Analysis of Comments on Impact-based Decision Support Services (IDSS) Service Description Document (2014 Version) and IDSS Philosophy Document

Background

In May 2014, the National Weather Service (NWS) released for public comment a Service Description Document (SDD), titled "*Proposed Enhanced Impact-Based Decision Support Services, for the Emergency Management Community and Government Core Partners, Supporting Events/Incidents Impacting Safety of Life and Property.*" This was the second version of the SDD, with the original version released in May 2013. This second version included numerous changes based on comments received and issues raised on the initial version. The comment period for this second version of the SDD was May 16 – August 31, 2014.

NWS sought comments directly through issuance of an NWS <u>Public Information</u> <u>Statement</u> (also available to the public via webpage) and announcement through an American Meteorological Society (AMS) listserv. A total of 30 sets of comments were received. Comments were received from individuals in the emergency management (EM) community/government partners (23), America's Climate and Weather Industry (AWCI)¹ (4), academia (1) and NOAA/NWS (2). A copy of the comments received is provided in the Appendix.

Before the IDSS SDD 2014 version was finalized, NWS underwent an Operations and Workforce Analysis (OWA) which evaluated how NWS currently functions and developed recommendations and decisions on how NWS should evolve to enable the agency to more effectively deliver accurate and timely weather, water and climate information to decision makers. Part of the OWA included development of an IDSS operating model philosophy that built on content in IDSS SDD 2014 Version, but also incorporated key ideas developed during the OWA. This IDSS operating model philosophy was disseminated for public comment/review May 16 – July 15, 2016.

NWS sought comments directly through issuance of an NWS <u>Public Information</u> <u>Statement</u> (also available to the public via webpage) and announcement through an American Meteorological Society (AMS) listserv. A total of 98 sets of comments were received. Comments were received from individuals in the emergency management (EM) community/government partners (78), school/university stakeholders (9), health-related stakeholders (1), media (2), private sector (1), AWCI (5), academia (2). A copy of the comments received is provided in the Appendix.

The SDD describes NWS's IDSS provided for the protection of life and property to officials that serve as NWS-defined core partners. It provides details on who will be

¹ America's Weather and Climate Industry includes all elements of the private sector (including media, consultants, equipment providers, etc.) which provide services to the public in the areas of climate, water, and weather, broadly defined (e.g., includes space weather). The term does not exclude foreign-owned companies which provide services to the American public.

provided IDSS; describes levels of service that will be provided; relates NWS IDSS to the DHS/FEMA National Response Framework (NRF)²; and describes the focus of NWS IDSS with respect to complementary services provided by AWCI.

The comments on both documents (IDSS SDD 2014 version and IDSS philosophy document) in general were very supportive from those stakeholder communities who would be receiving NWS IDSS services. Comments acknowledged an improvement in IDSS SDD 2014 version over the previous version in addressing many of issues that were originally raised, yet recognized that some of these issues were very difficult to address and suggested further changes to help clarify these issues. Comments on the IDSS philosophy document echoed many of the SDD comments and requested additional clarification of new concepts, especially "deep relationship core partner."

Key concerns related to the scope of our service (including the need for clarification of who is considered a core partner and deep relationship core partner); the need to describe NWS IDSS within the context of the broader Weather, Water and Climate Enterprise; redistribution of information provided as part of NWS IDSS; the need for transparency in approving new recipients of NWS IDSS; and the need for more well-defined and consistent procedures to be in place when there may be an intersection between services provided by NWS and AWCI.

In several areas with issues, suggested changes were at odds with other suggested changes. This dichotomy of views was not surprising given that responses were from both our user community and from AWCI whose immediate needs/interests are different. Our goal in this final version of the SDD was to achieve the best balance possible in how NWS approaches IDSS for our core partners, while respecting the roles of those in AWCI who are similarly providing support.

An analysis of comments is provided below, identifying the major comments received and how NWS has addressed them in the updated IDSS Service Description Document.

