

This document substantiates the assertions in the email letter.

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Notes

Please note that I am not speaking for DHS, any past or present DHS organization, or any past or present DHS colleagues.

In addition to the *What's missing?* attachment, I've included the pandemic model table referenced in notes 40 and 42 (I've included the Resource for Planners version [p. 184] because the TA version has a typo), and page 15 (Bates number 000064) of the November 2015 White House edited version of the SNRA Findings referenced in note 17 below, the October 16 letter to committee staff (p. 4) and the March 2019 SNRA FAQ (p. 7, first two sections).

I've tried to keep the amount of internal information that I'm communicating to the minimum needed for you to 1) understand what you're looking at, 2) substantiate the most important claims that I'm making that you can't otherwise corroborate; 3) have a meaningful conversation about it with one or more of the people who have the *ordinary* legal authority to share and discuss this information, that I can legally do only by exception (5 U.S.C. § 2302); and 4) be aware of the techniques (pp. 15-16 below) that DHS uses to deflect scrutiny from these contradictions, which have been hiding in plain view for ten years.

It would be completely legal for me at this point to make all of the unclassified documentation public right now, for the reasons listed on p. 10 below (justification for 5 U.S.C. § 2302 disclosure). I'm not doing so because I think it would set a bad example if it isn't necessary, and I don't think it is.

These are not the Pentagon Papers. There is absolutely no defensible reason why this 100% unclassified technical information should be locked up.⁺ Hundreds of people in two branches of government have immediate access to this 100% unclassified information, and the ordinary authority to discuss it with outside parties that I don't have (March 2019 FAQ for Congress p. 1 [*What this is about*] item (2)). It is impossible to construct a coherent explanation for why the Government can or should keep this 100% unclassified technical information locked up, that can stand up to a critical questioner who can see what that information actually is. I don't think I need to do any more than crack open that window.

The main reason why every solution route that I have tried—and that others have tried, but which depended on me in some way—has failed is me: my own personal inability to clearly and coherently communicate how the deliberate burial of this science is illegal, wrong, and dangerous. That's why all those routes by which the system should have fixed itself long ago, haven't worked: I can't communicate what the deciders in them need to know, clearly and coherently. You don't have that problem.

There are a lot of things that won't make sense. For many of them, that is because they really don't make sense: they shouldn't exist in the first place. But for many, maybe most, of the others, it is because I don't know how to explain them clearly. I apologize: I've done the best I could.

DHS/FEMA

Unfortunately, the DHS Component that I have to describe below, in some places, may sound like a different organization than the FEMA you know—the confident, resourceful, dedicated, noble, brave, patriotic, and in every way admirable and honorable agency that beat back the coronavirus apocalypse in this country, and saved thousands of lives. That is the real FEMA. The shadow that I have to call by that name in some parts here is an aberration, and a small one. The FEMA that you see every day is the real FEMA, not the one described below.

The unredacted information that these letters, attachments, and links communicate is explicitly within the scope of 5 U.S.C. § 2302, and communicated solely for its lawful purposes.

—Andrew Janca, 7/4/2021

⁺There is a parallel classified product that is very important, but it has been completely separated from this unclassified version since 2015.

Citations for email text

Subject line

DHS (subject line)

Pandemics have been the #1 or #2 (after drugs) non-CBRN risk on DHS's list since 2011.² The SNS was empty³ and the Nation was unprepared⁴ because⁵ we⁶ suppressed those risk assessments.⁷ We are still doing so.^{8, 9, 10, 11, 12}

Summary

DHS/FEMA (summary)

The DHS/FEMA Strategic National Risk Assessment (SNRA)¹³ is the science-based comparative national risk assessment of natural, accidental, and adversarial hazards that FEMA's National Preparedness System is based on.^{14, 15} It has been locked up since 2011.¹⁶ ~~(The SNRA's climate change analysis is the only Government climate study that I know of that has been suppressed by both parties.^{17, 18, 19})~~

While classification and disagreements with DHS HQ had a lot to do with that before 2015,²⁰ neither has been an obstacle since.²¹ As far as I know, the decisions to suppress the science that FEMA's plans,²² requirements,²³ and doctrine²⁴ are based on have been made by DHS/FEMA itself since 2015.

Pandemics have been the #1 or #2 (after drugs) non-CBRN risk on DHS's list since 2011.

² Page 86 below and cited references. Figures 1 (pandemics) and 3 (drugs) below, fatality risk.

The SNS was empty because we suppressed those risk assessments.

³ Pages 9-107-8 below and cited references.

The Nation was unprepared because we suppressed those risk assessments.

⁴ DHS (12/22/2020) national preparedness report (https://www.fema.gov/sites/default/files/documents/fema_2020-national-preparedness-report.pdf) page 2 callout block. FEMA (1/15/2021) initial assessment report on pandemic response to COVID-19 (https://www.fema.gov/sites/default/files/documents/fema_covid-19-initial-assessment-report_2021.pdf) pp. 100-102.

⁵ Pages 8, 10, 12, 14, 47 and 18 below, and cited references.

We suppressed those risk assessments.

⁶ DHS/FEMA research lead (me), personal knowledge. Agency leaders, paragraphs 14, 16, 17 ("FEMA's position") DHS/FEMA National Preparedness Directorate (NPD) 4/30/2019 declaration 28-1, *Public Employees for Environmental Responsibility (PEER) v. U.S. Department of Homeland Security* 1:2018-cv-00158, D.D.C., at <https://www.courtlistener.com/docket/6284501/28/1/public-employees-for-environmental-responsibility-v-united-states/>. Agency managers, paragraphs 11, 13 ("NPD leadership"), NPD (4/30/2019) 28-1. Agency staff, paragraph 6 FEMA Disclosure Branch 3/1/2019 declaration 22-1 *PEER v. DHS*, at <https://www.courtlistener.com/docket/6284501/22/1/public-employees-for-environmental-responsibility-v-united-states/>. DHS HQ, 2012-15 history described in March 2019 SNRA FAQ for Congress; improper b(5) withholdings in the FOIA of note 10.

⁷ Pages 40-8-12 and 15 below and cited references, and 10/16/2020 letter to committee staff pp. 5-6.

We are still suppressing those risk assessments.

⁸ Pages 9-11-43 and 15-47-18 below, and cited references.

⁹ DHS SNRA 2011 (FOIA requested items 2b, 4), FEMA SNRA 2015 (1, 2a, 3): FEMA (2018, December 10). Final response, FEMA FOIA 2016-FEFO-00165 and appeals. At <https://bd02.github.io/external/Reorganized/FOIAs%20for%20SNRA%20documentation/FOIA%20correspondence%202017-FEFO-00165/SNRA%20FOIA%20correspondence%202016-18.zip>. Note: the SNRA 2011 requested document #5 and the SNRA 2015 requested documents #6-8 were released in full (<https://bd02.github.io/external/Released%20documentation/Originals%20OCRed/Split%20by%20redaction%20status/Released%20in%20full.zip>), and the SNRA 2011 seven-page public summary (<https://www.dhs.gov/xlibrary/assets/rma-strategic-national-risk-assessment-ppd8.pdf>) has always been public (on DHS's website: FEMA removed it from its own site in fall 2020 [https://web.archive.org/web/2020*/https://www.fema.gov/media-library-data/20130726-1854-25045-5035/rma_strategic_national_risk_assessment_ppd8_1_.pdf]).

¹⁰ DHS HSNRC 2013 (DHS HQ): DHS (2019, June 17), Denial in full, FOIA request 2017-HQFO-00005, portions withheld by b(5) [the b(1) withholdings are proper for certain segregable parts, but the b(5) withholdings are not (DHS cites these finalized studies as non-political authorities for political decisions, <https://docs.house.gov/meetings/HM/HM09/20150708/103703/HHRG-114-HM09-Wstate-SmithT-20150708.pdf>)]. DHS FOIA annual report raw data, PRIV FY 2019, tab raw data requests, row 43766. At <https://www.dhs.gov/publication/annual-foia-report-raw-data>, https://www.dhs.gov/sites/default/files/publications/fy19_raw_data_priv.xlsx. The 2018 HSNRC methods

FEMA's current²⁵ public explanation for why it doesn't want the risk assessment that it cites as its authority for so many things to be seen is that it might confuse the public,²⁶ or other Federal agencies;²⁷ and that it might cause the public to take protective actions against risks like pandemics,²⁸ wildfires,²⁹ space weather,³⁰ or climate change³¹ that FEMA's leaders may have thought were important or real in 2015, but no longer do today.^{32, 33}

documentation is public, https://www.rand.org/pubs/research_reports/RR2140.html, but internally and externally the risk content (which is displayed in part in figure 1) is in the same unclear status as the 2018 QHSR.

¹¹ SNRA 2011, 2015: NPD (4/30/2019) 28-1, current status in docket at <https://www.courtlistener.com/docket/6284501/public-employees-for-environmental-responsibility-v-united-states/>.

¹² SNRA: FEMA internal orders 2/21/2017, 5/11/2021.

¹³ Brief description, p. 12.

¹⁴ U.S. Department of Homeland Security (2011, September). National preparedness goal, 1st edition, pp. 3-4. At <https://www.fema.gov/pdf/prepared/npg.pdf>.

¹⁵ U.S. Department of Homeland Security (2015, September 30). National preparedness goal, 2nd edition, pp. 4-5. At https://www.fema.gov/sites/default/files/2020-06/national_preparedness_goal_2nd_edition.pdf.

¹⁶ March 2019 SNRA FAQ for Congress p. 1 (*General*); SNRA FOIA appeal (2018).pdf, pdf pp. 1-4 (unnumbered two pages of 9/24/2018 appeal and numbered pp. 1-2 of 11/1/2017 appeal letter). Attached, or at <https://bd02.github.io/external/Reorganized/Sent%20to%20committees%20March%202019/>.

¹⁷ White House edits to SNRA climate change findings p. 15, November 2015 Findings document (redacted content, Bates page number 000064 production *PEER v. DHS* at <https://www.courtlistener.com/docket/6284501/24/3/public-employees-for-environmental-responsibility-v-united-states/>); outcome, FEMA/NPD SNRA decision briefing 30 November 2016.

¹⁸ Redacted content, Bates numbers 000072, 90-92, 322-338, production *PEER v. DHS* at <https://www.courtlistener.com/docket/6284501/24/3/public-employees-for-environmental-responsibility-v-united-states/>.

¹⁹ Parenthetically, the SNRA's climate change analysis is the only Government climate study that I know of that has been suppressed by both parties. 2015: White House edits to SNRA climate change findings p. 15, November 2015 Findings document (redacted content, Bates page number 000064 production *PEER v. DHS* at <https://www.courtlistener.com/docket/6284501/24/3/public-employees-for-environmental-responsibility-v-united-states/>); outcome, FEMA/NPD SNRA decision briefing 30 November 2016. 2018: Redacted content, Bates numbers 000072, 90-92, 322-338, production *PEER v. DHS* at <https://www.courtlistener.com/docket/6284501/24/3/public-employees-for-environmental-responsibility-v-united-states/>.

²⁰ U.S. Department of Homeland Security (2011, December 9). SNRA public summary, p. 4. At <https://www.dhs.gov/xlibrary/assets/rma-strategic-national-risk-assessment-ppd8.pdf>.

²¹ March 2019 SNRA FAQ for Congress p. 2 (*Security*); SNRA FOIA appeal (2018).pdf, last page (page 2 of October 2016 FOIA request letter 2017-FEFO-00165). Attached, or at <https://bd02.github.io/external/Reorganized/Sent%20to%20committees%20March%202019/>. Since 2015, the classified SNRA (which includes the CBRN risk numbers) has been completely separated from the main unclassified base assessment. Unless noted otherwise, the unclassified 2015-present DHS/FEMA SNRA is the risk assessment that I refer to below.

²² U.S. Department of Homeland Security (2016, August 18). Protection Federal Interagency Operational Plan (FIOP) 1st edition (2016), https://www.fema.gov/sites/default/files/documents/fema_protection-fiop.pdf pp. 5-6. Mitigation FIOP 2nd ed. (2016), https://www.fema.gov/sites/default/files/documents/fema_mitigation-fiop.pdf pp. 5-6. Response FIOP 2nd ed. (2016), https://www.fema.gov/sites/default/files/documents/fema_recovery-fiop.pdf pp. 7-8, B-3, B-4, B-9, B-1.1-1.4. Recovery FIOP 2nd ed. (2016), https://www.fema.gov/sites/default/files/documents/fema_recovery-fiop.pdf p. 5.

