



Recommendations for The Federal Emergency Management Agency Review Council

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Introduction

Earlier this year President Trump issued Executive Order 14180, *Council to Assess Federal Emergency Management Agency (FEMA)* and Executive Order 14239, *Achieving Efficiency Through State and Local Preparedness*. The International Association of Fire Chiefs (IAFC), representing 12,000 fire and emergency medical services (EMS) officers from across the country, welcomes these reviews. Sound government resource management requires periodic review of program effectiveness and efficiencies, something fire chiefs do regularly.

Local fire and EMS responders are often the first to arrive at complex incidents that demand regional, state, or federal coordination. These responders are trained to recognize escalating threats, deploy resources, and build scalable organizational structures. FEMA plays a critical role in this ecosystem—not as a command authority, but as a force multiplier that enhances local capacity through pre-disaster planning, funding, and coordination. Whether labeled homeland or national security, the federal government depends on the fire service, and FEMA is the connective tissue that enables these responders to operate as part of a unified national response.

Beyond traditional fire suppression and medical response, the fire service provides an essential partner in national defense against a wide spectrum of threats. These include natural disasters, terrorist attacks, hazardous materials incidents, technological failures, and public health crises. Firefighters and EMS personnel are uniquely positioned to protect critical infrastructure, sustain essential community lifelines, and support continuity of government operations during times of crisis. With its local presence, combined with its capacity for regional and national mobilization, the fire and EMS service make an operational partner in national defense and disaster response. The fire service, therefore, must be recognized not solely as a community-based emergency response network, but as an essential, enduring partner in the broader architecture of U.S. national security.

To date, much of the discussion has focused on the cost of disaster aid and the need for state and local governments to take a more active role in national resilience and preparedness. We agree. Local communities have a vested interest in ensuring that prevention, mitigation, response, and recovery funds are allocated in a manner that measures return on investment as a primary factor in allocation. We also agree that pushing some of the decision making and shared funding at all levels of government will support a sustainable, and more importantly, a more effective disaster response.

The fire service has traditionally focused on preparedness and response. More recently, local communities have adopted risk management through mitigation and recovery planning. These activities collectively prepare for the routine emergencies that are likely to happen in their communities. They also prepare for larger incidents that are less frequent such as hurricanes, tornadoes, mass-casualty events, and wildfires.

The Federal Emergency Management Agency plays a crucial role in supporting local fire and EMS agencies throughout the country. Through funding, training, disaster response coordination, and technical assistance, FEMA strengthens preparedness, response capabilities, and resilience of fire departments. FEMA provides comprehensive support that empowers local departments to serve their communities more effectively. While the system can work, it does not always operate effectively and efficiently. We believe that integrating local communities as a partner in the decision-making process regarding targeted funding and cooperative efforts across the entire spectrum: prevention, preparedness, mitigation, response, and recovery will help achieve President Trump's stated goals.

A core principle of disaster management is that local governments, supported by their state, retain primary authority and responsibility for incidents that occur in their jurisdiction. FEMA is never in charge. FEMA exists as a federal partner to provide support to a disaster when the incident overwhelms local and state capacity. This support comes in the form of coordinating federal assets that can be deployed to a disaster as local resources are exhausted or unavailable. When a disaster is predictable, such as with a hurricane, FEMA can pre-deploy essential goods and equipment that we know through years of experience will be needed. This pre-deployment is a cost-effective way to help local communities get back to a point where they can manage the balance of the incident independently. This aid is managed through local authorities using the National Incident Management System (NIMS).

FEMA is also an essential partner in the nation's security framework. Its federal presence ensures seamless coordination, standardized response, and a unified approach when disasters exceed local and state capabilities. Its role is to coordinate the resources from around the country that augment local capabilities when the locality and the state has used all its resources or does not have the specialized capabilities that some disasters demand.

Prevention, Preparedness and Mitigation

Fire and EMS departments invest heavily in prevention, preparedness, and mitigation—activities that yield measurable returns in lives saved and disasters averted. FEMA is a vital ally in these efforts, providing not only funding but also strategic coordination that ensures local investments align with national capabilities. States cannot do it alone. Resources and capabilities vary greatly across our country. While these variations will affect how well and how fast a state can recover from a crisis, it also magnifies the value of a national network of capabilities that can be deployed across state boundaries.