Analysis of Comments on 2014 Version of SDD

Grouping the comments into major categories results in the following areas of concern, along with a response to the comment/concern:

1. <u>Scope of support</u> – Comments suggested that the scope of NWS IDSS should be expanded (or at least considered) to include international government partners, the medical system, public utilities, volunteers and non-governmental organizations involved in emergency response, the media, as well as an expansion of services currently provided to state/local departments of transportation. In addition, we received comments indicating that additional clarity is needed in the definition of the EM community as it relates to private and non-profit entities mentioned in the definition as "safety and emergency personnel, from universities or other large entities

² The National Response Framework provides an overarching framework for preparedness and response activities both within the EM community and the general community at large.

with large populations whose roles are functionally equivalent to the public safety officials." At least one comment from the EM community recognized the importance of not expanding the scope, to ensure NWS can continue to meet the needs of the EM community when overall capacity is limited.

Response:

a. OWA activities assessed the issue of whether IDSS should be broadened beyond a focus on the categories of entities included in the current definition of core partner. The resolution was that NWS would not take a broad approach, but would instead devote resources to developing deep relationships with a subset of core partners (termed "deep relationship core partners"). This approach is consistent with PL 115-25 (Weather Act) codification of NWS provision of IDSS focused on state, local, and tribal emergency management agencies, and other agencies related to disaster management.

The updated SDD clarifies the focus of IDSS by identifying guiding principles stemming from our statutory authorities (PL 115-25 and PL 100-707 (Stafford Act)) along with recognition of the NWS role in the context of a broader Enterprise.

- NWS's primary focus is on supporting government partners who share similar mission objectives.
- NWS will focus on ensuring the safety of the public and particularly vulnerable populations.
- NWS will support disaster management efforts of federal³, state, local, tribal and territorial governments.
- NWS will interact with our partners at the highest level, reaching as many as possible who are potentially in harm's way.
- NWS will be flexible in how we provide IDSS to our partners, keeping in mind that they may also be receiving support from others in the Weather, Water and Climate Enterprise.

The concept of tiers of service included in the previous two versions of the SDD was replaced with the concept of relationship and service levels which was developed during OWA activities. Relationship levels include (1) general partner/public, (2) core partners, and (3) deep relationship core partners. Each relationship level is provided with an increasing level of service as described in detail in the updated SDD.

b. The SDD was revised to provide additional clarity on who is or is not considered to be within the scope of the NWS definition of "core partner," including the EM community, Water Resources Management community (a new category within the core partner definition clarifies our existing support in this area), government partners and media. In particular, the updated SDD (especially Table 1) provides clarification for the following entities:

³ To honor agreements with contiguous countries and territories and the terms of other international agreements, the term "federal" within this document encompasses international governments and organizations supported by NWS.

- Education sector
- Health sector
- Utilities
- NGOs (Non-Government Organizations⁴)
- Government
- Private sector

NWS plans to develop other SDDs to more fully address support to particular groupings of stakeholders, as needed. In addition, NWS has no plans to expand services to state/local DoTs to include support in areas we have never supported, such as forecasting road surface/pavement conditions or providing guidance on road treatment options (see internal guidance statement – see http://www.nws.noaa.gov/sp/dotsupportguidance.pdf).

In general, NWS is aiming to identify a boundary for our services which, recognizing NWS capacity limitations, allows us to provide a consistent, high level of service to those users across NWS while similarly recognizing the capacity of AWCI to provide a high level of service in areas we cannot support in this manner.

c. In the definition of Emergency Management Community, we have replaced the text "safety and emergency personnel, from universities or other large entities with large populations whose roles are functionally equivalent to the public safety officials" with "In select cases, NWS may provide similar support for organizations which are not formally government agencies, but which employ personnel who routinely exercise authorities equivalent to the public safety officials described above, particularly those who serve vulnerable populations. Examples include the emergency management function of primary/secondary schools, colleges/universities, and hospitals/long-term care facilities. With approval of NWS management, NWS offices providing IDSS, may extend support to these organizations." The term "routinely" is used to acknowledge that this does not apply to organizers of special events. NWS has successfully applied this element of the definition when limiting use of NWSChat to core partners and we believe we can do so within the broader context of IDSS support.