²³ U.S. Department of Homeland Security (2021, February 25). Risk-based core capabilities, pp. 9, 24, 33-34, A-1-2, 13-14, 17-18, 20-22, 26-29, 31, 47, B-1-3, 11-12, C-3, 5, D-13, E-8-9, F-12, G-16, H-1-2, 9, 12-13, 24-28. Preparedness grants manual. At https://www.fema.gov/sites/default/files/documents/FEMA_2021-Preparedness-Grants-Manual_02-19-2021.pdf. Core Capabilities, note 15 above.

²⁴ Note 15.

²⁵ Declarations cited below, current status in docket at <https://www.courtlistener.com/docket/6284501/public-employees-for-environmental-responsibility-v-united-states/>.

²⁶ DHS/FEMA National Preparedness Directorate (NPD) (2019, April 30). Paragraphs 10, 14, 16, 17. Declaration 28-1, *Public Employees for Environmental Responsibility (PEER) v. U.S. Department of Homeland Security* 1:2018-cv-00158, D.D.C., at <https://www.courtlistener.com/docket/6284501/28/1/public-employees-for-environmental-responsibility-v-united-states/>.

²⁷ NPD (4/30/2019) declaration 28-1, paragraphs 10, 14, 16, 17.

²⁸ Disclosure Branch, FEMA (2019, March 1). Declaration 22-1, *PEER v. DHS* 1:2018-cv-00158, D.D.C.: at <https://www.courtlistener.com/docket/6284501/22/1/public-employees-for-environmental-responsibility-v-united-states/>. Pages 3 (paragraph 6), 5 (paragraph 12), 16 [Bates number 000076], 18 [109], 20 [128-132], 28-29 [260-275], 37 [370-372], 38 [388-391], 43 [481-483], 48 [552].

²⁹ Disclosure Branch (2019) pp. 5 (paragraph 12), 16 [Bates 000076], 20 [138-139], 38 [385-386], 44 [495-496], 51-53 [594-597, 604-607].

³⁰ Disclosure Branch (2019) pp. 5 (paragraph 12), 16 [Bates 000076], 20 [128, 130, 135-136], 22-23 [164-187], 37 [369], 38 [387-388], 44 [488-489], 48 [552].

³¹ Disclosure Branch (2019) pp. 5 (paragraph 12), 16 [Bates 000072], 18 [90-92], 33-35 [322-338].

³² Disclosure Branch (2019) paragraph 11, p. 5.

³³ NPD (2019) paragraphs 10, 14, 16, 17. The declarations in this case are the only public place I know of where FEMA has been forced to directly answer the question "Why don't you want anyone to see this?"

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Context

PANDEMIC: Disaster agency foresaw killer virus months before COVID-19

E&E News, Thursday, April 9, 2020³⁴

The Federal Emergency Management Agency warned last year that a pandemic caused by a novel strain of influenza would cripple the country's response capabilities by driving millions of people into overwhelmed hospitals. The report,³⁵ which was written before the new coronavirus first surfaced in China, offered these prescient predictions: The deluge of patients would create "a shortage of medical supplies, equipment, beds, and healthcare workers."

FEMA's warning, issued in July, forecast with stunning accuracy the social, economic and personal devastation that the ongoing pandemic has caused.

The report, which has not been previously described, was drafted in collaboration with the White House Office of Science and Technology Policy and other federal organizations. With detail about widespread "social distancing" and "the overcrowding of hospitals and medical centers," the federal government's disaster agency provides perhaps the strongest contradiction of [the President's] assertions that the scope of the current pandemic could not have been foreseen.

...

"Is it really fair to say you had no warning about this?" ABC News' Martha Raddatz asked [FEMA Administrator] Gaynor in a March 22 interview.

"The public health medical mission, statutory lies with HHS," Gaynor replied. "My mission, FEMA, prior to this, [was] national disasters and those catastrophic events that happen."

FEMA has come under increasing scrutiny as it has taken charge of distributing emergency medical supplies and personal protective equipment, known as PPE, to desperate states and hospitals... Lawmakers and governors are questioning the capacity of the Strategic National Stockpile, a repository of supplies that is distributed during public health emergencies. Although the stockpile is controlled by HHS, FEMA is the primary customer, tapping it at least a dozen times since the stockpile was created in 1999, most recently when Hurricane Dorian hit the coast of the U.S. Southeast in August.

The stockpile is not designed to handle the demand for a 50-state pandemic such as COVID-19. [A FEMA spokesperson] said in a recent statement that the agency's "planning assumptions" for the pandemic acknowledged that the stockpile alone "could not fulfill all requirements at the State and tribal level."

...

PANDEMIC: Warning about killer virus was preliminary – FEMA.

E&E News, Monday, April 13, 2020³⁶

Responding to the story by E&E News, FEMA said its report "was not intended to drive resourcing decisions by itself, but rather to serve as a foundation for a more comprehensive analysis for future decisions." The agency report "was the first step in that process," FEMA said in an email to E&E News...

FEMA said its next step is to "look at national capability" to deal with a catastrophic event and to "support national targets" for building capacity to deal with the events.

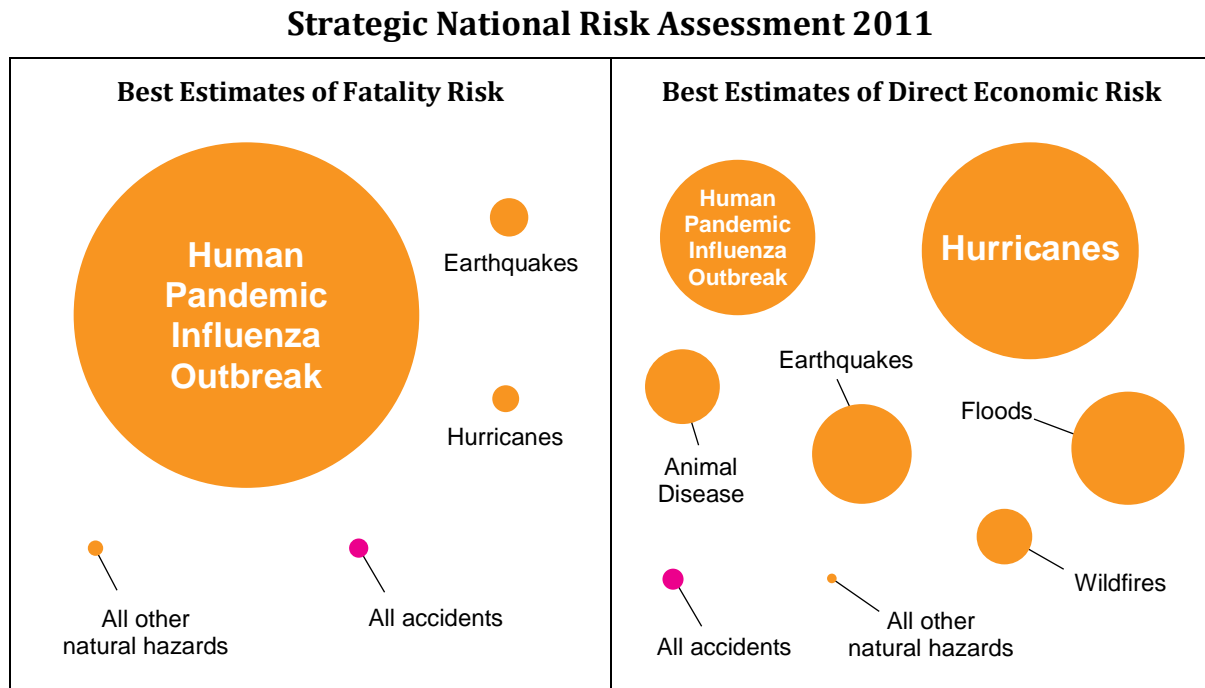
...

³⁴ Frank, Thomas (2020, April 9). Disaster agency foresaw killer virus months before COVID-19. *E&E News*: at <https://www.eenews.net/climatewire/stories/1062824495>. Bracketed [was] is in source, other brackets added.

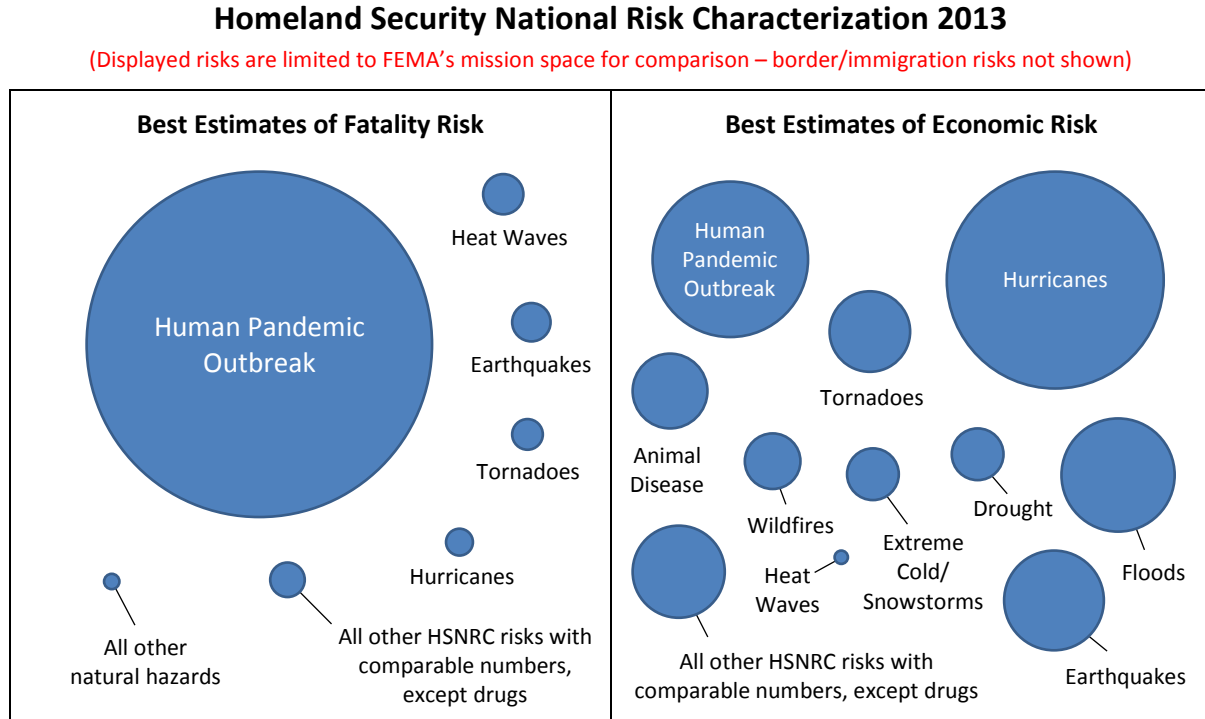
³⁵ Federal Emergency Management Agency (2019, July 25). 2019 National Threat and Hazard Identification and Risk Assessment (THIRA): overview and methodology. At <https://web.archive.org/web/20190725231745/https://www.fema.gov/media-library/assets/documents/18147>.

³⁶ Frank, Thomas (2020, April 13). Warning on killer virus was preliminary – FEMA. *E&E News*: at <https://www.eenews.net/climatewire/stories/1062857757> (paywalled original; pdf print at <https://bd02.github.io/external/Reorganized/Sent%20to%20committees%20October%202020/Warning%20about%20killer%20virus%20was%20preliminary%20-%20FEMA%20%28referenced%20article,%20EE%20News%2020200413%29.pdf>).

