May 2023

Hello –

The Strategic National Risk Assessment (SNRA) is the national risk assessment that the U.S. national preparedness system is based on.[[1]](#footnote-1), [[2]](#footnote-2) I was the technical lead for FEMA’s 2015 update.

The SNRA’s unclassified documentation (attached) was supposed to go out to every state, tribal, territorial, Federal, and community emergency manager in the Nation in 2015.[[3]](#footnote-3) It got buried instead. That was originally my fault,[[4]](#footnote-4) but I haven’t been able to undo that since.[[5]](#footnote-5)

Please note that I am not speaking for DHS or FEMA in this letter. In case that isn’t obvious by now, I wanted to make sure you knew that up front. I’m cc-ing DHS and FEMA for their awareness, not to suggest their endorsement.

## Context and justification for lawful disclosure

### Context

FEMA claimed the updated SNRA as the risk basis of its updated plans and requirements,[[6]](#footnote-6) but then buried its data and documentation so no one could question those claims.[[7]](#footnote-7) Some of those claims turned out to be wrong,[[8]](#footnote-8) and those errors caused additional loss of life in 2017 [[9]](#footnote-9) and 2020.[[10]](#footnote-10) But rather than correct them, we’re covering them up.[[11]](#footnote-11) FEMA is vested in them now.[[12]](#footnote-12)

I’m sending this to you directly because you were supposed to have gotten it seven years ago; a lot of bad things happened because you didn’t;[[13]](#footnote-13) I haven’t been able to get it to you any other way, including the media;[[14]](#footnote-14) it will never get to you otherwise, for the reasons referenced above and below; and because those reasons are problems in themselves.[[15]](#footnote-15), [[16]](#footnote-16), [[17]](#footnote-17)

### Impunity, accountability, and truth issues

In addition to the reasons above, I’m sending this unclassified documentation to stakeholders to break through a chicken and egg problem which is keeping it trapped: its invisibility to enterprise users, which resulted from its censorship by other parts of DHS and FEMA in the past, is now enabling the fraud that is keeping it invisible in the present to continue.

Since December 2016 or January 2017,[[18]](#footnote-18) in channels below the threshold of most partners’ awareness, FEMA has protected this risk assessment from scrutiny by insisting that everything that we tell you about it – and the ‘risk-based’ capabilities and grant requirements that are supposedly based on it (note ) – is actually false, and always has been.

* In some contexts, FEMA insists that this ‘risk basis’ of the ‘risk-based’ national preparedness system and requirements that the agency puts on state and local governments — is actually only a draft that never got approved,[[19]](#footnote-19) going back to 2011.[[20]](#footnote-20)
* In other contexts, FEMA insists that we actually replaced this risk assessment a long time ago (without telling anyone, but that’s another issue[[21]](#footnote-21)) with one or more different master risk products that are... based on the risk assessment that we’re not using and never used.[[22]](#footnote-22)

At first, FEMA confined these stories to the quiet administrative pathways of the FOIA process[[23]](#footnote-23) and internal inquiries.[[24]](#footnote-24) Since April 2019, those conflicting falsehoods have been nailed in place by sworn statements by FEMA leaders in Federal court.[[25]](#footnote-25) FEMA stands by these conflicting falsehoods today,[[26]](#endnote-1) and I can’t get FEMA, DHS, or the Justice Department to correct them.[[27]](#endnote-2)

The incoherence of FEMA’s versions of reality makes it impossible to solve these problems behind closed doors.[[28]](#endnote-3) It’s hard to report fraud when you always have to argue what is and is not true in the first place, and always lose. Since the parts that are not true are untrue because they make no sense whatsoever, trying to explain how they are not true – or trying to explain them at all – is always a losing battle, whether inside or outside FEMA.

But it is possible to establish what is true, for things that are true because they exist in fact, like the science attached to this letter. Although that too (establishing what is true) is a lost cause inside FEMA while the fraud which is trapping this thing controls there, it is possible to do on the outside. So I’m doing that now.