If these "functionally equivalent" entities already have support from AWCI, then NWS would interact with them as we would any other public safety official who has weather support either internally or via contract with AWCI. As the updated SDD indicates:

"NWS recognizes the value of coordination during an event to ensure consistent weather messaging to all involved in the support effort and to the general public. Upon request of core partner authorities in charge of the response activities, NWS will work with core partners in charge to identify weather support providers involved (i.e., NWS and any in-house or contracted provider of weather services to core partners or other entities involved in the response effort) and will provide an

⁴ A non-governmental organization (NGO) is any non-profit, voluntary citizens' group which is organized on a local, national or international level.

opportunity for coordination to ensure consistency of messaging and that weatherrelated roles in the support effort are well understood. For example, NWS may activate a private NWSChat room or similar capability for weather service providers supporting the event. NWS encourages this coordination; however, core partners, in conjunction with their weather support providers will determine the appropriate level of and procedures for coordination and interaction between NWS and those providers."

- d. The following phrase was added to the definition of EM community as "other members" "SKYWARN® coordinators and Net Control Operators, such as Amateur Radio Emergency Services (ARES) and Radio Amateur Civil Emergency Services (RACES)." This phrase is included in the current definition of "NWS core partner" as stated in <u>NWS 1-1003</u>, but was inadvertently left out of the previous SDD. Skywarn coordinators were added, in addition to the Net Control Operators, to recognize their role as a force multiplier to reach individual Skywarn spotters; individual Skywarn spotters continue to not be included under the definition of core partner.
- e. As mentioned in the SDD, NWS will, based on experience and external input, continue to review our definition of core partner along with how it is being applied, to ensure the most appropriate application of support resources across the Enterprise. NWS will maintain records of which core partners are being provided IDSS and continue to evaluate our IDSS services, both informally and in the context of post-event evaluations of IDSS services (see <u>NWSPD 10-1606</u>, *Service* <u>Assessment</u>), to identify and address any impacts to AWCI services as we are made aware of them.

The full definition of "core partner", including modifications which have been made in the drafting of this SDD, will be placed in NWSPD 10-24, *Impact Based Decision Support Services* (in preparation) and has been placed in Appendix A of the final SDD until NWSPD 10-24 has been published. NWSI 1-1003 will be updated to remove the definition currently included and instead provide reference to the revised version of the definition. Also of note, all NWS policies in the NWS directive system are subject to review and recertification requirements, assuring that this definition will be reviewed in the future with the benefit of additional experience.

2. <u>Redistribution of information provided to the EM community and core government partners</u> – Comments received from AWCI indicated that information provided to the NWS core partners as part of IDSS efforts should be made available to others in AWCI, if not generally available to the public. Other comments similarly indicated that our information needs to be provided in forms that are easily redistributed to others, as core partners will need to redistribute the information to other entities involved in supporting preparedness, response and recovery efforts. Comments received from the EM community also indicated that there is a need for some of this information NOT to be redistributed to the public either for security reasons or to ensure content is not misinterpreted by the general public.

<u>Response:</u> The revised SDD includes wording indicating our intent for any new information/products provided to core partners as part of IDSS support to be made available, in a timely manner, for broader distribution, e.g., via NWSChat, the NWS website and/or social media, unless safety and security considerations prohibit redistribution of these data. The mode of distribution may vary depending on the content of the information. For example, information intended for EMs that might cause public confusion without additional understanding of the complexities of the situation, may be provided via NWSChat rather than posted on a public webpage. The wording included in the SDD is:

"Any new information/products provided as part of the IDSS support described in this SDD will also, as resources allow and if safety and security considerations do not prohibit, be made available in a timely manner for broader distribution, e.g.,via NWSChat, NWS webpages and/or social media."

3. <u>Procedures for engaging with private sector user community</u> – Comments from AWCI indicate a need for consistent procedures to be defined when both the EM community and private sector user communities may intersect in the context of IDSS from NWS—NWS will support the aggregate life-safety preparation and response needs of the EM community and government core partners, while referring to AWCI requests for tailored or specific products to assist other entities with preparation, response, or optimization of their business needs. Comments indicate that all scenarios should make reference to these procedures.

<u>Response</u>: The main body of the SDD provides the overall NWS approach/ procedures for engaging with private sector user community in the context of IDSS to our core partners:

"When NWS provides IDSS within these coordinating structures [i.e., incident command system] to support the aggregate life-safety preparation and response, NWS recognizes that information of value and use in operational efforts is indirectly provided to all response participants. NWS will not, however, provide tailored advice to non-core partner entities on impacts of weather in areas such as how to expedite restoration activities or how to mitigate for hazardous weather in the future. In responding to requests for specific weather guidance and information beyond that provided to core partners, NWS personnel will inform the requestor that tailored support, including customized and highly localized forecasts and warnings, may be provided through AWCI."

