



International Association of Fire Chiefs

Providing leadership for the fire and emergency services since 1873

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International Association of Fire Chiefs Input for the 2009 DHS Quadrennial Review

Since the department's inception, the International Association of Fire Chiefs (IAFC) has worked collaboratively with the U.S. Department of Homeland Security (DHS) and other public- and private-sector stakeholders in order to enhance the protection and emergency response capabilities of the nation. We appreciate the opportunity provided by the department for stakeholders to offer input into this process in its initial stages. As many have said, "all incidents are local" and the IAFC believes strongly that regardless of the scope or scale of an incident, the most profound effect -- physical, psychological, ecological or economic -- is felt at the local level.

In looking at the future of DHS, the IAFC sees two parts in need of discussion. The first is to address key themes in the overarching framework of homeland security. The IAFC sees these overarching concepts as critical in order to move forward on effective and efficient national preparedness and response goals. The second set of issues are recommendations relating to specific actions or programs that are particularly germane to the fire and emergency service community and how this community fulfills its role as a central component in achieving the same national goals.

I. Overarching Framework

1) Embrace Regionalism: Regionalism must become truly embraced as part of the national strategy for homeland security. While the concept of regionalism has been talked about in recent years, there has been little action taken to support it and inconsistent application of the concept across the department. From the IAFC's perspective, FEMA should base the definition of "region" on areas that face similar threats, and organize, plan, and prepare based on those threats. These jurisdictions have an affinity based on their economies, geographic similarities, linked transportation networks, and industries. For example, the Northern Virginia region meets this definition of region, because of the large number of critical military and other federal installations in the region and resulting threats to them. These regions may be interstate, but are not the same thing as the large-multistate FEMA regions.

While state-level actors play a critical role in national preparedness and response, we must acknowledge that state and local actors are as different from each other as state and federal actors. State-level planning should secure input from local agencies working together using a regional perspective to address regional threats, build on those regional threats to expand to inter- and intra-state planning, and then be reported to the national level. This organization of efforts around regional risk naturally supports the development of a national preparedness and response system based on the needs of the actual first responders on scene at an incident. By drilling down by risk and how to prepare/respond, local responders are not only able to build a better formula to address the threat, but are able to integrate this strategy into their daily routine. They are then better positioned to leverage their knowledge and skills in the less frequent, but higher-risk incidents, and ultimately provide a better understanding of when, how and whom to ask for assistance.

2) Support Strong FEMA Regions: Efforts should be made to decentralize disaster management from Washington, D.C. to the FEMA Regional Offices. Again, as regionalism is the key to success, these offices should be staffed and ready to be the key control points for states during a declared emergency, and they should coordinate resources within the region before escalating the response to the next level. Much of the infrastructure, such as Federal Coordinating Officers and Defense Coordinating Officers, is already in place to support this decentralized approach.

3) Need for Qualified and Experienced Fire Service Leaders at DHS: The DHS is the most important federal agency for the fire service. Among the DHS activities that affect the fire service are: federal disaster response; communications interoperability; information sharing; development of new firefighting technology; grants; education; and training. It is important to have leaders and managers in DHS with firsthand fire service experience, who understand how the fire service fits into the national emergency response system and what this system looks like “on the ground” of a disaster. We also urge that DHS committees dealing with first responders also have experienced fire chiefs on them. Firsthand fire service leadership experience provides a unique and critical perspective into the challenges of responding to a major disaster. We are encouraged by the selection of Craig Fugate to be FEMA Administrator and Tim Manning to be Deputy FEMA Administrator for National Preparedness. Both are qualified emergency managers with fire service experience.

4) Embrace an All-Hazards Philosophy: Understandably, after the attacks of 9/11, much of the emphasis on response capability centered on preparedness for terrorist events. The major issue uncovered during these efforts was that a significant population of the response community could not even meet their basic operational needs. Over the next couple of years, the focus began to shift in an effort to assist local communities meet these basic needs and advance their capabilities to be able to address more complex events. This “all-hazard” theme then became the primary focus. Additional efforts to identify specific threats and vulnerabilities would then cause local and state governments to provide additional capabilities to address the associated risks.

Within DHS, much of the current documentation in the National Response Framework (NRF) and in the National Incident Management System (NIMS) makes reference to all-hazards response. Public safety disciplines and response agencies are, more than ever, working diligently to ensure these capabilities are maintained. But sporadically, there have been communications, directives, and funding opportunities from DHS that only address Weapons of Mass Destruction (WMD) and Chemical, Biological, Radioactive, Nuclear, and Explosive (CBRNE) objectives. While these threats exist, they are only a small part of what the response community must be prepared for on a daily basis.

We encourage DHS to maintain the all-hazards focus and not fragment the preparedness or response focus into specific areas.

5) Early Input from the “End-User”: As all incidents are local, all national preparedness and response efforts should include substantive input on the front end of the discussion by fire and emergency personnel. Opportunities for engagement should be open across the department – from national planning guidance, to future forecasting, to the latest in science and technology. Input should come in the initial phases of discussion from responders currently serving in their local communities.

II. Specific Initiatives and Programs

1) Grants: Since 9/11, the federal government has poured billions of dollars into state and local agencies to improve the response to terrorism. These programs have improved the nation’s ability

to respond to a terrorist attack. However, as Hurricane Katrina demonstrated, it is important that these programs focus on improving capabilities to respond to all hazards. The FIRE and SAFER grant programs have successfully improved the baseline training, equipment and staffing of many fire departments by using a merit-based, peer review process that delivers funds directly to needy departments. However, many departments still face major challenges in meeting the requirements of their day-to-day operations, especially with the economic downturn. These grants need to remain fully funded at the authorized level.

