



ICS Competencies Change Management Board Comment Adjudication July 31 – August 1, 2007

The following are comments received during the public comment period of the ICS position competencies. Each comment is coded, accepted or rejected, and given a rationale. The comments are coded as follows:

- (A) Administrative - changes (such as grammar, punctuation, style, etc.) which are for clarification and do not change the meaning of existing ICS position competencies or behaviors
- (M) Modification - proposed wording changes to existing ICS position competencies or behaviors which may change the meaning of existing ICS position competencies or behaviors
- (D) Addition/Deletion - Proposed additions/deletions of competencies and behaviors associated with existing ICS positions.

Position Title	Page	Proposed Change/Comment	Rationale	Board Decision & Rationale
Communication Unit Leader	4	COML seemed to have a different sequence of Behaviors for "Ensure completion of assigned actions..." compared to all the rest reviewed. Is the difference significant? If so, what is the significance?	Clarity	(A) Accept Comment. Order will be made consistent
Documentation Unit Leader	4	DOCL included "Ensure functionality of equipment." in "Ensure completion of assigned actions...". How is equipment functionality related to Documentation? Why do none of the other positions mention equipment functionality?	Clarity	(D) Reject the comment. Equipment refers to fax machines, copiers and printers, so this is an appropriate behavior. There is a unique equipment role for documentation unit leader
Liaison Officer	ALL	None of the Behaviors under the Liaison Officer seemed particularly relevant to the position.	Not Specific to Position	(M) Duly noted. Tasks will provide more specific guidance related to the behaviors.

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Medical/Technical Specialist Position	In reviewing the list of ICS competencies, I did not see the Command Staff position of Medical/Technical Specialist. Why is this?		(A) Reject comment. EMT is a Technical specialist, and technical specialists are not ICS positions, and therefore, not covered in these documents. The position could be covered under a discipline specific group.
Zipped Files*	The NIMS competencies are a great tool- well done. What a service it would have been if you had ALSO zipped up the files (one zipped package of pdf and one of txt files) so anyone who wanted to download these would not be required to download them individually. Most managers would want them all.	Most manager would want all the competencies and therefore, a complete zipped package would be helpful.	(A) Agree with comment, will check with the tech team and provide accordingly.
Competencies too Generic	My initial impression of the competency models is that they are very generic - arguably too much so to be of great use for training development in some cases.	For example, the same behaviours seem to repeat in many of the jobs, without actually listing many of the competencies that I'd think someone serving as, for example, Operations Chief or Plans Chief , would need to exhibit. Without this specificity, it almost begs the questions of why differentiate...you could simply list common behaviours for groups of positions, e.g., section chiefs.	(M) Reject comment. See summary message about competencies, behaviors and tasks and linkage to Position Taskbooks (PTB).

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Competencies too Subjective	Taking as an example the Task Force Leader competencies. Too many of them are in the Affective domain, e.g. "Model leadership principles of Duty, Respect and Integrity."	This is very subjective. How are we going to have a national standard on such a subjective statement? It does not seem that we have professional instructional design staff working on these standards. In Florida we have spent over 6 years and several million dollars to conduct job task analysis, identify objectives, high liability competencies and relate these to demonstrations of proficiencies or exam questions.	(M) Reject comment. See summary message about competencies, behaviors and tasks and linkage to PTB.
Concurrence	Several included "... and gain concurrence of affected agencies and the public." Concurrence on what? On the plans developed?	Clarity	M) Reject comment. This is a task level questions that will be addressed by discipline-specific tasks and PTB
Assessing Understanding	Several include "Communicate and assure understanding ... within the chain of command ..." Does this mean the Position holder is responsible for ensuring understanding by everyone from top to bottom of the chain of command?	Clarity - That seems an unrealistic expectation.	(M) Reject comment. Competency "Gather, analyze, and validate information pertinent to the incident or event and make recommendations for setting priorities" covers this issue.
Incident Management Teams	I don't disagree on the value to Incident Management Team levels 1-3. However, to get local police agencies involved and committed we need to start at level 5 and move toward level 4.	Every crisis starts locally and ends locally. My concern is that asking law enforcement to start working on level 1-3 competencies will make it even more difficult for them to embrace ICS. We need to work on level 5 IMT first and then work our way up to the higher levels.	(M) Reject comment. This document doesn't address IMTs but individual positions.

