

SNRA – A partial FAQ – 2019/03/19

Nothing in this packet is intended to influence any legislation, law, ratification, policy, or appropriation.

The opinions I express are my own. They don't represent my organizations or leadership in any way.

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General

What this is about:

The Strategic National Risk Assessment (SNRA) is the risk basis of FEMA's doctrine, planning assumptions, and public narrative. It has been buried in DHS for seven years.

The former DHS Office of Risk Management & Analysis (RMA) created the SNRA for FEMA in 2011. FEMA updated the SNRA in 2015. I worked on both iterations, and was the technical lead for the second.

RMA's dissolution during the 2011 SNRA's final write-up interrupted its peer review and socialization, and buried it for three years.

Another complication was the SNRA's classification, which limited its utility for FEMA. FEMA's 2015 update focused on building out a fully unclassified version that its state and local stakeholders could see and use.

Since the 2011 SNRA never got to peer review or to FEMA's stakeholders, we explicitly wrote the peer and public review requirements of OMB's Information Quality Act (IQA) standards into the 2015 SNRA's instructions to ensure that these things would happen in 2015.¹

But they didn't: I messed up the rollout, and the SNRA got stuck again. And instead of the break-out-of-jail insurance we had counted on, our stress on the IQA reframed the SNRA in terms of the basic authority questions that DHS and FEMA are fighting today, and which have trapped it behind closed doors since.

I FOIAed my team's work in October 2016. The science advocacy group Public Employees for Environmental Responsibility (PEER) FOIAed it themselves a year later. I exhausted my administrative appeals in December, right before the shutdown. PEER's case has been in court since January 2018.

I am forwarding this to you because what will be done with the SNRA depends on decisions which can only be made by you.

- 1) The SNRA is a national risk assessment. The national policy and resourcing decisions that national risk assessments are used to inform in other countries belong to Congress in our system. You should have had this years ago: now you do.
- 2) Congress must represent the interests of the SNRA's state and local stakeholders in decisions that turn on information that cannot be shared outside the Federal Government. The SNRA involves such decisions.
- 3) The IQA issues. Truth has to be non-negotiable. The IQA standards that OMB wrote to implement the law articulate the reasons why that is so better than anything else I've ever seen. If you don't want to delegate their enforcement to the courts, then we need you to enforce them yourselves.

This unique planning tool that you – and its state, local, and whole community stakeholders – could have used for many things has been buried for seven years now, and seven disaster seasons, to no useful end. ~~And it shows little promise of getting un-buried any time soon, without outside intervention. So I thought it was time to pull you in.~~

Why are you sending this to us?

I am sending this to you because it has been stuck for seven years, and I do not think it will be resolved so long as it stays inside the Executive Branch, or any time soon in court.

This request was specific to the original recipients (Congress) and time (2019). The information has been public since August 2021 (<https://sus2302.github.io/risk>) [<https://web.archive.org/web/20220517093534/https://sus2302.github.io/risk/>]

The original audience for this document (i.e. the "you") was committee staff, but it is of general relevance.

¹ See records #6-#8, especially #6 and pp. 2-4 of #8.

The SNRA instructions to contributors, email 1/2 zipfile or at [https://sus2302.github.io/risk/Full%20documentation/Instructions%20and%20terms%20of%20reference%2020211-15%20Instructions%20and%20terms%20of%20reference%20\(compressed%20files\).zip](https://sus2302.github.io/risk/Full%20documentation/Instructions%20and%20terms%20of%20reference%2020211-15%20Instructions%20and%20terms%20of%20reference%20(compressed%20files).zip). #6 – Background & general guidance, #8 – Risk summary sheet instructions. (#7 [Qualitative data instructions] is valuable too, it just doesn't reference this point as directly.)

Why are you sending this to us now?

FEMA ended my last administrative appeal in December. PEER's lawsuit continues, and they will eventually win. However, the earliest scheduled date for the suit's possible conclusion puts it into the next hurricane season.

We made this thing to put the best tools we knew for managing a community's risks in the hands of state and local emergency planners. But seven disaster seasons for which they could have used it to help their communities prepare have already come and gone. FEMA is doing its best to make it right. ~~If any of your Members want this tool to get to their constituents before the next disaster season, it will have to get to them through you.~~

This request was specific to the original recipients (Congress and time (2019)). The information has been public since August 2021 (<https://5usc2302.github.io/risk> [<https://web.archive.org/web/20220517093534/https://5usc2302.github.io/risk/>])).

What are you asking?

- 1) Take ownership of this tool: you are a stakeholder.
- 2) Decide what should be done in the best interests of its state, local, private, and whole community stakeholders.
- 3) Decide the Information Quality Act (IQA) questions regarding the SNRA, DHS, and FEMA.

What are you sending?

The unredacted originals are attached to three emails from my work account. The FOIA-released versions are attached to the next two emails from my personal account (the account this FAQ is coming from).²

What if we have questions?

