



November 16, 2009

The Honorable Janet Napolitano
Secretary
U.S. Department of Homeland Security
Washington, DC 20528

Dear Secretary Napolitano,

The National Association of Regional Councils (NARC), representing regional planning organizations and their local elected officials nationwide – large, small, urban and rural – including metropolitan planning organizations (MPOs) and councils of governments (COGs), is concerned about a recent announcement by Federal Emergency Management Agency's (FEMA) Grants Program Directorate that changes the interpretation of federal policy regarding the use of preparedness grant funds to sustain homeland security investments. We recommend this policy be amended to reflect original Congressional intent, which encourages both the development and sustainment of regional capabilities to prevent, respond to and recover from natural and manmade disasters. This recommended policy interpretation would allow for flexibility in the use of homeland security grant funding for sustainment of capabilities, including the cost of user fees, equipment maintenance and ongoing training and exercise activities, no matter the original purchase timeframe or grant year. This policy change is of particular importance to the safety and security of our communities, and is more urgent given limited municipal budgets.

According to the FEMA policy change, "grantees may use FEMA preparedness grant funding to pay for maintenance agreements, user fees, and other sustainment costs" as long as the cost of the materials purchased "fall within the performance period of the grant that was used to purchase the equipment." This prevents grantees from using any future year preparedness grant funding to pay for additional agreements and user fees. This change would jeopardize vital local and regional planning, equipment expenses and projects that protect communities. For example some regions use this funding to:

- Support specialty response teams, including hazardous materials response teams. These teams have been equipped with specialized equipment that requires calibration and regular maintenance by equipment vendors or experts. Local agencies maintain the equipment on a daily basis and provide trained personnel to make use of it on behalf of a region, but the recalibration and extensive upkeep is beyond their financial ability. If the equipment is not maintained, a region will lose its achieved level of response capability; or,
- Support regional Geographic Information Systems (GIS) to allow local agencies to share GIS data for emergency planning and response. The license fees associated with these types of systems, which benefits numerous agencies in a region, are required for ongoing use and maintenance.

NARC encourages an immediate fix to this policy change and offers any assistance to strengthen the federal, state, local and regional partnership that is critical to bolstering our preparedness and response in the case of natural or manmade disasters. Please do not hesitate to contact Fred Abousleman, NARC's Executive Director, at fred@NARC.org or 202.986.1032, x216 for more information.

Sincerely,

Stephen T. Cassano
President, National Association of Regional Councils
Selectman, Town of Manchester, CT

Cc: The Honorable Craig Fugate, Administrator, FEMA, U.S. Department of Homeland Security
The Honorable Peter Orzag, Director, Office of Management and Budget
Members of the U.S. House of Representatives Homeland Security Committee
Members of the U.S. Senate Homeland Security and Governmental Affairs Committee