### Disambiguation

The ‘National Risk and Capability Assessment’ referenced in FEMA’s national preparedness reports to the President[[29]](#endnote-4) and public website[[30]](#endnote-5) is the fictional replacement risk assessment referenced in *Substantiation…pdf* note 141, page 18.[[31]](#endnote-6) It is part of the same cover story (albeit with some contradictory falsehoods [*ibid.* page 9]) as the fictional history which the FEMA organization to which I belonged at the time invented from whole cloth to defeat a FOIA suit for the SNRA’s documentation in 2019.[[32]](#endnote-7)

To confuse things further, in the fictional narrative in which it lives, the property that makes this imaginary tool a ‘risk assessment’ is that it is based on the real risk assessment that FEMA is using it to suppress.[[33]](#endnote-8) While this mailing should make further suppression of the real thing moot, that claimed connection could cause more confusion if I didn’t clarify it here. The science attached to this letter does not support imaginary things, or its own suppression, or perjury, or insubordination, or fraud.

### Continued relevance

FEMA used the ‘risk-based’ authority of the SNRA to shield the agency’s core decisions from political accountability, while shielding the source of that authority from the critical scrutiny and correction that science depends on to hold itself accountable in place of elections.[[34]](#endnote-9) By separating the authority of the evidence from the evidence itself, and locking that evidence tightly away so that no one could question that claimed authority, FEMA turned the science-based master risk assessment that was supposed to be a powerful engine of accountability into a blank check for bad decisions instead.[[35]](#endnote-10)

FEMA’s suppression of this risk data made communities plan to the wrong risks and build the wrong capabilities in the years leading up to the 2020 pandemic. The reason is that while the risk assessment itself turned out to be right, the constructs and measures which operationalized the agency’s understanding of what it said were not.[[36]](#footnote-26)

The problem with FEMA’s contrivance of an imaginary ‘replacement’ is that because it doesn’t actually replace anything – the science that FEMA now wishes had never existed is still there, it’s just masked with another layer of narrative – it locks in those lethal errors for years to come, instead. So you still need the real thing.

### Perspective and justification for disclosure

There are many things that FEMA says are very important to it that haven’t happened because we prevented them from doing so, while representing otherwise. I don’t know how widespread these problems are in FEMA, but all the ones that I know of are connected to risk, and this risk assessment in particular.

In 2011 and 2015, DHS and FEMA redesigned the U.S. national preparedness system to be dependent on a specific tool for its basic functioning: a master risk engine that connected everything that FEMA and its Federal, state, and local government partners do with math, science, and evidence. And then it disappeared. That broke the system. And when the system was seriously challenged for the first time in 2017 and again in 2020, it failed, and a lot of people died. That broken system, and our responsibility for breaking it, is what we are covering up.

I was supposed to get this tool to you seven years ago, but I didn’t. I’m sending it to you now to stop these problems from compounding further, and to help my organization speak truthfully about FEMA’s risk data in the future.

### Notes

I am not speaking for my Department or Component (DHS/FEMA), any past or present DHS organization, or any past or present colleagues. I will forward this email and attachments to other parts of DHS, FEMA, and other Federal parts, including my own management, once I’ve finished sending these letters to other states.

Everything is unclassified, and non-security sensitive.

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

I apologize for the awkwardness of this letter.

Andrew Janca, PhD

[andrew.janca@fema.dhs.gov](file:///C:\Users\for-l\Documents\Github\risk\docs\5_U.S.C._2302_justification\20230301\NC_20230327\andrew.janca@fema.dhs.gov)

