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I am a continuity and exercise planner for a federal entity, using the HSEEP model for all exercises beyond annual Occupant Emergency Plan testing. I have used and taught HSEEP since 2008, most often developing tabletop exercises for threats such as active shooters, hurricanes, and other disruptive incidents to which my component is regularly exposed.

It is already difficult enough to ensure that personnel who are trained, knowledgeable, and proficient in the HSEEP methodology are available to serve as evaluators or planning team members. We encounter a distinct lack of HSEEP trained or familiarized personnel with nearly every exercise, both within our own component and within the surrounding local jurisdictions with whom we partner for bilateral exercise support. We are required to build exercises based upon extremely limited information, exercise partners who do not understand the methodology or reasons for the data and production timeline we request, and a distinct lack of supporting funding. Most units requesting exercises want only to perform the exercise. They will not have the personnel available to assist with scoping, developing, or constructing it. They will not have personnel available for evaluating, controlling, or facilitating it. They will not be readily available when it comes to developing and refining the After-Action Report / Improvement Plan. Having associated HSEEP templates assists us in developing, producing, providing, evaluating, and assessing exercises and overall performance; of this, there is absolutely no question. The leverage that most frequently allows us to spur the unwilling participants to provide the elements we need to create a fact-based, realistic, capability-testing exercise is that "this exercise will need to be submitted to the Exercise Coordination Group in order to be considered a valid exercise" for the component. Having a collection point above the component level which can aggregate exercises and act as a repository for additional, national level data mining is by far the most important driver behind gaining cooperation, assistance, funding, and information for exercise development at our component level.

We recognize the collection feature as HSEEP's greatest potential asset but also acknowledge that limited FEMA staffing and the absence of a system to populate, parse, correlate, and report AAR/IP data threaten this feature's effectiveness. Historically, too few personnel have been involved in collecting post-exercise assessment data, dating back to the Lessons Learned Information Sharing (LLIS) database days. This has prevented submitted data from being easily cataloged and extracted for macro-level insights. While more personnel are needed, there is a distinct need for an input source that eases the burden of submitting data to FEMA. A simple system, such as a Microsoft Form, allowing users to answer questions or input data that can be accumulated and deconstructed as needed, is the type of process that should be considered for submission standards. This would also help jurisdictions standardize their processes as they become familiar with the data categories and submission procedures.

The development of EEGs is consistently the most difficult part of the process. Associating EEG elements with target categories (e.g., ICS, Fire Management, On-Scene Security, Law Enforcement, Mass Search and Rescue, Public Health, Healthcare, Emergency Medical Services, Initial Command Decisions, Staging, Supporting Resources, Safety, etc.) would make the process for novice EEG builders more manageable and less overwhelming. This would lead to better evaluation tools, improved evaluations, richer datasets, and ongoing improvement and information sharing. I recognize that costs will be associated with these system improvements. The current process is exceptionally labor intensive for FEMA personnel to delineate into functional datasets. A submission system that allows documents to be uploaded while also identifying specific datasets from the outset would benefit both database administrators and users. Identifying objectives within threat types could assist others in developing objectives at their level. Historically, most agencies do not consistently pursue their improvement plans into the next exercise cycle. A submission system that aggregates mass data for reference and houses component or unit-level data to track improvements (visible only to component representatives and select users) could lend credibility to any Improvement Program.

I appreciate FEMA's efforts to ensure the outcome of the HSEEP process is as valid and supported as its other elements. The development of standardized templates was crucial in socializing HSEEP during its early years. It is now time for the next major improvement, focused on the outcome and relevant data generated by the process.

Respectfully,

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