FIGURE 1: BEST ESTIMATES OF FATALITY AND ECONOMIC RISK IN THE UNCLASSIFIED SNRA AND HSNRC.³⁷



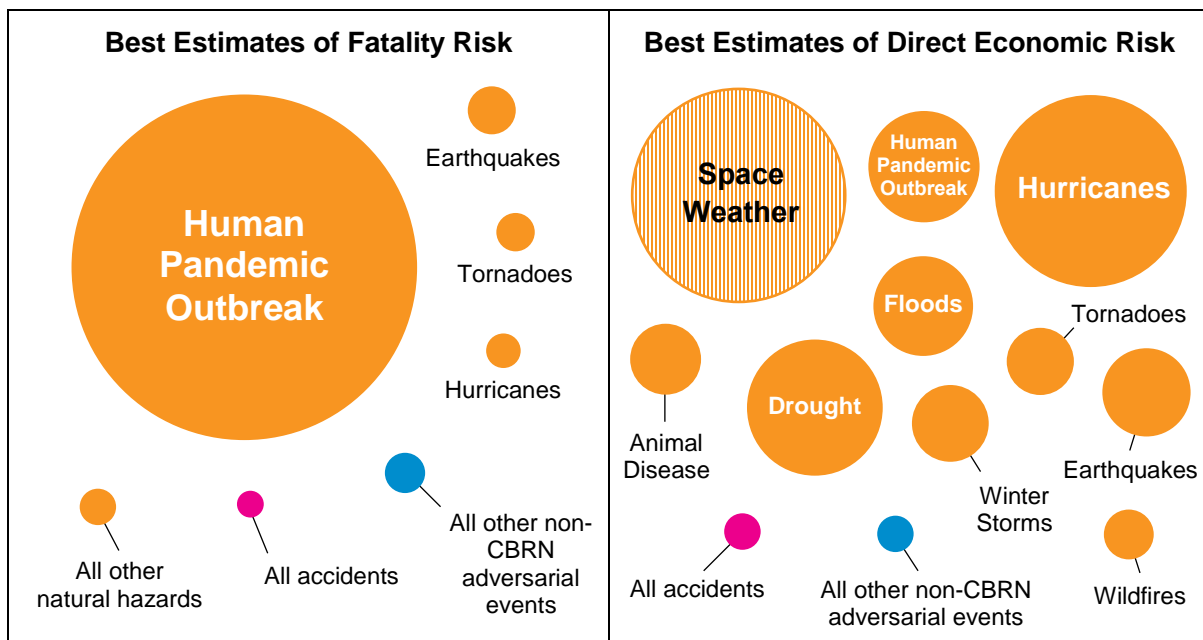
Not depicted: Risks with classified data (all terrorist attacks), cyber attacks, space weather, tsunamis, volcanoes, acts of war, risks outside FEMA's traditional mission space, risks added in later iterations.



Not depicted: Illicit drugs, events with classified data (all terrorist attacks), risks with data gaps (cyber attacks, space weather, tsunamis, volcanoes, illegal immigration), acts of war. On this charts, the displayed risks are limited to FEMA's traditional mission space to enable comparison with the other charts, not because of data challenges or negligible risk in other DHS missions: the fatality and economic risks of Illicit Drugs (which for the 2013 HSNRC include the collective costs to users and society from individual Americans' use of illegal drugs smuggled across an air/land/sea border or other DHS screened route) are larger than those of all FEMA-mission-space events displayed above, including pandemics. This chart is reproduced with the Illicit Drugs numbers at the end of this letter (figure).

³⁷ The SNRA's and 2013 HSNRC's primary charts resemble figure 7, page 54 of <https://www.publicsafety.gc.ca/cnt/rsrscs/pblctns/ll-hzrds-sssmnt/ll-hzrds-sssmnt-eng.pdf>. That format represents more data and critical uncertainties, but differences in overall best-estimate risk magnitudes aren't as clear as they are on the 'planets' charts reproduced above.

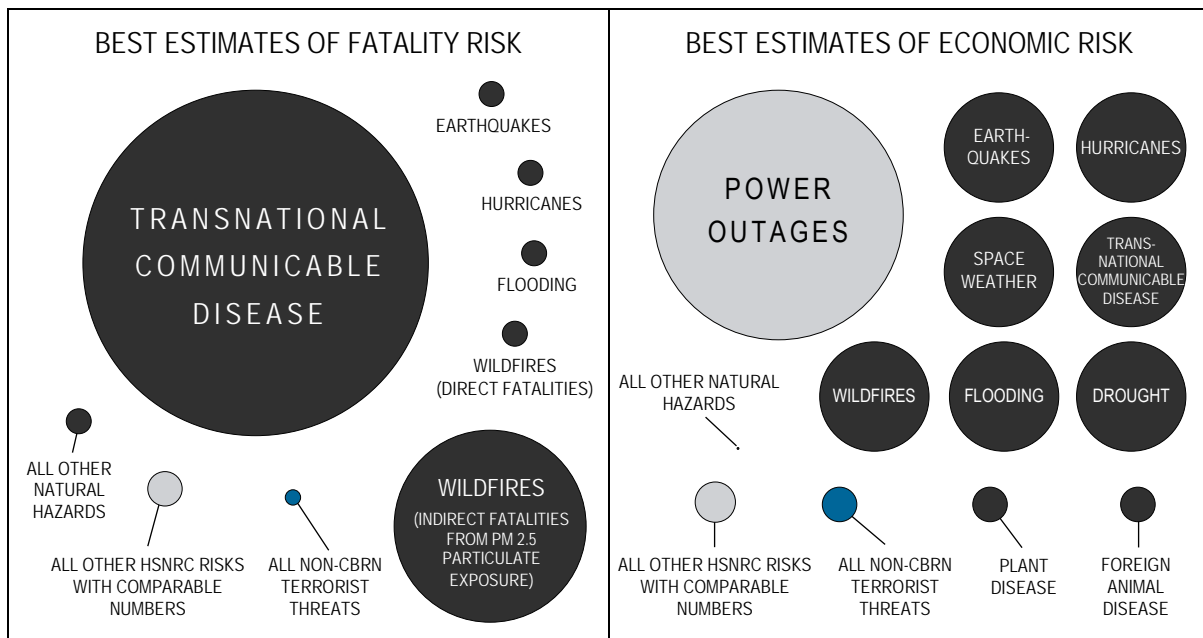
Strategic National Risk Assessment 2015



Not depicted: Events with classified data (CBRN terrorist attacks), risks with data gaps or data comparability challenges (cyber attacks, cross-cutting events, qualitatively assessed events), acts of war, risks outside FEMA's traditional mission space.

HOMELAND SECURITY NATIONAL RISK CHARACTERIZATION 2018

HSNRC 2018 source data on DHS planets chart (displayed risks are primarily in FEMA's mission space)



Unlike the other three, this chart does **NOT** itself come from the 2018 HSNRC (at least not in any decks or documents that I have seen), but represents HSNRC 2018 data in the same format as the other assessments for purposes of comparison. Sets of uniformly sized circles represent the geometric midpoints of reported common order of magnitude bins, and the other circles depict the underlying data from the documentation and its cited public or SNRA sources. Not depicted: events with classified data (CBRN), unknown shareability (counterfeit goods), data gaps or limitations (cyber events, illegal migration, trans-national drug trafficking), acts of war. Plant disease depicted as same magnitude as animal disease. Deaths from illicit drug use are not depicted, but that is because of counting differences between the 2013 and 2018 assessments rather than [my] deliberate omission.

Pandemic risk

Every one of the four science-based national risk assessments that DHS analysts have made since 2011 has assessed the human life risks from a pandemic of natural origin to be greater than those of every threat and hazard that FEMA has responded to in its forty year history – combined (figure 1).

- The 2011 Strategic National Risk Assessment (SNRA) and 2013 Homeland Security National Risk Characterization (HSNRC) pandemic analysis, based on the ‘moderate’ version of National Planning Scenario #3 with updated numbers from CDC, projected 140,000 – 440,000 U.S. deaths [153,000 to 480,000 in a U.S. (including territories) population of 335.1 million] in the first wave of the pandemic.^{38, 39, 40}
- The 2015 SNRA projected 77,000 – 230,000 [84,000 – 250,000] U.S. deaths for its median 1 in 30 year pandemic scenario, together with the larger set of probability-tagged pandemic events ranging from 12,300 to 1.94 million [13,400 to 2.1 million] U.S. deaths⁴¹ that the Nation could expect to experience every 10 to 60 years or so.⁴² The SNRA’s estimate for a pandemic exceeding 547,000 [597,000] U.S. deaths in a population of 307 [335] million is 1 in 120 years.⁴³
- The 2018 HSNRC used the same median consequence scenario, but with a higher best estimate return period of 25 years.⁴⁴

The one national preparedness success⁴⁵ of this pandemic – the fall 2019 cost-benefit analysis that resulted in the project that was later renamed Operation Warp Speed⁴⁶ – used the same 2015 CDC sources⁴⁷ and probabilistic risk assessment methods⁴⁸ as the 2015 SNRA. The CEA’s scenario range corresponds to the middle fifty percent (roughly the 25th to 75th percentile range bounded above by the 547,000 death line) of table 12, p. 158 of the SNRA Technical Appendix.⁴⁹

³⁸ SNRA 2015 technical appendix [TA] pp. 366-368, numbers. CDC also provided the SNRA’s probability estimate (1/30 years).

³⁹ Model parameters: U.S. Government (2006, March). National Planning Scenarios v. 21.3, at <https://web.archive.org/web/20140502084541/https://www.llis.dhs.gov/sites/default/files/NPS-LLIS.pdf>, pp. 3-6, 3-7, 3-12, 3-16. Estimates reflect a single pandemic wave, pp. 3-11 – 3-12.

⁴⁰ The 2014 QHSR Bio Study (<https://www.dhs.gov/sites/default/files/publications/2014-qhsr-final-508.pdf>) broadened the HSNRC’s pandemic scenario to 1,000-2 million U.S. deaths for an event of natural origin, and 80,000-750,000 U.S. deaths for a 1/80 year accident.

⁴¹ SNRA 2015 technical appendix [TA] table 12 p. 158, or SNRA Resource for Planners [RFP] table 4 p. 184.

⁴² TA p. 145 [RFP p. 173] table 1B top row (low/best/high frequency 0.017=1/60, 0.033=1/30, 0.10=1/10) or p. 148 [p. 175], *Frequency*.

⁴³ TA table 12 p. 158, or SNRA Resource for Planners [RFP] table 4 p. 184, conditional probability given event occurrence 0.256, times overall event best estimate probability of 1/30 years.

⁴⁴ DHS 2018 HSNRC risk summary sheet, transnational communicable disease, p. 251. The HSNRC 2018 data referenced or depicted in this document are limited to HSNRC numbers that either came from public sources, one of the other three assessments which I worked on as an analyst, or aggregated from multiple numbers that are impossible to pick apart from the depicted aggregation. The 2018 HSNRC’s plant disease numbers come from another project I worked on (the QHSR Bio Study): since I’m not sure of their shareability, I’ve arbitrarily represented them as being in the same order-of-magnitude bin as animal disease for visualization purposes. HSNRC source document is UNCLASSIFIED // FOR OFFICIAL USE ONLY; extracted information is UNCLASSIFIED without caveats.

⁴⁵ U.S. Department of Homeland Security (2020, December 22). National preparedness report, page 57. At https://www.fema.gov/sites/default/files/documents/fema_2020-national-preparedness-report.pdf.

⁴⁶ Zinberg et al (2020, August 18). The White House prepared for a pandemic. *Wall Street Journal*: at <https://www.wsj.com/articles/the-white-house-prepared-for-a-pandemic-11597792593> (Frank [4/9/2020] also touches on this analysis).

⁴⁷ U.S. Centers for Disease Control and Prevention (CDC) (2015, April 10). CDC modeling efforts in response to a potential public health emergency: influenza A(H7N9) as an example. *Clinical Infectious Diseases* special issue 60(suppl. 1) (issue date 1 May 2015): at https://academic.oup.com/cid/article/60/suppl_1/S1/S1356555. Meltzer et al (pp. S1-8, https://academic.oup.com/cid/article/60/suppl_1/S1/S1356555) define the common scenario set used by the vaccine-infrastructure paper (Biggerstaff et al. pp. S20-29, https://academic.oup.com/cid/article/60/suppl_1/S20/S20356419) that CEA used, the PPE paper (Carias et al. pp. S42-51, https://academic.oup.com/cid/article/60/suppl_1/S42/S42356585) referenced below, the other applications in this CDC-modeling special issue, and the 2015 SNRA.

⁴⁸ White House Council of Economic Advisers (CEA) (2019, September 5). Mitigating the impact of pandemic influenza through vaccine innovation. At <https://trumpwhitehouse.archives.gov/wp-content/uploads/2019/09/Mitigating-the-Impact-of-Pandemic-Influenza-through-Vaccine-Innovation.pdf>.