The coherent explanation and the most important parts are in the FOIA letter, the 2nd attachment (SNRA FOIA appeal (2018).pdf). The indirect presentation is deliberate, to put additional distance between my personal opinions on the points where I have to be most directly critical of my agency, and my work voice.

- Quick orientation: FOIA letter, first four pages.

The rest is in this FAQ. The FAQ format is to give some organization to the collection of disconnected leftover pieces of information that didn't fit into a coherent letter, but which you will also want to know.

Please keep in mind that FEMA's and DHS's SNRA problems are self-inflicted. Many are the product of mistakes, rather than design. Some things that make no sense in terms of rational interests may make more sense in that light.

Unless there is something that you really think that only I can answer, I would ask you to please direct your questions to FEMA Congressional Affairs or DHS Legislative Affairs when you can. I've put everything I can think of that you might want to ask me in this FAQ so you won't have to ask it again (which is why it's so long). But if you have more questions, please ask my Department or agency first. My leadership and my lawyers know I'm writing you, so it's okay on my end.

² The unredacted [they're all unclassified] originals are attached to emails 2/3 and 3/3 from my work account (andrew.janca@fema.dhs.gov). I've attached OCR-ed versions (records #1-#5, and the White House findings [PEER's record #9]) and the clean-PDF versions of #6-8 that FEMA sent PEER to emails 2/3 and 3/3 from this account (andrew.janca@outlook.com). Since the scanned-PDF FOIA-released versions that FEMA sent to me are very large (105 MB) I made the OCRs to get them small enough to email. I put the

What is FEMA's side of the story?

In its FOIA correspondence and court case, FEMA cites the deliberative process privilege: protecting the integrity of the deliberative or decision-making processes within the agency. No other mission interest is cited.

The most charitable interpretation I can put on FEMA's argument is that my agency is conceptualizing the SNRA as a policy document, whose authority comes from the final approver as opposed to its content. This would explain why the redaction pattern of the SNRA's documentation (records #1-#3) is the opposite of the legal standard: words and narrative are left alone while science and evidence are redacted, as though fact and opinion were switched. And it would be consistent with the agency's references to a concurrence process that DHS uses for policy documents, rather than the peer and public review for science and risk assessments that the 2015 SNRA's instructions describe.

My thoughts on this are in the FOIA letter, so I won't repeat them here.

How this happened

The SNRA has been a problem inside DHS for seven years. FEMA got very close to resolving it three years ago, with its 2015 update. But after the project was done, the White House decided it wanted to edit the findings. This probably well-meant, but clumsy intervention resulted in the SNRA getting buried again. It has been buried since.

I was largely responsible for the SNRA's getting buried again in 2015. The way I pushed back against the White House's intervention alienated people whose support we needed to roll it out. Since my decision-making role for the project ended at that point, my insight into FEMA's own decision-making ended then too. So I can't explain how my protest resulted in its burial (you will have to ask FEMA), I just know it did.

My FOIA attempt is one of the ways that I have been trying to undo the outcome of my decisions in the three years since. My team, and hundreds of contributors from all across DHS and the Government and more, worked very hard to make this complicated technical product into a tool that local emergency managers could use to assess their risks in a real and defensible way, and help their communities prepare for them. I flushed their work down the toilet. And even with PEER's very skillful and tenacious help, nothing that I have tried has succeeded in pulling it back out. One of the reasons I'm writing you is because I hope you may be able to help with that.

(committee staff)

Security

What about security?

There are no security issues. The classified information in the SNRA is classified by derivation: one piece of classified data classifies everything else downstream. Since the SNRA is a comparative analysis, the 2011 assessment's use of classified data for some events locked up the SNRA in its entirety.

FEMA's 2015 revision replaced some of the classified sources with unclassified alternatives, and moved the rest into a separate classified product. The result was a fully public-sourced unclassified product uncontaminated by sensitive information. We also were very careful to avoid creating new aggregation issues.³

I FOIAed only the unclassified documentation, to keep things simple.

FOIA-released-originals at https://www.dropbox.com/sh/4qhf99efizpsxc9/AAC_aqooldf7HKJVK2dn5PMKa?dl=0.

³ See the last page of the second attachment (SNRA FOIA appeal (2018).pdf) for additional detail on how we avoided creating information-sensitivity issues (I didn't repeat this part in the appeal letters because it was moot, so I added the two non-repeated pages at the back of the PDF to make the attachment self-contained. The original versions of all the correspondence are also attached as a zipfile).

Who-is-who questions

What is PEER, and how is it involved?

The Public Employees for Environmental Responsibility (PEER)⁴ is a science-advocacy organization which uses legal means, like FOIA, to protect Government science where it believes it is threatened.

I went to PEER for advice in August 2017 after FEMA's initial reply in my FOIA request. PEER made their own FOIA request in September 2017. Their case (1:18-cv-00158-CKK⁵) has been in court since January 2018.

Who are you?

