapt, and implement risk-assessment tools to design more resilient national and international systems. Emergency management of future global shocks, OECD said, called for policy options such as (1) surveillance and early warning systems, (2) strategic reserves and stockpiles of critical resources, (3) addressing where countermeasures to systemic threats have been weak, and (4) monitoring of future developments that could pose potential risks. OECD cited challenges such as insufficient skills and knowledge to manage global shocks and obstacles to international cooperation and coordination.

The DHS certainly understands the need for action anticipating these global shocks. The FEMA Strategic Foresight Initiative, initiated in 2010, emphasizes the importance of understanding and addressing the drivers of future change.⁴⁹ The FEMA urges the emergency management community to establish a foresight capability – identifying key future issues, trends, and other factors with an eye to executing an agenda for action over the next twenty years. Not surprisingly, FEMA identifies well-known drivers – universal access to and use of information, technological innovation and dependency, shifting US demographics, climate change, global interdependencies and globalization, government budget constraints, critical infrastructure deterioration, and the evolving terrorist threat. The FEMA study says that through the foresight process, over the next few decades, very rapid change and complexity will define the emergency management environment. FEMA says that

even slow-moving and predictable trends such as demographic changes could be radically changed because of drivers such as climate change or pandemics.

FEMA sees a number of emergency management capabilities as needed as part of strategic foresight that could be included in preparedness efforts. For example, these include addressing dynamic and unprecedented shifts in local and regional population characteristics and migratory flows; anticipating emerging challenges and developing appropriate plans and contingencies; employing alternative surge models to meet the challenging confluences of social, technological, environmental, economic, and political factors and conditions; and remediating hidden vulnerabilities in critical supplies from water to energy to medical products to offset threats to the full scope of emergency management activities.

FEDERAL CONTROL OVER OTHER GOVERNMENTAL LEVELS FOR THE NATIONAL INTEREST

A fourth area of concern that overarches the other three is the stated importance and needed leadership of the whole homeland security community and the actual federal control over other levels of government. An article discussing federalism and homeland security noted that the September 2001 terrorist attacks created a high demand for national homeland security policy and action.⁵⁰ The many federal homeland security directives, mandates, and grant compliance requirements have framed and centralized control of the national homeland security agenda, even if there was collaboration in the development with selected state and local officials. Hurricane Katrina presented another opportunity for an expanded federal government role in disasters because of the failures of individual agencies and weak intergovernmental collaboration.

As a result, it is difficult to find the appropriate balance between federal control over the national interest and its objectives and local flexibility and discretion under federalism. The homeland security links between the broadened national security

strategy and national preparedness goal and then state and local support depend on state and local implementation of the national direction. At present, the *National Preparedness Goal* and its supporting documents have limited language about state and local flexibility and the meeting of specific and direct state and local interests. The streamlining of lists of core capabilities and their preliminary targets is encouraging, but federal approval of state and local implementation will be the proof if state and local jurisdictions can craft capabilities responsive to their needs as well as what is seen as the national interest. This will be a continuing concern as budget decisions consider fiscal austerity and the funding needed to build and sustain preparedness capabilities for a mega-disaster.

CONCLUSION

The September 2010 Local, State, Tribal, and Federal Preparedness Task Force report commissioned by Congress underscored the importance of preparedness as a major policy agenda, but also warned of the central difficulty. The Task Force determined,

The basic tenets of preparedness...are relatively uncontroversial within both the emergency management discipline and homeland security policy. What has changed is the realization that preparedness can be only as effective as the goals and priorities for readiness. The challenge is determining what our readiness goals and priorities should be, from which preparedness activities are subsequently derived and then measured against.⁵¹

Over the past decade, the federal government has done much to determine national preparedness or readiness goals and priorities. In the next decade of homeland security as part of national security, the threat environment – the security environment – is somewhat known, but also uncertain. New threats may emerge and others wane. The larger social and economic environment, such as fiscal austerity and demographic changes create instability in what can, and should be done.

PPD-8 emphasizes the vital role of preparedness in protecting the nation, its people, its vital interests, and its way of life. Preparedness on the part of all members of the homeland security community in this national endeavor should be done in ways that emphasize the principles of clarity, sustainability, integration, balance, and accountability. This article suggests that federal policymakers, in concert with others with preparedness responsibilities, should consider refinements in a number of fundamental policy areas that are in line with these principles.

Preparedness expectations to meet all threats – whether imminent or slowly emerging – should be clear. Common sense should reign. Expectations about sustainability of funding to meet whole of community preparedness for a mega-disaster must consider and then reflect the reality of funding – whether from governmental or other sources. Even apart from funding, preparedness principles and activities should be seamlessly integrated into ongoing programs and business processes, such as the adoption of management system standards. Balance should be applied in assessing the

costs and benefits of preparedness and required capabilities and their impact on non-preparedness goals. Lastly, accountability calls for identifying preparedness accountability points, performance goals, and measures reflective of the national interest, yet also local flexibility and discretion within our federalist system.

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