⁴⁹ A 2010 back-of-the-envelope version with risk numbers similar to the 2011 SNRA’s scenario is in the previous Administration’s study (<https://obamawhitehouse.archives.gov/sites/default/files/microsites/ostp/PCAST-Influenza-Vaccinology-Report.pdf> p. 17).

Had the Federal Government used the SNRA⁵⁰ and these models⁵¹ as the national all-hazards all-missions all-of-Government decision support tools that they were designed to be^{52, 53} – even for just the one application of prioritizing what goes into the Strategic National Stockpile (SNS) that DHS created the SNRA’s classified core to do^{54, 55} – on January 1, 2020 the United States would have had more than enough PPE for every single front-line medical and long-term care worker in America – without re-use or rationing – for the entirety of this past year.^{56, 57, 58, 59, 60}

⁵⁰ Summary, p. 12 below; March 2019 SNRA FAQ for committee staff (attached or at <https://bd02.github.io/external/Reorganized/Sent%20to%20committees%20March%202019/SNRA%20FAQ%2020190319%20redacted.pdf>). The 2011 SNRA public summary is at <https://www.dhs.gov/xlibrary/assets/rma-strategic-national-risk-assessment-ppd8.pdf>.

⁵¹ Heinrichs, Rebecca (2020, April 1). The truth about the National Security Council’s pandemic team. *National Review*: at <https://www.nationalreview.com/2020/04/coronavirus-truth-national-security-council-pandemic-team/>. Earliest use of these CDC models that I know of (2014), *Wall Street Journal* 4/30/2020 p. A1 (Many missteps led to mask shortages), <https://www.wsj.com/articles/miscalculation-at-every-level-left-u-s-unequipped-to-fight-coronavirus-11588170921>.

⁵² World Health Organization (2016, June). Joint external evaluation of International Health Regulations (IHR) core capacities of the United States of America, pp. 34-35. At <https://apps.who.int/iris/bitstream/handle/10665/254701/WHO-WHE-CPI-2017.13-eng.pdf>.

⁵³ SNRA FOIA appeal (2018).pdf numbered page 8 (tenth page in the pdf file) cited references, and numbered page 6 note 15. (Attached, or <https://bd02.github.io/external/Reorganized/Sent%20to%20committees%20March%202019/SNRA%20FOIA%20appeal%20%282018%29.pdf>.)

⁵⁴ U.S. Department of Homeland Security (2008, June). WMD terrorism risk assessment in DHS Science & Technology. Steve Bennett. Presentation, S&T Stakeholders Conference, June 2-5 2008: at <https://ndiastorage.blob.core.usgovcloudapi.net/ndia/2008/homest/benn.pdf>. The classified terrorism risk assessments created by Homeland Security Presidential Directives (HSPD) HSPD-10 (Biodefense for the 21st century) and HSPD-18 (Medical countermeasures against weapons of mass destruction) were used to risk-prioritize SNS purchases of countermeasures specific to CBRN terrorist attacks until 2018 (<https://www.latimes.com/politics/story/2019-07-17/times-investigation-homeland-security-gutted-programs-aimed-at-stopping-wmd-terrorism>). However, resourcing decisions for other risks and overall SNS funding continued to be made by human judgement, rather than the expanded all-hazards versions of them (the SNRA and HSNRC) which disappeared.

⁵⁵ The SNRA’s comparative methodology and the frequency, fatality, and direct economic loss metrics come from the DHS Terrorism Risk Assessments. (The 2011 SNRA wildfire and chemical accident chapters were my first learner projects at RMA. The textbook I used to complete them was one of the methodological appendices from the 2008 Bioterrorism Risk Assessment [BTRA]).

⁵⁶ In combination with domestic production (<https://www.hassan.senate.gov/imo/media/doc/SCTF%20Demand%20PPE%20Chart.pdf>): Two billion N95 respirators (CDC), 17 million face shields (ASPR), four billion gowns (ASPR). In combination with domestic production and projected imports [gap fill]: 100-400 million surgical masks (CDC), 19 billion gloves (ASPR). CDC: CDC 2015 national resourcing model, notes 57, 58 below. ASPR: Numbers scaled in proportion to N95s using 2018 ASPR TRACIE PPE calculator (<https://asprtracie.hhs.gov/technical-resources/resource/6457/hospital-personal-protective-equipment-planning-tool>), note 59 below. 23,000 ventilators, note 60.

⁵⁷ N95 masks: Carias et al (2015, April 10). Potential demand for respirators and surgical masks during a hypothetical influenza pandemic in the United States. *Clinical Infectious Diseases* 60(suppl. 1) S42-51. At https://academic.oup.com/cid/article/60/suppl_1/S42/356585.

The 2015 SNRA’s median scenario (25% attack rate, 0.1-0.3% CFR) represents a severity 4 to low-severity-5 scale pandemic on table 1 of Meltzer et al (https://academic.oup.com/cid/article/60/suppl_1/S1/356555), the scenario space that defines the risk inputs of the national resourcing model for pandemic events that the CDC published in April 2015 (https://academic.oup.com/cid/issue/60/suppl_1). The SNRA’s scenario range spans the interval between the low and high severity and transmissibility scenarios of the model’s PPE chapter (Carias et al, https://academic.oup.com/cid/article/60/suppl_1/S42/356585), corresponding to 2 billion N95 respirators (Carias table 3 base case, midpoint of the 20% and 30% attack rate estimates for the SNRA’s 25% attack rate fatality scenario set = 1982-2624 million N95s for low-severity and 2172-3085 million N95s for high-severity scenarios, low end of both ranges, rounded). With no mitigation measures other than social distancing, no attenuation in projected demand, no imports, no increase in domestic production above the 35 million per month U.S. baseline in January 2020, no decontamination technologies, and no vaccine – i.e. all of the blue bar increases in need, and none of the green or orange increases to supply above the 35 million/month dark green bars of early 2020 (slide 4, <https://www.hassan.senate.gov/imo/media/doc/SCTF%20Demand%20PPE%20Chart.pdf>) – that would have taken the United States through June 2021 in the absence of any further intervention.

I want to stress that the completeness of that sufficiency is true only for the N95 respirators, which were in shortest supply during the past year. Everything that FEMA flew in – **everything** that my FEMA colleagues did in the response – would have been every bit as vital and needed and life-saving and heroic as it was in the history that really happened. But they wouldn’t have had to fight the impossible.

Each of the applications in this CDC resourcing model (https://academic.oup.com/cid/issue/60/suppl_1), including the vaccine-infrastructure chapter (Biggerstaff et al, https://academic.oup.com/cid/article/60/suppl_1/S20/356419) that the CEA’s cost-benefit analysis used as its intermediate source, used the same scenario set as the 2015 SNRA (Meltzer et al, https://academic.oup.com/cid/article/60/suppl_1/S1/356555). Since this paper was still in press when we launched the SNRA update, CDC sent us the preprints and told us which numbers to use.

⁵⁸ Surgical masks, Carias et al, 100-400 million masks. This would have filled the small projected future supply gaps in the Government’s chart, but not in the absence of continued imports from overseas (slide 6 [<https://www.hassan.senate.gov/imo/media/doc/SCTF%20Demand%20PPE%20Chart.pdf>]).

⁵⁹ Since the 2015 CDC journal issue does not estimate projected needs for other kinds of PPE in these 2015 models, the most authoritative source is a CDC PPE calculator which the HHS office of the Assistant Secretary for Preparedness and Response (ASPR) adapted to pandemic influenza (<https://asprtracie.hhs.gov/technical-resources/resource/6457/hospital-personal-protective-equipment-planning-tool>). Since this model was made for hospitals rather than communities it scales to workforce size rather than population illness and hospitalization numbers, so the relevant output numbers are ratios relative to the N95 resource needs determined by the CDC model above. (I am making the assumption that gown, glove, and face shield consumption relative to N95 mask consumption by non-hospital workers is comparable to the ratio for hospital workers, which seems a safe assumption as a lower bound.)

The Government has had detailed, comprehensive tools for connecting risk to resources for at least a decade. While the resourcing parts are well known,⁶¹ the tools on the risk front end – the risk assessments that provide national and community decision-makers, given their personal values, the information they need to know which risks and which resources they need to prioritize over others to protect their people⁶² – are not. We buried them.⁶³

Justification for 5 U.S.C. § 2302 disclosure

I am disclosing this information because it evidences censorship of science, fraud, waste, and violations of law and policy, and because its suppression harmed our employers. The purpose of this section is to describe my reasonable belief for these things that is necessary for this disclosure to be legal by 5 U.S.C. § 2302.

The tables for the different disease scenarios are distributed between the different tabs of the spreadsheet referenced above (a section 508 compliant PDF version is at <https://files.asprtracie.hhs.gov/documents/aspr-tracie-hospital-ppe-planning-tool.pdf>): the total sums for each scenario relative to the total N95 mask requirement (i.e. if your scenario needs X N95 masks, how many of each other kind of PPE will you also need) are summarized below.

PPE NEEDS RELATIVE TO N95 MASKS, FROM ASPR PPE CALCULATOR (2018)*

Per N95 mask	EVD VHF		MERS SARS		Pandemic	
	Initial	Hosp.	Initial	Hosp.	Inpatient	ED
N95	1.00	1.00	1.00	1.00	1.00	1.00
Gloves	5.14	10.55	4.40	6.67	9.52	16.19
Gowns	1.05	1.00	1.00	1.40	2.09	3.05
Face shields	1.00	1.00	1.00	1.00	0.0162	0.0085
Boot/shoe cover	2.00	3.09	2.00	2.80	2.12	3.52

Using the pandemic influenza rather than the MERS/SARS model (because the purpose of these calculations is not to show what the projections would have been with the benefit of hindsight, but the assumptions that would have been applied at the time) and, to be conservative, applying the lower of the other-PPE-to-N95 ratios between the two tabs (9.52 glove sets/N95s and 2.09 gowns/N95s from the inpatient tab and 0.0085 face shields / N95s from the ED tab) to the two billion N95 masks of the 2015 SNRA's median scenario results in total projected stockpile requirements of 17 million face shields, four billion gowns, and 19 billion gloves.

The gowns would have covered the demand-supply gap for the remainder of the pandemic with domestic production alone (<https://www.hassan.senate.gov/imo/media/doc/SCTF%20Demand%20PPE%20Chart.pdf> slide 5), as would have the face shields given the added domestic production of non-traditional suppliers (Ford, Boeing, universities, and so on, slide 8). The projected number of gloves also would have been more than sufficient to meet any gaps, given expected continued *imports* from overseas, but would have lasted only two or three months by themselves at most had those been cut off (slide 7).

* HHS Office of the Assistant Secretary for Response and Prevention (ASPR) (2018, December 11). Hospital personal protective equipment planning tool. ASPR TRACIE: at <https://asprtracie.hhs.gov/technical-resources/resource/6457/hospital-personal-protective-equipment-planning-tool>, pdf version at <https://files.asprtracie.hhs.gov/documents/aspr-tracie-hospital-ppe-planning-tool.pdf>, calculating tool at <https://files.asprtracie.hhs.gov/documents/aspr-tracie-hospital-ppe-planning-tool.xlsx>.

⁶⁰ A second paper in this issue by Meltzer et al (https://academic.oup.com/cid/article/60/suppl_1/S52/356562) projects peak national ventilator need for the same combination of scenarios as Carias et al. The endpoint of one of these scenarios (20% attack rate, 0.25% CFR [high severity]) corresponding to the 2015 SNRA best estimate ($0.25\% \times 20\% \times 310 \text{ million} = 155,000 \approx 0.20\% \times 25\% \times 307 \text{ million} = 154,000$ fatalities, 1.2 million vs. 1.4 million hospitalizations) has a projected need of 23,250 ventilators (source table 3).

⁶¹ E.g. DHS 2007 Target Capabilities List at <https://www.fema.gov/pdf/government/training/tcl.pdf> pp. 460-463, HHS 2010 PHEP hospital surge model <https://archive.ahrq.gov/prep/hospurgemodel/description/description3.htm>, CDC 2015 tools discussed above.

⁶² U.S. Department of Homeland Security (2011, April). Page 11, first paragraph. Page 9, strategic planning, capabilities-based planning, resource decisions. Risk management fundamentals: homeland security risk management doctrine. At <https://www.dhs.gov/xlibrary/assets/rma-risk-management-fundamentals.pdf>.

⁶³ Notes 66-69 below.

