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March 8, 2022

FEMA Colleagues:

IAEM-USA would like to thank you for the opportunity to provide input on the *Supplemental Response Teams (SRT) Concept of Operations (CONOPS) Operational Draft*. We are not submitting line by line changes to the document **because IAEM cannot support this program or the concept as currently written**. We have outlined the reasons for this position below.

One of the basic tenants of Emergency Management is to utilize all internal resources and supporting or lateral mutual aid resources before requesting resources from the next higher level. This program does not build on that principle. The SRT should be an internal federal government program that pulls from other federal agencies first. The federal government is a significant employer and exhausting those resources should come well before attempting to leverage state, local, tribal, and territorial (SLTT) partners.

Additionally, SLTT partners are already taxed well beyond their current capacity even when they are not responding to an event or incident. Our profession is still growing and many small, rural jurisdictions still employ only part-time personnel or staff with duties including Emergency Management along with additional responsibilities. This leaves the burden of supplying a workforce to fit the SRT concept to larger jurisdictions who are likely already participating through mutual aid programs like EMAC. The success of your proposal as written hinges on advocating from the highest level, the need for professionally managed and funded Emergency Management programs in order to fully distribute a workforce through all jurisdictional levels. SLTT bandwidth is also a factor when looking at the extensive process to even qualify as a SLTT AHIMT for the SRT program and allocating additional training hours for SLTT partners to make decisions on how they align their priorities to protect their communities or engage in additional specialized training.

IAEM-USA recommends further stakeholder engagement and rewriting the program to focus on internal federal resources as the primary audience with an option for SLTT partners to participate if interested. We share your desire in developing a skilled and deployable workforce within the nation; however, the ways in which we see this support implemented currently differ. Before relying on SLTT partners in a federal capacity, we must build and strengthen capacity at the local level so we do not unintentionally leave SLTTs shorthanded in simultaneously occurring events. Until that capacity is strengthened, we feel it is best to engage other federal resources in developing SRTs.

We greatly appreciate the opportunity to review and comment on this concept and document, however additional time would have been helpful given the bandwidth challenges faced by all SLTT partners. We are committed to assisting with the development of FEMA programs and policies and would prefer to do that through engagement in the early stages of the process. **Our membership represents the pulse of the profession and industry that can provide you with a unique look into your stakeholders.** We look forward to working with you to engage SLTT partners and identify opportunities for utilizing federal workforce to augment FEMA's response to disasters.

Sincerely,

IAEM Government Affairs Committee