The FEMA Urban Search and Rescue (US&R) Response System exemplifies how FEMA enables local departments to contribute to a national response network. Through pre-disaster collaboration, response times are reduced, resource deployment is optimized, and even the most resource-limited jurisdictions can access specialized capabilities when needed. Twenty-eight standardized task forces funded by FEMA and supported by local jurisdictions provide timely specialized response, sometimes prepositioned before an event such as a hurricane. These teams have capabilities that may not be within the financial or technical means of some state or local jurisdictions. Moreover, the availability of these capabilities highlights the fact that not every jurisdiction needs to invest in resources that are important but not necessarily used every day. The US&R System is also an example of how a network of capabilities across the country, staffed by local resources, can provide for more efficient and less costly investments.

All Hazards

Executive Order 14239 calls for a shift from the all-hazards approach to a risk-informed approach to critical infrastructure. There is merit to applying risk-based methodology to determine where best to apply scarce resources. An all-hazards approach encourages communities to build core capabilities that can be applied regardless of the emergency. These include incident management, interoperable communications, resource management, situational awareness, and public warning. It recognizes that while some emergencies may be less likely than others, communities have capacity to apply core capabilities in less frequent, but high consequence novel events. The all-hazards approach also acknowledges the value of dual use in which tools and technologies acquired for routine everyday incidents can be deployed and applied in novel, less frequent events.

U.S. Fire Administration

An agency within FEMA, the U.S. Fire Administration (USFA) plays an essential role in support to local fire and EMS departments. FEMA provides a standardized process and platform, which is currently being updated, to process data and make meaningful system improvements.¹

Fire-based EMS is the predominant model because of the ability to provide expedient and efficient patient care that allows for seamless transition from locating the patient, administering care, and transporting the patient to the appropriate health care facility. In those areas where EMS is delivered by a third service, fire departments still provide first response and support in patient care. Unfortunately, coordination and support of our lifesaving EMS service is splintered across the federal government. The National Highway Safety Traffic Administration's Office of Emergency Medical Services collects data specific to EMS responses to motor vehicle crashes, evidence-based performance management for the delivery of EMS, and workforce planning. There are even two different reporting data systems for tracking emergency incidents.² As the administration looks to make government reforms that result in streamlined delivery and improved service, consideration should be given to consolidating EMS programs under the U.S. Fire Administration.

Through the National Fire Academy (NFA), the USFA is preparing the next generation of senior leaders on topics that are necessary to advance the profession and improve performance. Local departments invest in training but often cannot afford the level of instruction, some of which, like the Executive Fire Officer program is comparable to graduate level education, is offered at the NFA. Additionally, the Emmitsburg campus provides an environment where practitioners from varying parts of the U.S., representing fire and EMS departments of all sizes and complexities can gather to share ideas and exchange experiences that advance learning.

The role the fire service plays in our nation's disaster preparedness and response warrants the position of U.S. Fire Administrator being elevated to a Deputy FEMA Administrator. This would provide continuity

¹ The USFA currently is phasing out the National Fire Incident Reporting System and transitioning to the new National Emergency Response Information System.

² The NHTSA's National Emergency Medical Services Information System (NEMSIS) is the national system used to collect, store, and share EMS data from the U.S. states and territories. The USFA's new NERIS system is a secure, cloud-based system that collects all-hazards data from the nation's fire departments to provide near-real-time information about emergencies facing the nation.

in disaster preparedness and response as the majority of first line responders in technical operations such as water rescue, search and rescue, and collapse rescue come from our nation's fire service.

National Incident Management System

Before 9/11 the nation used a variety of methods and systems to manage emergencies. This led to inefficiencies, often resulting from conflicting directions, poor communication, and higher risk to both the public and responders. After-action reports were replete with examples of unnecessary deaths, higher response and recovery costs and destruction due to poor or no incident management.

The National Incident Management System (NIMS) was established in 2004 under Homeland Security Presidential Directive (HSPD) 5. It provides a standardized controlling framework as well as terminology that works across disciplines and jurisdictions. Disasters almost always require the assemblage of multiple response organizations representing potentially dozens of jurisdictions and specialties from professional responders to non-governmental organizations to citizen volunteers. NIMS assures that these disparate participants, whose organizational and technical backgrounds can vary tremendously, unify under one decision making and accountability system.