Our suppression of this risk information degraded the Federal Government's capability to make risk-based resourcing decisions across missions and Departments,⁶⁴ and state and local government partners' capabilities to protect their own people against their own greatest risks.⁶⁵ But we continue to keep it buried today.^{66, 67, 68, 69}

We avoid accountability by telling different things to different people.

- We tell the courts that FEMA never actually used the (2015) SNRA, because FEMA has been using other risk tools in its place since 2015.⁷⁰
- We tell the press that those other tools are brand new⁷¹ – so new that the Government can't be blamed for failing to prepare the Nation for a disaster matching the pandemic scenario that a journalist discovered in them in April 2020.⁷²
- We tell Congress and the President that the risk data available to FEMA at the end of 2019 gave no indication that pandemic risk might be significantly greater than anything else FEMA has ever dealt with.⁷³ That disconnect wasn't FEMA's fault, but the fault of the state and local government partners who gave FEMA bad information about national risk because they were ignorant.^{74, 75}

But we continue making the same requirements on those partners to plan to the wrong risks and build the wrong capabilities⁷⁶ which inverted the Nation's preparedness in the first place – and tell them that the risk-based evidential authority for those requirements is the 2015 SNRA.⁷⁷ Which they can't see.⁷⁸

⁶⁴ FEMA, April 2020 email to E&E News. Frank, Thomas (2020, April 13). Warning on killer virus was preliminary – FEMA. *E&E News*: at <https://www.eenews.net/climatewire/stories/1062857757> (paywalled original; pdf print at <https://bd02.github.io/external/Reorganized/Sent%20to%20committees%20October%202020/Warning%20about%20killer%20virus%20was%20preliminary%20-%20FEMA%20%28referenced%20article,%20EE%20News%2020200413%29.pdf>).

⁶⁵ U.S. Department of Homeland Security (2020, December 22). National preparedness report. Page 2, callout block. At https://www.fema.gov/sites/default/files/documents/fema_2020-national-preparedness-report.pdf.

⁶⁶ DHS SNRA 2011 (FOIA requested items 2b, 4), FEMA SNRA 2015 (1, 2a, 3): FEMA (2018, December 10). Final response, FEMA FOIA 2016-FEFO-00165 and appeals. At <https://bd02.github.io/external/Reorganized/FOIAs%20for%20SNRA%20documentation/FOIA%20correspondence%202017-FEFO-00165/SNRA%20FOIA%20correspondence%202016-18.zip>. Note: the SNRA 2011 requested document #5 and the SNRA 2015 requested documents #6-8 were released in full (<https://bd02.github.io/external/Released%20documentation/Originals%20OCRed/Split%20by%20redaction%20status/Released%20in%20full.zip>), and the SNRA 2011 seven-page public summary (<https://www.dhs.gov/xlibrary/assets/rma-strategic-national-risk-assessment-ppd8.pdf>) has always been public (on DHS's website: FEMA removed it from its own some time in fall 2020 [https://web.archive.org/web/2020*/https://www.fema.gov/media-library-data/20130726-1854-25045-5035/rma_strategic_national_risk_assessment_ppd8_1_.pdf]).

⁶⁷ DHS HSNRC 2013 (DHS HQ): DHS (2019, June 17). Denial in full, FOIA request 2017-HQFO-00005, portions withheld by b(5) [the b(1) withholdings are proper for certain segregable parts, but the b(5) withholdings are not (DHS cites these finalized studies as non-political authorities for political decisions, <https://docs.house.gov/meetings/HM/HM09/20150708/103703/HHRG-114-HM09-Wstate-SmithT-20150708.pdf>)]. DHS FOIA annual report raw data, PRIV FY 2019, tab raw data requests, row 43766. At <https://www.dhs.gov/publication/annual-foia-report-raw-data>, https://www.dhs.gov/sites/default/files/publications/fy19_raw_data_priv.xlsx. The 2018 HSNRC methods documentation is public, https://www.rand.org/pubs/research_reports/RR2140.html, but internally and externally the risk content (which is displayed in part in figure 1) is in the same unclear status as the 2018 QHSR.

⁶⁸ SNRA 2011, 2015: NPD (4/30/2019) 28-1, current status in docket at <https://www.courtlistener.com/docket/6284501/public-employees-for-environmental-responsibility-v-united-states/>.

⁶⁹ SNRA: FEMA internal orders 2/21/2017, 5/11/2021.

⁷⁰ DHS/FEMA National Preparedness Directorate (NPD) (2019, April 30). Paragraph 8. Declaration 28-1, *Public Employees for Environmental Responsibility (PEER) v. U.S. Department of Homeland Security* 1:2018-cv-00158, D.D.C., at <https://www.courtlistener.com/docket/6284501/28/1/public-employees-for-environmental-responsibility-v-united-states/>.

⁷¹ FEMA, April 2020 email to E&E News (note 64 above).

⁷² Frank, Thomas (2020, April 9). Disaster agency foresaw killer virus months before COVID-19. *E&E News*: at <https://www.eenews.net/climatewire/stories/1062824495>.

⁷³ DHS 2020 national preparedness report pp. 1-3.

⁷⁴ DHS 2020 national preparedness report p. 2, callout block.

⁷⁵ Of the real national risk picture, which we censored. Notes 66, 68, 69 above (limited to DHS/FEMA actions).

⁷⁶ U.S. Department of Homeland Security (2021, February 25). Risk-based core capabilities, pp. 9, 24, 33-34, A-1-2, 13-14, 17-18, 20-22, 26-29, 31, 47, B-1-3, 11-12, C-3, 5, D-13, E-8-9, F-12, G-16, H-1-2, 9, 12-13, 24-28. Preparedness grants manual. At https://www.fema.gov/sites/default/files/documents/FEMA_2021-Preparedness-Grants-Manual_02-19-2021.pdf. I want to stress that I am not asserting a policy judgement, or a difference of professional opinion, which would be inappropriate. I'm asserting fraud.

I signed off on the planning assumptions that those requirements are based on in 2015 – not the assumptions themselves (called the Core Capabilities⁷⁹), but FEMA’s claim that they were supported by the national risk picture that my team found.⁸⁰ But FEMA never submitted that picture – or that claimed connection – to the outside critical and stakeholder scrutiny that they needed;⁸¹ that Government information quality standards require;⁸² and that FEMA agreed to as the condition for our contributors’ help, and our endorsement of that claim.⁸³

Those planning assumptions turned out to be wrong. That is why the National Preparedness System failed in 2017 and 2020.

But we are still using them.⁸⁴ We are still keeping the real risk data that we say that those planning assumptions came from locked up.⁸⁵ The risk assessment that FEMA’s plans are based on is banned inside FEMA.⁸⁶ And we are still avoiding the scrutiny and accountability needed for correction – and *prioritizing* that evasion over mission success.⁸⁷

⁷⁷ U.S. Department of Homeland Security (2015, September 30). Risk and the Core Capabilities. National preparedness goal, 2nd edition, pp. 4-5. At https://www.fema.gov/sites/default/files/2020-06/national_preparedness_goal_2nd_edition.pdf.

⁷⁸ DHS Homeland Security Advisory Council (2016). Grant Review Task Force: final report spring 2016, p. 21. At [https://www.dhs.gov/sites/default/files/publications/HSAC%20-%20Grant%20Review%20Task%20Force%20-%20Final%20Report%20-%20FINAL%20\(accessible\).pdf](https://www.dhs.gov/sites/default/files/publications/HSAC%20-%20Grant%20Review%20Task%20Force%20-%20Final%20Report%20-%20FINAL%20(accessible).pdf).

⁷⁹ The 2011-present (PPD-8) Core Capabilities replaced the Target Capabilities (<https://www.fema.gov/pdf/government/training/tcl.pdf>) of DHS/FEMA’s pre-2011 (HSPD-8) doctrine. The first purpose of the 2015 SNRA update was to check whether the 2011-assessed national risk picture still supported the broad, balanced all-hazards existing set of Core Capabilities, and was consistent with the small adjustments that FEMA and its stakeholders made to them in 2015. I expected that it would, and those were the findings that we reported.

⁸⁰ Note 77.

⁸¹ March 2019 SNRA FAQ for Congress p. 4 (*Why does a highly technical product that was made by experts need outside critics?*).

⁸² Information Quality Act. Section 515, Consolidated appropriations act for FY 2001 (Public Law 106-554): at <https://www.govinfo.gov/content/pkg/PLAW-106publ554/pdf/PLAW-106publ554.pdf#page=156>.

- OMB (2002, February 22). Guidelines for ensuring the quality, objectivity, utility, and integrity of information disseminated by Federal agencies. At <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/assets/OMB/fedreg/reproducible2.pdf>.
- Graham, John D. (2002, March 21). OMB’s role in overseeing information quality. Remarks, National Academy of Sciences. OMB: at https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/assets/OMB/info-reg/info-quality_march21.pdf.
- OMB (2004, December 16). Final information quality bulletin for peer review. At https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/assets/OMB/fedreg/2005/011405_peer.pdf.
- OMB, OSTP (2007, September 19). Updated principles for risk analysis. At <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2007/m07-24.pdf>.
- DHS (2012, April 12). Directive 026-07: Scientific integrity. At https://www.dhs.gov/sites/default/files/publications/mgmt/general-science-and-innovation/mgmt-dir_026-07-scientific-integrity_revision-00.pdf.
- DHS (2019, November 21). Directive 139-02: Information quality. At https://www.dhs.gov/sites/default/files/publications/mgmt/information-and-technology-management/mgmt-dir_139-02-info-quality_revision-01.pdf.
- DHS (2019, November 27). Directive 139-02-001: Information quality implementation. At https://www.dhs.gov/sites/default/files/publications/mgmt/information-and-technology-management/mgmt-dir_139-02-001-info-quality-implementation_revision-01.pdf.
- President (2021, January 27). Restoring trust in Government through scientific integrity and evidence-based policymaking. At <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/memorandum-on-restoring-trust-in-government-through-scientific-integrity-and-evidence-based-policymaking/>.

⁸³ SNRA instructions to contributors, at <https://www.courtlistener.com/docket/6284501/24/3/public-employees-for-environmental-responsibility-v-united-states/> 000001-43, esp. 000011-13 (pp. 2-4 of the SNRA 2015 Risk Summary Sheet and Template).

⁸⁴ Note 76.

⁸⁵ FEMA internal orders 2/21/2017, 5/11/2021.

⁸⁶ FEMA internal orders 2/21/2017, 3/26/2019, 5/11/2021.

⁸⁷ The funding stream which Congress appropriated for a) conducting national risk assessments and b) building state and local risk management capabilities is the funding stream that FEMA is using to c) suppress its national risk assessment and d) keep its best risk data from state and local emergency managers. October 16 letter p. 6; Disclosure Branch (3/1/19) declaration 22-1 ¶ 6, NPD (3/1/19) 22-2 ¶ 1, NPD (4/30/19) 28-1 ¶ 1.

Responsibility

I am using the word “we” because I helped bury this too. I probably have more responsibility for that than anyone else above the ground today.

I’m not writing to blame anyone else. I don’t even know who is making the decisions to keep this science suppressed now, or who has been making the decisions for its suppression at any time since 2015, other than that it is not being driven by my current organization today.⁸⁸ I’m just trying to end it.

Status update (since 16 October 2020 committee letter)

October 27, 2020: After I had tried to get what FEMA was saying in court corrected, and failed to do so, I told the Justice Department attorney and GAO together that what we were telling each of them factually contradicted what we were telling the other,^{89,90} and sent them all this information (the information in the other attachments). Nothing happened.

I spent October to June writing this letter.

Late December 2020: I told the committee staff that I would contact the third party who was unaware of the contradictions between what we were telling him and others – the journalist whose article I’d cited in my October 16 follow-up letter⁹¹ – before following up with them again.⁹²

- ~~That is this letter. I’m a very slow writer. The intervening events listed on this page (starting with the Government’s decision to keep in place the issues that the 10/27 email reported) complicated the existing issues with new ones faster than I could write.~~

December 22, 2020: FEMA reported that the risk data available to the agency on December 31, 2019 had given no indication that pandemics were any more of a risk than other threats and hazards that emergency managers had to deal with.⁹³

April 28, 2021: The 2020-updated versions of this substitute ‘risk data’ were released internally. They returned the same result: On December 31, 2020, half the jurisdictions using this FEMA-mandated tool to assess their risks reported that their risk from pandemics was zero.⁹⁴ ~~FEMA went ahead and~~ used those numbers anyway.

