



February 6, 2007

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FR: Stephen Jordan, Vice President and Executive Director, Business Civic Leadership Center, U.S. Chamber of Commerce

RE: National Response Plan Review – Private Sector Comments

We appreciate the Department of Homeland Security's invitation to the U.S. Chamber of Commerce Business Civic Leadership Center (BCLC) to participate in several working groups involved in the *National Response Plan* review process. BCLC in turn, has requested feedback from companies participating in the BCLC Disaster Assistance and Recovery (DAR) working group, and the attached recommendations reflect our discussions. Given our structure, it makes sense for us to present this as one unified set of recommendations, although we recognize that these may have various applications for the individual working groups drafting the NRP revisions.

Clarity of Purpose and Incentives

Among the BCLC's DAR participants there is a widespread sense that the goals of the NRP are important, but that they need to be better defined and have metrics associated with them in order to better evaluate performance against the plan. More specific criteria would be welcomed for each of the key disaster phases and expectations about when they should be met should be better specified. For example:

Emergency Response:

- How well evacuation procedures and routes function
- How well local-state-federal authorities communicate and coordinate
- How well authorities and roles and responsibilities are established, understood, and implemented
- Critical infrastructure robustness and/or reinforcement

Relief:

- Lives saved/successful rescues
- Public order maintained or restored
- How quickly families are united
- Availability of health care, food and water, and temporary shelter

Recovery/Reconstruction:

- Percent of utilities and public/social services functioning
- How quickly and how many businesses re-opened
- How many employees return to work
- Improvements in local quality of life

Preparedness and Mitigation:

- Intensity of multi-sectoral pre-disaster planning
- How well-trained are local and state officials
- Resilience of new infrastructure and housing

While every catastrophe is different, guidelines would help evaluate whether a disaster response is succeeding. One of the reasons that previous disaster responses have been criticized is that goals and objectives have not been clearly understood and clear performance targets have not been identified. BCLC's DAR members also believe that currently there is a bias toward relief, and that community-resilience performance targets need to be embedded throughout the disaster response process. This perception has been informed by the

experience with Hurricane Katrina, where several of the local chambers in the impact area still report 30%-50% fewer members than they had before the storm eighteen months later.

Clarity of Terminology

We understand that there has been some discussion about what is meant by “private sector.” When BCLC refers to the private sector, we define this as the business community made up of enterprises that seek an economic return on investment. Other organizations like not-for-profit schools, hospitals and disaster service providers fall outside of our definition. We refer to them as either voluntary organizations, civil society organizations, or not-for-profit organizations. We believe that non-governmental coordination should be strengthened for both the private sector and the civil society sector.

Participation in the Disaster Response Stages

Based on these key disaster phases and sample metrics, the NRP would strengthen the U.S. business community’s ability to respond to disasters if it would incorporate some of the following ideas:

I. Emergency Response

The private sector, in general, should have very little, if any, role in emergency response, except to the extent that local companies provide emergency equipment and supplies. In fact, we would encourage private sector personnel to evacuate and get out of harm’s way and follow all DHS guidelines. That being said, there should be some protocol so that business continuity professionals can more easily obtain credentials and access to the impact area in order to save lives, either of employees or of residents who might be affected. There should be an office at DHS or FEMA to coordinate this badging and credentialing process, which should also publish a user-friendly and easily understood document outlining rules and procedures for companies to understand how the process works.

II. Relief

Facilitating increased public-private communication and coordination is critical. The following items would be helpful if included in the NRP:

Continued Strengthening of the Aidmatrix-FEMA Donations Management Capability. For many companies it is easier to mobilize products, services and employee volunteers than cash. Several firms, like Pfizer, Coke, and IBM, have in the past mobilized far more in products and services than cash. Well-positioned companies can apply unique capabilities and expertise quickly and effectively, and government and volunteer agencies should benefit more from what companies have to offer. We commend FEMA for establishing the relationship with Aidmatrix, and we encourage Aidmatrix to continue to build linkages between the government, business and the national and local Volunteer Organizations Active in Disasters (VOAD) groups.

Strengthen Channels of Communication. Many of the leading private sector disaster support organizations are informally linked. BCLC, the Business Roundtable, and the Association of Corporate Contributions Professionals and their designated representatives should be included in field office relief discussions and headquarter coordination.

Establish Clear Information Sharing Protocols. Companies need clear guidelines about how to access and act upon sensitive records, such as medical records, education records, and financial records to expedite assistance.

II. Recovery and Reconstruction

Strengthen ESF-14. The community recovery emergency support function needs to be re-thought and strengthened. It needs to include private sector participation at each level, including such entities as local chambers of commerce and economic development authorities in impact areas and national organizations like the U.S. Chamber, BCLC, International Economic Development Council, and other organizations with economic development expertise. There should be pre-established guidelines for how private entities can provide input to ESF-14.

IV. Preparedness and Mitigation

Mitigation remains a grossly neglected component in the disaster response continuum. A 2005 FEMA study finds that \$1 spent on mitigation in the U.S. provides \$4 in future benefits and cost avoidance to the nation. As companies take steps to protect their property, plants and equipment from natural disasters, they should also promote mitigation in the communities in which they operate. There is a clear business case for companies to encourage community resilience to natural disasters. When homes, roads and public

infrastructure are disaster-resistant, employees are able to return to work more quickly. FEMA should coordinate with the private sector to introduce effective preparedness and mitigation strategies.

Additional Recommendations

While partnerships between the private sector and NGOs enhanced the response to the Gulf Coast hurricanes, business-government coordination still needs improvement. Better business and government communication channels could reduce delays and streamline the delivery of needed goods and services. The establishment of a functional online clearinghouse via Aidmatrix, as discussed previously, should vastly improve donations management. In addition, the governments can work with the private sector to take the following steps:

- Provide clear points of contact for relevant functions and make this information easily accessible. (food, transport, medical, etc.).
- Catalogue which federal departments and functions would benefit from private sector involvement after a disaster.
- Pre-identify functions and organizations where private sector volunteers would be welcome.
- Develop information sharing and staging protocols.
- Invite private sector participants to federal training and exercises.
- Develop clear access, badging and credentialing policies.
- Formulate agreements prior to disasters for private sector provision of materials and services.
- Encourage and facilitate private sector-driven mitigation.

Ultimately, success should be defined by how quickly people are able to return to their normal lives, return to work, and rebuild their communities, and how little future disaster response efforts cost in the same impact area.

BCLC will continue to promote coordination, collaboration and communication between the private sector and disaster response providers. BCLC will maintain its role as an intermediary for businesses, governments and non-profits and will map potential collaboration within these sectors. In the aftermath of a major disaster, BCLC plans to:

- Host a series of public disaster advisory conference calls for our corporate donor community. We will plan to invite the DHS private sector liaison to be the official government representative on that call. At that time, BCLC would provide a call schedule to FEMA for FEMA to determine appropriate government participation.
- Continue to serve as the keeper of record for private sector contributions as informed by individual companies and business organizations.
- We would welcome the opportunity to have a place within the ESF-14 structure and a close working relationship with both the FEMA and DHS private sector liaisons. We would also welcome having the opportunity to have a representative embedded in the Joint Field Office, who could serve as our point of contact and a conduit of information to the principal responding authorities.

Thank you very much for the opportunity to provide comments at this stage of the NRP revision process. We welcome this ongoing dialogue with the Department of Homeland Security as we continue to foster a more coordinated and effective role for future private sector disaster assistance.

If you have any questions, I can be reached at 202-463-5490. We look forward to continuing to participate in the NRP revision process.