

Conference of Radiation Control Program Directors, Inc.

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December 4, 2025

Matthew Payne, Assistant Administrator for Response
Office of Emerging Threats
Federal Emergency Management Agency
500 C Street SW
Washington, DC 20472

Dear Mr. Payne:

The Conference of Radiation Control Program Directors (CRCPD) has made several attempts to address ongoing questions and concerns regarding the RadResponder component of CBRNResponder. Despite multiple emails and a formal letter transmitted on April 29, 2024, we have not received a response. Since that time, the concerns expressed by our members have continued to increase.

These challenges were further highlighted during the October 2025 government shutdown, when state programs were unable to obtain technical support for a two-week period. While we understand that furloughs were beyond your control, it is important to note that radiological incidents do not pause during such disruptions. The unavailability of RadResponder during that time created a significant gap in the nation's capacity to respond effectively to a radiological emergency, and the ongoing issues continue to degrade ongoing operational capacity of the state/local radiological response communities.

As you are aware, state radiation control programs were initially cautious about integrating RadResponder into their emergency response operations. Over time, however, many programs expended significant time and resources to adopt it, recognizing its critical role in facilitating data sharing during radiological incidents. Furthermore, the system is referenced within the *National Response Framework* and the *Nuclear/Radiological Incident Annex*, underscoring its importance as a national capability.

When FEMA transitioned the CBRNResponder contract, CRCPD and other stakeholders expressed concern regarding potential impacts to reliability and operational performance. Unfortunately, those concerns have materialized as declining quality of the system operation and services from the FEMA, resulting in diminished confidence among state users.

The current program structure, situated within a single federal entity, has also complicated these challenges. Because FEMA is not among the primary response agencies that routinely utilize the system, the RadResponder component of CBRNResponder and the system overall has appeared to receive a lower operational priority.

The CRCPD E-43 Committee for Interagency Environmental Data Sharing and Communication, the committee that coordinates CRCPD activities related to data collection, assessment, and sharing, has been monitoring the situation and provided the following overarching concerns along with a spreadsheet of ongoing issues with RadResponder. The main identified issues are:

Lack of communication and transparency related to system functionality and issues

- No notifications of system changes, fixes, or outages.
- Users enter exercises unaware of recent system problems or updates.
- Sudden failures during training/exercises force teams to improvise with unsafe workarounds.
- No longer receiving proactive communication or rapid customer support previously available 24/7.

Programmatic support activities discontinued

- Monthly live virtual training webinars have stopped.
- Train-the-Trainer certification program discontinued.
- Annual nationwide drills no longer conducted.
- RadResponder Prepared Certification program halted.

System upgrades and improvements are no longer being implemented

- Planned enhancements (e.g., dose reporting improvements, reorganized data tables) are not allowed for discussion.
- Based on program staff discussions, FEMA has deprioritized RadResponder to augment ChemResponder functionality.

Major decline in system reliability and operational performance

- Core functions are failing (e.g., equipment not appearing in the mobile app, inability to upload sample data, mobile app at times will not open).
- States are losing trust in the system as a reliable emergency response tool.
- Even though CBRNResponder is cited in state plans, the ongoing issues have required some state/local response agencies to stop using CBRNResponder during FEMA-evaluated exercises and other training drills and revert to outdated and inefficient paper tracking methods.

Loss of institutional knowledge and expertise

- High turnover in FEMA program management and vendor personnel which has resulted in significant loss of institutional memory about the system and the critical function it serves.

Clearly, the current state of the system as reflected by these issues requires immediate attention and resolution in order to ensure that all response agencies across the federal, state, and local

jurisdictions have full capabilities for a radiological response. CRCPD request that FEMA leadership consider the following options to restore the critical capability of CBRNResponder, specifically RadResponder.

Proposed solutions for consideration:

To ensure the nation maintains a stable, interoperable, and mission-critical radiological data-sharing capability, CRCPD recommends the following three actionable paths forward:

Option 1 — Restore and Fully Resource the CBRNResponder Program within FEMA

FEMA should allocate the resources, personnel, and technical support necessary to return the CBRNResponder system—particularly its RadResponder component—to a fully functional, reliable, and trusted operational capability. This includes:

- Reestablishing all previously supported programmatic elements (e.g., RadResponder Prepared Certification, Train-the-Trainer program, national drills, routine training webinars).
- Restoring consistent communication and change notifications to users.
- Ensuring regular system maintenance, upgrades, and configuration management.
- Providing timely support during exercises and real-world incidents.

This first option preserves the existing infrastructure and provides the fastest path to restoring system capability.

Option 2 — Transfer Program Ownership to a Federal Agency with a Direct Operational Stake in Radiological Response

If FEMA cannot fully support and resource CBRNResponder, the program should be transferred to a federal entity with an established mission, technical capability, and operational dependence on high-quality radiological data sharing. Under this option, the receiving agency would:

- Assume responsibility for system management, maintenance, and programmatic elements.
- Ensure reliable 24/7 support and consistent communication related to system updates and functionality.
- Continue coordination with state and local organizations and expand integration into national response planning.

This second option provides the strongest alignment between system ownership and operational need, which could support regained trust in the system operations and reassurance related to ongoing development and maintenance.

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Matthew Payne, Assistant Administrator for Response

Option 3 — Provide Direct Support to States and Local Agencies to Manage Independent Data-Sharing Solutions

In alignment with recent Executive Orders emphasizing support for state and local governments, FEMA could provide funding and technical assistance directly to state and local agencies, enabling them to select or manage their own radiological data-sharing platform. However, this approach presents serious challenges:

- It risks fragmentation of national radiological data workflows.
- It undermines the consistency and interoperability required for multi-jurisdictional response.
- It could recreate the post-Fukushima gaps that RadResponder was originally designed to solve.

Therefore, while this third option is included for completeness and aligns with federal directives, it is the least desirable because radiological emergency response requires national uniformity in data processes, data quality objectives, and situational awareness tools.

We would appreciate an acknowledgement of receipt of this from FEMA within 5 days, and initiation of a plan for resolution based on the proposed items no later than December 31, 2025.

The CRCPD Board, and the entire state radiation control program membership, appreciates your consideration of these concerns and the continued collaboration between our organizations to strengthen the nation's radiological emergency response infrastructure. CRCPD stands ready to assist in identifying and implementing an effective, sustainable solution that restores confidence and reliability in this critical capability.

Sincerely,



Pat Mulligan
Chairperson

cc:

Keith Turi, Acting Associate Administrator, Office of Response and Recovery
Julia Moline, Acting Deputy Associate Administrator, Office of Response and Recovery
CBRNResponder Steering Committee Members
CRCPD Board