Reference to this approach is included in the scenarios in the SDD appendix.

 <u>Recognition of importance of outreach/training</u> – Several comments from the EM community and government core partners identified the critical nature of "advance" work to support IDSS efforts, including outreach, training exercises, and longer-term planning. <u>Response:</u> NWS recognizes the critical nature of these efforts. Through OWA activities, NWS identified that IDSS is comprised of episodic (response to particular events) and recurring (outreach, training, planning with core partners, as well as ongoing support for routine, high-value decisions). The updated SDD fully incorporates this "advance" work into the IDSS philosophy, particularly with deep relationship core partners.

 <u>Approval for IDSS services</u> – AWCI comments requested more detail on criteria for evaluation of requests for IDSS from NWS as well as a more transparent process for approving new users.

<u>Response:</u> Section 6 of the updated SDD now indicates that information from the request, the definition of core partner, and office management's determination of the ability to support the request will be used to evaluate the request. In addition, NWS will apply best practices from our body of experience with IDSS to further refine application of our definitions to specific classes of potential users in a consistent manner across NWS. The Section 4 of the updated SDD also describes how local offices will determine which core partners approved for IDSS may be categorized as deep relationship core partners, including specific criteria offices will use to guide their decisions.

NWS offices will maintain a record of organizations of those entities which have been approved to receive IDSS. Interested parties may request this information from the NWS (Analyze, Forecast, and Support Office).

6. <u>Emergency Conditions</u> – Comments from AWCI indicate a concern over actions described in SDD section F on emergency conditions (current Section 7) and the impact these actions may have if services are already provided by AWCI to the organization contacted.

<u>Response</u>: The SDD has been revised to clarify that these actions are expected only infrequently and are to ensure awareness of an impending threat. If such an action is taken, a senior NWS office official will be notified, a record of the action made, and review performed after the incident to determine impacts, if any, of this action and if IDSS for the individual/organization is needed on an ongoing basis. An example scenario has been provided in the revised SDD.

7. Internal NWS Issue

A section has been added to the updated SDD (5.7. Specialized, decision-specific information supporting IDSS) further recognizing that as part of IDSS, in addition to providing existing standard NWS products, during events that are hazardous to life and property, rapid prototyping, modification of existing products or development of new NWS data/products to meet the immediate needs of core partners may be needed. Description of this need for NWS to produce information or products specific to a particular incident or event, in whatever format is necessary to best convey the information to the partner supported was included previously in section E of the SDD

and is not a new aspect of the DSS being addressed in this SDD. The text in this section has been qualified with statements indicating that the new content will be provided to general partners/public if privacy and security conditions allow, and that continued provision of the new products/services will require that standard internal policies for comment/review of the products take place.

Analysis of Comments on the IDSS Philosophy Document

Grouping the comments into major categories results in the following areas of concern, along with a response to the comment/concern. Please note that some comments on the IDSS philosophy document echoed concerns raised on the original IDSS SDD 2013 version, which were already addressed in a previous set of comment responses and already led to changes in subsequent versions of the SDD, as appropriate.

- 1. <u>Role of AWCI</u> Comments indicate that the document does not adequately reflect the role of America's Weather and Climate Industry (AWCI) in supporting NWS core partners. Specifically, comments suggest:
 - a. AWCI has a long history of providing tailored services to the emergency management community and other government partners and providing interpretative support is a core function of AWCI.
 - b. This proposed philosophy seems to ignore concentrated joint efforts of the past few years, across many meetings, where in the spirit of these meetings consensus agreement was reached to have members of Enterprise leverage each other in order to achieve mutually desired results.
 - c. Members of AWCI should be considered a core or deep relationships core partner, recognizing the key role they play in delivering critical information about hazardous weather/water/climate events to the public. NWS should engage with them for preparedness activities, tabletop exercises, etc.
 - d. There is no protocol for NWS to work with AWCI suppliers in emergency situations; this interaction would likely cause confusion.