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ICS Training	We must find better ways to encourage law enforcement agencies to welcome ICS.	In August 1990, the Gainesville area had five college students murdered in a serial killing. Before the suspect was arrested the task force use around 350 people and spend around five million dollars. During this investigation we used much of the ICS concepts. Due to the jurisdiction issues for the murder scenes we used a Unified Command structure, use had logistic team, finance team and a very unique operations concept. We had detectives from our state and local agencies working in teams, FBI and State Crime Analysis personnel, we developed lead tracking software and incident reporting that we unique at that time. (I was the Operations Commander for the Gainesville Police Department at the time of the murders). These kinds of examples would related more to law enforcement than a ferry in a river. More of the training material needs to be adapted to law enforcement practices. As an adult learner, they want to know how the material being taught will be of value to them. I think we fail here in ICS training.	This comment has been referred to training under IMSD on 3/26/07.

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EOC Training	While I understand that FEMA is developing a course on ICS/EOC interface, the tactical responders (fire, law, EMS) do not have clue one on how EOCs/ECCs are organized or operate. We need designed classes for those staff (think EOCs/ECCs as brigade/battalion level versus fire, law, EMS as company and platoon level.	Recommend that those classes be designed by emergency managers rather than fire.	This comment has been referred to training under IMSD on 3/26/07.
Further Development/Refinement	While the competencies and associated behaviors do not appear substantive, it seems prudent at this stage that they not be overly descriptive or detailed due to the broad array of organizations and agencies that will be impacted by the NIMS Standard Curriculum Guidance. However, further refinement will likely be warranted as we mature in our application of NIMS/ICS in the all hazardous environment.	These initial competencies provide (as the NIMS Alert document suggests) a national "benchmark" point of departure for the development of further agency and organization specific, performance-based training and development.	Duly noted. No action necessary.
Needs All Hazards Approach	It is noted that the Incident Commander Type 1, 2 and 3 and Resource Unit Leader positions include a behavior described as "prepare clear and concise assessments regarding hazards, fire behavior, weather, and other relevant events," which suggests that these position are focused on wildfires rather than all hazards.	This language should be modified to address all hazards, including storms, flooding, earthquakes and acts of terrorism.	(M) Comment accepted. Change has been made.

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Readiness Component	Nearly all included "Ensure readiness ..." Who's readiness? Several also included a second "Ensure readiness of self and others..." Doesn't this duplicate the first?	Clarity	(M). Comment accepted. Change has been made.
Organizational Structures	All included "Establish organization structures ..." Why would these not already be in place BEFORE this position's responsibilities were assumed? This language makes it sounds like everyone is starting from scratch.	Clarity	(M) Reject comment. ICS is standardized, but the needs of the incident will dictate how the organizational structure will develop.
Guide/Direct Personnel	Several of the Positions included "Influence, guide, and direct ... personnel..." as a description of "Lead Assigned Personnel".	But many of these included no behaviors that seemed directed at guiding and directing.	(M) Reject comment. More specificity can be provided at the task level.
Effective Communication	In the "Communicate Effectively" competency, all included "... and ensure understanding by recipient." I'm puzzled how the holder of the position is supposed to assess this understanding.	Wouldn't this be a good place to include some specifics for ALL, on how to ensure this? assess this?	(M) Reject comment. Measures are established at the task level.
Insufficient Information?	Nearly all included language/behaviors about making decisions based on analysis of gathered information.	None of these included how to assess when insufficient information exists to make a decision.	(M) Reject comment. Competency "Gather, analyze, and validate information pertinent to the incident or event and make recommendations for setting priorities" covers this issue.

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Generic Definitions	The definitions of competency, behavior, task, and learning objectives are very generic and duplicative across each position.	This is true whether the position is a supervisor or technical specialist. The competency is to be a standard qualification and benchmark. The draft activities or behaviors are not distinguishable from one level to the next, such as the Planning Section Chief 3, 2, or 1 position.	(M) Reject comment. See summary message about competencies, behaviors and tasks and linkage to PTB.
Qualifiable Competencies	For competencies to be meaningful and not open to interpretation, it is suggested that the behaviors be quantifiable and measurable.	For instance, a benchmark would be the type of required courses required for a Planning Section Chief 1 and 2 and whether the position is working at the incident or in an emergency operations center.	(M) See summary message about competencies, behaviors and tasks and linkage to PTB.
Similar Competencies	Nearly all of the Competencies and Behaviors for all of the above Positions sounded strikingly similar.	I would have expected stronger differentiation among the positions.	(M) Reject comment. See summary message about competencies, behaviors and tasks and linkage to PTB.
Transfer of Command	Nearly all included language about "Transfer position duties...", but none of these mention to whom the duties were to be transferred.	Clarity	(M) Reject comment. This is a task level questions that will be addressed by discipline-specific tasks and PTB

All comments should be sent in accordance with the ICS Competency Change Management Board procedures document. Typically input will be collected via oversight bodies of NWCG, USFA, USCG, EPA, HHS, membership organization / professional associations, IMSD Work Groups, federal agency, state, local and tribal government, NGO, or headquarters office. If no oversight body exists, forward comments to NIMS-FEMA@dhs.gov.