2) Information Sharing: One of the fire service's major challenges is in the field of information sharing. The fire service critically needs real situational awareness—*information on tactics, techniques and procedures*—regarding local threats, so that they can be adequately prepare for and respond to them. While there may be some limited cases that may require additional information, fire and emergency service leaders generally do not need access to intelligence regarding sources, motive or other high-level information. While DHS' programs like the Fire Service Intelligence Enterprise and the Emergency Management and Response – Information Sharing and Analysis Center (EMR-ISAC) are working to improve information sharing, local fire departments face a number of barriers to the information sharing activity. These barriers include the slow processing of security clearances; over-classification and a lack of analysts who can package material at a lower or unclassified level for the fire service; an over-abundance of complex rules regulating distribution of lower-classified information; and a general lack of understanding of the role that the fire service plays in DHS' anti-terrorism mission.

3) Communications Operability and Interoperability: Eight years after 9/11, communications operability and interoperability still remain a major challenge for all of public safety. The S&T Directorate's Office of Interoperability and Compatibility (OIC); the National Protection and Programs Directorate's Office of Emergency Communications; and SAFECOM all need increased attention to solve this problem. The National Emergency Communications Plan and the requirement that states develop statewide communications interoperability plans have begun to break down barriers to communications interoperability at the local level. Funding remains an important part of the interoperability solution; however, it also is important to continue to work with state and local jurisdictions to develop protocols and procedures to improve interoperability. The S&T Directorate's OIC should continue to assist public safety with valuable research at the NIST labs in Boulder, Colorado on digital noise problems in radios as well as with standards recommendations for public safety broadband applications.

4) U.S. Fire Administration: The U.S. Fire Administration is part of FEMA and serves as one of the major advocates for the fire service within the federal government. It is involved in fire service training, information sharing, and tracking fire statistics, and runs the National Fire Academy, which is the nation's premier fire service training academy. Increased effort should be made to engage USFA as an "in-house" resource for expert information on fire and emergency service issues. The USFA needs to remain fully funded at the authorized level.

5) Critical Infrastructure Protection: The fire and emergency services are identified as one of the core critical infrastructure components. The IAFC participates in the Emergency Services Sector Coordinating Council (ESSCC). We have found that many of the critical infrastructure-related documents produced by DHS lack any relevance to the job of the average responder or emergency services leader. While we have integrated many critical infrastructure protection (CIP) concepts into our IAFC programs, we believe that the role and objectives of the ESSCC within the CIP framework need to be evaluated and clarified; the EMR-ISAC must be strengthened; and the DHS' CIP programs must focus on meeting the needs of the end-user.

See Appendix A, Emergency Services and the CIKR Public-Private Partnership: Goals and Recommendations for Moving Forward

6) FEMA Reimbursement: The national response to a major terrorist attack or natural disaster is predicated on the principle of local governments' emergency response units (such as police, fire and EMS) being dispatched through the EMAC system to aid the affected state or locality. Unfortunately, many localities are not being fully reimbursed for personnel expenses, when their local police, fire, and EMS departments respond to an incident like Hurricane Katrina or the California wildland fires. Part of the problem is that there are at least 4 different interpretations for FEMA reimbursement, depending on whether emergency response personnel are members of a federal USAR team; covered under a private ambulance service contract with HHS; designated as a local structural firefighter; or covered under a decision by the FEMA reimbursement appeal process. We urge FEMA to review and standardize the rules for reimbursing localities that contribute personnel and equipment to major disasters or emergencies.

See Appendix B, FEMA Reimbursement

7) Pandemic Planning and Response: The fire service serves as the primary first medical responder for critical illness and injury in America. Nationwide, over 67 percent of pre-hospital 9-1-1 emergency response to patient care is provided by community fire departments (*FEMA/USFA, 2005, Survey of the Needs of the US Fire Service*). With dense urban areas posing the greatest risk to pandemic influenza spread, it is important to note that 94.6 percent of pre-hospital 9-1-1 emergency response is provided by the fire service in our nation's top 200 cities by population (*Journal of EMS, February 2009, 200 City Survey*).

To ensure best patient care, the DHS should encourage local public health officials to include their fire departments in planning for outbreaks of dangerous diseases, including pandemic influenza. To ensure continuity of service, it is critical that firefighters and their families be on the priority list for receiving vaccination, prophylaxis and treatments for appropriate diseases to which they may be exposed, so that the firefighters and EMS personnel will be healthy and capable of responding to the resulting public health emergency.

When considering pandemic planning for the next four years, the DHS needs to allocate resources to address the unique needs of fire-based emergency medical services in caring for patients with infectious illnesses. This includes extra support and funding for prophylaxis of pre-hospital emergency personnel against infectious diseases, development of evidence-based guidelines for triage and transportation of infected individuals, and better guidelines for management of occupational exposures of pre-hospital emergency personnel to infectious diseases.

It is important for DHS to remember that the pre-hospital environment is not a controlled clinical setting and clinical guidelines applicable to other health care settings are not functional in the pre-hospital environment.

APPENDICES

The following documents provide further background on issues referenced above, or on existing IAFC programs supported by DHS that support concepts recommended in this document.

- Appendix A Emergency Services and the CIKR Public-Private Partnership: Goals and Recommendations for Moving Forward
- Appendix B FEMA Reimbursement
- Appendix C Local Training for Regional Assessment and Collaboration (L-TRAC) Executive Summary