<u>Response</u> –The IDSS philosophy document was meant to describe a high level framework for services provided by NWS and was not intended to describe in detail services provided by others in the W/W/C Enterprise. The updated SDD incorporates all of the additional material that was added into SDD 2014 version to address this issue.

- a. See response to IDSS SDD 2013 version comments at http://weather.gov/im/SDD_IDSS_Version_1_Comment_Response.pdf
- b. All of the conclusions from previous interactions were incorporated into the updated SDD; especially those that frame NWS provision of services in an environment where those core partners may be receiving or interacting with others who receive support from AWCI. Comments that were addressed in revisions for SDD 2014 version were incorporated into the current SDD update.

- c. NWS has not made major changes to the basic definition of core partner beyond those discussed in previous revisions to the SDD. As such, those partners that NWS needs to interact with either because of their role in preparation of NWS information/products or in delivering NWS information/products to the public continue to include (1) the emergency management community (2) key government partners, (3) the electronic media, and the new category (4) water resources management community (this category within the core partner definition clarifies our existing support in this area and does not represent an expansion of service to additional entities). The bulk of the information in the IDSS philosophy document relates to our support of core partners for the provision of IDSS. NWS does not play a role in helping members of AWCI make decisions and thus were not identified as a core or deep relationship core partner for IDSS. Like the media (who also is not the recipient of IDSS), NWS may need to coordinate with AWCI members who are informing their customers about hazardous W/W/C events to ensure consistency of messaging. This type of interaction is described in the updated SDD.
- d. See response to IDSS SDD 2013 version comments at http://weather.gov/im/SDD_IDSS_Version_1_Comment_Response.pdf
- 2. <u>Strategic Approach for defining Enterprise roles</u> Comments indicate that NWS should work with others in the W/W/C Enterprise to take a strategic approach to defining the roles in providing IDSS, including:
 - a. Identifying the strengths and resources available to each sector to meet all users' needs and strategically determine guidelines for roles based on best use of all enterprise resources
 - b. NWS and AWCI should find ways to innovate and partner together to meet users' needs
 - c. NWS should not try to do everything, but rather incentivize others to provide services and consider using established services from private industry rather than creating new products/services.

Response

- a. NWS agrees that there is great value in working with others in the W/W/C Enterprise to identify the broad range of user needs, capabilities/resources of those in the Enterprise and strategically map out guidelines for roles to best meet the overall needs of our users. NWS Office of Organizational Excellence (OOE) will be working to spin up these efforts. However, in the more immediate timeframe, there is a critical need to provide general guidance within NWS on how we will move forward with IDSS and to do this we have produced a final update to the IDSS SDD to support development of internal policies and procedures.
- b. NWS continues to be open to opportunities for collaboration with our Enterprise partners on preparedness (e.g., Weather-Ready Nation), communication of NWS information/forecasts (e.g., via media), and in exploring innovations in providing

services (e.g., through formal Cooperative Research and Development Agreements).

- c. See response to IDSS SDD 2013 version comments at http://weather.gov/sp/SDD_IDSS_Version_1_Comment_Response.pdf
- 3. <u>Role of the media</u> Comments indicate that the role of the media with respect to IDSS and core partner status should be clarified.

<u>Response</u> – Members of the media do not receive IDSS from NWS – NWS does not provide support to the media to assist them in making operational decisions. The media, however, does have core partner status because of the role they play in helping to deliver NWS forecasts and warnings to the public. The media may be included in such coordination activities as NWSChat, webinars/telecons and be provided access to iNWS to ensure accuracy of messaging of NWS information to the public.

4. <u>Deep relationship core partner category</u> - Comments indicate that the deep relationship core partner designation adds complexity and the criteria listed for determining which entities qualify leave substantial room for lack of consistency from one WFO to another and the possibility of favoritism and failure to meet the legal standard of not being "arbitrary, capricious and unreasonable."

<u>Response</u> – NWS understands that having a sub-category of core partner adds complexity, but it was critical to identify some subgroup of core partners that receives a deeper level of service, as NWS does not have the resources to serve all at the highest level. Whether a particular type of partner (e.g, local emergency manager) is categorized as a deep relationships core partner may vary from office to office, as the duties, responsibilities, and level of interaction of these partners with NWS vary from office to office (e.g., in some area EMs serve part time, while law enforcement officials play a greater role in overall public safety). The apparent lack of consistency will certainly not be due to favoritism, nor will it be arbitrary, capricious and unreasonable. Rather, offices will document their decisions to make note of the associated differences in operating capability and function of those served.

