

To: Captain Gary Sirmons, Acting Director
National Disaster Medical System

From: Helen C. Miller, MD
2003/04 NADMAT Chair

Re: Recategorization Conference Call

Date: January 22, 2004

Below is a copy of what I presented on behalf of NADMAT on the conference call regarding the Recategorization today, 1/22/04 as you requested. It is quite concerning to us that Mr. Tolbert and Mr. Lowder from FEMA were not on the call although they were formally invited and the scheduling of exact time/day was at your discretion to accommodate their schedule to attend.

This is Dr. Helen Miller. I serve as the NADMAT Chair this year. Judy Edwards from GA 3 is Chair Elect, Tim Tackett from AR1 is Third Chair and Mark Swicord is past chair. For those on the call who are not familiar with NADMAT, NADMAT is the association of NDMS response teams. NADMAT is active and committed to the sharing of information and the pursuit of common goals in preparedness and delivery of quality medical care in disasters (specifically including medical, veterinary, mortuary and specialty team care) since 1996. NADMAT officers are democratically elected and seek to take issues common to all teams, seek consensus through open democratic process, and to regularly communicate with NDMS to keep concerns in view and to work together toward solutions.

NADMAT hereby requests:

First, at the consensus level, the teams formally contend that the process used to develop and implement the recategorization policy was flawed and invalid. New criteria of which the teams had no knowledge or even notification were applied retrospectively during the assessment and implementation process. The new criteria conflict with standing written and verbal directives in place at the time under review. It is requested that the PROCESS by which the assessment and subsequent policy on recategorization of DMAT operational status types be formally reviewed at the highest level of FEMA and DHS oversight.

At the consensus level, there is additional concern by the teams that sweeping national federal policy has been developed by a part time contractor who may have a conflict of interest. They request this situation be formally and independently reviewed promptly.

When updated performance agreements were issued in association with team workplans, teams were reassured that revised criteria listed at that time for minimum total and specific key position numbers would not become requirements until the personnel system at FEMA to ultimately approve applicants and allow them to be actively rostered with ID and included into the federal employee system was functional. That system is not in

place to date. Teams were implored to be patient and told that new IT resources for roster callout were about to be rolled out. That system is not in place to date.

At no time previously were teams given any notice nor requirement to recruit 4-deep at any alert roster position. Teams would have had no indication they should have had that additional recruitment completed and specific applications already on file. Teams were also told to hold all applications back and not submit them for months.

Teams have been repeatedly promised that items deficient from their basic loads would be issued by NDMS to complete their loads to the current version status. This has not occurred and is not within the authority of the teams to correct.

Teams were provided with a self-assessment survey tool in September, 2003. A large number of items on that list had never before been seen by teams and had never been required of teams. Teams formally asked if workplan funds could be used begin to address some of the items newly presented and were told this is not authorized. Further, there was not adequate detail in many categories to initiate coordinated action. Teams were absolutely assured that this survey was only being developed and used for planning purposes and would never be used to penalize teams in any way, but rather to gain an overall view of what sorts of support NDMS should consider requesting for the future. I high percentage of adherence to these criteria are now required to maintain status.

Second, the teams were only informed of the recategorization policy, and provided a listing of new criteria for the first time in a letter that was sent out after the recategorization had already been implemented, and demoted teams already supplanted from their monthly rotation without explanation. By consensus request of the teams, NADMAT hereby requests that each team, immediately and in writing, be provided with the exact criteria that FEMA has determined each team does and does not meet for recategorization. Immediate reinstatement is indicated should there have been an error identified in the assessment leading to the recategorization. There was no mechanism for appeal outlined, and this should be provided immediately.

Thirdly, each team shall be promptly provided with a clear and reasonable timeline to enable them to reach criteria outlined, the full support financially and system-wise to have mechanisms in place to meet such criteria, and immediate type or level reinstatement as soon as criteria are met or revised.