May 11, 2021: Leadership renewed the prohibitions on sharing the [real] risk data which contradicted these results inside or outside FEMA.⁹⁵

⁸⁸ The reason I’m noting this is because it may not look that way from the outside. My organization’s name is on many of the products cited above, but they aren’t in control. FOIA request letter <https://bd02.github.io/external/Reorganized/Other/FOIA%202020-FEFO-00401/FOIA%202020-FEFO-00401%20request%20letter%2020200218%20redacted.pdf>, p. 5 last sentence.

⁸⁹ DHS/FEMA National Preparedness Directorate (NPD) (2019, April 30). Paragraph 8. Declaration 28-1, *Public Employees for Environmental Responsibility (PEER) v. U.S. Department of Homeland Security* 1:2018-cv-00158, D.D.C., at <https://www.courtlistener.com/docket/6284501/28/1/public-employees-for-environmental-responsibility-v-united-states/>.

⁹⁰ U.S. Government Accountability Office (GAO) (2020, May 4). National preparedness: additional actions needed to address gaps in the Nation’s emergency management capabilities, pp. 11-12, 28. GAO-20-297: at <https://www.gao.gov/assets/710/706612.pdf>.

⁹¹ Note 64.

⁹² ~~That is this letter. I’m a very slow writer. The intervening events listed on this page (starting with the Government’s decision to keep in place the issues that the 10/27 email reported) complicated the existing issues with new ones faster than I could write.~~

⁹³ U.S. Department of Homeland Security (2020, December 22). National preparedness report. At https://www.fema.gov/sites/default/files/documents/fema_2020-national-preparedness-report.pdf.

⁹⁴ 68/120 (57%) reported zero risk for pandemic or epidemic scenarios on 12/31/2019 and 55/117 (47%) on 12/31/2020. (My 2019 count is a little more generous/higher than the published one.) This looks like an improvement, but it isn’t. It should be zero. If what these tools reported had any connection to risk, or even just perceived risk, the number of jurisdictions reporting on 12/31/2020 that pandemics posed no risk to their communities would be zero.

These information products (THIRAs) are actually fabulous planning tools – so long as they are closely calibrated to a shared picture of risk between users, that users can see and judge for themselves. The THIRAs were never intended to be used without at least that common national risk picture to calibrate against, feed into, identify weaknesses in, and help to correct and improve. Without that, and siloed from each other by default, the risk picture that these tools will paint, by their construction, can be only as accurate as the risk assumptions encoded by the ‘risk-based’ capabilities which determine the risk picture that comes out of them – even when that picture is clearly wrong.

⁹⁵ FEMA internal orders 2/21/2017, 5/11/2021. I’m using ‘leadership’ because I don’t know where these decisions are being made at present, other than that it is outside my current organization.

Background (summary)

The Strategic National Risk Assessment (SNRA) was designed to help Federal and community decision-makers prioritize and plan for the greatest risks to the Nation, with math, science, and evidence.

Origin

In 2011, FEMA asked DHS for a master risk assessment that would compare every threat and hazard in FEMA's mission space – a One Ring To Rule Them All of national risk – using math, science, and evidence that FEMA could defend. DHS's analysts gave FEMA what it asked for. DHS has been trying to put that genie back into its bottle since.⁹⁶

The former DHS Office of Risk Management & Analysis (RMA) created the SNRA for FEMA in 2011. RMA accomplished this by adding hurricanes, pandemics, and other natural/accidental/malevolent hazards to the existing comparative framework of the classified DHS terrorism risk assessments⁹⁷ which determine[d] what goes into the Strategic National Stockpile. DHS/FEMA updated the SNRA itself in 2015. FEMA's update focused on building out a fully unclassified version that its state and local stakeholders could see and use.

The U.S. national risk assessment

The SNRA is a national risk assessment. It makes comparative judgements between risks – chemical accidents vs. terrorist bombings, nuclear meltdowns vs. pandemics, geo-magnetic storms vs. a second 9/11 – touching the equities, responsibilities, and budgets of every Department in the U.S. Government. It expresses those risks in common mathematical terms, allowing direct comparison and resource allocation decisions between functions and agencies in a way that the Government has never been able to do before. What the national Budget does for revenue and spending, the SNRA does for national risk.

At present, the U.S. Government manages national risk in the same way that it managed the national accounts a century ago, before the creation of the unified Budget. The Government makes risk tradeoff decisions in program siloes, or decision-by-decision, judging costs and benefits in isolation from other risk management decisions, like the decision that the CEA's Warp Speed analysis supported. The SNRA breaks down those walls for risk, like the Budget does for money.

A national risk assessment is an entirely new thing in American government. I believe that many of the SNRA's problems may stem from this: without a pre-existing frame of reference, decision-makers who encounter it don't have the standard of comparison needed to understand just how much this thing will empower citizens, and empower accountable government.

FEMA's master risk assessment

The SNRA's quantitative method makes FEMA's planning assumptions explicit in a way that makes it possible for any expert, critic, or citizen to examine and question them, to an extent that no other kind of analysis that DHS, FEMA, or any other U.S. Government entity practices can do.

If they could see it. Once the agency got what it wanted from us – an updated master risk assessment that FEMA could claim as evidential confirmation for its updated planning assumptions – it buried the risk assessment to protect those assumptions, and those claims, from scrutiny.

We see reproducibility as an essential feature of competent and accountable government. Show me what numbers, assumptions, and equations you used: and then show me how they add up to what you say they add up to.

- John Graham, OMB Office of Information & Regulatory Affairs, March 2002

⁹⁶ From 2012-15 DHS HQ was making the decisions and FEMA was the impacted party. Since 2015 DHS/FEMA has been making the decisions itself for the SNRA. DHS HQ returned to this analytic line of work for its own planning needs in 2016, but did not interfere with FEMA. I don't know what (if any) role DHS HQ had in FEMA's decisions after 2016.

⁹⁷ The DHS Integrated CBRN Terrorism Risk Assessment (ITRA) and its biological (BTRA), chemical (CTRA), and radiological-nuclear (RNTRA) components (notes 54 and 55 above).

Why the National Preparedness System failed

The PPD-8 (2011-present) National Preparedness System was designed on the assumption that it would have the capability of dynamic self-correction.⁹⁸ It needed that capability to work.^{99, 100}

The system wasn't built on the largest scope science project that the Government has ever made from vanity. Emergency managers are practical people. It was built on a science project because dynamic self-correction is what science does. That's what science is.¹⁰¹ That scrutiny by outside stakeholders,¹⁰² other partners,¹⁰³ and critics¹⁰⁴ is the one element that every means for that self-correction needs to function.^{105, 106}

The planning assumptions at the center of this system were formulated by a relatively small number of people, based on their best good-faith interpretation of what they thought that science said, in a few small rooms, in a few small months in 2011 and in 2015.¹⁰⁷ The subsequent events which cut off those routes for self-correction – in 2011 by external events, and in 2015 by DHS/FEMA itself – froze those assumptions in place.¹⁰⁸

The formalization of those derivative planning assumptions – the PPD-8 Core Capabilities – as risk assessment tools in themselves,¹⁰⁹ to define the risk picture that state and local governments were and are required to plan to¹¹⁰ – as stand-ins¹¹¹ for the unavailable real risk picture,¹¹² for which they had been originally designed as capabilities, to counter¹¹³ – further institutionalized the circular risk assumptions which had constrained their own definitions.¹¹⁴ That rigid and unquestioned continuation, compounded over years, magnified the eventual real-world impacts of each error in them out of proportion to its original magnitude.

In 2017, those planning assumptions turned out to be wrong. In 2020, those planning assumptions turned out to be lethal. That is why the National Preparedness System failed in 2017 and 2020.

⁹⁸ Reference of note 77, page 4, paragraph preceding *Risk and the Core Capabilities*.

⁹⁹ U.S. Department of Homeland Security (2011, April). Adaptability. Risk management fundamentals: homeland security risk management doctrine, page 11. At <https://www.dhs.gov/xlibrary/assets/rma-risk-management-fundamentals.pdf>.

¹⁰⁰ U.S. Department of Homeland Security (2011, November). National Preparedness System. Page 2, SNRA role. At https://www.fema.gov/pdf/prepared/nps_description.pdf.

¹⁰¹ The success and credibility of science are anchored in the willingness of scientists to

- 1) Expose their ideas and results to independent testing and replication by others. This requires the open exchange of data, procedures, and materials.
- 2) Abandon or modify previously accepted conclusions when confronted with more complete or reliable experimental or observational evidence.

Adherence to these principles provides a mechanism for self-correction that is the foundation of the credibility of science.

American Physical Society (1999, November 14). What is science? APS Council, https://www.aps.org/policy/statements/99_6.cfm.

¹⁰² OMB (2002) V.3.a, V.3.b.ii.B, pp. 8459-60.

¹⁰³ Unity of effort. DHS (April 2011) pp. 11-12.

¹⁰⁴ Graham, John D. (2002, March 21). OMB's role in overseeing information quality. Remarks, National Academy of Sciences, page 10. OMB: at https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/assets/OMB/inforeg/info-quality_march21.pdf.

¹⁰⁵ Transparency. DHS (April 2011) pp. 11-12.

¹⁰⁶ Utility. OMB (2002) V.2, p. 8459.

¹⁰⁷ March 2019 SNRA FAQ for Congress p. 4 (*Why does a highly technical product that was made by experts need outside critics?*).

¹⁰⁸ March 2019 SNRA FAQ for Congress p. 3 (*How is FEMA using the SNRA?*).

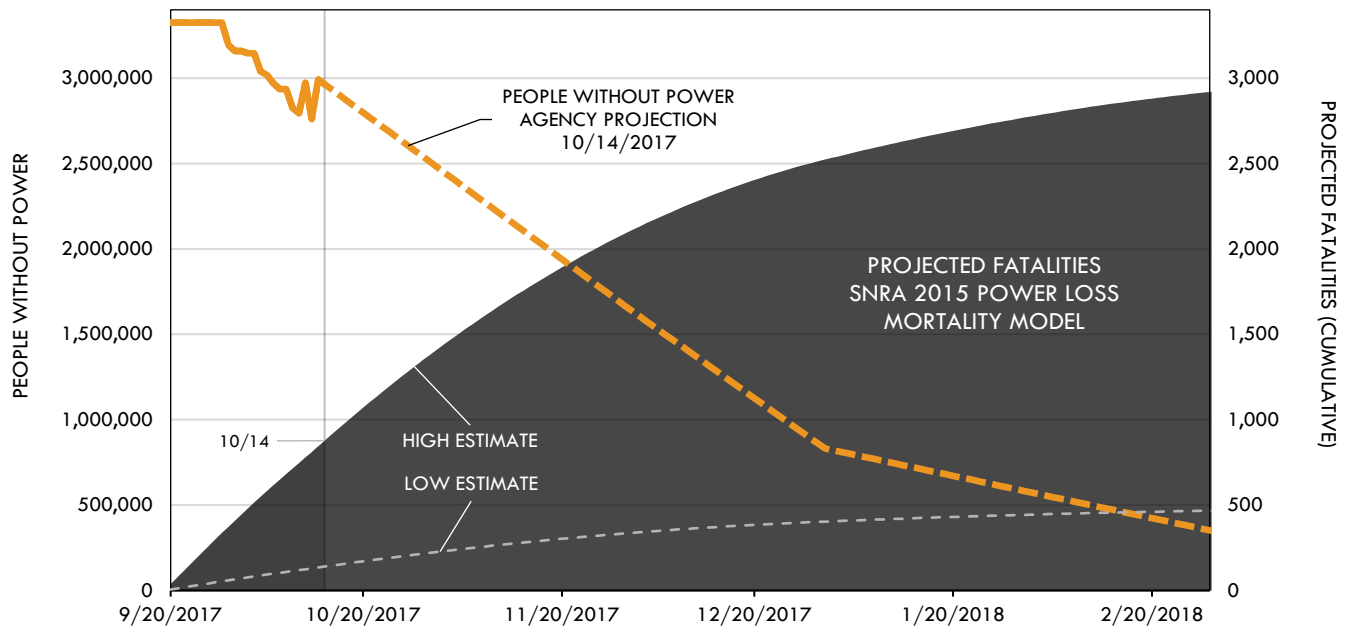
¹⁰⁹ I.e. the capabilities define the risks, rather than vice versa. The origin of this is a specific interpretation of capability-based planning which emphasizes pre-defined capabilities as first-order elements in themselves, rather than risk.