1. *Big picture...pdf*. [↑](#footnote-ref-1)
2. U.S. Department of Homeland Security (2015, September 30). Risk and the Core Capabilities. National preparedness goal pp. 4-5, <https://www.fema.gov/sites/default/files/2020-06/national_preparedness_goal_2nd_edition.pdf>. First edition (2011-15), <https://www.fema.gov/pdf/prepared/npg.pdf> pp. 3-4. [↑](#footnote-ref-2)
3. *Final notes*, SNRA 2015 Findings page 20 (*Consolidated SNRA* [first attached] front matter, page F-26). [↑](#footnote-ref-3)
4. *SNRA FAQ 20190319* page 2 (*How this happened*). [↑](#footnote-ref-4)
5. *Detail...pdf* page 3. [↑](#footnote-ref-5)
6. DHS (10/02/2015).  Risk and the Core Capabilities.  National preparedness goal pp. 4‑5, <https://www.fema.gov/sites/default/files/2020-06/national_preparedness_goal_2nd_edition.pdf>. DHS (2/27/2023). Risk-based core capabilities, pp. 8, 24-25, 34-35, A-1-2, 14, 18-19, 21-23, 28-31, B.1-3, 12, C-2, 5, D-13, E-8, F-13, G-16-17, H-1-3, 12, 15-16, 29, 31-35, 38, 42. Preparedness grants manual. At <https://www.fema.gov/sites/default/files/documents/fema_gpd-fy-23-preparedness-grants-manual.pdf>. [↑](#footnote-ref-6)
7. *Substantiation...pdf* pp. 1-2, 8-11, 15-18. [↑](#footnote-ref-7)
8. *Detail...pdf* pp. 1-2. *Substantiation...pdf* pp. 7-8, 10-11, 13, 19. [↑](#footnote-ref-8)
9. *SNRA follow-up letter...pdf* sections 1, 5, section 6 (*Small picture*). *Detail...pdf* pp. 1-2 (*Maria*). *Substantiation...pdf* pp. 12-14. [↑](#footnote-ref-9)
10. *SNRA follow-up letter...pdf* sections 2, 5, section 6 (*Big picture*). *Substantiation...pdf* pp. 1-10, 12-13, 19. [↑](#footnote-ref-10)
11. *Substantiation...pdf* pp. 8-10, 13, 15-19. *Disambiguation* below. [↑](#footnote-ref-11)
12. *Substantiation...pdf* pp. 9, 16 note 121, 18 note 141. *Disambiguation* below. [↑](#footnote-ref-12)
13. *SNRA FAQ 20190319* page 4 (*Why does a highly technical product that was made by experts need outside critics?*). *SNRA FOIA appeal 20171101.pdf* page 12 (*Relevance*). Notes , above. [↑](#footnote-ref-13)
14. E.g. *Press letter 20220901.pdf* (the core letter [the last email in the common chain], which I then forwarded to other national and regional media recipients). The additional letters included in the binder [https://5usc2302.github.io/risk/short/Press letters 2021-22.pdf](https://5usc2302.github.io/risk/short/Press%20letters%202021-22.pdf) also include the full email loop with my notifications to management, and back to the media recipients that I’d done so so they would know that it was okay to talk to DHS or FEMA directly. None of these attempts to get this information to the SNRA’s stakeholders through the media, or any third party, were successful. [↑](#footnote-ref-14)
15. Political accountability, *SNRA FOIA appeal...pdf* pp. 1-2, and remainder of this letter. [↑](#footnote-ref-15)
16. Impunity, *NTHIRA FOIA...pdf* page 5. *Detail...pdf* page 3 end. This letter pp. 2-3. [↑](#footnote-ref-16)
17. Truth issues, *Detail...pdf* page 3. This letter pp. 2-3. [↑](#footnote-ref-17)
18. Estimated decision date based on 30 working days after FEMA’s 10/21/2016 receipt of my first FOIA request 2017-FEFO-00165 (<https://5usc2302.github.io/risk/2017-FEFO-00165/>), but I don’t actually know. FEMA didn’t send its first response with a decision until August 2017. [↑](#footnote-ref-18)
19. *What’s missing.pdf*. *SNRA FOIA appeal...pdf* pp. 1-9. *Substantiation…pdf* pp. 15-16. FEMA correspondence referenced in note above. Reference of note below. [↑](#footnote-ref-19)
20. *Substantiation...pdf* pp. 16 note 121(2)**A**(b).  *What’s missing.pdf* pages 14/14a - 20/20a (2011 content). Full version, [https://web.archive.org/web/20221211021435/https://5usc2302.github.io/risk/5\_U.S.C.\_2302\_justification/What's\_missing\_for\_OSC.pdf](https://web.archive.org/web/20221211021435/https:/5usc2302.github.io/risk/5_U.S.C._2302_justification/What's_missing_for_OSC.pdf) pp. 000350 – 000557 (pdf pages 535-950) (2011 content). [↑](#footnote-ref-20)