I was a junior analyst for the classified 2011 SNRA; a middle-level risk analyst on related projects during the challenging transition of RMA's functions to DHS Office of Policy, where I 'inherited' the SNRA after the senior analysts who had been leading it left; and the technical lead for FEMA's 2015 revision. I was acting overall project lead in the months following the update's completion when the SNRA's forward progress stalled, before it could finish rollout.

I am not a lawyer. My PhD is in physics. National Integration Center, the DHS/FEMA office which led the SNRA update, was where I helped FEMA with the SNRA. My current permanent organization is National Preparedness Assessment Division, National Preparedness Directorate, DHS/FEMA.

The gorilla in the room (RMA).

The SNRA was the last flagship product of the DHS Office of Risk Management & Analysis (RMA). Much of the SNRA's history has been driven by the Department's difficulties coming to terms with RMA's legacy.

The comparison with the past was especially challenging for us in DHS Policy, as the risk-specific analytic capabilities that we had inherited from RMA hollowed out over time. The SNRA represented everything we said we were, but weren't. But the day we decided that our success depended on RMA's work not being seen, was the day it became true.

Our mission was getting the best information we could to our enterprise stakeholders. While the comparison with RMA's work showed our narrative to be hollow in a critical place, our choice to protect our narrative by suppressing the SNRA made it false in its entirety.

FEMA's 2015 update prioritized the visibility of RMA's 2011 original product for very practical reasons. In Policy, our abandonment of the norm that truth was important for no other sake than itself when it came to historical truth undermined its value everywhere else. When your product is information, this corrupts everything you do in an essential way. Eventually you become the opposite of the person or organization that you still think you are: and this is what happened to us.

Protecting the technical integrity of the work we (FEMA) did in 2015 required establishing that truth was non-negotiable, as a global ground rule, for everything. Acknowledging RMA as the primary author of our (FEMA's) own product was a necessary part of doing that.

⁴ Main at <https://www.peer.org>.

⁵ Background at <https://www.peer.org/news/press-releases/our-strategic-national-risk-assessment-is-missing.html>, docket at http://foiaproject.org/dc_view/?id=5013738-DC-1-2018cv00158-docket. The public case history to date is attached (PEER SNRA FOIA case to 20190201.zip) for convenience.

⁶ Homeland Security Act of 2002, as amended, section 503(b)(1) (6 U.S.C. 313(b)(1)). Federal Emergency Management Agency: Mission.

⁷ See the 2nd attached (SNRA FOIA appeal (2018).pdf) p. 6, note 15 and p. 8, notes (hyperlinks for the letter's cited references are in its bibliography). Many of these documents are also (and currently)

SNRA questions (general)

Why are FEMA's plans based on a risk assessment?

The primary mission of the Agency is to reduce the loss of life and property and protect the Nation from all hazards, including natural disasters, acts of terrorism, and other man-made disasters, by leading and supporting the Nation in a risk-based, comprehensive emergency management system of preparedness, protection, response, recovery, and mitigation.⁶

How is FEMA using the SNRA?

FEMA used the SNRA to develop (2011) and update (2015) its doctrine and planning factors – but stopped there.

In each iteration, the obstacles which trapped the SNRA occurred shortly after project completion. This brief window was enough for the assessment to be used for its intended initial purpose: define the common risk picture that FEMA's doctrine and plans are based on.⁷ But its unexpected closure prevented 1) the further internal and external uses that DHS and FEMA had intended for the SNRA, and 2) external validation of the SNRA and the planning assumptions FEMA had developed from it.

The SNRA's most important contribution to FEMA's plans was to confirm FEMA's existing core assumptions about the *kind* and overall *magnitude* of catastrophic events that it needed to plan to. The SNRA's limited availability precluded the detailed fine-tuning of planning targets that the agency had hoped to use it for. But FEMA used it to set the big dials.

The SNRA's disappearance, after each of these initial uses in 2011 and 2015, closed off any opportunity for subsequent critical examination of these judgements by outsiders with different ways of looking at the world – and different blinders – than the tiny, DC-centered community of us planners and analysts who made them.

Why is the SNRA a problem for FEMA?

The SNRA is a problem for FEMA's mission because

- 1) The parts that are useful can't be used for other things, or by other partners; and because
- 2) The parts that are wrong can't be questioned by outsiders, who can see flaws and mistaken assumptions in it that those of us who made it can't.

Why is the SNRA a problem for FEMA's stakeholders?

In 2011, FEMA re-engineered its plans, doctrine, and business model around this master information product on the assumption that it would be widely seen, validated, and used by its preparedness partners. The National Preparedness System was designed to be shaped to meet a strong, quantitative risk picture of the world as it was, and refined over time as DHS and the enterprise built out and refined that quantitative risk instrument and the risk picture it provided.

