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Federal Emergency Management Agency
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Director Matthew Redding,

The Institute for Diversity and Inclusion in Emergency Management (I-DIEM) appreciates the opportunity to provide Public Comment on revisions and updates to the *Comprehensive Preparedness Guide 101: Developing and Maintaining Emergency Operation Plans* (CPG 101). I-DIEM's mission is to serve as a resource and advocate for diversity and inclusion in Emergency Management. I-DIEM leads efforts to increase representation of women and people of color in the field of emergency management, including in positions of leadership, through awareness, training and education. I-DIEM serves as the conduit for research on diversity and inclusion, social equity and the practical application of equitable Emergency Management practices to improve outcomes and build resilience. The impacts from disasters that have occurred over the decade since the last update of *CPG-101* (2010) demonstrate the negative, disproportionate impact of more frequent and powerful disasters on marginalized communities and individuals. This response to the CPG-101 update supports I-DIEM's goal to educate and train the emergency management enterprise on diversity, inclusion and equity issues as it relates to women, people of color, people with disabilities, LGBTQ, various religious beliefs, low-income, disadvantaged communities, and other underrepresented groups within each phase of emergency management. I-DIEM believes that leveraging and integrating diversity, inclusion, and equity will produce numerous emergency management benefits including limiting fatalities and injuries, increasing trust in government, building response and recovery capacity, reducing disaster costs, and improving the effectiveness and efficiency of the emergency management enterprise.

Importance of Emergency Operations Plans and the Planning Process

The integration of diversity, inclusion, and equity is uniquely important within emergency planning. Emergency planning is a critical activity conducted on all levels of government and by private and non-profit organizations. As noted in CPG-101, "planning identifies tasks, allocates resources to accomplish those tasks, and establishes accountability." The emergency planning process and Emergency Operations Plans (EOP) in most cases determines priorities and includes assumptions that influence response and recovery decisions. Planning is essential for ensuring the effective allocation of limited resources to respond to all-hazard emergencies. Unfortunately, numerous examples- both historically and in the last two decades- have highlighted systemic gaps in disaster planning that has contributed to unsuccessful operations. FEMA's inclusion of the "Whole of Community" concept was a needed addition in the 2010 update, but more is needed beyond awareness and it must be done in response to the disproportionate impact of disasters on those who are marginalized and underserved. Emergency planning should intentionally reference and integrate the concepts of diversity, inclusion, and equity as a fundamental principle and goal of emergency management. Leveraging diversity, inclusion, and equity to clearly prioritize vulnerable populations would make CPG-101 a more impactful guide for the Emergency Management Enterprise and further to goal of building a more resilient nation.



Disproportionate Impact of Disasters

Numerous natural disasters have indiscriminately impacted large swaths of the United States over the last decade. These disasters continue to demonstrate the need for emergency planners and community leaders to understand how historical and existing exclusionary and discriminatory practices increase the risks and impacts of disasters on specific individuals and communities. Those most vulnerable to disasters are consistently not fully considered in disaster planning, to include communities of color, women, low-income individuals, people with access and functional needs, and other marginalized individuals. Emergency management practices should be included in this analysis since a long history of biased planning and resource allocation policies have contributed to creating distrust in government for many marginalized individuals and communities.

Emergency planning must understand the historic and existing barriers that create and heighten vulnerability. Disasters act as “shocks” to communities, amplifying and exacerbating the existing inequities experienced by those lacking resources and excluded from “mainstream” disaster planning approach. Further contributing to the issue is the lack of diversity within the profession of emergency management from a racial and gender perspective. This lack of diversity combined by the failure to integrate cultural competence and fully understanding and respecting the unique attributes of communities has resulted in a disconnect leading to non-inclusive and inequitable emergency plans. Each phase of emergency management is then negatively impacted. Preparedness, mitigation, prevention, response, and recovery plans consistently fall short of meeting the needs of those individuals and communities requiring the most support. As noted in *FEMA’s Building Cultures of Preparedness: Report of the Emergency Management Higher Education Community*, “to meet the challenge, professionals in the field of emergency management must better understand the communities, peoples, and varied populations that they hope will become “better prepared.” The report also states that, “these households are not at risk simply due to their exposure when disaster threatens; they live in a state of permanent emergency resulting from socio-economic conditions and marginality that make each day precarious”. Recognition of the causality of vulnerability and intentional inclusion of diverse stakeholders is required in order to improve emergency planning.