FEMA is responsible for the maintenance and continual improvement of NIMS doctrine through the NIMS Integration Center (NIC). The NIC ensures ongoing coordination, maintenance, and improvements, as necessary. The NIC is also responsible for the NIMS training regime and for engaging with stakeholders, such as the fire and EMS service to make doctrinal improvements. NIMS must be preserved in a reformed FEMA and there must be an entity responsible for the doctrine.

FEMA in Partnership with Local Communities

FEMA's most impactful contributions often occur before a disaster strikes. Through programs like "Until Help Arrives," Threat and Hazard Identification and Risk Assessment (THIRA), and Community Lifelines, FEMA empowers local communities with standardized tools and frameworks that enhance readiness and resilience. These initiatives are not top-down mandates—they are collaborative platforms co-developed with local stakeholders and scaled nationally to ensure consistency and interoperability. FEMA's ability to nationalize local innovations and provide branding, training, and technical support makes it an indispensable partner in building community resilience.

Other FEMA programs play an important role in building community resilience. The THIRA is a standardized way for communities to identify threats, assess their potential impact and determine necessary capabilities to respond. THIRA is a uniform method for communities to assess risk. States and localities could come up with their own method, but this would undoubtedly create uneven assessments and the potential for misjudged vulnerabilities.

In collaboration with local communities FEMA fosters programs like Community Lifelines that lay out the most important services that are essential for human health, safety, and economic security in the aftermath of a disaster. FEMA provides a framework for local leaders to communicate, assess, and prioritize the delivery of food, water, shelter, transportation, and public utilities during a crisis. It is important to note that FEMA established Community Lifelines with state and local stakeholder input, and the framework does not direct how local leaders will apply it.

Federal Grants

FEMA's grant programs—AFG, SAFER, SHSGP, and UASI—are more than financial support; they are strategic investments in a distributed national response system. These grants enable local departments to build and maintain capabilities that are interoperable, scalable, and deployable across jurisdictions. In doing so, FEMA ensures that local responders are not only equipped for their own communities but are also integrated into a broader mutual aid framework. This approach reduces the federal burden during disasters and ensures a faster, more coordinated response when seconds count.

Local governments fund the majority of fire and EMS services. The Assistance to Firefighters Grant (AFG) and the Staffing for Adequate Fire and Emergency Response (SAFER) grants are important strategic investments by the federal government to maintain sufficient resources locally so that federal resources are not required. Local departments invest in baseline capabilities, but the grants enable departments to become part of a national system of response at a lower overall cost than if the federal government were to attempt to staff this capability.

The State Homeland Security Grant Program (SHSGP) and the Urban Area Security Initiative (UASI) grant program recognize that fire and EMS departments are on the frontline of the nation's security. Novel threats abound and departments find that new investments in training, equipment, intelligence, and specialized capabilities are a modern necessity. These grants enable fire and EMS departments to

acquire and maintain sophisticated capabilities such as chemical, biological, and radiological detection, personal protective equipment for responding to active shooter incidents, patient tracking systems, antidotes for chemical exposures and much more that enable departments to function outside their traditional mission. These capabilities are available, with trained local response personnel, to serve our local communities in partnership with the federal government when the need arises. Grants also pay for a portion of state and local fusion centers that connect with federal intelligence services and help localities to identify and prepare for threats. Partnering with local departments through federal grants is an acknowledgement that the nation depends on the fire and EMS service when there is no one else to call.

Emergency Management Assistance Compact

Any discussion about reforming disaster response must include a discussion about the Emergency Management Assistance Compact (EMAC). The EMAC was created in the aftermath of Hurricane Andrew in 1992. Before the Compact, there was no mechanism to allow firefighters, EMT's, paramedics, nurses, physicians, and others to work in another state if they were not licensed in that state. The Compact was developed to provide interstate assistance during state-declared disasters, prior to or in the absence of federally declared disasters. Currently, all 50 states, the District of Columbia, and all US territories are members of the Compact.

The EMAC was developed to resolve challenges associated with the ability of a resource to operate in another state, but it still faces several challenges since its inception. Highlighted below are just a few examples of the gaps and issues faced by emergency management personnel in resourcing mitigation, response, and recovery.