Take away that dynamic risk instrument – and the broad, whole-community-based community of practice that science-based tools like

conveniently linked at <https://www.fema.gov/national-preparedness-resource-library>. A representative subset:

- National Preparedness Goal: <https://www.fema.gov/national-preparedness-goal>.
- National Response Framework: <https://www.fema.gov/media-library/assets/documents/117791>.
- Response Federal Interagency Operational Plan (FIOP): <https://www.fema.gov/media-library/assets/documents/108300>.
- SNRA unclassified summary from 2011 (the public document that the SNRA Findings [record #1] updates): <https://www.fema.gov/media-library/assets/documents/29223>, <https://www.dhs.gov/xlibrary/assets/rma-strategic-national-risk-assessment-ppd8.pdf>.

the SNRA need to accurately operate them – and that continuously self-correcting picture of national risk that FEMA’s plans depend upon to anchor and calibrate them goes away too. They become just another stale plan from headquarters, derived from planning assumptions that nobody can see or question.

Why does a highly technical product that was made by experts need outside critics?

The short answer is 1) science is too important to be left to the scientists, and 2) the Federal Executive Branch can’t substitute for the diversity of values, perspectives, and knowledge that a national risk assessment for the most diverse Nation in the world needs for it to be meaningfully validated and used. Since this may not be obvious if one’s mental image of science is men in white coats solemnly proclaiming authoritative truths, it needs some unpacking.

For the past seven years, FEMA’s core planning assumptions have been based on a large, novel, and complicated technical assessment of scope and scale without precedent in this country – a scientific product that is both experimental, and revolutionary – that almost nobody can see.

But that assessment also begins with assumptions of its own. Those are the assumptions that constrain the space of things it will study in the first place: the assumptions about the types and magnitudes of risks that the Nation needs to worry about.

These are the assumptions that went into the risk models, planning scenarios, and national exercises that DHS and FEMA planned to before 2011. The scenarios that DHS and FEMA were modeling, planning to, and exercising defined what was plausible to consider in the SNRA. The outputs of the SNRA confirmed that FEMA was planning to the right things. And the cycle continued.

Those assumptions reflect the worryspace of the small and comparatively homogeneous Beltway community of analysts, planners, and policymakers who have been thinking about homeland security since the end of the Cold War. This largely self-contained community acculturates newcomers to the common assumptions about the world the community shares, and perpetuates them as givens that everyone knows.

The problem is that we all share the same blinders. So we can’t see what we’re missing.

It’s not supposed to work that way.

FEMA’s doctrine is based on the centrality of the “Whole Community”: the idea that individuals, families, communities, businesses, first responders – basically, everyone other than us – are not only the people we serve, but are also where the vast majority of the Nation’s emergency management capabilities live. We don’t put them in the driver’s seat as a courtesy, but as a recognition of that fact.

This is just as true for capabilities relating to information as it is for those relating to action. It is especially true for the practice and use of science.

Any science product has at least two parts:

- 1) The product itself, as made by the expert or person who comes up with it; and
- 2) Other people who examine and use it.

Those other people aren’t always experts in the authors’ field. They may not be experts in any field. But they find and fix errors that the authors couldn’t see. They make improvements that the authors never would have thought of. Science is a two-way street: a product’s user base is also its developer base.

In the SNRA’s case the problem wasn’t that FEMA set the big dials to the constricted assumptions that we brought to it, even though many of them were surely wrong. Everything we did from beginning to end that produced what looked like a completed product, was just part 1: it was only the first cut. The problem is that we didn’t have #2, the outside critics and users to adjust and refine our initial judgements further. Our provisional starter guesses got frozen in place like the voice of God. The dials stayed where they were.

Many of us had PhDs in various fields. But in none of them were any of us qualified to make independent judgments of technical merit, in the absence of an emergency, without scrutiny or review by critical eyes outside our small group. Science doesn’t work that way.

Authority in science works very differently from executive authority. Unlike executive decisions, the authority of a technical finding doesn’t come from the person who made it: it comes from other people. It can *only* come from other people – outside people. The critical outside scrutiny of the information needed to replicate a scientific finding is what provides the independent validation that its authority comes from. Cutting a scientific work off from that critical outside scrutiny does not enable or protect its authority: it neuters it.

Keeping science in a drawer may seem like a good way to protect it from critical or ignorant eyes. But science kept in a drawer has little value for anybody other than you. More importantly, science kept in a drawer has no claim to truth. So if you’re too scared of outside scrutiny to let the science behind your decisions get the critical evaluation it needs for you to know whether it’s any good, it has no value for you either. And it is dangerous to trust it as though it did.

There are many things that sadden me about the deliberate waste of this instrument, and the deliberate sacrifice of the community and enterprise planning capabilities that the National Preparedness System needed to work, for no good reason at all. But this is the one thing that scares me.

Don’t FEMA and its stakeholders already have other all-threats/all-hazards risk management tools?

Yes, but they were designed to work with the SNRA. The SNRA needs these tools’ flexibility and power to be useful for many of the additional things that FEMA would like to use it for. And these tools need the SNRA to anchor them to something solid and definite – something having a truth value that is independent of the decision-maker whose decisions they are supposed to inform – to keep them from being shaped to say anything that their owner might want them to say.