Examples of research findings of the attributes which contribute to vulnerability include:

- People in lower income brackets often live in the most vulnerable housing and lack the resources to undertake recommended loss-reduction or evacuation measures. (Insurance Institute for Business & Home Safety)
- “People with disabilities may be unable to undertake self-protective actions before, during or after disasters.” According to a 2006 Census Bureau report commissioned by the National Institute on Aging, almost 20% of the U.S. population age 65 and older report some level of disability.” (Insurance Institute for Business & Home Safety)
- “Low-income individuals and families often live in lower cost homes that are less able to withstand disasters.” (Insurance Institute for Business & Home Safety)



- “Communities of color and other frontline communities tend to live in the most at-risk environments and are more vulnerable to the negative impacts of these kinds of events due to a range of preexisting factors.” (*In the Eye of the Storm: A People’s Guide to Transforming Crisis & Advancing Equity in the Disaster Continuum*, Page 9)

The NAACP’s Report entitled *In the Eye of the Storm: A People’s Guide to Transforming Crisis & Advancing Equity in the Disaster Continuum* provides a comprehensive overview of the issue:

“Emergency planners often do not consider communities of color, low-income communities, nursing home facilities, people with disabilities, women, LGBTQ people, and incarcerated persons when they plan emergency transportation needs, evacuation routes, shelter needs, food and clean water access, utility shut-offs and reconnection processes, medical needs, etc.” (Page 11)

Equitable Emergency Planning

“Social Equity” is defined as the “fair, just and equitable management of all institutions serving the public directly or by contract, and the fair and equitable distribution of public services, and implementation of public policy, and the commitment to promote fairness, justice, and equity in the formation of public policy” (Standing Panel on Social Equity in Governance of the National Academy of Public Administration). Inequitable policies have led to the congregation of marginalized individuals in communities across the country. Equitable emergency planning is required due to the rising frequency of extreme weather caused by climate change and disproportionate impacts based on systemic biases.

Produced by consensus from 13 federal agencies, the *Fourth National Climate Assessment, Volume II Impacts, Risks, and Adaptation in the United States* found that communities of color will face increasing disproportionate negative impacts of climate change and extreme weather. The report states that “prioritizing adaptation actions for populations that face higher risks from climate change, including low-income and marginalized communities, may prove more equitable and lead, for instance, to improved infrastructure in their communities and increased focus on efforts to promote community resilience that can improve their capacity to prepare for, respond to, and recover from disasters” (Page 55).

The rising threat of more impactful natural disasters requires that emergency planners prioritize the needs and tailor preparedness, mitigation, protection, response and recovery approaches for those with the least access and means.

The last decade has featured several disasters that have had greater impact on vulnerable communities:

- **Hurricane Sandy, 2012:** Hurricane Sandy caused over 100 deaths in the United States mostly impacting those with access and functional needs who were without power and trapped in high-rise buildings, and unable to evacuate or procure supplies.



- **2017 Hurricane Season:** The 2017 Hurricane season devastated and displaced thousands of low income and communities of color in the South and Gulf States. Hurricane Maria resulted in the death of over 3,000 people in Puerto Rico. The loss of power for several months increased the period of suffering for the most vulnerable populations. Hurricane Irma resulted in the death of eight nursing home residents, ages 71 to 99, who died "following a prolonged outage" of the air conditioning system.
- **Wildfires, 2019:** The Camp Fire resulted in 85 deaths and displaced hundreds of thousands. Reports have found that people with access and functional needs were not adequately included and prioritized in disaster planning.

Recommendations

- Integrate Diversity, Inclusion, and Equity as Foundational Goal of Emergency Planning
- Prioritization of Vulnerable and Underserved Populations
- Integration of Social Vulnerability Assessments to Guide Disaster Planning
- Cultural Competence Training for Emergency Planners
- Diversify the Emergency Management Profession
- Increase Research and Improve Data Collection on Marginalized Populations and Disasters
- Inclusion of Diversity, Inclusion, Equity and Environmental Justice Subject Matter Experts in Emergency Planning
- Understand and Integrate Planning to consider the Relationship between Intersectionality and Increased Vulnerability

Closing

In summary, without intentional efforts to incorporate diversity, inclusion and equity within the CPG -101 update, the damaging impacts caused by a lack thereof will ensure that disproportionately biased planning, policy and funding decisions will continue to negatively affect underserved communities. Please review and carefully consider the significant recommendations made, herein. More time is required over the next few months to more directly engage subject matter experts to ensure that diversity, inclusion and equity is properly leveraged. By doing so, FEMA can avoid loss of public trust, heightened scrutiny, loss of life, and increased costs which result without bold, sustainable changes to emergency management planning practices. I-DIEM encourages FEMA to drastically improve the planning guidance to focus on diversity, inclusion and equity to better support the emergency management enterprise and the communities it serves across America. I-DIEM is pleased to provide more information on this important issue and believes that our organization can be a resource and collaborator to enact impactful change in this area.

All the best,

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