We all have the common goal of rapid response time. Demoting teams and arbitrarily imposing unanticipated and retrospectively applied alert rostering criteria is neither a valid nor an effective solution. Obstacles to rapid response time in the past have most often been related to transportation and mission delay issues not at the team level. FEMA is clearly not familiar with medical response, nor the challenges that face our healthcare citizen reservists who are willing and committed to respond. NDMS responders do not have the same support from FEMA as do the USAR teams with which they are familiar, and particularly do not have the same mechanisms to have employment release work effectively. Teams have loudly and repeatedly requested since the transition a simple

letter from DHS/FEMA to our employers outlining Public Law 107-188 and the Uniformed Services Act as it applies to NDMS disaster responders. In an alert situation, there is no activation order, and so ability to roster for an alert is not necessarily equally indicative of rostering for a deployment. Since transition, teams have been refused flexibility in augmenting their roster directly from other teams within the system-----teams with whom they train, who had immediately available personnel in the required positions without impacting their own team's readiness. Teams were promised last March that listing of multiple skills to the roster was being implemented; this has still not occurred, and continues to cause delays in alert roster approval time. Teams have difficulty in rapid readiness of their basic load because of equipment shortfalls that were promised and never issued, and with loading, transportation as well as pharmacy cache mobilization because of a continued history of excessive delays in federal payments to the partners that help us make that happen.

Fourth, on behalf of a consensus of the teams, NADMAT again requests immediate rescheduling of the face to face team commander meeting to be held prior to the April NDMS conference with travel provided and confirmed by FEMA in advance and NDMS activation for an attendee from the command staff of each team. Personal attendance at the meeting is requested of all key NDMS and FEMA leadership with relevant authority to correct the issues outlined as well as ongoing issues identified at the Team Command meeting in November, 2002 and subsequently. NADMAT also requests additional commitment to a follow up meeting with Team Commanders at the April NDMS Conference in Dallas, TX. NADMAT requests formal reaffirmation of the commitment to maintain regular bimonthly Team Leader conference calls and a regular schedule of face to face meetings between Team Command and NDMS/FEMA leadership beyond that at the NDMS conference.

Fifth, NADMAT officers received strong support from the teams to continue to advocate on their behalf. We also seek reaffirmation of the commitment made to NADMAT since the transition for ongoing quarterly meetings with NDMS/FEMA leadership and at least one face to face meeting in addition to the one routinely scheduled at the Annual Conference.

In Summary, a consensus of teams strongly contend that the manner in which the recategorization assessment, policy development, and implementation was flawed and invalid and should be rescinded on that basis. This deserves immediate formal investigation by FEMA and DHS at the highest level of oversight and that process should be transparent to the teams.

It should be emphasized that the manner in which the recategorization process was carried out is symptomatic of a much larger issue-----that of the profound systemic dysfunction occurring in the transition of NDMS into FEMA under DHS. NDMS Teams are a key resource and have been committed and infinitely patient with the challenges particularly in this past year of transition. Teams have received recent and repeated praise for their performance in recent alerts that are at an unprecedented level and

intensity. It does not make sense that those same teams have been demoted without warning purportedly due to their alert performance.

The teams are on the ground carrying out our mission of readiness and service under difficult circumstances, as well as in the context of holding regular jobs in addition to their DMAT commitment. The teams are greatly concerned that NDMS is losing its identity within FEMA, and rapidly becoming fragmented and relegated to a section without authority, staffing or administrative, logistical, communications and other resources necessary to move forward with the most fundamental day to day readiness and operational issues for the teams. Teams are also greatly concerned with the lack of medical representation in the new organizational leadership structure at FEMA/DHS. Teams welcome milestones and specific criteria, but to accomplish them they require the parallel support and accountability from DHS/FEMA and NDMS to reach those goals. Teams deserve a command and control structure that is also professional, ethical and responsive. It is not appropriate to demote or penalize teams for not meeting criteria about which they had never been notified, that well exceeded standing performance expectations, and for which there are not mechanisms for them to accomplish and no timeline over which to do so.