FEMA has taken these tools – think of them as FEMA’s muscles, in the information space – as far as they can be taken in the absence of the strong and rigid SNRA skeleton that they were made to work with. But they can’t replace everything the SNRA does. When they are presented as complete solutions by themselves without that objective core, they tend to encounter some credibility challenges. And those can be hard to answer.

How is the SNRA relevant for other agencies?

The SNRA has two major roles:

- 1) The risk basis of FEMA’s plans and doctrine, and the common risk picture of the National Preparedness System. The principal stakeholders for the SNRA in this role are state, local, tribal, territorial, private sector, and whole community grantees and planners.
- 2) The U.S. national risk assessment – one that is currently limited to the all-hazards risk space that FEMA is mostly interested in, but which is readily extensible. The principal stakeholder for the SNRA in this role is you.

These two things are different, but one is a consequence of the other. The sweeping scope of the all-hazards mission space that FEMA and the emergency management community need to plan against mean that any risk assessment designed to cover FEMA's mission space will be relevant to everyone else as well, in some way or another.

The SNRA makes comparative judgments between risks – chemical accidents vs. terrorist bombings, nuclear meltdowns vs. pandemics, geomagnetic storms vs. a second 9/11 – touching the equities, responsibilities, and budgets of every Department in the U.S. Government. It expresses these 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.

These capabilities are what make the SNRA most relevant to you.

Why is/did FEMA / DHS / the current Administration / the last Administration try(ing) to keep the SNRA from getting out?

I don't know. The SNRA does many things that we say we care about and would like to do better, or don't know how to do.

Many problems involve an agency not doing something it's supposed to do, or doing something it's not supposed to do. This problem is about an agency doing the opposite of what it is supposed to do. Moreover, it is doing so not only for no apparent reason at all: it is doing so against many very definite reasons why it should. These factors make it very challenging to form a theory.

If this question is no more productive for you, you may find it helpful to turn it around. Why is the SNRA so unique in the first place? Why doesn't everything we make look like this?

Whatever the reason is that you are not seeing more tools from DHS that –

- Are objective, quantitative, auditable, defensible, repeatable, repairable, improvable by anybody, and fully documented for those purposes;
- Have an authority and truth value whose independence of preferred narratives is so essential to what they are, that it cannot be compromised without breaking them in an obvious way;
- Empower enterprise partners with data they can use;
- Build the risk management capabilities of community planners in real and defensible ways;
- Allow state, local, tribal, and territorial grantees to see and understand the common national risk picture that we require them to plan to;
- Can be scrutinized by any critic;
- Can be scrutinized by the public, whose safety depends on the quality of that information;

and that

- Give you the same capabilities to make cost-benefit tradeoff decisions across risk and Department silos that we have –

– it isn't because we don't know how to do it.

If you can answer that question, others may fall into place.

Why didn't FEMA get the SNRA out a long time ago?

Before 2015 the SNRA 1) was largely classified, and 2) was caught up in the DHS-internal fallout from the dissolution of the organization (RMA) which made it for FEMA. FEMA's 2015 revision eliminated those obstacles. But after it was completed in June 2015, the White House decided that it wanted to edit the findings. This intervention after everything had already been closed out not only interrupted the SNRA's rollout, but left the SNRA's status in a limbo of ambiguities that had no clear resolution. The updated SNRA was represented as final to the public because the updated National Preparedness System depended on it, but treated as an un-shareable draft on the inside.

That is the point where my direct knowledge ends, so you will need to get the rest of the story from FEMA.

Why don't you think this will be resolved in court?

Most of the SNRA's issues aren't strictly legal questions.

Were all these documents intended to be public in the first place?

No. The Findings document (the revised version of the existing SNRA 2011 seven-page public summary⁸) was to be public. The remaining seven hundred pages of supporting documentation were going to be restricted to non-public stakeholders – state and local emergency managers and planners and others, maybe several thousand people in total.

A year after we completed the 2015 update, every part of the unclassified documentation was still locked up: no one could see any of it. So I FOIAed all of it.

Why did you FOIA the unclassified SNRA?

Because it would be nice if the things that FEMA used it for could be validated, or fixed where they are wrong. Or if DHS and FEMA could use it for other things (the DHS family of assessments to which the SNRA belongs are generally unavailable inside DHS). Or if you could use it – in its role as the U.S. national risk assessment, you are the SNRA's principal stakeholder. Or if FEMA's jurisdictional grantees could see the common risk picture we make them plan to. Or if other whole community stakeholders could use it in their preparedness planning – or for purposes of their own, that we would never have thought of ourselves. None of these can happen if no one can see it.

Why are the FOIA-redacted versions attached?

The FOIA-released versions of the core SNRA documentation (records #1-3) consist almost entirely of white redaction boxes. They're attached because a side-by-side comparison with the originals communicates something that I think is important, but can't put into words.