In addition, the subcategory of deep relationship core partner allows NWS to identify specifically those partners for which NWS plans to provide a deeper level of service. Acknowledgement that NWS will not be providing this level of service universally to all core partners clarifies that there is an opportunity for our partners in AWCI to provide this level of service which NWS cannot.

- 5. <u>Scope of IDSS</u> There is a perceived expansion of the scope of IDSS customers supported by NWS into areas served by private sector. In particular, comments indicate that:
 - a. Core partner support under the terms of this approach can be expanded without apparent limit ("If a deep relationships core partner indicates the need to serve an entity (in writing), then they should be provided the service, but are not

necessarily considered a core partner"). This effectively directs the NWS to provide essentially any service to any entity, without limitation.

- b. Level of support for events is not consistent with existing policies. How will NWS determine what events/incidents are supported? Will NWS be supporting any event where there is a large gathering?
- c. Expanding support to "organizations with large populations which are not formally government agencies employ personnel who routinely exercise authorities similar to the public safety officials" is overly broad and could therefore be used to justify custom forecasts and on-site NWS meteorologists for nearly any public event, gathering, institution or entity.

<u>Response</u> - Our definition of "core partner" and limiting of IDSS activities to those who are core partners has not changed substantially from that presented through the work on the IDSS SDD in previous years. The concentration of our support is on government entities, recognizing that there are some entities that play functionally equivalent roles although they are not government employees. The updated SDD (Table 1) provides additional details and clarification on NWS interpretation of who will or will not be considered a core partner.

- a. As in the previous IDSS SDD, NWS recognizes that there are certain non-core partners (e.g., critical infrastructure providers) who are routinely involved in interaction with government emergency managers and who may need to be engaged in coordination as NWS provides IDSS to our core partners. While NWS will not be providing decision-making support to these entities, at the request of a core-partner, they may be involved in coordination activities (e.g., conference call, webinar). If these entities are already receiving support from AWCI, it will be up to the core partner to determine if this level of involvement is needed or not. In addition, in emergency conditions, if we are directed to provide a level of support to an entity by our core partners, NWS must actively address these requests; however impact on private sector support must be taken into account (NWS support may not be required if the entity already obtains support from AWCI).
- b. See response to IDSS SDD 2013 version comments at http://weather.gov/im/SDD_IDSS_Version_1_Comment_Response.pdf
- c. See response to IDSS SDD 2013 version comments at http://weather.gov/im/SDD_IDSS_Version_1_Comment_Response.pdf
- 6. <u>Resources</u> Comments indicate that resource limitations will have an impact on NWS implementation of IDSS. More specifically,:
 - a. NWS expansion of IDSS as described has the potential to erode NWS's ability to provide and improve both general warning services to the public and NWS's foundational data sets, especially in an era of shrinking budgets.
 - b. Core partners need to have certainty in level of service provided in order to make planning decisions. For example, if an emergency manager receives approval for deep relationship core partner services, it will have to make planning choices based on that expected level of support. The best emergency plans have reliability

as a central factor. So it will need to assume NWS support or no NWS support (there may also be more complex and compound plans based on periodic support or withdrawal of NWS support at inopportune times). If the level or type of IDSS support varies based on the number of requests or scope of the event there will be a lack of certainty whether it will either need to contract with a company from AWCI or choose to forego such arrangements assuming NWS support.

Response

- a. See response to IDSS SDD 2013 version comments at http://weather.gov/im/SDD_IDSS_Version_1_Comment_Response.pdf
- b. See response to IDSS SDD 2013 version comments at http://weather.gov/im/SDD_IDSS_Version_1_Comment_Response.pdf
- 7. <u>Product Consistency</u> Comments indicate that custom products and especially those created on the fly create serous concerns regarding consistency. Forecasts provided by on-site meteorologists may differ from the official forecast and customized products/services will lead to lack of consistency across the country.