¹¹⁰ DHS (2018, May). Comprehensive preparedness guide (CPG) 201 pp. 5, 7, 11-18. At <https://www.fema.gov/sites/default/files/2020-07/threat-hazard-identification-risk-assessment-stakeholder-preparedness-review-guide.pdf>.

¹¹¹ DHS 2020 national preparedness report pp. 2 (callout box, second sentence), 4, 16-18.

¹¹² The unavailability of the SNRA's information to the enterprise partners who were supposed to be making use of it for their own planning was the National Preparedness System's specific failure point in 2017 (figure 2).

FIGURE 2: SNRA 2015 POWER LOSS MORTALITY MODEL. RETROSPECTIVELY PROJECTED FATALITIES IN PUERTO RICO, BASED ON THE INFORMATION AVAILABLE TO FEMA IN OCTOBER 2017



Power loss mortality model: Linear extrapolation of best-estimate (90) excess fatalities, New York City 14-15 August, 2003 East Coast Blackout, Anderson et al (2012) (*Epidemiology* 23(2) 189-193, NIH public access <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3276722/pdf/nihms348988.pdf>) to total person-days without electric power. Low estimate (1.8 fatalities/million person-days) assumes the 90 NYC fatalities represented all fatalities from the multi-state blackout (50 million person-days without power in U.S. and Canada); high estimate (11.25 per million person-days) assumes the 90 NYC fatalities represented impacts only in NYC (8 million person-days). The SNRA used the low-estimate-assumptions for the electric-power-related hazard events which FEMA added in 2015 (space weather & physical attack on the power grid). FEMA also included indirect fatalities in other events added or revised in 2015 where defensible numbers were available, but these were not specific to electric lifeline failure.

Maria power restoration curve: 9/20-10/13, FEMA senior leadership briefing (SLB) 10/13/17 1700 EDT (<https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Senior%20Leadership%20Briefing%20and%20Recovery%20Snapshots.pdf>); projected 10/14-3/31 (linear interpolation), FEMA daily operations brief 10/14/17 (<https://www.fhsl.org/?view&did=804878>). Assumption of constant population (Census July 2017). Official fatality total (47 as of 10/14) not included in chart.

Figure 2 above is the second of a pair of charts in a separate FOIA letter (2020-FEFO-00393, <https://bd02.github.io/external/FOIA%202020-FEFO-00393/Maria/PR%20data%20FOIA%2020200218%20Request%20letter.pdf>) that I'm including here partly for completeness – the first is figure 1 in the October 16 letter to committee staff – which retrospectively project the number of expected deaths from the long-term, wide-scale power outage after Maria. Figure 1 in the October 16 letter shows the results for the actual outages which were determined after the fact. This figure instead displays what the fatality projections would have been with the information that FEMA had available three weeks after the storm. The results are the same.

¹¹³ Note 77 above (National Preparedness Goal 2nd edition pp. 4-5); also National Preparedness Goal, 1st edition (2011), p. 3, <https://www.fema.gov/pdf/prepared/ngp.pdf>.

¹¹⁴ March 2019 SNRA FAQ for Congress p. 4 (Why does a highly technical product that was made by experts need outside critics?).

Accountability

What they will tell you

~~Much of this discussion is about accountability, or avoiding accountability, in one way or another.~~

~~It is important to understand how this avoidance actually works in practice—the mechanics of it. The reason why it is important is because these~~These ~~are the things that DHS and FEMA will tell you, to deflect your asking further.~~

These DHS (general)

They relate to a frequent point of confusion: DHS's practice of claiming data and analysis as evidence for final decisions, then turning around and shielding that evidence from scrutiny by claiming it to only be a 'draft'. This is how we have our cake, and eat it too.

We avoid political accountability by claiming that our decisions are based on objective science and evidence.^{115, 116, 117, 118, 119, 120, 121, 122, 123} When we are called on those claims,^{124, 125, 126, 127} we turn around and avoid scientific accountability by calling them discretionary policy decisions that critics have no right to question.^{128, 129, 130, 131} When these contradictions become unsustainable,¹³² we make stuff up.¹³³ When our choices catch up to us,^{134, 135, 136, 137} we double down,¹³⁸ and keep going.^{139, 140}

¹¹⁵ This section includes the larger DHS context of these issues including the DHS strategic planning context where the SNRA first got trapped, as well as the post-2015 DHS/FEMA-centered issues that the rest of this document mostly focuses on.

We avoid political accountability.

¹¹⁶ U.S. Department of Homeland Security (2011, September). National Preparedness Goal, 1st edition (2011), pp. 3-4. At <https://www.fema.gov/pdf/prepared/npg.pdf>. (SNRA)

¹¹⁷ U.S. Department of Homeland Security (2011, December 9). The Strategic National Risk Assessment in support of PPD 8: A comprehensive risk-based approach toward a secure and resilient Nation (public summary). At <https://www.dhs.gov/xlibrary/assets/rma-strategic-national-risk-assessment-ppd8.pdf>. (SNRA)

¹¹⁸ U.S. Department of Homeland Security (2012, February 3). Testimony, DHS Office of Policy, transcript p. 65. House Committee on Homeland Security Subcommittee on Oversight, Investigations, and Management. At <https://www.hsdl.org/?view&did=731178>. (SNRA, HSNRC, QHSR analysis)

¹¹⁹ U.S. Department of Homeland Security (2013, September 9). Using enterprise-wide risk modeling, analysis, and assessment to inform homeland security policy and strategy. Alan Cohn, DHS Office of Policy. Presentation, Association for Federal Enterprise Risk Management (AFERM) 6th Annual Federal Enterprise Risk Management Summit: at https://www.aferm.org/wp-content/uploads/2016/10/ERM_2013_Cohn_Using_Risk_Modeling.pdf. (SNRA, HSNRC, QHSR analysis)

¹²⁰ U.S. Department of Homeland Security (2014, June). Quadrennial Homeland Security Review 2014 pp. 6-7, 15-17, 34-35, 41-43, 47, 56, 64, 67, 71-72, 74, 81, 94-96 ("risk" cited as an evidential basis for policy decisions as opposed to a descriptive term). DHS Office of Policy, Strategic Plans. At <https://www.dhs.gov/sites/default/files/publications/2014-qhsr-final-508.pdf>. (HSNRC and QHSR analysis)

¹²¹ U.S. Department of Homeland Security (2015, July 8). Testimony, DHS Office of Policy. House Committee on Homeland Security Subcommittee on Oversight and Management Efficiency: at <http://docs.house.gov/meetings/HM/HM09/20150708/103703/HHRG-114-HM09-Wstate-SmithT-20150708.pdf>. (HSNRC and QHSR analysis)

¹²² U.S. Department of Homeland Security (2015, September 30). National preparedness goal, 2nd edition, SNRA pp. 4-5, threats & hazards identification p. 12. At https://www.fema.gov/sites/default/files/2020-06/national_preparedness_goal_2nd_edition.pdf.

¹²³ DHS/FEMA National Preparedness Directorate (NPD) (2019, April 30). Declaration 28-1, *Public Employees for Environmental Responsibility (PEER) v. U.S. Department of Homeland Security* 1:2018-cv-00158, D.D.C., at <https://www.courtlistener.com/docket/6284501/28/1/public-employees-for-environmental-responsibility-v-united-states/>. Paragraph 6 ("data-driven policy decisions") (THIRAs are state/local/tribal/territorial-level planning and reporting tools, of which the National THIRA is the national-level version).

¹²⁴ FEMA FOIA request 2016-FEFO-00165, <https://bd02.github.io/external/Reorganized/FOIAs%20for%20SNRA%20documentation/>. (SNRA)

¹²⁵ Public Employees for Environmental Responsibility (PEER) (2018, January 25). Flying blind – Our national risk assessment is still under wraps. Press release: at <https://www.peer.org/flying-blind-our-national-risk-assessment-still-under-wraps/>. PEER (2018, January 25). Complaint, document 1, *PEER v. DHS* 1:2018-cv-00158, D.D.C., at <https://www.courtlistener.com/docket/6284501/1/public-employees-for-environmental-responsibility-v-united-states/>. (SNRA)

¹²⁶ DHS FOIA request 2017-HQFO-00005 for Homeland Security National Risk Characterization (HSNRC), Current Strategic Environment 2012, Future Strategic Environment 2013 reports (C. Beckner 10/4/2016). DHS Privacy Office FOIA log October 2016, at <https://www.dhs.gov/sites/default/files/publications/dhs-privacy-office-foia-log-october-2016.pdf>. (HSNRC and QHSR analysis)

¹²⁷ FEMA FOIA request 2020-FEFO-00401, <https://bd02.github.io/external/Reorganized/Other/FOIA%202020-FEFO-00401/FOIA%202020-FEFO-00401%20request%20letter%2020200218%20redacted.pdf>. (National THIRA)

We avoid scientific accountability.

DHS/FEMA (specific to the 2015 SNRA):

‘We’re using something else now’

1) Ask to see it.

There are no security issues. I made a FOIA request for any national risk assessment that FEMA might be using or has been using in the SNRA’s place from 2015 to the present. The only FOIA exemption which FEMA applied to the redacted documents it produced was that they were still pre-decisional [b(5)], as of April 9, 2021.¹⁴¹

2) It’s not actually something else. FEMA is still using the SNRA. FEMA uses the SNRA every time it uses, or says it is using, one of those something-elses.

The ‘risk-based’ Core Capabilities which FEMA’s substitute risk tools¹⁴² rely on as their primary

¹²⁸ FEMA (2018, December 10). Final response, FEMA FOIA 2016-FEFO-00165 and appeals. At <https://bd02.github.io/external/Reorganized/FOIA%20for%20SNRA%20documentation/FOIA%20correspondence%202017-FEFO-00165/SNRA%20FOIA%20correspondence%202016-18.zip>. (SNRA, my FOIA)

¹²⁹ DHS/FEMA National Preparedness Directorate (NPD) (2019, March 1). Declaration 22-2 paragraphs 4, 6, 8, 10, 12, 14, 16, 18, *PEER v. DHS*, at <https://www.courtlistener.com/docket/6284501/22/2/public-employees-for-environmental-responsibility-v-united-states/>. FEMA Disclosure Branch (3/1/2019) 22-1 paragraphs 7, 10-13. (SNRA, *PEER*’s FOIA)

¹³⁰ DHS (2019, June 17). Denial in full, FOIA request 2017-HQFO-00005, b(1) [this would be segregable portions of the HSNRC documenta- tion], b(5). DHS FOIA annual report raw data, PRIV FY 2019, tab raw data requests, row 43766. At <https://www.dhs.gov/publication/annual-foia-report-raw-data>, https://www.dhs.gov/sites/default/files/publications/fy19_raw_data_priv.xlsx. (HSNRC and QHSR analysis)

¹³¹ FEMA (2021, February 9, April 9). Interim and final responses, FEMA FOIA 2020-FEFO-00401. At <https://bd02.github.io/external/Reor- ganized/Other/FOIA%202020-FEFO-00401/2020-FEFO-00401%20Interim%20Final%20Response%2020210209.pdf>, <https://bd02.github.io/ external/Reorganized/Other/FOIA%202020-FEFO-00401/2020-FEFO-00401%20Final%20Response%2020210409.pdf>. (National THIRA)

When those contradictions become unsustainable,

¹³² *PEER* (2019, March 29). Memorandum 24-1, *PEER v. DHS*, at <https://www.courtlistener.com/docket/6284501/24/1/public-employees-for- environmental-responsibility-v-united-states/>. (SNRA)

We make stuff up.

¹³³ NPD (4/30/2019) 28-1 paragraph 8. (SNRA, National THIRA)

When our choices catch up to us,

¹³⁴ Federal Emergency Management Agency (2018, July 12). 2017 hurricane season FEMA after-action report. Page 12. At https://www.fema.gov/sites/default/files/2020-08/fema_hurricane-season-after-action-report_2017.pdf. (THIRA)

¹³⁵ FEMA 6/19/2020 testimony to Senate Homeland Security Committee, <https://www.c-span.org/video/?472884-1/senate-hearing-procurement- distribution-strategies-response-coronavirus-pandemic> at 44:55-45:18.