The information behind those boxes is the information that connects the "risk-based" and "all-hazards" parts of FEMA's mission. DHS and FEMA put a decade of very hard work into creating and compiling it, and putting it all together in one place... and then sealed it all away. Other than what the FOIA process has cleared for public release, the SNRA is generally unavailable inside FEMA itself.

As you flip through those pages, those vast expanses of white that you see are FEMA's memory hole. FEMA erased its memory by choice, years ago: the deliberate self-lobotomy whose remains you see is only the agency's attempt to make that loss permanent. And FEMA doesn't want those memories back, no matter how much its mission needs them.

⁸ At (DHS link) <https://www.dhs.gov/xlibrary/assets/rma-strategic-national-risk-assessment-ppd8.pdf> or (FEMA link) <https://www.fema.gov/media-library/assets/documents/29223>.

Information Quality Act (IQA) questions

What is the Information Quality Act (IQA)?

See the IQA appendix 1/A [the 1/A variation is just a typo that I keep missing], pp. 19-22 of the 2nd attachment (SNRA FOIA appeal (2018).pdf), especially page 21, for an overview of the IQA and its DHS context up to 2015.⁹

The IQA itself is very brief: its real substance is in OMB's implementing standards for the Executive Branch. OMB developed these standards by taking the norms and practices that science uses to enforce accountability on itself outside the Government, and applying them to Government information of any kind in two specific cases:

- 1) Information that the Government claims as *evidence* for a decision that it wants the public to support – and represents as having an authority that is independent of the decision-maker claiming it.
- 2) Assessments of risks to health, safety, or the environment, regardless of use.

I mostly focus on the first case in my FOIA letters, because it concerns basic issues of accountability in science and democratic accountability that I think are really important. But the second is obviously relevant to the SNRA too.

Why are you talking about the IQA in a FOIA letter?

FOIA is the appropriate administrative mechanism for requests to provide (rather than correct) information under the Information Quality Act (IQA).¹⁰

There are also some DHS-specific reasons. The IQA is central to the problems in the Department's analytic and leadership cultures that trapped the SNRA, in a way FOIA is not. The IQA is also applicable to the large proportion of DHS analysis that uses information that cannot be made public for very good reasons, in a way FOIA is not.

FOIA is about public access. IQA is about accountability, and utility to partners in the enterprise. Public access is the most efficient and effective means to accomplish the IQA's ends, but there are others: and it is the ends to which the IQA is directed that DHS needs the most help with.

What is the IQA case you refer to¹¹ in your FOIA appeal?

As far as I know, this case is the first major IQA challenge that DHS has had to deal with, and articulate its position about what obligations it thinks the IQA puts on it. This filing is the most recent and most complete statement of DHS' current interpretation of the IQA.¹²

⁹ A possible point of confusion: In this appendix I refer to DHS risk assessments as being all classified, even though FEMA's unclassified SNRA had been done for a year by the time I wrote this. The reason I kind of ignored the very thing this whole letter is about is because I was trying to avoid criticizing DHS at this point. Referencing only the classified version (i.e. a version that was unavailable for a reason that someone might disagree with, but still understand) was a way around having to do so.

¹⁰ Pp. 50-52, OMB (2004), Information Quality: a report to Congress, FY 2003; at https://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/fy03_info_quality_rpt.pdf.

¹¹ Footnote ii, unnumbered second page of the PDF (attachment SNRA FOIA appeal (2018).pdf).

¹² U.S. Department of Homeland Security (DHS), U.S. Department of Justice (DoJ) (2018, August 2), Defendants' Memorandum of Law in Support of their Motion to Dismiss (August 2, 2018, ECF No. 18) at 13-19 in *Protect Democracy Project, Inc. et al. v. U.S. Department of Justice et al.*, case 1:18-cv-10874-DPW (D. Mass. [filed] 05/03/2018). Available (on plaintiffs' site) at <https://protectdemocracy.org/government-response/> (this document) and <https://protectdemocracy.org/false-terrorism-report/complaint/> (additional case and IQA petition documents). A parallel IQA petition and case by Democracy Forward and Muslim Advocates, 3:18-cv-02137-JSC (N.D. Cal. [filed] 04/09/2018), has some case documents at <https://democracyforward.org/work/muslim-advocates-case-page> (also a plaintiff website). Full U.S. district court case history and documents are on the PACER system, <https://pcl.uscourts.gov/pcl/index.jsf>.

SNRA questions (specific) (more in the weeds)

The SNRA is big. Where should I start?

1. Flip through the Findings document.¹³
2. Technical Appendix: SNRA data sources table,¹⁴ user-friendly charts,¹⁵ scary mathy charts¹⁶ (yes, we know we could have done these better).
3. Flip through the Technical Appendix and Working Papers.¹⁷ See what catches your eye.

The SNRA is a national risk assessment. It is a very big thing. It is many different things. What seems significant to you will be different from what seems significant to me, or to the person next to you. So follow your questions where they take you.

How does the SNRA relate to DHS' Homeland Security National Risk Characterization (HSNRC)?