<u>Response</u> – See response to IDSS SDD 2013 version comments at <u>http://weather.gov/im/SDD_IDSS_Version_1_Comment_Response.pdf</u>

- 8. <u>Transparency</u> Comments communicate concerns about how transparency will be addressed in provision of IDSS, including:
 - a. How will external parties have an opportunity to provide input on new products produced on an ad hoc basis, as part of IDSS support, as we have in the past, per NOAA's Partnership Policy?
 - b. There is no transparency in decisions to determine which entities qualify for the different levels of support and, in those cases where there is disagreement as to whether an entity qualifies; the NWS is also the sole arbiter. Additionally, a mechanism is needed to provide reporting about decisions that are made, for internal and external review, as well as the possibility of an outside advisory panel.

Response

- a. See response to IDSS SDD 2013 version comments at http://weather.gov/im/SDD_IDSS_Version_1_Comment_Response.pdf
- b. Information on criteria for categorizing a core partner as a deep relationship core partner was included in the IDSS philosophy document. The updated SDD describes how information from a request to be a recipient of IDSS services, the definition of core, criteria for deep relationship core partners, and office management's determination of the ability to support the request all will be used to evaluate the request. In addition, NWS will apply best practices from our body of experience with IDSS to further refine application of our definitions to specific classes of potential users in a consistent manner across NWS. While it is not appropriate to directly include external parties as part of NWS management procedures for these individual decisions, any such decisions which are

determined to have a negative impact on our partners in AWCI will be reviewed and addressed as they are brought to our attention.

NWS offices will maintain a record of organizations categorized as core/deep relationship core partners. Interested parties may request this information from the NWS (Analyze, Forecast, and Support Office).

9. Comments suggest that specialized products produced on an ad hoc basis to support a core partner for a particular event/incident should be made available to everyone via standard dissemination media.

<u>Response</u> – See response to Comment #2 on IDSS SDD 2014 version, above.

10. <u>Discontinuation of services</u> – Comments question how NWS will curtail its level of service beyond the stated scope.

<u>Response</u> - NWS will follow standard procedures for termination of any existing operational environmental information services. NWS will state what services it proposes to terminate along with information on alternative sources for support. Based on public comment/review, NWS will proceed with a decision to terminate or to adjust any proposed action. For example, NWS successfully terminated provision of direct text/email alerts to the general public. While continuing to provide this service to our core partners, we provide a list of alternative sources of alerts (including those from AWCI) at <u>http://www.weather.gov/subscribe</u> for those who don't fall within the definition of core partner.

Conclusion

NWS's goal in this final version of the SDD was to achieve the best balance possible in how we approach support for NWS core partners while respecting the roles of those in AWCI who are similarly providing support. Please note that while this will represent a "final" version of the SDD, it is really a first issuance (v1.0) of a document that will be updated periodically. NWS will continue to assess and revise our guidance for providing IDSS based on internal input, feedback from our core partners, and input from our partners in the Weather, Water, and Climate Enterprise. The content of the document cannot address every possible question or situation that our forecasters will be presented with, but rather tries to describe the approach NWS will take in providing IDSS and the guidance that will be provided to our forecasters in managing many of the issues which will arise concerning boundaries between NWS and our partners in AWCI.

In reality these boundaries will continue to be adjusted as all Enterprise partners continue to learn from actual support situations. NWS is committed to incorporate lessons learned from review, both informally, and in the context of post-event evaluations of IDSS services. These lessons learned will drive improvements, both in services to NWS core partners, and in better recognizing and addressing any impacts to AWCI and their role in providing complementary or exclusive services to NWS core partners (and those who are

engaged in supporting these partners) to ensure the safety of life and property in our nation.

Appendix – Comments on IDSS SDD 2014 Version and IDSS Philosophy Document

- Service Description Document titled "Proposed Enhanced Impact-Based Decision Support Services, for the Emergency Management Community and Government Core Partners, Supporting Events/Incidents Impacting Safety of Life and Property, Version 2" (Collected May 16 - August 31, 2014) - Comments may be accessed at the following link: <u>http://weather.gov/im/IDSS_SDD_Version_2_comments.pdf</u>
- Document titled "NWS Impact-based Decision Support Services Philosophy" (Collected May 16 – July 15, 2016) – Comments may be accessed at the following link: <u>http://weather.gov/im/IDSS_Philosophy_Comments.pdf</u>