¹³⁶ Frank, Thomas (2020, April 9). Disaster agency foresaw killer virus months before COVID-19. *E&E News*: at <https://www.eenews.net/ climatewire/stories/1062824495>. (National THIRA)

¹³⁷ DHS 2020 national preparedness report pp. 1-2. (THIRA)

We double down,

¹³⁸ Frank, Thomas (2020, April 13). Warning on killer virus was preliminary – FEMA. *E&E News*: at <https://www.eenews.net/climatewire/ stories/1062857757> (paywalled original; pdf print at <https://bd02.github.io/external/Reorganized/ Sent%20to%20committees%20October%202020/Warning%20about%20killer%20virus%20was%20preliminary%20- %20FEMA%20%28referenced%20article,%20EE%20News%2020200413%29.pdf>). (National THIRA)

And keep going.

¹³⁹ U.S. Department of Homeland Security (2021, February 25). Risk-based core capabilities, pp. 9, 24, 33-34, A-1-2, 13-14, 17-18, 20-22, 26- 29, 31, 47, B-1-3, 11-12, C-3, 5, D-13, E-8-9, F-12, G-16, H-1-2, 9, 12-13, 24-28. Preparedness grants manual. At https://www.fema.gov/sites/ default/files/documents/FEMA_2021-Preparedness-Grants-Manual_02-19-2021.pdf.

¹⁴⁰ DHS 2020 national preparedness report p. 2. FEMA continues to use this information in its ‘data-driven policy decisions’ (note 123), in place of the SNRA or equivalent (real) risk data.

¹⁴¹ 2/9/21 production pp. 73-265 (non-redacted pp. 1-72 and 266-302 were already public, but responsive [they answered part of the question that I asked]). FEMA’s responses to requests #1 (2/9 production pp. 303-304), #6 (2/9 interim response letter), and #9 (4/9/21 production) were fully responsive. Request, responses, and records are at <https://bd02.github.io/external/Reorganized/Other/FOIA%202020-FEFO-00401/>.

¹⁴² NPD 28-1 paragraphs 6-8.

authority¹⁴³ are based on the 2015 Strategic National Risk Assessment.¹⁴⁴ Any claim that FEMA makes that some other product that the agency is using – to the extent that that claim involves those ‘risk-based’ Core Capabilities in some way – is a ‘risk’ assessment is valid only to the extent that the 2015 SNRA is valid,¹⁴⁵ and to the extent that the Core Capabilities reflect what the 2015 SNRA actually says.¹⁴⁶

All FEMA is doing is

- a) Taking a science-based national risk assessment that, by design,¹⁴⁷ is based on accountable evidence that anyone can question;¹⁴⁸
- b) Creating another layer in between [that risk assessment and the next layer (c)];¹⁴⁹
- c) Basing a new ‘risk-based’ tool that, by design, is accountable to nobody except the leaders of the day,^{150, 151} on top of that constructed ‘risk-based’ layer;¹⁵²
- d) Asserting that the original risk assessment – the one that the replacement product’s claimed connection to ‘risk’ rather than ‘something we made up’ depends on – never existed;¹⁵³ and
- e) Counting on the reader to not look up the document that its descriptions of the new layer repeatedly cite as their ‘risk’ based source.¹⁵⁴

That’s it. That’s really all it is. You don’t even need Google to find it. Just look up the source that FEMA cites (the National Preparedness Goal), on FEMA’s website.¹⁵⁵

FEMA is still using the SNRA. It’s just doing so in a way that completely removes 1) the SNRA, 2) the planning assumptions FEMA took from the SNRA, and 3) the decisions that DHS and FEMA base on

¹⁴³ DHS (2018, May). Comprehensive preparedness guide (CPG) 201 pp. 5-6, 11-15, 19-31, 33-40. At <https://www.fema.gov/sites/default/files/2020-07/threat-hazard-identification-risk-assessment-stakeholder-preparedness-review-guide.pdf>.

¹⁴⁴ U.S. Department of Homeland Security (2015, September 30). Risk and the Core Capabilities. National preparedness goal, 2nd edition, pp. 4-5. At <https://www.fema.gov/sites/default/files/2020-06/national-preparedness-goal-2nd-edition.pdf>.

As noted above, that interpretation was off in some ways which turned out to be very consequential. This section doesn’t focus on the validity of that claimed connection with the invisible risk assessment, but on the internal consistency of FEMA’s separate claims to have 1) replaced the risk assessment 2) with other information products which 3) depend on that risk assessment for their claimed validity in the first place.

¹⁴⁵ NPD 28-1 paragraphs 8 and 9. FEMA FOIA 2020-FEFO-00401 request p. 2, <https://bd02.github.io/external/Reorganized/Other/FOIA%202020-FEFO-00401/Request%20letter%2020200218.pdf>, 2/9/2021 production pp. 303-304, <https://bd02.github.io/external/Reorganized/Other/FOIA%202020-FEFO-00401/Production%20pp.%20303-304.pdf>.

¹⁴⁶ This was the National Preparedness System’s failure point in 2020. The failure point for 2017 was the unavailability of the SNRA’s information to enterprise partners (figure 2).

¹⁴⁷ The 2015 SNRA explicitly incorporated into its instructions OMB’s Information Quality Act (IOA) standards for highly influential scientific assessments of risk to health, safety, and the environment that are used to inform government decisions. SNRA instructions to contributors, at <https://www.courtlistener.com/docket/6284501/24/3/public-employees-for-environmental-responsibility-v-united-states-/000001-43>, esp. 000011-13 (pp. 2-4 of the SNRA 2015 Risk Summary Sheet and Template).

¹⁴⁸ Graham, John D. (2002, March 21). OMB’s role in overseeing information quality. Remarks, National Academy of Sciences, page 10. OMB: at https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/assets/OMB/info-foreg/info-quality_march21.pdf.

¹⁴⁹ DHS (2018, May). Comprehensive preparedness guide (CPG) 201, pp. 7, 11-14 (using Core Capabilities to define risks). At <https://www.fema.gov/sites/default/files/2020-07/threat-hazard-identification-risk-assessment-stakeholder-preparedness-review-guide.pdf>.

¹⁵⁰ NPD 28-1 paragraphs 3, 11, 12, 13, 14, 15, 16, 17.

¹⁵¹ SNRA FAQ p. 4, *Don’t FEMA and its stakeholders already have other all-threats/all-hazards risk management tools?*

¹⁵² Federal Emergency Management Agency (2019, July 25). Pages 2, 5-10, 16-17 (defining what the Nation’s top risks are as those which most challenge a specific set of pre-defined capabilities that were defined by what the Nation’s top risks are). 2019 National THIRA: overview and methodology. At <https://web.archive.org/web/20190725231745/https://www.fema.gov/media-library/assets/documents/18147>.

¹⁵³ NPD 28-1 paragraphs 8, 9, 11, 13, 16, 17.

¹⁵⁴ U.S. Department of Homeland Security (2015, September 30). Risk and the Core Capabilities. National preparedness goal, 2nd edition, pp. 4-5. At <https://www.fema.gov/sites/default/files/2020-06/national-preparedness-goal-2nd-edition.pdf>.

¹⁵⁵ At <https://www.fema.gov/>.

those planning assumptions from all political,¹⁵⁶ scientific,¹⁵⁷ stakeholder,¹⁵⁸ and legal¹⁵⁹ accountability whatsoever – even internal accountability¹⁶⁰ – every time it uses, or claims to be using, one of those ‘something-elses’.

¹⁵⁶ Notes 104-115.

¹⁵⁷ Notes 116-119.

¹⁵⁸ Notes 122-128.

¹⁵⁹ Notes 120-121.

¹⁶⁰ FEMA internal orders 2/21/2017, 3/26/2019, 5/11/2021.

Information Quality Act

None of that should have happened.

Everybody makes mistakes. But the mistakes in themselves weren't the problem.

The problem is that DHS excluded the scrutiny needed to *correct* those mistakes. That is the critical outside scrutiny that any information needs to be safe to use.

The 2015 SNRA explicitly adopted the peer and public review requirements of OMB's information quality standards for U.S. Government risk assessments.^{161, 162} These standards connect the sometimes philosophical-sounding practices which science has developed over centuries, to hold itself accountable – to the very real people and very consequential things that DHS exists to protect.¹⁶³

When information is used to direct and coordinate really important things, really good things can happen if that information is good. But really bad things can happen if that information is bad.

These information quality standards are meant to ensure that the information that the Government uses to *make* important decisions, and to explain and *justify* important decisions so our employers can hold us accountable for those decisions, is good information rather than bad information.

A lot of really bad things happened because we didn't do that.

But that isn't in the past. It's still going on. We're still doing it.

¹⁶¹ SNRA instructions to contributors, at <https://www.courtlistener.com/docket/6284501/24/3/public-employees-for-environmental-responsibility-v-united-states/> 000001-43, esp. 000011-13 (pp. 2-4 of the SNRA 2015 Risk Summary Sheet and Template).

¹⁶² OMB (2002, February 22). Guidelines for ensuring the quality, objectivity, utility, and integrity of information disseminated by Federal agencies. At <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/assets/OMB/fedreg/reproducible2.pdf>.

- OMB (2004, December 16). Final information quality bulletin for peer review. At https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/assets/OMB/fedreg/2005/011405_peer.pdf.
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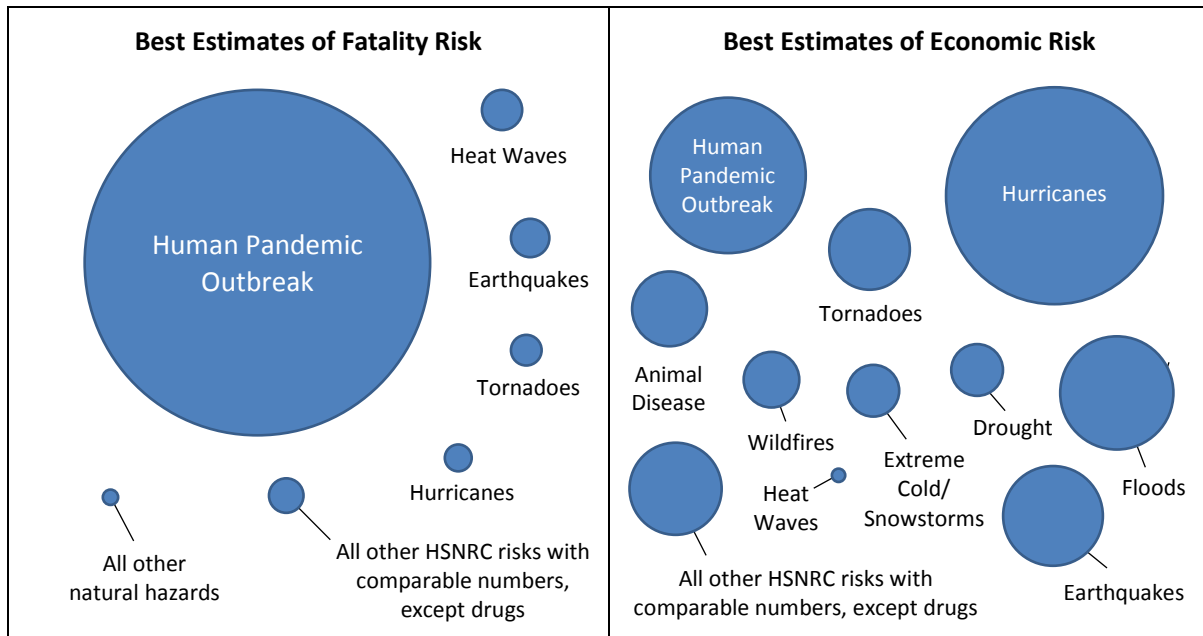
These standards implement OMB's interpretation of the Information Quality Act (section 515, <https://www.govinfo.gov/content/pkg/PLAW-106publ554/pdf/PLAW-106publ554.pdf#page=156>).

¹⁶³ SNRA FOIA appeal (2018).pdf blue-banded pdf pages 1-4 (unnumbered two pages 9/24/2018 appeal + pp. 1-2 of 11/1/2017 appeal).

Additional charts

FIGURE 3: HSNRC 2013 WITH ILLICIT DRUGS (INCLUDED TO AVOID BEING MISLEADING).

Homeland Security National Risk Characterization 2013 with Drugs



Fatality risk

Economic risk