For example, EMAC lacks central coordination. Each state's EMAC Coordinator is responsible for sending out their EMAC resource request to all the other state coordinators. If a disaster impacts multiple states as is frequently the case in natural disasters, states oftentimes are competing for the same finite resources, and it is unclear which state accepted which resource. The only entity that knows who is responding to the request is the requesting state. During one of California's major wildfires, an EMAC request for 20 Type 1 Structural Engine Strike Teams (that is 100, four-person fire engines) was broadcast nationwide. States as far away as Florida were trying to fill the request not knowing whether any other state was or could, fill the request. A requesting state does not know where the closest resource is

located and oftentimes “shops around” to find the most cost-effective resource, not necessarily the closest resource.

Depending on the magnitude of the disaster, the requesting state often waits for federal reimbursement before providing reimbursement to the assisting state(s). The US&R task forces deployed from Florida under the EMAC to Alabama and Mississippi in the aftermath of Hurricane Katrina were not reimbursed for nearly three years. There is no clear documentation before the deployment of resources as to what are “allowable” expenses except for the costs for personnel and equipment indicated on the EMAC Form Req-A. This typically causes the assisting state(s) to have to absorb the expenses deemed not allowable after the service has been rendered. The most common example is in backfill costs for personnel deployed and “portal to portal” (24/7) pay for those responding. Typically, unless previously authorized, neither pay is reimbursable even though many assisting agencies’ labor agreements call for these payments for their personnel. This creates a large financial burden and disincentive to participate for the assisting state or agency.

Disaster response often requires civilian responders such as structural engineers, canine handlers, and physicians, who are not employed by the responding agency and as such have no Workers Comp, injury/illness, or employment protections. Unless a state identifies these responders as some form of temporary state employee or the assisting agency is willing to provide these non-reimbursable benefits, the civilian member is taking all the risk.

Completing the EMAC Form Req A is time consuming. The requesting state must approve the costs outlined in the Req-A BEFORE a resource can be accepted. These must be actual costs rather than projected costs, specifically related to personnel pay rates. A better approach can be found in FEMA’s National US&R System that requires the submittal of 75% of the estimated costs for the resource prior to deployment, which would provide the requesting state with a reasonable expectation of what the resource will ultimately cost and speed the process and deployment of resources.

EMAC has no provision to fund the “leaning forward” of resources. In a disaster, the number one enemy is time. The longer it takes to get the right resources to the people in need, the less likelihood of assisting survivors. One of the lessons learned out of Hurricane Katrina was the need to activate and deploy resources ahead of the disaster declaration to reduce the reflex time of the resources. The National

US&R System can deploy lifesaving resources ahead of a disaster declaration under surge funding thus reducing the reflex time to assemble and move resources. Many times, based on the projected pathway of a hurricane, state resources are held in place, and not released until after the storm passes which can further delay getting resources into an impacted area. With the federal surge model, resources from outside impacted areas are moved closer to the projected impact area and are ready to work as soon as it is safe.

Several years ago, the effort to create a National Mutual Aid System (NMAS) was discontinued. Revisiting this effort would result in a strengthened nationwide response network. It would establish an inventory of available resources and refine resource typing and would lead to the more efficient deployments of resources within EMAC, providing a valuable resource to determine where and how many resources exist as close to the incident as possible. Another option to consider would be utilizing the National Multi-Agency Coordinating Group (NMAC), currently used to coordinate wildfire responses to adopt an “all hazards” resource approach.

The EMAC system as it exists today is inefficient and time-consuming. In a disaster, when lives are at stake, time is our enemy. Our country cannot rely on 50 different states and multiple territories trying to coordinate the movement of disaster resources in 50-plus ways. We need to be able to coordinate disaster response outside the impacted area efficiently, timely and centrally, ensuring that the closest Kind/Type of resource is deployed. We believe we should look at EMAC as a system that can be adapted to meet a broader range of needs with the federal government providing coordination.

Conclusion

FEMA’s value to local fire and EMS departments extends far beyond disaster aid. It lies in its ability to facilitate collaboration, standardize systems, and invest in readiness before disasters occur. As the complexity and frequency of emergencies increase, FEMA’s role as a strategic partner becomes even more essential. Reforms should focus on strengthening FEMA’s capacity to support local responders—not just in crisis, but in the quiet moments of preparation that determine the success of every response.