The 2011 and 2015 SNRA and the 2012/13/14 (depending on who is writing) Homeland Security National Risk Characterization (HSNRC) are the respective DHS/FEMA-branded and DHS-HQ-branded versions of a common DHS analytic product. The second half of the SNRA 2015 Technical Appendix (record #2 pp. 235ff) is the unclassified version of the 'missing' methodology report common to the 2011 SNRA and the 2013 HSNRC. I don't know why it didn't get to you earlier, but you have it now.

The revised (2017) HSNRC is an entirely new product (https://www.rand.org/pubs/research_reports/RR2140.html).¹⁸ The new HSNRC is designed for policy-makers in the homeland security mission space, and unlike the SNRA it is customized for that specific decision context so non-analysts can use it right out of the box. This customization comes at the cost of the extensibility to other decision contexts that distinguishes the SNRA. But it also makes the new HSNRC much better suited to its DHS strategic-planning purpose than its SNRA-based predecessor.

Is the 2015 SNRA the end of FEMA's work in this space?

~~Oh no! FEMA is doing some very interesting things in this space. Some of them involve reinventing RMA's wheel, but better. These include developing unclassified alternatives to existing classified tools that FEMA's partners can actually see and use. Others involve expanding the 2015 SNRA in directions that [I think] it needs to go. The things that will probably most interest folks from a preparedness background are the national capability targets. These were primary but unrealized goals of both the 2011 and 2015 SNRA projects that needed many more years of hard FEMA work, and that work is finally bearing fruit now.~~

I don't know if I would word this in exactly the same way today (January 2022), so I'm crossing it out to avoid being misleading.

¹³ Work email 2/3, record #1 (SNRA 2015 Findings report); also reproduced in front insert pages of the SNRA Resource for Planners (RFP) [unofficial single-volume version of the two-part SNRA Technical Appendix (TA), which may be easier to use], attached to work email 1/3.

¹⁴ Work email 3/3, TA table 2 pp. 7-8; alternatively work email 1/3, RFP table 3 p. 10.

¹⁵ Work email 3/3, TA figure 1-2 p. 15; or work email 1/3, RFP figures 1-2 p. 27.

¹⁶ Work email 3/3, TA figures 3-8 pp 16-27; or work email 1/3, RFP figures 3-8 pp. 30-41.

¹⁷ SNRA 2015 Working Papers: record #3, work email 2/3. SNRA 2015 Technical Appendix: either work email 3/3 record #2 (official version split in two parts) or work email 1/3, the SNRA Resource for Planners (unofficial one-volume version of the Technical Appendix [which confusingly is also labelled with "SNRA Working Paper" on the white ribbon on the cover page – I apologize, this was my bad idea]).

¹⁸ Only the methodology report is public [publication is still a huge step forward for DHS in terms of transparency – none of the supporting documentation for the 2014 QHSR was ever published]. An earlier version of a complete product using all-public data is public (https://www.rand.org/pubs/rgs_dissertations/RGSD319.html).

~~My colleagues are spending your money well. I think you will be excited to see where they take the SNRA (or whatever it's called next) and FEMA in coming months and years.~~

What are the 'White House findings'?

That is the November 2015 For Official Use Only (FOUO) marked version of the 2015 SNRA findings that the White House edited. Since it was part of PEER's request, FEMA also added it to the FOIA release they sent me at the same time (June 2018).

The White House's decision to edit the SNRA's findings was half of the event that halted the 2015 SNRA's forward progress, right when it was about to roll out the door. The other half was my reaction to it. In retrospect, I made a fuss over very little. Few of the edits change anything of substance, and I'm sure the ones that did could have been fixed if I'd tried to be diplomatic instead of throwing a fit.

Why is a sentence colored red in the climate change section of the White House findings?

I don't know. But it doesn't belong there. Maybe someone flagged it.

Why is the Technical Appendix divided between 2011 and 2015 content?

The separate presentation of 2011 and 2015-added material was to keep ourselves honest. Since the 2011 original was not otherwise available for comparison, we preserved [the unclassified version of] it as-is in our documentation so the reader could hold our revisions accountable to the same standard.

Inside DHS, the SNRA was an uncomfortable reminder of the quantitative capabilities that the Department had lost with RMA. And it was reasonable to anticipate that its wider circulation might raise the bar for quantitative rigor higher than DHS might want or be able to meet in the future. We knew that the SNRA's surprise re-emergence could create an organizational interest in deliberately watering it down to protect narratives of progress, or the Department's freedom of action in the future. So we wrote the preservation of the original material into our ground rules to deter that kind of meddling, by [we thought] making it impossible to get away with.

So then why are you leading with the integrated version (the SNRA Resource for Planners) that FEMA promised not to make?

Preserving the 2011 documentation as the standard that we needed to meet was one of the essential factors that ensured the credibility of FEMA's 2015 update. The uncomfortable comparison with a better past forced us to match it: that was the point. It worked.