21. *NTHIRA FOIA...pdf* pp. 1-2, *Substantiation...pdf* pp. 15-16 esp. note 121, and reference of note below. [↑](#footnote-ref-21)
22. *Substantiation...pdf* page 16 note 121(2)**B**(b) and pages 17-18. Section *Disambiguation* below. [↑](#footnote-ref-22)
23. *Substantiation...pdf*notes 8, 10 (the correspondence itself is at <https://5usc2302.github.io/risk/2017-FEFO-00165/>). The advantage of FOIAing your own office is that you can see where you’re being lied to (*Supporting files and context / What’s missing.pdf*). [↑](#footnote-ref-23)
24. Inquiries from FEMA personnel (2015-present), partner agencies (2016-present), the incoming Trump Administration (2017-18), Justice Department attorneys (2018-19), Congress (2019-present), OMB (2020-present), the incoming Biden Administration (2021-22). I’m sure there are others, I’m just listing the ones that I know of. [↑](#footnote-ref-24)
25. DHS/FEMA National Preparedness Directorate (NPD) (4/30/2019) *PEER v. DHS* (1:18-cv-00158-ckk D.D.C.) declaration 28-1, <https://www.courtlistener.com/docket/6284501/28/1/public-employees-for-environmental-responsibility-v-united-states/>, paragraph 8 and other parts. See *Substantiation...pdf* page 16 note 121 and *NTHIRA FOIA...pdf* pp. 1-2. [↑](#footnote-ref-25)
26. NPD (4/30/2019) declaration 28‑1, current status in docket at <https://www.courtlistener.com/docket/6284501/public-employees-for-environmental-responsibility-v-united-states/>. The court ruled in DHS’s favor in December 2021 (document 33, <https://www.courtlistener.com/docket/6284501/33/public-employees-for-environmental-responsibility-v-united-states/>). [↑](#endnote-ref-1)
27. E.g. the October 2020 email at the bottom of the chain, *Press letter 20220901.pdf* (follow-ups [not included] 7/5/2021, 6/27/2022). Note: Those letters focus on the contradictions between the stories themselves, as opposed to the contradictions between those stories and the truth, because they are immediately obvious. The stories that FEMA uses to evade responsibility for having failed to anticipate the pandemic contradict the stories we used to bury the science that did (*Substantiation…pdf* page 9). [↑](#endnote-ref-2)
28. *Detail...pdf* pp. 3-4. [↑](#endnote-ref-3)
29. <https://www.hsdl.org/?view&did=873847> 16, 25, 54-56. [↑](#endnote-ref-4)
30. At <https://www.fema.gov/emergency-managers/risk-management/risk-capability-assessment>. [↑](#endnote-ref-5)
31. It includes some real components (including the formerly but no longer fictional ‘National Threat and Hazard Identification and Risk Assessment (THIRA)’ of note , *NTHIRA FOIA…pdf* pp. 1, 4). But they all share the same two problems:

    They aren’t risk assessments themselves, but risk management tools; and

    Their only real ‘risk’ inputs come from the [real] national risk assessment that the agency is using them to suppress (*Substantiation…pdf* pp. 17-18).

    FEMA just bundled those risk management tools together and gave the collection a name which makes it sound like there’s some new risk assessment in there somewhere, but there isn’t. It’s just a name in a slide deck. There’s nothing inside. [↑](#endnote-ref-6)
32. The court case referenced above (*Impunity*). *NTHIRA FOIA…pdf* pp. 1-2, *Substantiation…pdf* p. 16 note 121. [↑](#endnote-ref-7)
33. *Substantiation…pdf* pp. 17-18, esp. page 18 note 141. [↑](#endnote-ref-8)
34. *Ibid.* pp. 15-16. [↑](#endnote-ref-9)
35. *Ibid.* pp. 3, 9, 12. [↑](#endnote-ref-10)
36. *Ibid.* pp. 9-10, 13. [↑](#footnote-ref-26)