Since the 2015 product is the equal of the standard that it took from the past, it is the uncomfortable standard from the past to beat today. Future tools that purport to do something that the SNRA already does may not look anything like it – the 2017 HSNRC is quite different, for example, because it was designed to answer different questions – but they have to be able to be held up next to it, and still look credible by comparison. That possibility of comparison with the past is just as important for DHS today as it was in 2015.

Relevance

The 2015 update demonstrated two things. One is that DHS can match any standard from what it might fear will be seen as a better past – so long as it is made impossible to hide from it.

In 2015, our promise that outsiders would be able to compare our contributors' work with the 2011 original was a very effective means of quality assurance all by itself. Inside DHS, the sheer novelty of the kind of transparency and accountability that other science agencies take for granted made our promise credible.

But in the end, our failure to follow through only strengthened the backwards DHS-internal norm that we had so loudly and successfully challenged, by validating it: Don't even bother trying, management will always win in the end.

My second takeaway from 2015 is that truth is non-negotiable. In 2015 the re-emergence of the 2011 original – and the expectation of its continued visibility – had a very real positive effect on the product we were making for the future. It didn't matter that its content was four years old, and had been kept from view all that time: if anything, that increased its power. In a world that hasn't seen it yet, truth never goes out of date.

Additional questions

Some things don't make sense.

Yes. Many things don't make sense to me either.

Is there anything else in particular in the SNRA that we might be interested in?

Space weather compared with other risks, methods for projecting fatalities from the loss of lifeline electric infrastructure,¹⁹ the bioterrorism-pandemic risk comparison [in the classified SNRA, you will have to ask DHS for this] that Energy & Commerce needed for Biowatch, climate change impacts on disaster risk. And other things that you're interested in, that I'm not aware of. Go look – there's a lot in there.

What if we have questions?

Other than technical issues with parts of these letters or attachments not making it through, or anything that you really think you need to get the answer from me, please direct all questions to FEMA Congressional Affairs, 202-646-4500, FEMA-Congressional-Affairs@fema.dhs.gov, or DHS Legislative Affairs, 202-447-5890, CongresstoDHS@hq.dhs.gov.

Perspective

The big picture (DHS)

No human organization is perfect. There are some parts of the SNRA's story where DHS and FEMA have not always entirely lived up to the best they can be. But it is important to step back, and put them in perspective.

Overall – in the big picture – DHS and FEMA have a great deal to be proud of in this tool. The SNRA is our country's first national risk

¹⁹ Space weather and physical attack on the power grid events only. I made the editorial decision not to extend the method to other natural hazards in 2015 because there wasn't enough historical data to support indirect fatality and injury estimates that we could defend. Unfortunately that isn't a problem now.

assessment. It connects data to decisions in a meaningful way that no other U.S. Government tool like it can do. It fuses the many fractured lenses through which we look at risk today, atomized in silos, into a common focus for rational and coherent action. It puts the factual assumptions that leaders make from private intuition into a common, objective, and unambiguous language that any citizen can understand and judge.

Risk assessments are one of the Government's principal tools for connecting science to policy. Every Department has them. Some are larger than others. Some are more important than others. Some have more riding on them than others.

But the SNRA is the big enchilada. And DHS made it.

The SNRA is the product of unique and positive features – creativity, resourcefulness, innovation – of DHS's analytic and leadership cultures. These factors are driven by the constant need to invent new tools and connect information in ways that have never been done before. That need is driven by the information requirements of a problem space defined by the most important thing tomorrow that we wish we had known today, and a mission space larger than that of the rest of the Government combined. These positive cultural features are structural: they are not going away.

There are some other features of DHS's analytic and leadership cultures that are not so positive, and which have driven some of the SNRA's problems. Much of this document is about them. But while it would be difficult to argue that any other organization could have managed to sabotage its own interests and accomplishments to the only-in-DHS extent that DHS did with the SNRA, it is important to recognize that only this Department could have created it in the first place.

Closing reminder (the small picture)

Overall, please keep in mind that I'm not some plucky, honest whistleblower trying to bust the key to everything DHS and FEMA have done wrong over the past seven years out of the cold, selfish grip of my mean, mean organization.

There *are* serious cultural, functional, and accountability issues on our end that are both causes and consequences of the SNRA's problems. The long-term effects of the cognitive dissonance and inversion of value that are necessary to sustain the multiple turned-around-backwards aspects of the SNRA's situation have been especially corrosive for the Department's analytic and moral culture. Many of these problems will continue to deepen and become more intractable until the SNRA's problems are resolved.

There is also the waste of this instrument in itself, and the many serious harms to FEMA's mission that fill most of the column space above. But with the one exception of the danger of shielding the fundamental planning assumptions of the lead agency for national continuity from the scrutiny of people – our people, in the larger Nation – who see the world in different ways than we do, they are not the primary reason why I am writing you right now.

I was in a position of responsibility for this thing, and I messed up. I've been trying to undo the consequences of that since, without success. I'm bringing it to you now because I've exhausted the options inside my own branch. That's all.